

Submission Topic

Guildford Borough Green Belt and Countryside Study: Effingham

There were numerous errors and omissions in this study, but this submission deals only with those that relate to Effingham, with two broad issues, the recommendation to inset Effingham in the Green Belt and the potential development site proposed in Effingham.

1. Insetting of Villages in Green Belt - Volume IV of the Study

The first issue is Effingham's proposed removal from the Green Belt, so that Effingham would be inset into rather than washed over by the Green Belt. This was one of the recommendations in Vol IV of the Green Belt and Countryside Study.

There were fundamental errors in the Pegasus study (*Guildford Borough Green Belt and Countryside Study, Volume IV*) that recommended that Effingham should be removed from the Green Belt.

Three inseting criteria were developed in the study, called Stage 1, Stage 2, etc. These were then evaluated (in tabular form) for each village. Each village was given a positive or negative against each criterion – all very subjective. Tests of this nature should be developed so that the methodology is transparent with results likely to be generated by others repeating the tests. The methodology developed by Pegasus is subjective and as such was open to exploitation. More specifically, the tests developed as inseting criteria were subjective and as such the outcome can be predetermined just by tweaking the test. In the case of the built ratio, subjectivity was masked by adding in some calculations, but the basis of the test was subjective. No independently defined boundaries are used in determining developed land or open land; areas were selected by Pegasus and called "extent of perceived village area".

This would therefore be a very easy test to manipulate. In the specific case of Effingham "the perceived village area" extended into the Mole Valley District



Council (MVDC) region, with all of Woodlands Road and some developments along Guildford Road included – most of which are in MVDC region.

However, the open fields (Rolls Farm) opposite the entrance to Woodlands Road and opposite the housing along

Guildford Road (which was included in the perceived village area) were not included. It seems it was acceptable to include developed land, but not open land, suggesting that the purpose behind the selection of the "extent of perceived village area" was to get a predetermined answer. In this image of this area, the open area excluded is marked – but all the housing shown was included in the "perceived village area".

In the derivation of the developed or "built" area, the built area was measured by computer analysis of satellite images. This resulted in flawed data. Some wooden stables at the top of Woodlands Road and also on land to the rear of Woodlands Road were included in the "built" total – and these are all in the MVDC area. This is probably true for other stables and possibly garden sheds in Effingham and in other villages – two of these are identified in the picture below. Both of these are wooden field stabling for horses. Thus the built or developed area is an unreliable statistic.



Taking the first criterion, Stage 1, the quotation below was taken from the Pegasus Report, Volume IV, section 14.17 and follows:

"Does the majority of the village exhibit an open character?"

Effingham generally exhibits a high proportion of built development to open land with approximately 13.87% of the village area (160.33 ha) covered with existing development (22.24 ha)"

The derivation of this statistic, per cent built land, in itself is questionable, as detailed above. Furthermore, the interpretation of the ratio by Pegasus was entirely without logic. This ratio, expressed as a percentage, was given for 24 villages in the borough and the following is a summary of those ratios together with the classifications given by Pegasus:

"Low": 14 villages in this category, ranging from 9.7% to 21.6%

"Medium": only 1 village in this category – 17.1%

"High": 9 villages in this category, ranging from 13.9% to 24.8%

Clearly, there was no consistency in this classification, with a very considerable overlap between villages categorised as "low" and those categorised as "high". What is key was that Effingham was incorrectly categorised as "high", with a score of 13.9%, when "medium" was given as 17.1%. In other words, if there was any consistency in this approach by Pegasus, Effingham would have been categorised as having a "low" built development to open land ratio. And this low score was obtained even after selective exclusion of open land from the "perceived village area" and the inclusion of wooden buildings in the "built" area. But the actual number was ignored, suggesting that Pegasus was predisposed to the inseting of villages before they even started their analysis.

There was a second part to this first inseting test, and so consider another quotation from the Pegasus report (section 14.17):

"Effingham generally exhibits a high density of development..."

Three developed areas within the perceived village area were given as examples of high density – out of 14 areas considered, with four described as either open farmland or low density and the remainder as medium density. No numerical definition of high, medium, or low densities was given though this would have been appropriate. Areas categorised as high density included an area designated 1A on the Stage 1 Effingham map. This is an area of 6 houses, set in 1.73 acres (0.7 ha) so the calculated density is 3.5 houses/acre, or 8.6 dwellings/ha. Under no circumstances could this be considered as high density.

Area 1C was described as high density, but the actual density is 12.2 houses/ha.

Area 1K, described as high density, actual density is 17.9 houses/ha.

These are the only areas described as high density in the Effingham analysis. To recap, 3 areas were reported as high density, but analysis shows this was flawed. Setting this flawed analysis aside, 7 of the 14 were described as medium density and 4 as low density or open farmland. Yet the conclusion was that the three areas described as high density typified all of Effingham, so that overall Effingham was considered to "exhibit a high density of development". There was no logic in this conclusion – and as shown above, the 3 areas described as high density should not have been described as high density. Again, this is indicative of Pegasus having a predetermined result in mind when performing the tests.

By way of comparison, terraced homes can reach 64 dwellings/ha. Consider too that the average density of the Berkeley Homes proposal to replace the Howard of Effingham school is 25 dwellings/ha; with the highest proposed density (on

the existing school playing fields, running into MVDC, along Lower Road) has 31.2 dwellings/ha. This has been described by Berkeley Homes as "low density". So to suggest any of the areas considered in the Pegasus report were high density development was simply wrong, but because Pegasus did not provide any numerical definitions for "high", "medium" or "low" it is more difficult to challenge their conclusion. These numbers speak for themselves.

Pegasus scored this first criterion for Effingham as a negative, but they have been wholly inconsistent in the way they applied and interpreted these tests. Without their errors this test would have been a positive for Effingham.

Another insetting test, Stage 3 was also rated a negative, and is quoted below:

"Does the majority of the village exhibit incomplete, indistinguishable boundaries that would not permit the provision of new Green Belt boundaries in accordance with the requirements of NPPF paragraph 85 (last point)."

The National Planning Policy Framework (NPPF) bullet point in paragraph 85 referred to reads:

- *"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"*

However, Pegasus suggested that Green Belt boundaries could be defined by treelines and hedgerows. These are not physical features but are biological. As biological features they are subject to disease, old age, windthrow and of course removal by man. Consequently, they do not meet the criteria of the NPPF. There are a limited number of permanent physical boundaries that could be used to partly define the proposed new Green Belt boundary around Effingham, and so again Pegasus arrived at an incorrect conclusion. The negative score given to Effingham should be reversed to a positive score.

If the scoring of insetting criteria had been applied consistently and in compliance with the NPPF, Effingham would have been scored positive in all 3 insetting tests and so would not be considered for insetting.

I urge all committee members to re-examine Pegasus's erroneous conclusions and disregard Pegasus's proposal to inset Effingham within the Green Belt. Effingham should continue to be washed over by the Green Belt.

2. Land Identified as Suitable for Development (PDA 61)

This site was identified in the Local Strategy and Sites Issues and Options Study, and designated PDA 61. It is in the Green Belt, and forms part of Effingham Lodge Farm, but oddly, not all of the farm was selected for development. There are many reasons why this site would not be suitable for development. It makes a considerable contribution to the openness of the Green Belt, with views across the site from Lower Road and through hedgerows on Effingham Common Road, as well as the public footpath extending beyond Water Lane to the north east of

the site. Building on it would cause encroachment into this open countryside. A site of this size would prevent the development of smaller local sites, whether these would be infill or brown field, as this would have a major impact on the local housing market.

According to the National Planning Policy Framework, new boundaries to the Green Belt have to follow boundaries that are easily recognisable physical features, likely to be permanent. Boundaries to the west and south west of the plot shown do not follow physical features. In fact existing boundary lines in these areas are very weak, with no recognisable boundary, especially in the south west corner of the site marked. Part of the western boundary is a treeline, and this is not a physical feature, it is biological, and so is susceptible to disease, drought, wind damage, removal by man, etc. Thus it is not likely to be permanent, and so the boundaries do not meet the requirements of the NPPF.

One of the boundaries to the site is one of the last surviving parcels of ancient woodland in Effingham, Thornet Wood. Development close to the woodland would have a major negative impact on wildlife in the woods. A considerable portion of the site is within 5 km of the Thames Heath Special Protected Area at Wisley and Ockham Commons, which is also a Site of Special Scientific Interest. Planning restrictions would thus apply to housing development on this part of the site. Development on the site would be inappropriate development on the Green Belt, without very special circumstances to mitigate the damage to the Green Belt. Building a replacement school (not a new school) would not constitute very special circumstances, especially given the harm the entire development would do to the Green Belt in and around Effingham, and to the setting of Effingham's conservation area.

The geology of the site is not especially favourable to development. It is close to (or on the spring line, which is where chalk meets a thin ribbon of sand, then another thin ribbon of silt, and finally London Clay. These have very different permeability to water, especially between chalk and clay. As the direction of ground water flow is roughly south to north, from chalk to clay, ground water pools when it meets clay and will rise and emerge as a spring when ground water levels are high. Springs have caused great damage to neighbouring roads, for instance Manorhouse Lane, which is currently closed (March 2014) due to damage from springs. On Little Bookham Street a spring emerged in the lounge of one of the houses. According to Dr Tony Cooper, of the Royal Geological Society, areas with underlying chalk are in particular danger from sink holes, as chalk dissolves more readily, and in areas where chalk meets the sand of the Thanet Sand Formation, this danger would be even more acute. Finally, much of the site overlies London Clay, which is relatively impermeable, a difficult strata for the inclusion of Sustainable Urban Drainage Systems (SUDS). In addition, locally (in Kennel Lane, in Bookham), there have been substantial problems with the instability of foundations to housing built on clay, caused when the moisture content of clay changes, as it shrinks quite dramatically as it

dries out. Being close to chalk means there would be regular and potentially significant changes in moisture content as seasons change. Buildings on this site are thus likely to experience movement of their foundations.

Note:

The Pegasus study was not the only study in the evidence base to reach incorrect conclusions regarding Effingham. The Guildford Borough Settlement Hierarchy, July 2013, appears to have been scored in hope rather than reality. Specifically, in the Sustainability Scoring (Appendix C) Effingham does not have a state infant school. Both its primary and secondary schools are oversubscribed. It's Post Office is a sub post office and so does not offer a full range of services. The bus service is poor, and I would suggest anyone scoring it differently uses it for a period of a few months as their sole method of transport. Had the scoring system reflected reality, Effingham would have scored 21, not 24, and ranking would have fallen from 11th to 14th.

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