



Ms R Barrett
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Registered Office:
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19th April 2024

Dear Madam,

Mole Valley District Council Draft Local Plan Main Modifications

The Bookham Residents Association has strong concerns as to the soundness of MVDC's draft Local Plan, including elements of the Main Modifications open for consultation as detailed in ED 71, ED74 and associated documents ED75 – 80. As the same topic can arise within one or more of the examination documents open for consultation, we have grouped our comments under topic headings and then referenced to the individual examination documents.

Delivery of Housing - ED71A, MM2, MM45

The trajectory in **ED71A** for Bookham allocates a total of 255 dwellings by 2039 across named sites. Of these, 212 net new houses would be on sites DS8, DS9 and DS11 over a 15-year period, with the other two named sites being completed. This equates to an average of 14 per annum from 2024. In addition, there would be Bookham's contribution to the Small Sites Windfall and Development Opportunity Areas, which cover all of Mole Valley. Bookham's contribution across all three categories was to be 381 net new dwellings at the time of the Matter 2 Hearings, with a subsequent increase proposed to reflect the additional two years that the Draft Local Plan is to run. We believe that it is both logical and consistent with planning consents granted for new dwellings in recent years that the target could be met without the need to develop 200 houses on what is currently Green Belt (Proposed Site Allocation DS8). The rates from infill or conversion from single dwelling to multiple over the past two years has been:

- 2023 – 22 net new dwellings approved, with a further 2 being subject to appeal
- 2022 – 26 net new dwellings approved

And in the first 3½ months of 2024 there have been applications for a further 10 such dwellings, demonstrating that these rates or higher should be attainable going forwards.

For ease of reference, we have compared the above to the detail in Table 2 of Section H1.1.5 of the Matter 2 Hearing Statement of 26th June 2022 which gives a breakdown against the relevant categories. There was a minimal change to this in ED59, a 0.6% increase, before the proposed adjustment under **ED71A** (the change identified in **MM7 Policy H1 Criterion 4** in **ED74**) for the extended duration of the Draft Local Plan. We question the quantum of the increase proposed under **ED71A**, namely a further +8.7%.

Allocations to Specific Sites	Equates to DS8, 9,11	212
Permissions Granted	These were granted before 22/6/22 so would not count as new approvals for 2024-39	Excl.
Completed	Exclude as they were completed in/ by 2022	Excl.
Small site windfall	Table 2 total of 110 across 13 years plus further 2 years pro-rata	127
Development Opp Areas	Unchanged as they are within previously defined boundaries	59
		398
Average per annum over next 15 years		26.5
<i>Cf. 2022 – 2023 average</i>		24
<i>Cf. 2022 rate</i>		26

Furthermore, when considering the overall placement of new housing under **ED71A**, we believe that it defies logic to allocate so many dwellings within the northern part of the Borough, where there are limitations on employment and transport infrastructure, when the main employment areas around Crawley and Gatwick must suggest that the optimal place for a substantial addition to housing stock lies in the south of the Borough in the vicinity of Gatwick and Crawley. Placing more housing away from the main areas of employment will exacerbate commuting by car, especially in Mole Valley where the non-radial transport links are poor. There was a proposal some five years or so ago for a major development in the south of the Borough, not on Green Belt, which met most (if not all) of the development criteria at the time and would be worth re-assessing.

MM2, Criterion 2 proposes an early review of the plan, completed before the third anniversary of adoption. We propose that this must include a thorough update of the potential from brown-field sites, which can make a critical and positive contribution to the delivery of the housing needs whilst protecting Green Belt. Without such a thoroughly researched update being carried out, we would question the soundness of the Local Plan as it progresses through future years.

Green Belt Boundary – MM45

The boundary in **MM45** shows how the proposed site and Green Belt boundaries would be amended for site allocation DS8. This allocation is on land that is currently designated as Green Belt. Whilst we acknowledge the instruction from the Minister that the Local Plan should be considered under the previous draft of the NPPF, government policy as reflected in the December 2023 update to the NPPF is now that new housing should be limited to brownfield sites where possible. The Minister stated that, even under the previous draft of the NPPF, the release of the Green Belt was to be only under exceptional circumstances and that a Local Authority has to show that it has examined all other reasonable options for meeting its identified development needs. Felicity Buchan's final response in the debate: *"The Government's position is clear; let me restate it. To demonstrate exceptional circumstances, the local authority*

has to show that it has examined all other reasonable options for meeting its identified development needs. As I say, green belt release is definitely the last resort.” (Hansard Volume 745, Column 946, debated 22/2/24).

Transport – ED71E

ED71E sets out the Council’s view on the traffic impact of DS8 on the Lower Road. We believe a 200-dwelling development on DS8 would have a far greater adverse impact on traffic than that identified in SCCs Lower Road Bookham Technical Note January 2023 (incorporated as ED71E). In the attached Annex there is a detailed analysis by the BRA of the Council’s transport assessment.

There are three major developments that will feed additional traffic onto the Lower Road: two with an overall 405 dwellings in Effingham have been approved, DS8 with a further 200 dwellings remains the subject of an outline planning application. Our analysis concludes that traffic volumes along Lower Road would be increased significantly from current level, increasing by up to 59% just east of the Preston Farm entrance. Therefore, it is our belief that the Draft Site Allocation DS8 may create the tipping point beyond which the existing road infrastructure can no longer handle traffic volumes safely and efficiently. This will have significant consequences: with congestion a major issue especially in the vicinity of the development; increasing pollution levels; and creating a less safe environment for pedestrians and cyclists, especially for children when travelling to or from school.

ED74 Schedule of Main Modifications other than those mentioned above

Heritage Assets – MM24

MM24 Policy EN6 Criterion 7 will require that “*development proposals resulting in less than substantial harm to specified grades of Listed Buildings will not be permitted unless the public benefits outweigh the harm to the asset’s significance.*” We agree with this amendment as Bookham has two conservation areas with Listed Buildings.

We are concerned that in relation to the ongoing outline application for DS8, the SCC Historic Buildings Officer has interpreted this as “*provision of housing in Mole Valley is a public benefit which outweighs the harm to the asset’s significance*”. We disagree that his wording is an appropriate interpretation for this site. As noted already in relation to ED71A, we believe that housing can be provided through infill and brownfield development without resorting to Green Belt and thus the harm to the Green Belt would not be an issue to be outweighed. He noted that the site entrance is within the Little Bookham Conservation Area. We would also note that part of the site adjoins Listed Properties in Little Bookham Street in the Conservation Area.

MM24 also proposes amended wording to **Policy EN6 Criteria 11 and 12**. This wording might be better as referring to the legislation *as amended from time to time*.

Biodiversity Net Gain – MM27

We welcome that **MM 27 Policy EN9 Paragraph 6.61** seeks the attainment of a Biodiversity Net Gain ('BNG') of a minimum of 20% on most sites. We shall await the Planning Obligations Supplementary Planning Document and recommend that it includes details of the nationally approved tool to calculate BNG.

We read **MM27 Policy EN9 Criterion 3** to be that the Biodiversity Gain Plan referenced in paragraph 3a would be a mandatory successor document to the submission of the Biodiversity Statement as part of the initial planning application. This needs clarification. We are concerned whether the abridgments to paragraph 3b under this criterion make the measurement of the required 20% net gain more difficult to quantify with certainty.

Drainage and Groundwater – MM34

Policy INF3, Criterion 2 – The policy states: 2. *“All development will seek to avoid, reduce or mitigate flood risk by: a. Ensuring development is directed towards areas of lowest flood risk from any source by applying the Sequential Test”*. This should require also that an Exception Test is conducted when necessary, in accordance with the NPPF Sections 167, 169 – 171.

Under 2.e.iii there is a proposed addition of *“not ...increase flood risk elsewhere”* which we recommend should be a general requirement in all zones. Previous development on the Lower Road directly adjacent to DS8 has led to increased flooding to properties in Little Bookham Street. This will only get worse through the impact of climate change with an increased likelihood of what has been regarded up till now as 1-in-100 climatic events. The periods of high rainfall with deluges and flooding may well become the new norm.

In addition, this policy should require also that new developments undertake a survey to establish whether either a surface or an underground Chalk Stream exists.

Policy INF3, Criterion 3 – The policy states: 3. *Where feasible, sustainable drainage systems should be incorporated into (i) all major developments or (ii) developments involving a net increase of 3 or more dwellings within Areas of Critical Drainage, as identified in Appendix 19*. It is proposed to remove the reference to Appendix 19 and change to a general reference to the policies map. The Area of Critical drainage affecting Bookham & Fetcham identified in the initial draft, but subsequently deleted, should be reinstated. There needs to be recognition also of the presence of lowland fen and areas of priority habitat when assessing approaches to drainage. The limitations of sustainable drainage systems needs to be recognised when planning drainage in such areas.

Chalk Streams

The only reference to sensitive habitats (including chalk grassland) is in **Policy EN9 paragraph 6.62 of MM27** but **ED74** is totally silent on priority habitats. This contrasts with the direction of national policy as reflected in the NPPF paragraph 185b: *“promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of*

priority species.” We regard this as a significant omission to the draft Local Plan and the implication for potential areas for development, including the assessment of biodiversity net gain under **MM27 Policy EN9 Criterion 3**, which is within the Main Modifications for consultation.

Whilst the Main Modifications and the Draft Local Plan are silent on Chalk Streams, there has been evidence provided since the hearings and we believe that it is imperative that the impact of any development is considered. These initial discussions are reflected in ED49C but there has been further progress on identifying chalk streams in the area of the Proposed Site Allocation DS8 since 25/10/22.

Policy DS8 does not address the adverse effect of the proposed development on the chalk streams that run through the land. The BRA has been liaising with Surrey County Council and the Southeast Rivers Trust in examining the natural spring lines in Bookham and particularly those running adjacent to Lower Road in the vicinity of Preston Farm. Natural England proposes to make 2 additions to the UK’s Chalk River data set (i.e. permanent chalk streams) in Great and Little Bookham. Following the submission of video and photographic evidence into their survey, the Southeast Rivers Trust conducted an initial site survey in December 2022. This initial survey confirmed the proposed Chalk River additions; identified some winterbourne headwaters in the areas to the south of the new Chalk Rivers including: one of the ancient chalk pits in Great Bookham, which fill directly from the aquifer when the water table is high; and a few of the locations in which chalk springs have repeatedly emerged; confirmed the need for further surveys along Mole Valley’s spring line to identify the full extent of this Priority Habitat and trace the route of each chalk stream tributary through Bookham Common’s SSSI into the River Mole.

During an examination of the draft Local Plan, specific mention was made of Downside Ditches and Bookham Brook, which takes in water from an area around 21.379 km² in size and is part of the Mole Lower and Rythe catchment area. It is 6.327 km long. According to the mapping data available from the Environment Agency it flows to the north/northwest of the development site, stretching to the vicinity of Bookham Common, a SSSI.

Whilst there is yet to be a formal confirmation that there is a chalk stream running through Preston Farm, the presence of natural spring lines close to the site mean that groundwater chalk streams do cross it and would be adversely affected by a development on DS8. Accordingly, in the interests of protecting the environment and Priority habitats, it is essential that a detailed survey is undertaken by the Council to confirm our belief in the presence of chalk streams.

Wastewater (Sewerage) – MM45

MM45 Policy DS8 Criterion 15 requires that *“the necessary upgrades to off-site wastewater infrastructure can be delivered by Thames Water and that the occupation of the development is phased to align with delivery of necessary sewerage infrastructure.”* We have observed that this criterion for DS8 does not adequately deal with how a development on this site will affect the sewerage infrastructure in the area, which is already in need of upgrading. Bookham has old sewerage infrastructure and there are continuing problems of blockages causing raw sewage spills in the vicinity. The sewage pipelines (both onsite and downstream off-site) are still partially pitch fibre (subject to regular root ingress and resultant blockages). These problems



have been manifested in a recent development on the Lower Road, adjacent to the Proposed Site Allocation DS8, where residents experienced last summer sewage backing up as well as flowing across some fields of Preston Farm. Thames Water attributed this to mass root ingress, which took over two months to identify and clear, but leaving still *"bit compressions in the pitch fiber section. [report SA-877965]"*. The inadequacy of the sewage pipelines with the pitch fibre sections allows the infiltration of surface and groundwater during periods of high rainfall, exacerbating capacity issues.

Thames Water needs to upgrade both sewer construction material and size upfront rather than wait till problems occur post occupation of any development. We are concerned also whether the extent or timeliness of the required upgrading will be hampered by the financial difficulties in which the water company (or its successors) finds itself. There are already significant calls within the region covered by Thames Water for major and overdue upgrading, which can only increase the pressure on constrained funds.

In Conclusion

We are contented that the comments we have made in respect of the Main Modifications will assist the completion of the Local Plan with policies that will assist the Council to manage the future of Mole Valley, and in particular Bookham over the next 15 years of the Local Plan. Naturally, the focus of our concerns relates to the Main Modifications pertinent to the Draft Site Allocation DS8, the land to the Northwest of Preston Farm in Bookham.

Though it is not the listed as a Main Modification for consultation, we are convinced that the allocation of Preston Farm in the Site Allocation DS8 is wholly inappropriate and unnecessary, due to a number of factors that we have touched upon above, as well as finding that a number of matters that allegedly supported its original inclusion were based upon unreliable data and insufficient research especially in relation to traffic generation, drainage issues and means of access (which Surrey County Council have concerns about).

There is also the question of whether there is the need for the site to be developed when it is logical that additional housing need can be met elsewhere in Mole Valley or Bookham, through a combination of infill and brownfield development, particularly with the strong prospect that more brownfield sites will emerge consequent to changes to the economy over the years since MVDC last compiled a full analysis of potential sites in 2017.

Yours faithfully

K Whale
Chairman Planning Sub Committee.

Cc Cllr Monica Weller, Cllr Elizabeth Daly, Cllr Roger Adams, Cllr Paul Kennedy, Cllr Andrew Matthews, Cllr Christine Miller, SCC Cllr Clare Curran, MVDC Planning Department, Alex Bagnall.

ANNEX - ED71E: Appendix 5 Lower Road Transport Note

1.0 Projected Traffic Increases

1.1 SHAR

The Strategic Highway Assessment takes as its base level the projected traffic on the Lower Road after the completion of 296 dwellings by Berkeley Homes as part of the Howard of Effingham development (the *Do-Minimum* scenario). The impact of Preston Farm is considered (in the *Do-Something* scenario) and then a further comment is made following the granting of permission to develop an additional 110 dwellings on Effingham Lodge Farm. The suggested impact is:

	Increase from <i>Do-Something</i> above <i>Do-Minimum</i>	Further increase from Effingham Lodge Farm	Combined increase above <i>Do-Minimum</i>
AM peak hour	223 pcu	21 pcu	244 pcu
PM peak hour	165 pcu	27 pcu	192 pcu

1.2 Other Assessments

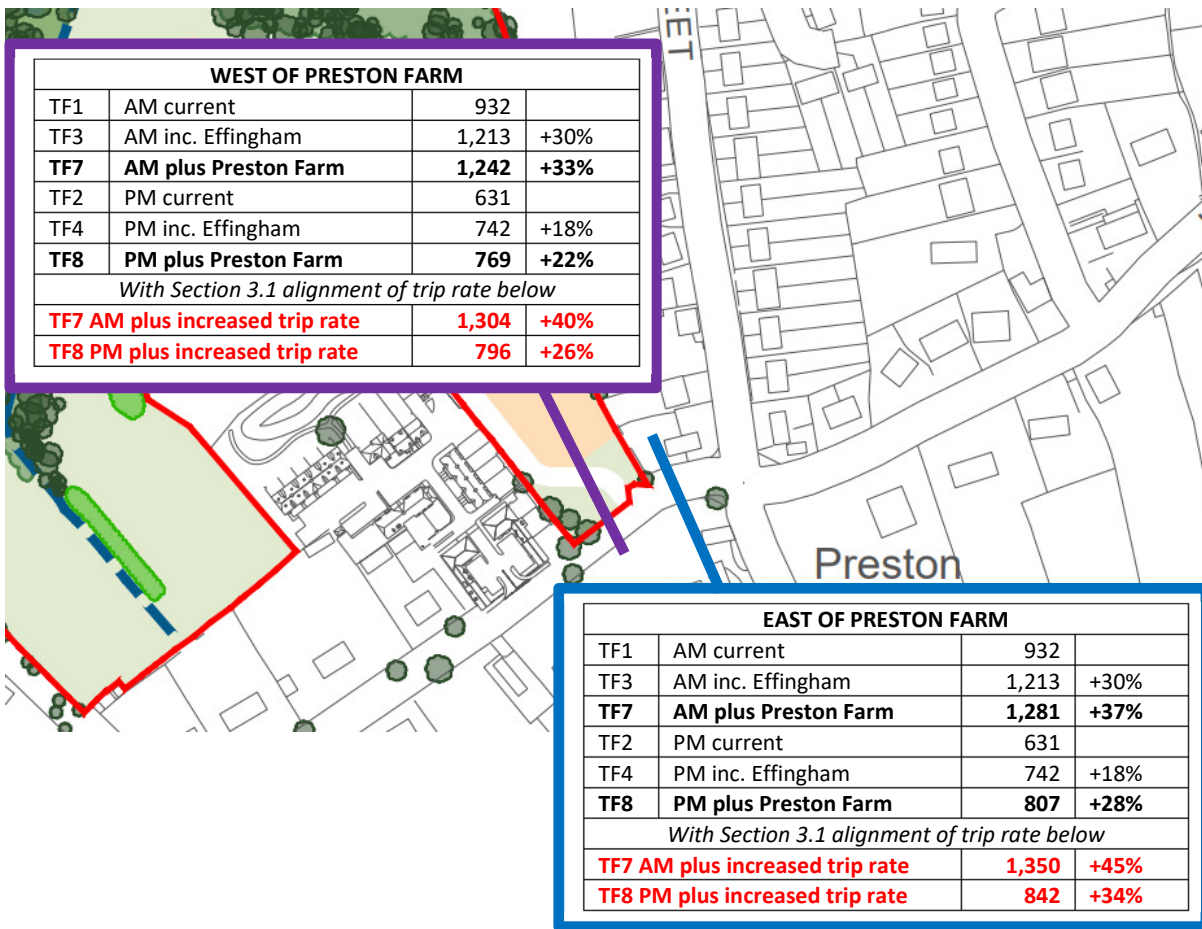
The Transport Assessment by i-Transport for Thakeham Homes was broadly consistent in many respects with the assessments by Motion of April 2021 and, previously in 2014, Granville for Berkeley Homes but it was more conservative in its projected increase in traffic. We share the concerns that the data files for i-Transport's Assessment are not available and that it was undertaken at a time of road closures further east on the Lower Road. However, we did note consistencies between all three assessments. Therefore, we believe that it is valid for our comments on the i-Transport Assessment to be considered within our commentary on ED71E. For clarity, the broad scopes of the assessments are summarised in Section 1.5.

1.3 Using Current as Baseline

The cumulative impact of all development should be contrasted against the current position, rather than the SHAR using as its *Do-Minimum* base level the completed development of 296 out of a total 605 dwellings (i.e. the 49% point in development). This can be seen through the modelling by i-Transport and comparing TF1, TF2 (current traffic levels with no developments) against TF7, TF8 respectively (all Effingham and Preston Farm developments completed).

The trip rate per dwelling used by i-Transport was lower than that used by Motion and Glanville in their assessments, hence the adjustment shown in red over page This is explored further in Section 4.1.

This shows a likely net increase in traffic movements on the Lower Road of +40% in the AM peak hour and +26% in the PM peak hour west of Preston Farm and +45% and +34% east of Preston Farm, between its entrance and the Preston Cross mini-roundabout. See over page.



1.4 Potential Further Increases

Neither the Transport Assessment by i-Transport nor the Lower Road Transport Note give adequate consideration to the following:

- The impact of school journeys by residents of Preston Farm.
- Traffic generated by the Community Facility and the SANG.
- The actual rate of car ownership in Bookham, reflecting the limited public transport choices for local journeys.

These are explored in Section 5.0. We estimate that they would have the effect of taking the increase in traffic on the Lower Road in the AM peak hour **just west of Preston Farm to circa +46% and just east (between it and Preston Cross) to circa +59%**. With these increases in traffic flow along the Lower Road, we question the validity of the suggestion in ED71E that “congestion will not be notably increased”. We believe that there will be the potential for serious congestion as a consequence of this plus compromised road safety, especially for pedestrians and cyclists.

1.5 Scopes of Assessments

For the purposes of clarity, we set out below our understanding of the differing scenarios of development reflected in the transport assessments referenced above and in this commentary.

Transport Assessment	Howard of Effingham	Lodge Farm	Preston Farm
	296 dwellings [1]	110 dwellings [2]	199 dwellings [3]
Glanville Assessment 2014	✓		
Motion Assessment April 2021	✓	✓	
ED71E SHAR Do-Minimum	✓		
ED71E SHAR Do-Something	✓	As overlay	✓
i-Transport TF3, TF4	✓	✓	
i-Transport TF7, TF8	✓	✓	✓
<p><i>Notes:</i></p> <p>[1] 296 cited in the SHAR cf. 295 approved. The assessment by Glanville was for application GBC 14/P/02109 covering three sites in three phases; initially 310 dwellings across Browns Lane, the playing fields to the north of the existing Howard of Effingham School and finally the existing school site. The final approval was 295 dwellings.</p> <p>[2] Excludes the 4 self-build dwellings. The assessment by Motion for application GBC 21/P/01306 considered a further 110 dwellings on land at Lodge Farm plus 4 self-build dwellings on land at 408-410 Lower Road.</p> <p>[3] 199 cited in the SHAR cf. 200 in application MO/24/0096.</p>			

2.0 Traffic Flow

2.1 Congestion on Lower Road

ED71E recognises that there are delays on the Lower Road but suggests that these are limited to brief times and “do not affect the whole peak hour”, nor continue throughout the school day. This is incorrect as the reality is:

- West of Water Lane, the Lower Road is reduced to a single lane by parked cars all day on weekdays in term-time. None of this relates to “quick visits to local facilities”. This is likely to continue even if the Howard of Effingham School development progresses with onsite parking as the Lower Road would remain an easy drop-off/ pick-up point, though there is one planned within the development. The Lower Road may remain the alternative preferred by parents, affording a quicker getaway. We understand that SCC Highways would be resistant to installing any further stopping/ parking restrictions along the Lower Road, beyond those in place already.
- When buses stop on the Lower Road, traffic needs either to wait behind the bus or try to overtake when it is safe to do so. This slows traffic flow. This will remain the case with the new bus stops as proposed and unless bus laybys were to be created, which could be difficult. The rate of traffic build-up in the AM peak hour behind a stopped eastbound bus at the stop nearest the Preston Farm junction may be up to 9 cars per minute and up to 12 per minute behind a stopped westbound bus at the stop nearest the Preston Farm junction (based on the traffic flow projections of i-Transport in TF7). Both of these stops are used by disabled people going to/ coming from The Grange and Liberham Lodge.

2.2 Preston Cross

ED71E suggests in the *Do-Something* scenario (296 Effingham dwellings plus 199 in Preston Farm) that all links along the Lower Road will “remain at the optimum level of Service A”. However, this is contradicted by Motion’s Transport Assessment for Berkeley Homes (document *Lodge Farm – 21P01306 -Transport Assessment - 1712403*). The latter noted the

Preston Cross mini-roundabout as being 'inadequate' to cope with increased flows from any development (either within the Effingham sites or Preston Farm) without improvement works. We understand that the widening of the pavement and the white-lining carried out already may be the extent of planned works by SCC Highways. If so, there are no further works planned that will improve traffic flow rate through the roundabout and so Preston Cross will remain a source of potential congestion.

2.3 Analysis at Junction Level

ED71E suggests that in its analysis of the junctions along the Lower Road under the *Do-Something* scenario they continue to operate at "a level of service A or B". However, paragraph 7.5 in the Strategic Highway Assessment Report of September 2021 states that "*the nature of the model as a strategic model and the associated coarse zoning mean that as a tool it is not able to fully assess the impacts on specific junctions in the area*". Therefore, we question whether the assertion in ED71E is valid.

Whilst i-Transport's Assessment included modelling at a junction level and projected levels of queueing, it assumed that traffic can move away freely from a junction. We believe that this assumption is flawed in that it does not reflect:

- Vehicles turning left from Preston Farm's new junction onto the Lower Road eastbound may be blocked by vehicles queueing at Preston Cross mini-roundabout, leading to southbound queueing within the new access road. The distance between the two is around 30m, allowing no more than 4 cars to queue eastbound. Using i-Transport's projections in Table 7.7 of the Transport Assessment and reflected also in TF7, the queue may be 2.8 cars in 2028 in the AM peak hour with all developments. If this is adjusted simply in line with the increased trip rate per household used by Motion in its assessment of April 2021 preceding the SHAR, this queue increases to the maximum of 4 vehicles, beyond which point vehicles are prevented from exiting freely.
- Vehicles on Lower Road westbound may be unable to move away quickly from Preston Cross mini-roundabout on account of congestion either from the width restriction on Rectory Lane by Liberham Lodge affecting its southbound flow or, if continuing westbound, traffic turning right into Preston Farm's new junction or cars queueing behind a stopped westbound bus.

2.4 Congestion is Non-Linear

A further factor that should be considered is that the ability of traffic to flow freely is not necessarily a linear relationship to volume. Traffic volume can increase, with congestion increasing linearly, until the volume reaches a critical point beyond which the flow reduces disproportionately. This may be through factors such as:

- Four cars heading eastbound on Lower Road can queue between the exit from Preston Farm and Preston Cross, but a fifth car will block it.
- Any westbound car turning into Preston Farm will block Lower Road westbound until it has turned, crossing the eastbound flow. This interrupts both flows on the Lower Road.
- When traffic moves away from a stationary position, the spacing of cars increases so traffic moves in a concertina fashion when delayed or at any junction.

- When cars have to give way in *single lane with passing* flows, such as in Rectory Lane or along Lower Road by the Howard of Effingham School, the delay can be worsened by one driver trying to push forward and another then needing to reverse.
- The impact of buses stopping on the Lower Road as noted in Section 2.1.

Hence there is a point at which a small increase in the volume of traffic has a disproportionate impact on traffic congestion.

3 Air Quality

The increases in traffic along Lower Road and queueing at junctions will have an adverse impact on air quality, either from exhaust of fossil fuelled vehicles or the increased generation of particulates by the heavier electric vehicles, especially when braking and turning. The latter may pollute further the water courses as they wash off the road surfaces in heavy rain. We believe that this runs counter to the Council’s policies seeking a cleaner environment.

4 Trip Rate Adjustment

4.1 TRICS Source Data

The rate used for trip generation per household in all transport assessments has been based on the TRICS surveys. We noted that the rate for trip generation per household used by i-Transport was low compared to those used by Motion and Glanville, which were consistent with each other. Had the latter rates been used by i-Transport, the effect would be to increase the projected traffic flows on the Lower Road, Rectory Lane, Preston Cross mini-roundabout and other highway infrastructure. i-Transport proposes an even further reduced rate in its ‘Vision’ projections.

As i-Transport quote a single overall rate, whereas the other assessments differentiated between the types of housing (*Open Market vs. Affordable*), we have averaged the rates in the latter on the basis of 40% affordable housing (this being the mix quoted by Savills in the Final Planning Statement dated January 2024). Through this, the trip generation rate used by Motion and Glanville is 20.6% higher than i-Transport’s ‘Vision’ rate, meaning that, if applied, the projections in i-Transport’s TF3 – TF8 would be proportionately higher and queueing at junctions may be worse to a similar degree.

Source	Type of Housing		Averaged car trips per household
	Open Market	Affordable	
Preston Farm – i-Transport	<i>Not separated</i>		Baseline (Table 7.1 of Transport Assess.) = 4.32 Vision (Table 7.2 of Transport Assess.) = 3.88
Lodge Farm – Motion	5.32	3.73	Averages 4.68 on 40% Affordable & 60% Open Market
Berkeley Homes – Glanville	5.32	3.70	

4.2 Car Ownership

In addition to the above, the rates of car ownership within the selected regions and areas for the TRICS data used by i-Transport were lower than Mole Valley. The areas selected for the data tables in the i-Transport Assessment were from the Southeast, Southwest, East Anglia, East and West Midlands, Yorkshire, the Northwest and Durham. We have compared below the rates of car ownership in these areas to that in Mole Valley, based on ONS data.

Region/ Area		Source	Average Rate of Car Ownership per Household
A	Southeast only	ONS Census 2021	1.42
B	Selected regions excl. Southeast	ONS Census 2021	1.34
C	All selected as above by i-Transport and listed in Appendix A		1.36
D	Mole Valley	ONS Census 2021	1.54
E	% increase Mole Valley over all regions selected by i-Transport		13.2% (D cf. C)
F	% increase Mole Valley over regions selected excl. Southeast		15.0% (D cf. B)

Therefore, an estimate of trip generation based on the source data used by i-Transport may give a 13.2% lower result than one based on Mole Valley only, or an even larger difference depending on the weighting of the other regions outside of the Southeast.

Whilst the trip generation rate used by Glanville in its 2014 Transport Assessment (for the 296 dwellings reflected in ED71E *Do-Minimum*) was higher than i-Transport's, we noted that the regions, and thus areas within them, selected for the TRICS data also reflected a marked bias away from the Southeast.

Region	Number of Areas Selected within Each Region
Southeast	1
England – other regions	6
Ireland	6
Ulster	2

The rate of car ownership in Bookham is reflective of the limited public transport apart from the train services radiating from London. The only bus service is between Guildford – Bookham – Epsom, with none running to Reigate or Cobham. Travel by public transport to adjacent Reigate or Cobham entails train journeys with changes.

5.0 Impacts of School Trips, Community Facility & SANG

5.1 Introduction

As noted in Section 1.0, we believe that neither the i-Transport Assessment nor the ED71E Transport Note have given adequate consideration to the impacts of school trips and external users of the SANG and Community Facility.

5.2 School Trips

To project the impact of including school trips, we have taken the split of dwellings by size and *Affordable* vs. *Open Market* from the Savills report submitted as part of Thakeham Homes' initial planning application and estimated the following:

- % of those dwellings with children. See Table 5.2.1 below.
- Of those dwellings with children, the % sending the children to private schooling. We have used the lower end of the range in Bookham. See Table 5.2.2 below.
- And of those dwellings with children in state education, the % with children neither going to St. Lawrence nor the Howard of Effingham for whatever reason. See Table 5.2.3 below.
- Of those dwellings that thus might be driving children to/ from school, the % that would travel west along the Lower Road from Preston Farm. This has been taken to be the minority based on where alternative schools are.
- And the % of dwellings that are driving children to school for which the journey is combined with commuting. For the % that may be combining the trip with commuting, we have assumed that no additional journeys are generated. Otherwise, it is 2 trips within the AM peak hour (out and back).

Table 5.2.1

	Bedrooms	1	2	3	4+
Market	%ge	25%	45%	20%	10%
	homes	20	36	16	8
	% with children	0%	50%	70%	85%
Affordable	%ge	15%	45%	30%	10%
	homes	12	36	24	8
	% with children	0%	75%	90%	100%

Table 5.2.2

Homes with children in private schools		
	Market	25%
	Affordable	0%

Table 5.2.3

Children state educated not in Howard/ St Lawr & driven		
	Market	40%
	Affordable	40%

5.3 SANG

For the SANG, we have estimated the number of cars coming in the AM peak hour for a reason such as dog-walking. As these would be short duration stays, it is likely that the generation is 2 trips within the same hour. As with school traffic, there is a % assessment of how much traffic is coming from Lower Road west and returning that way.

SANG	AM peak hour	Cars	
			8
	Coming from west		20%
	Trips in peak		2

5.4 Community Facility

For the Community Facility we have considered the impact of an early years' facility where the children are left, as opposed to a playgroup which would be later in the morning and the parents remain. We have assumed that a few of the cars arriving may relate to staff and so the trip generation has been reduced from 2, since staff will be staying past the AM peak hour.

Community Facility	AM peak hour	Dropping	15
	Coming from west		20%
	Trips in peak		1.75

5.5 Car Ownership

As noted in Section 4.2, the difference in the rate of car ownership in Mole Valley against those regions used to select the TRICS data was 13.2%. When projecting the impact of this, we have applied a dilution factor in the table over page in Section 5.6, which reduces the net impact to provide a margin of caution. For example, a dilution factor of 25% reduces the impact of the higher ownership to 9.9%.

5.6 Consolidated Impact

The consolidated assessment of the impact is shown over page, with that west of the Preston Farm junction in blue and east in pink. The increase in traffic to the west in the AM peak hour **could then increase by +46%**, rather than the +33% in TF7 in the Transport Assessment, and to the east **by +59%**, rather than the +37% in TF7.

AM peak hour			Source	West of Preston Farm		East of Preston Farm		
Baseline - current traffic level			i-Transport Assessment	TF1	932	TF1	932	
After Effingham developments			i-Transport Assessment	TF3	1213	TF3	1213	
After Preston Farm			i-Transport Assessment	TF7	1242	TF7	1281	
Uplifting trip rate per dwelling to be consistent with Motion/ Glanville trip rate			Reflected in Section 1.1	Sec'n 3.1	1304	8%	Sec'n 3.1	1350
School trips impact			West		13			52
			Commuter %					
SANG trips			See Section 5.3		3			13
Community Facility			See Section 5.4		5			21
Increased car ownership			Sec'n 3.3	13.2%	This document			
			Dilution	25%	See Section 5.5			
			Apply	9.9%				
Additional trips			Sub-total of above					
					58			128
TF7 with uplifted trip rate					1304			1350
Revised total trips			Total of above		1362			1478
Increase vs. baseline			Comparison against TF1			46%		59%

We would question whether the Lower Road, Preston Cross mini-roundabout and environs can handle such a potential increase without unacceptable congestion or risks, such as to road safety or from frayed tempers of road users.

6.0 Active Travel

6.1 School Trips

There is an expectation expressed in ED71E that the Howard of Effingham development as a whole will “assist in minimising trips by private car along the route”. We do not believe that this is a realistic assumption:

- Whilst the Preston Farm residents will be in the catchment area for the Howard of Effingham and St. Lawrence schools, the alternatives are more distant. The parents' choice of school may be affected by where the child is already, educational needs or religion.
- The new developments by Berkeley Homes, with a proposed 409 dwellings in Effingham, will also have children competing for places at the Howard of Effingham and St. Lawrence schools.
- The children living in these developments going to the Howard of Effingham and St. Lawrence schools and thus within walking distance will be restricted to the extent that the school places increase sufficiently. Otherwise, there will be a displacement effect as children need to go to more distant schools.
- When families with school-age children move into Preston Farm or one of the Effingham developments, they are likely to keep children in existing schools if they are living already within the area. This may increase school trips by car along the Lower Road in the immediate vicinity of Preston Farm as families re-locate.
- Manor House is close, but it is private and less likely to be a choice for the 40% in affordable housing.
- If families were unsuccessful with entry to the Howard of Effingham School, the state sector secondary alternatives are primarily in Leatherhead.
- If younger families did not enrol in St Lawrence for any reason or could not get a place, Great Bookham and Eastwick Infants & Junior School are 1.0 – 2.0km distant.

6.2 Bus Provision

ED71E correctly notes that improved bus provision could help reduce travel by car. Indeed, Surrey County Council has sought in its response of March 2024 to the planning application MO/24/0096 that a demand responsive bus service is introduced, towards which a funding contribution of an indexed £750,000 over 5 years would be made by Thakeham Homes. However, there would be a covenant that any unspent monies can be used towards other sustainable travel schemes. We question whether the likely continued pressures on public funding will mean that the covenant is exercised and the bus provision does not materialise to the aspired extent.