



Planning and Building Control
Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey GU2 4BB

21st May 2019

Dear Sir or Madam

Re: Planning Application 19/P/00703 408 & 410 Lower Road, Effingham

Effingham Residents Association (EFFRA) is writing to object to this planning application. The application represents gross overdevelopment of a Green Belt site and the design of the development is poor. EFFRA believes that the proposed access to Lower Road is unsafe and is contrary to the principle of the agreement that Berkeley Homes signed in relation to planning application 14/P/02109 to close the existing access to this site.

408 & 410 Lower Road are in the Green Belt and therefore any application for this site must meet the criteria for appropriate development in the Green Belt which this application patently does not. The two detached houses on this site are boarded up rather than derelict as they were lived in until very recently. If Berkeley Homes wants to replace these houses we understand that the footprint of the replacement housing should be of similar size, possibly with a small uplift. The footprint of the proposed development, including the houses, the car barns and the parking hardstandings is approx. 489 sq. m. The footprint of the two existing houses, scaled from the submitted drawings, is approximately 170 sq.m., ie. approximately 2.9 times the existing footprint. There would consequently be little green space remaining. This would be contrary to the NPPF provisions and, in EFFRA's view, the application should therefore be refused since no "exceptional circumstances" have been cited or indeed apply.

The application seeks to replace the two dwellings by five dwellings. There is no justification for an increase in the number of dwellings as Guildford now has more than a five year housing supply under the recently adopted Local Plan. Additionally, for Effingham itself

Berkeley Homes has already been allowed to build 295 dwellings on Green Belt land, constituting an increase of almost a third in the number of dwellings in the village.

The density of the dwellings on the plot at 32.4% per hectare is also unacceptable. This is much higher than the density of most housing in the village and where there is a similar density (at Middle Farm Place for example) this is because of mixed developments including apartments. There is no similar density on the frontage of a main road in the village and for Lower Road which is a main thoroughfare it is particularly unacceptable.

The design of the houses which would front the road is quite out of character with other housing on the road and has a more urban appearance. Residents are very concerned that any new development in the village should not affect its rural character.

The application makes reference to the site allocation SA2 in the Effingham Neighbourhood Plan which allowed up to 6 homes on previously developed land on Effingham Lodge Farm which included this plot of land. However, the allocation was on the condition that the remainder of Effingham Lodge Farm should be kept in agricultural use or managed open natural grassland. This condition has not been met as the applicant applied to build a school and 159 dwellings on Effingham Lodge Farm which was allowed by the Secretary of State and therefore the site allocation has been made redundant.

Whilst the application has sought to conform to the requirements of the Neighbourhood Plan in providing sufficient parking, the parking layout is impractical with two sets of three parking bays behind each other. The difficulty of parking in these would be likely to lead to some residents and visitors parking outside the development.

EFFRA is also particularly concerned about the proposed access which is off Lower Road. The current access to these properties is via the back of the plot from the former farm entrance. Berkeley Homes agreed to close this access and reinstate the kerb in its agreement with Guildford Borough Council and Surrey County Council on 23rd June 2017 as part of the application for the development of the neighbouring land. Proposing an access close to the one that will be closed in our view is against the principle of this agreement. We understand that it was agreed to close this access because of safety considerations as this part of Lower Road is particularly dangerous. A new access was agreed further to the east on a flatter section of the road which in addition would have a toucan crossing nearby.

The proposed access is in fact more unsafe than the current farm entrance as it is further west on the rise of the road and close to the entrances to the British Legion and the Catholic Church carpark. It is also almost immediately opposite Effingham Place which has a restricted sight line and which was in January the scene of a fatal accident. We understand that in the last five years of reported accidents there were eight accidents on this part of Lower Road to Rectory Lane and that there have been a number more including the fatal one in the unreported period. A major reason for council officers recommending the refusal of the proposed application at Church Street (Planning application 18/P/01924) (although it was withdrawn before consideration) was the effect of the proposed access from Lower

Road. EFFRA cannot stress strongly enough that it believes there should be no further access allowed on this stretch of road and that if any development is allowed at 408 & 410 Lower Road the access should remain at the rear of the site. As the land next to this plot is to be developed by the same developer, Berkeley Homes, there is no problem for them in building access to this plot into their detailed scheme which has as yet not in any case been submitted to Guildford Borough Council for approval.

EFFRA is very disappointed that Berkeley Homes has submitted such a poorly designed and ill-considered planning application for this plot. We would have expected the company to have previously consulted with the village, especially as there is a Liaison Group of village representatives with the company and the school formed for this purpose. The application bears all the hallmarks of a hastily produced design which instead of being an improvement to the Green Belt as is required by the NPPF, would cause damage to it and the character of the village itself. EFFRA hopes that this is not a portent of the design for the larger site next to it which Berkeley Homes has assured us will do justice to the character of the village. We trust that Guildford Borough Council will take the Association's objection and comments into account and refuse this application.

Yours faithfully

Vivien White
Chairman, EFFRA