



Effingham Parish Council

**PROOF OF EVIDENCE OF
PAULA MOSS BA**

In respect of

**APPEAL BY BERKELEY HOMES (SOUTHERN) LTD AND
THE HOWARD TRUST PARTNERSHIP**

**SITE AT LOWER ROAD AND BROWNS FIELD, BROWNS LANE,
EFFINGHAM, SURREY, KT24 5JR**

Planning Inspectorate Ref: APP/Y3615/W/16/3151098

Local Authority Ref: 14/P/02109

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Effingham Parish Council

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CONTENTS

Qualifications and Experience

	PAGE
1. INTRODUCTION AND SCOPE OF EVIDENCE	4
2. PLANNING POLICY AND GUIDANCE	5
3. AMPLIFICATION OF CASE	7
Current demand for places at The Howard	7
The claimed popularity of the school, and school performance as a basis to justify expansion	7
Future Demand Projections & Planning	9
Parental choice	10
Impact of the Emerging Local Plan on need for school places	11
Proposed Autism Unit	12
4. SUMMARY AND CONCLUSIONS	13
NOTE: Section 4 serves as the Summary Proof of Evidence.	
APPENDIX 1	
Surrey County Council response to Freedom of Information Request W10001364	
APPENDIX 2	
Surrey County Council response to Freedom of Information Request 14853	
APPENDIX 3	
Allocation of Secondary School Places in Surrey September 2015	
APPENDIX 4	
Allocation of Secondary School Places in Surrey September 2016	
APPENDIX 5	
Tabulation of analysis of Information on Surrey County Council school admissions	
APPENDIX 6	
Information on Secondary Schools in Surrey 2017/18	
APPENDIX 7	
Measures of Attainment	
APPENDIX 8	
School Organisation Plan 2015/16 – 2014/25	
APPENDIX 9	
School Organisation Plan 2016/17 – 2025/26	
APPENDIX 10	
New Multi-Academy Trust	
APPENDIX 11	
Guildford Draft Local Plan Education Review 2016	
APPENDIX 12	
Statement on behalf of the Education Authority, January 2017	
APPENDIX 13	
National Autistic Society/Cullum Autism Centres in Surrey Schools, Sept 2014	
APPENDIX 14	
Surrey County Council response to Freedom of Information Request 16358	

QUALIFICATIONS AND EXPERIENCE

Paula Moss (BA Joint Honours)

Parish Councillor, Chair of ENPAG, and Business Communications Consultant

I came to Surrey in 1991 to take up a position with Rank Hovis McDougal, one of the largest food manufacturing companies in the UK at that time. I moved to Effingham shortly afterwards and have lived in the village ever since. As a senior executive and Divisional Board Director for RHM I was responsible for the Commercial Planning, Marketing, and Research & Development operations for its largest Division. In 2005, after a successful period with RHM during which I was twice awarded the Chartered Institute of Marketing's Annual Marketing Effectiveness Award, and the DBA's Design Effectiveness Award, I left to form my own Communications Consultancy.

For many years since I have been a highly active and engaged member of the Effingham community. I set up and coached a local youth soccer team operating for 6 years in the local Epsom & Ewell Youth league. I participated in my children's schools, and I was elected to Effingham Parish Council. I have now been a councillor for over six years, and in such capacity I have led the community effort to develop a Neighbourhood Plan for Effingham. I became Chair of Effingham Neighbourhood Plan Advisory Group in 2015.

As a research and communications consultant I am able to use my professional skills and experience to engage with the local community on behalf of the Parish Council. Along with fellow councillors I have hosted a great number of community consultation events and also operate the Effingham Community Consultation Group. This is an online panel of over 650 households in Effingham, set up to understand and represent the views of residents on future development of the village. Such experience has made me a familiar figure around Effingham, and one particularly well placed to comment upon the views and aspirations of residents.

1. INTRODUCTION AND SCOPE OF EVIDENCE

- 1.1 This appeal relates to an appeal against Guildford Borough Council's refusal of planning permission (ref 14/P/02109) for:

Hybrid planning application for outline permission (only access to be considered) for the erection of a replacement secondary school for Howard of Effingham and up to 258 residential dwellings with means of access at Howard of Effingham School and Lodge Farm, Lower Road following demolition of all existing buildings; and full permission for the erection of 37 dwellings, with access, parking and landscaping works on land at Brown's Field, Brown's Lane, Effingham.

Guildford Borough Council is hereafter referred to as 'GBC'.

- 1.2 Effingham Parish Council (EPC) objected to the planning application 14/P/02109 on the basis of the 2003 Guildford Local Plan and the National Planning Policy Framework (NPPF). Effingham was designated as a Neighbourhood Planning Area in April 2014 and the draft Neighbourhood Plan was subject to a Regulation 14 consultation from 23 May 2016 to 18 July 2016 and submitted to GBC on 3 March 2017. GBC are carrying out a Regulation 16 consultation on the Submission Neighbourhood Plan from 20 March to 30 April 2017. The Submission Effingham Neighbourhood Plan now carries modest weight in planning decisions, and its policies are therefore cited here in support of the case for refusal.

- 1.3 This proof presents evidence in support of reason 1 in GBC's reasons for refusal of the application:

- 1. The proposed development represents inappropriate development within the Green Belt and is harmful by this definition. In addition the level of development proposed would have a clear and substantially detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt. Very special circumstances to outweigh the harm to the Green Belt (and any other harm) have not been demonstrated.*

This proof presents evidence that the claimed very special circumstances have not been demonstrated with respect to

- Current demand for places at The Howard
- The claimed popularity of the school, and school performance as a basis to justify expansion
- Future Demand Projections & Planning
- Parental choice
- Impact of the Proposed Submission Local Plan on need for school places
- Proposed Autism Unit

- 1.4 Section 4 'Summary and conclusions' serves as my Summary Proof of Evidence.

2. PLANNING POLICY AND GUIDANCE

The following planning policy and related documents are relevant to this proof.

a) Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24 September 2007)

CF4 EXPANSION OF SCHOOLS

b) Guildford Borough Proposed Submission Local Plan 2017 (PSLP)

S2 BOROUGH WIDE STRATEGY

The 'Guildford Draft Local Plan Education Review 2016' in the Local Plan evidence is particularly relevant to this proof.

c) Effingham Emerging Neighbourhood Plan (SENP)

The relevant policies in the Submission Effingham Neighbourhood Plan (SENP) are:

ENP-C6 Schools

ENP-G1 Sustainable locations for development

ENP-G2 Open character and heritage of the village

ENP-H2 Housing Mix

ENP-ENV1 Local Green Spaces

ENP-ENV2 Wildlife corridors & stepping stones

ENP-SA3 Site allocation policy for Previously Developed Land at Effingham Lodge Farm

The Neighbourhood Plan received significant support from the Effingham community during the Regulation 14 consultation stage. 574 households responded to the parish-wide consultation survey representing a participation rate of 54% of all Effingham households. All policies within the plan were highly supported. Those most relevant to this appeal and the corresponding level of support are listed below:

- 80% supported the spatial development policy G1
- 93% supported policy G2 to sustain the open character and heritage of the village.
- 73% supported the proposed housing target H1 for Effingham.
- 78% supported the proposed mix of new homes H2 favouring smaller and more affordable units.
- 95% supported the Local Green Spaces designated in ENV1
- 96% supported the proposed wildlife corridors in ENV2 linking SSSIs via stepping stones including Thornet Wood
- Over 60% of respondents supported the sites allocated for housing development, with 66% supporting the site allocation policy SA3 for Effingham Lodge Farm.

d) National Planning Policy Framework (NPPF)

The most relevant paragraphs of the National Planning Policy Framework (NPPF) are set out below.

72. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning

authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- *give great weight to the need to create, expand or alter schools; and*
- *work with schools promoters to identify and resolve key planning issues before applications are submitted.*

3. AMPLIFICATION OF CASE

Current demand for places at The Howard

- 3.1 The appellant asserts in their Statement of Case, para. 7.4, that the proposal will 'enable HoE School to expand to meet growing demand both from within Guildford but also the wider catchment that it serves'. However, information acquired from Freedom Of Information (Fol) requests W10001364 and 14853 to Surrey County Council (*Appendix 1 and 2*) and publicly available information about the allocation of secondary places in Surrey for September 2015 and September 2016 (*Appendix 3 and 4*) refute this assertion, as set out below.
- 3.2 In every year from 2010 up to and including 2014, Surrey County Council stated in Fol response W10001364 concerning first preference applications to the Howard School that 'Everyone who applied and lived in catchment got a place at the school.'
- 3.3 For the years 2015 and 2016, school allocation information (*Appendix 3 and 4*) shows that in 2015 there were 14 children admitted from outside the catchment area (3 siblings and 11 'any other applicant') and in 2016 there were 18 children admitted from outside the catchment area (7 siblings and 11 'any other applicant'); this shows that in 2015 and 2016 everyone who applied from within the catchment was admitted, leaving space for some from outside the catchment. This is confirmed by the Council's response to Fol request 14853 which stated that in 2016 all 53 applicants who did not receive a place lived outside the catchment area and of these, only 32 had placed the school as their first preference.
- 3.4 The vast majority of all children placing the Howard as their first choice school, regardless of whether they live in the catchment area, achieve a place at the school. In 2016 this equated to 88.2% of all first preference applications, up from 85% in 2012, and an average rate of 88.2% 2012 -2016 (*Analysis of response to question 6 of Fol request 14853, Table 1 in Appendix 5*). Expansion of the school cannot therefore be justified on the basis of 'unmet demand' for places at the school currently.
- 3.5 Neither does the evidence support the assertion that the school needs to expand to keep pace with increasing demand for places. In 2016 demand in terms of first preference applications (271) was lower than 2012 (294) and is broadly stable at an average of 276 first preference applications per year during the period 2012 - 2016.
- 3.6 In summary, in all the years from 2010 to date, the Howard School has been able to admit all applicants from within its catchment area, and in fact since 2012 has admitted at least 85% of all first preference applications from within or outside the catchment. The demand measured in terms of first preference applications has remained broadly stable for the five years since 2012, and there is no evidence of 'growing demand' for places at the Howard from within the local area.

The claimed popularity of the school, and school performance as a basis to justify expansion

- 3.7 The appellant asserts that the school needs to expand because it is a popular school and should be supported in order to facilitate parental choice. However, as can be seen from analysis of the Surrey County Council admissions booklet 'Information on secondary schools in Surrey 2017' (*Appendix 6*), in 2016 the Howard of Effingham had total combined preferences of 2.3 applications per place, one of the lowest applications per place ratios in the area (*Table 2, Appendix 5*). Information received from Surrey County Council on 10 April 2017 under Freedom of Information request 16358 (*Appendix 14*) shows that for 2017

admission the number of applications per place at the Howard had reduced to 2.1 applications per place, once again one of the lowest in the area.

- 3.8 Compared with the 8 other secondary schools in the local area nearest to the Howard School, the Howard is in the bottom two in terms of ‘popularity’, as measured by total applications per place, in both 2016 and 2017.
- 3.9 Of those 8 nearby schools, an analysis of total applications per place in 2016 demonstrates that Cobham Free School was the most popular with 7.6 applications per place, followed by the Catholic schools St Peter’s (3.3) and St. Andrews (3.1). George Abbot in Guildford was the most popular academy (3.0), then in Dorking the Priory and Ashcombe Schools both had 2.9 applications per place, and Rosebery School in Epsom had 2.8. By this measure, in 2016 only Therfield School in Leatherhead, with 2.1 applications per place, was less popular than the Howard with its 2.3 applications per place. This ranking was essentially unchanged in 2017: Appendix 14 shows that Cobham Free School is again the most popular with 9.8 applications per place, now followed by George Abbott (3.2), then in order St Peters (3.0), St Andrews and Ashcombe (2.9), Rosebery (2.6) and The Priory (2.2). Again, in 2017 only Therfield School in Leatherhead, with 1.8 applications per place, is less popular than the Howard with its 2.1 applications per place.
- 3.10 Comparing how many first preference applications schools accepted gives an estimate of the relative need for expansion of a school. This is set out in Table 3 of Appendix 5 for 2012-2016, using information from FoI request 14853 to Surrey County Council for local non-faith schools normally considered alternatives to the Howard.
- 3.11 In 2016 the Howard met 88.2% of all first preference applications regardless of catchment area. This was ahead of the alternative nearest school in Guildford Borough, George Abbot with 86.7% acceptances, and well ahead of Cobham Free School, which accepted 52.5% of applicants. The Ashcombe School in Dorking had a higher acceptance rate than the Howard in 2016, but in two of the five years from 2012 to 2016 it took a smaller percentage than the Howard. On these figures, George Abbott School and Cobham Free School have a stronger case for expansion on the grounds of popularity than the Howard of Effingham whose profile of applications cannot be deemed sufficiently strong to justify a case for very special circumstances.
- 3.12 When considering performance as a justification for expansion, the Howard does not stand out amongst its peer group as exceptional. Based upon Department of Education measures of Attainment in 2016 (*Appendix 7*) of the eight schools closest to The Howard, The Howard ranks bottom of the league table for ‘Added Value’ in measuring the progress that pupils make in key subjects across eight areas of the curriculum. (The ‘Progress 8 score’.) It ranks 4th of the eight schools in terms of overall Attainment 8 score, and 5th in terms of attainment of C grade in Maths, English and Science. It is still an ‘Outstanding School’ but only one of several in the area, and indeed all schools within a seven mile radius of the Howard are, according to the Department of Education website, either ‘Good’ or ‘Outstanding.’ By implication all children living in the catchment area of The Howard, and indeed those beyond, already have access to a range of good and outstanding schools and expansion of the school as a means of extending access to good schools is not justified.
- 3.13 In summary the argument that the application is justified on the basis that government policy is to support and promote access to popular and high performing schools is not justified for The Howard. Analysis of the admissions figures suggests that the Howard is at best ‘middle-ranking’ in terms of popularity, measured both by applications/place and the

number of first preference applications accepted. In addition, children in this part of Surrey already have an extensive choice of good and outstanding schools. Expansion of the Howard on the grounds of popularity with parents and high performance compared with other schools in the area does not appear to be a strong enough argument to justify the case for very special circumstances.

Future Demand Projections & Planning.

- 3.14 The appellant's assertion that expansion of the Howard is necessary to meet future forecast demand is contradicted by Surrey County Council, the statutory body responsible for provision of school places in Surrey. Surrey County Council has stated categorically that expansion of the Howard is not necessary to meet future forecast demand in this part of Surrey. In the 'Statement on Behalf of the Education Authority' (*Appendix 12*) it states:

"Overall, current forecasts would indicate that the combined demand for secondary school places in Effingham and Leatherhead planning areas can, in the long term, be satisfied adequately by the combined number of secondary school places in those areas."

In addition the Surrey Schools Organisation Plan 2015/16 – 2024/25 (*Appendix 8*), which assesses the need across the whole of Surrey, gives no support to the case for expansion. The 2016/17 – 2025/26 Schools Organisation Plan, confirms this (*Appendix 9*). Comments for the most relevant areas are summarized below.

- 3.15 For Mole Valley, from where the majority of children entering the Howard of Effingham are drawn, the report highlights the contribution the Howard of Effingham is able to make to support demand further to the north of Mole Valley. "Although there is pressure in the Leatherhead and Ashted area, this is lower than it might otherwise be as a number of residents historically apply for secondary school places in the adjacent Effingham area of Guildford borough." (*page 29 2015/16 SOP*). Expansion is however planned for the Dorking area, where greater pressure for places exists. At The Priory school, approximately 4 miles from the Howard, and bordering its catchment area, an additional 2 FE (forms of entry) are planned in 2017-2019 (*page 79 2016/17 SOP*) It seems reasonable to conclude that pressure for places from Mole Valley for access to the Howard will, as a result of this expansion, lessen considerably in the foreseeable future.
- 3.16 For Guildford Borough in which the school actually sits for planning purposes, the report highlights that at secondary school level: "*In the past there has been an adequate number of places within the borough to accommodate all students*" (*page 26 2015/16 SOP*). However, increases in primary cohorts will need to be accommodated, and an additional 80 secondary places (up to 3 FE) are planned in the Guildford Town section of the borough from 2017. There are no plans for extra places in the Effingham section of the borough.
- 3.17 The SOP acknowledges that additional housing created by the Guildford Local Plan will need expansion or new provision: "*School Commissioning is working closely with local planning officers to ensure land for additional education infrastructure is set aside alongside the strategic development sites, to ensure sufficient future provision.*" (*page 75 2016-17 SOP*). In fact in the Effingham area this would be provided by new secondary schools on two strategic sites rather than expansion of existing schools, as discussed separately below,
- 3.18 Elmbridge Borough is experiencing pressure on secondary places, and expansion is planned at Rydens Enterprise School in the north of the borough. In Cobham and Downside, adjacent

to the Howard catchment, additional places are now being provided by Cobham Free School. In the future, further expansion will be provided by an additional 3FE at Rydens Enterprise School (supported by the Howard Partnership Trust) and a further 1FE at Esher Co E High School (*page 67 2016/17 SOP*).

- 3.19 To the north east of the Howard catchment, additional provision will be needed in the Borough of Epsom & Ewell and the Epsom and Ewell High School is likely to be expanded by two forms of entry.
- 3.20. The appellant's own application document confirms that there is no demand for places in the area of the Howard of Effingham to justify expansion. SCC says in the letter from P.J.Wilkinson: *"Demographic upturn is initially most critical around Guildford town by 2019 and therefore the Basic Need provision would be prioritised to that locality."* [Application document] It is clear there are no plans for an expansion of the Howard School in the latest School Organisation Plan, and no suggestion of any demand existing to justify such an expansion
- 3.21 Surrey's schools expansion programme has responded to the increased demand that does exist beyond the Howard of Effingham catchment area by providing the additional provision in the areas where it is needed. More than 14 additional Forms of Entry (FE) - providing over 400 places, are planned to come on stream by 2017/18 at alternative schools around the catchment area of The Howard. These are summarised below, where the figures are taken from the school's website or the appendices quoted:
- The new Cobham Free School in Elmbidge (72 places in 2014/15, planned to rise to 96 in 2017/18)
 - An additional 2 Forms of Entry (60 places) at St Andrews Catholic School in Leatherhead (*Appendix 6 gives PAN of 210 compared with previous 2016 PAN of 150*),
 - 100 additional places, 20 places per year, at the popular Guildford County School (*Appendix 9*),
 - A new free school at Hoe Valley Free School, Woking (4 Forms of Entry – 120 places).
 - Two FE at Bishop David Brown and 2 FE at St John the Baptist, at Woking
 - The Priory School, Dorking plans to expand by 30 additional places in 2017 and 2018, then another 30 places from 2019.
- 3.22 In summary, there is no evidence that expansion of the Howard is necessary to meet future forecast demand, and the demand for places may actually decrease as other local schools, particularly Cobham Free School, expand over the next few years.

Parental choice

- 3.23 The appellant asserts that redevelopment and enlargement of the Howard is consistent with the need to provide parental choice within education provision. However, the variety of choice available to parents in this area of Surrey is already extensive as can be seen in Table 4 of Appendix 5. The Howard is one of four large coeducational, Academy schools serving the local area. The recently confirmed Multi-Academy Trust linking Therfield School in Leatherhead, Ashcombe School in Dorking and Warwick School in Redhill now provides alternative attractive Academy places (*Appendix 10*).

3.24 At a practical level investment in additional places at St Andrews and The Priory extends choice within the Faith sector, whilst expansion of the highly popular Guildford County School extends provision in a state mainstream comprehensive that is currently the most oversubscribed school in Surrey. The addition of the two new Free schools at Cobham and Hoe Valley brings something new to educational choice in the area. The newly formed Multi-Academy Trust partnership between Therfield School, Ashcombe School and Warwick School has also added to the number of Academy places available. The proposed expansion of the Howard only provides further places within the Academy sector, which is not justified by parental demand.

Impact of the Proposed Submission Local Plan on need for school places

- 3.25 The 'Guildford Draft Local Plan: Education Review' (*Appendix 11*) produced by School Commissioning, Surrey County Council in May 2016 considers the need for additional school places specifically within Guildford Borough over the period of the Proposed Submission Local Plan (PSLP).
- 3.26 The Education Review states that school expansions within Guildford borough have already been planned to meet the increase in demand from those extra homes in the Emerging Local Plan, which already have planning permission. At secondary level, expansions are planned in the west of the borough at St. Peter's Catholic School (one form of entry from 2017) and in the east of the borough at Guildford County School (20 places/year from 2017); no expansion is planned for the Howard of Effingham School.
- 3.27 The Education Review considers the need for additional school places arising from potential new housing in the PSLP which does not yet have planning permission. The Review states
- "Secondary provision is proposed alongside the strategic developments of Wisley former Airfield, Gosden Farm and Normandy & Flexford to serve the developments themselves and the wider areas."
 - "Locating new provision with the strategic sites at Wisley former Airfield and Gosden Hill to the east... is likely to provide the most sensible geographic locations being close to where the majority of pupils are likely to reside. ...In the east 8FE [forms of entry] could be split between Wisley former Airfield and Gosden Hill, with 4FE co-located with each site."
- 3.28 Since the Education Review considers that the secondary provision on the strategic sites in the east of the borough, at Wisley Airfield and Gosden Hill, will also provide additional choice in 'the wider areas', it is clear there will be no further requirement for additional places at the Howard School to meet the need arising from housing development in the PSLP.
- 3.29 The 295 homes included in the proposal would themselves generate the need for at least 53 extra secondary places (using the minimum estimated pupil yield 0.18 per dwelling as in the Education Review), ie 11 pupils per year based on 5 year groups. In practice it is anticipated that many of the new homes would be purchased by young families with children, so that the number of places taken up by the 295 homes is likely to be significantly higher than this. These new homes are not included in the PSLP, yet would take up more than one third of one additional form of entry at the expanded Howard School. The appellants claim that 295 houses are needed to fund a new expanded Howard School, yet the new houses themselves would take up a significant proportion of the extra places provided.

Proposed Autism Unit

- 3.30 We welcome any additional services that support young people with learning difficulties or special needs. The proposed specialist Autism Inclusion Unit will supplement the new Cullum units already in place at Hinchley Wood Secondary School and Salesian RC School Chertsey. However, we believe that the unit proposed for the Howard School could be accommodated on the existing Howard site, a solution that would be supported by the Submission Effingham Neighbourhood Plan Policy ENP-C6.
- 3.31 Appendix 13 indicates the decision to locate the centre at The Howard of Effingham was taken in in 2014 and formed part of SCC 2014-2019 Financial plan, and could not have envisaged a new school being built to accommodate the centre. No mention is made of the unit being accommodated on a new site and provision of the site is not dependent upon the Berkeley Homes application progressing. All capital for the design, build and fitting of the site is provided by The Cullum Foundation.
- 3.32 As Hinchley Wood School, Esher, demonstrates it is entirely possible to accommodate the centre via an extension to the existing building. In the case of Hinchley Wood the centre has been built as an additional floor on top of the main school building.
- 3.33 This additional centre in Effingham will deliver the final unit in an initiative to provide 4 regional centres to serve the entire county. However, some might question the distribution of a third 'Regional Hub' within 10 miles of two already established 'Regional' Cullum centres, for what is intended as the final one of four regional centres to cover the whole of Surrey.

4. SUMMARY AND CONCLUSIONS

4.1 The appellant's Statement of Case states that "Given Central Government's focus on: improving choice for school places, the expanding the role of successful Multi-Academy Trusts (MATs) in delivering high quality education, and the limited public sector funds available to upgrade all but the very worst of school buildings and the identified need for additional school places, these factors create a compelling case for the grant of planning permission." However I have provided objective evidence that:

- As Table 4 of Appendix 5 highlights, there is already a rich variety of schools in the local area to provide considerable parental choice, especially taking into account the new Free schools and the additional Multi Academy Trust, linking nearby secondary schools in Leatherhead, Dorking and Redhill. Indeed, taking into account the array of Faith, Multi Academy, Private and Free Schools available there is no justification for building a new school to enhance parental choice or to expand the role of successful Multi-Academy Trusts.
- SCC, the statutory body responsible for educational provision in Surrey, has highlighted (*Appendix 12*), the demand for additional school places lies outside the planning area for The Howard of Effingham school, and to the east of Guildford borough. The Howard also has sufficient capacity to meet local demand for secondary school places including increased local demand due to potential new housing development in the Emerging Local Plan. As Table 1 of Appendix 5 illustrates, the school meets almost 90% of all first preference applications received regardless of their geographical source, and has not failed to deliver a place to any child living within its huge catchment area, regardless of preference, in any year since SCC records began. This assertion is further supported by analysis of Surrey County Council (SCC) Schools planning documents (Appendices 3,4,6,8,9,11) and has been confirmed by SCC in their own statement to the Appeal. The Appellant has not provided any evidence to contradict this evidence to justify their assertion that there is an urgent need for additional school places to justify such substantial harm to the Green Belt.
- Neither can the expansion be supported on the basis of expanding a popular or high performing school to provide access to good and outstanding schools to all children. All nearby schools in the area of the Howard of Effingham are judged as either Good or Outstanding by Ofsted and therefore all children in the area already have access to good schools as promoted within the NPPF. Similarly, in terms of relative performance, the Howard of Effingham is one of the weakest school's in the area. As Appendix 7 highlights, The School is judged 8th out of the eight state schools serving the area, and achieves a Progress 8 ranking of 'Average' in national league tables placing it in the middle 40% of schools nationally. It does not have the accolade of delivering 'Exceptional' or even above average results that would support an extension on the basis of educational performance.
- Whilst we welcome any improvement in Special Needs provision, no objective evidence has been put forward by the appellant to support their view that this part of Surrey is in such particular need of an additional specialist autism unit and that such a unit requires the building of a 2000 pupil school and 295 houses on Green Belt land to deliver it. Indeed as the centre at Hinchley Wood demonstrates the unit can and should be accommodated on the existing site as was originally envisaged in the 2014-19 SCC plan. (*Appendix 13*). There is already access to two regional centres at Chertsey and Hinchley Wood, both within 10 miles of Effingham, in addition to the already strong SEND

provision in the more immediate area (Therfield). On the basis of the projected numbers, (20 pupils), the potential benefit cannot justify the extensive loss of public amenity and Green Belt land. Effingham Parish Council maintain that any such unit can be accommodated on the existing site, a policy already supported in the Effingham Neighbourhood Plan (Policy ENP-C6).

- 4.2 **In conclusion, for the reasons set out in this proof and summarised here, the case for very special circumstances for such substantial and detrimental development in the Green Belt due to the demand for additional secondary school places, support for expansion of good school provision, or to provide further parental choice has not been demonstrated.**