



Planning Enquiries
Planning Department
Guildford Borough Council
Millmead House
Millmead, Guildford GU2 4BB

4th November 2019

Dear Sir or Madam

Re: 19/P/01726 Land at Church Street, Effingham

Effingham Residents Association (EFFRA) would like to register its strong objection to this planning application. EFFRA is very disappointed that Millgate Homes has resubmitted an application for this site that is little changed from the previous application 18/P/01924 withdrawn in April 2019 and which contains the same flaws. The proposed number of homes has only been reduced from 23 to 20 which we believe is an insufficient reduction and the application still contains the same design flaws. Millgate Homes has failed to listen to the concerns of residents and continues to disregard the planning constraints applying to this sensitive site at the centre of Effingham's Conservation Area, including the requirements of the NPPF, the Guildford Local Plan and the Effingham Neighbourhood Plan. EFFRA asks for its previous letter of 19th November 2018 to be taken into consideration, but also adds the points below specific to the new application.

In its letter of application and Policy Statement Millgate Homes points out that this piece of land is now in the settlement area (it is actually inset) and no longer in the Green Belt with the implicit implication that this supports the application. We would like to submit that the opposite applies. Guildford now has a five year housing supply and there is now no requirement for building additional houses. This particularly applies to Effingham where 295 houses outside the Local Plan requirement have already been allowed at Appeal by the Secretary of State. Whilst the constraints of the Green Belt no longer apply to this site, the heritage constraints of it being in a Conservation Area and affecting the setting of nationally listed buildings close to it continue to be of major importance and it is these tests we believe it has to meet and fails to do so.

Conservation Areas are Designated Heritage Assets under the NPPF and are given protection with para 200 of particular significance stating that proposals that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. We believe this application signally fails to meet this test. We consider that the Planning Statement and Built Heritage Statement significantly underestimate the damage to Designated Heritage Assets that this development would cause if allowed.

- The density of 35dph is excessively high being inappropriate for a Conservation Area (as documented in our previous letter) and would irreparably damage the Effingham Conservation Area. This piece of land is currently largely hidden by vegetation except during the autumn and winter months. Its natural green hedge boundary, the perception of green space beyond and the lack of noise from it contribute to the character of the Conservation Area and were identified as such in the Conservation Area Appraisal recently carried out, but not yet put out for consultation. Any development should retain these characteristics which a dense development cannot do.
- The height of the buildings is also excessive with unnecessarily high roofs. This will make the development visible from the Conservation Area below it and more obtrusive from The Lodge – the listed building that overlooks it. Although the roof heights have been reduced from the previous application which averaged 9.4 metres, the average height of the proposed buildings is 8.873 metres with the tallest being 9.5 metres. This can be compared with the last house approved for Effingham Conservation Area (17/P/00473) which had a height of 7.839 metres and which is a more typical height for the area.
- The application states that the style of the homes has been designed to take account of local styles, but we believe that the designs do not reference the Conservation Area unlike the allowed application 17/P/00473 which uses flint to reference it, and are unsympathetic to it particularly in their bare brick and high roofs.
- Contrary to page 20 of the Design and Access Statement, The Lodge, a grade II listed building; (erroneously called Effingham House in the Design and Access Statement) borders the site. Its setting would be adversely affected by this development. The Built Heritage Statement says that there is “no appreciation of The Lodge from within the site.” This is the wrong way to look at this. There is a view of the site from The Lodge which is the listed building concerned and whose setting would be damaged by a dense development on this adjoining piece of land. It is regrettable that the writer of the Built Heritage Statement did not ask the owners for permission to visit and assess the setting of the listed property and thus form an informed view. This land used to be part of its grounds and The Lodge is located 25 metres from its boundary and overlooks this site. A dense development would destroy any conception of its history. It is relevant that the detached houses allowed on part of its former grounds which are all on large plots were only agreed to fund the repair of this historic building.
- The setting of St Lawrence Church (a grade II* listed building) and its graveyard containing listed tombs to its southern boundary through the Council graveyard would be adversely affected by the light and noise of this development.

Inappropriately, all houses backing onto the Council graveyard are proposed to have either conservatories or ground floor extensions with horizontal roof lights.

- The setting of the listed cottages in Church Street would be damaged by being overlooked by the buildings on this dense development, particularly the proposed apartment block with vehicular access directly opposite. The document says that this is an existing access. The existing access here belongs to the owners of the electricity sub-station and is only used to access it. Millgate is proposing building a new vehicular access next to it leading to an ugly double entrance off Church Street.

The application continues to contravene the following policies in the Effingham Neighbourhood Plan:

ENP-G2: Landscape, Heritage, Character, and Design require the scale and height of new buildings to be proportionate to their surroundings which those proposed are demonstrably not. The average height of 8.873 metres of the proposed buildings is still much higher than others nearby. The buildings have a disproportionately and uncharacteristically high roof, more suitable for a third floor. Their height will be magnified by the elevation of the field at 1.6 metres above Church Street which will make them very dominant. The density of 35 dph (20 dwellings in 0.7ha) is much greater than the surrounding land and would be quite out of character with it.

ENP-G3 & G5: as this application fails to respect the historic environment and the Effingham Conservation Area and to conserve the setting of heritage assets as described above.

ENP-H1 and ENP-SA: as “up to 9” dwellings is allowed on this site not 20. Millgate’s argument that this is similar to the original assessment is faulty as the original assessment was based on a mistake in the size of the plot which accidentally doubled its actual size and the number of units it could potentially hold as documented in our letter of 19th October 2018. It also includes a new vehicular access from Church Street for the six affordable apartments contrary to policy SA1.

ENP-H2: The application does not meet the required housing mix. Para 4.13 of the Policy Statement acknowledges this and justifies it by the need for 3 and 4 bedroom houses in the Local Plan. However, the housing mix in the Neighbourhood Plan is specific to the needs of Effingham, was approved by GBC and therefore cannot be disregarded in this way.

ENP-ENV3: there is a lack of shared spaces on the proposed development and it remains very cramped.

ENP-ENV4: as street lighting and lighting from conservatories and horizontal lights to ground floor extensions included in eight properties are proposed contrary to Effingham’s status as a Dark Skies village. This would result in much harm to nocturnal wildlife, as has been shown by numerous scientific studies.

ENP-C4: as the area offered for a graveyard extension is impractically small and this field is ideal to allow a much needed extension of the neighbouring village graveyard.

ENP-R1: this application fails to provide sufficient car parking spaces, especially visitor spaces. These are particularly important in this congested part of the village where there is already dangerous overflow parking on the narrow village streets.

ENP-R2: Sustainable Movement because of the congestion it would cause, including the additional vehicular access on Church Street proposed.

The proposal is also contrary to Policy D3 in the Guildford Local Plan which requires that developments should make *“positive contribution to the local character and distinctiveness and sustain or enhance the special interest, character and significance of the borough’s heritage assets and their settings.”* We also believe that it is contrary to the general principles for new developments laid out in G1, G5 and D1 which requires it to: *“respect the local, natural or historic character of the surrounding environment paying particular regard to scale, height, layout, materials and architectural details, and landscape design to ensure that new developments integrate into the existing townscape and landscape.”*

EFFRA continues to be very concerned about the traffic and safety implications that would arise if a development of this size was allowed on this site, particularly with the large development already allowed on Lower Road under 14/P/02109 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. Perhaps recognising that the narrow access from Lower Road has serious safety implications Millgate are now proposing a separate access from Church Street for the proposed six affordable homes. In para 2.3 of the Planning Statement they say that: *“There is an existing electricity sub-station and access from Church Street near the southwest corner which will be retained. The access will be used to serve the proposed apartment building.”* This access does not in fact belong to Millgate Homes and they are instead proposing to build a vehicular access adjoining it. Such a vehicular access on Church Street which is a narrow, busy road with limited pavements would be extremely dangerous and increase traffic congestion. It was expressly ruled out in the Effingham Neighbourhood Plan as residents are opposed to it. We also believe that it is not acceptable to provide a separate access for the affordable homes and that they should be an integrated part of any development.

In summary, EFFRA believes that this resubmitted application continues to fail on many important planning points and that it would cause substantial damage to the village centre of Effingham, its Conservation Area and the setting of important nationally listed heritage assets, besides dangerously increasing traffic congestion in a part of the village where this is an issue and where St Lawrence Primary School is located. As previously stated EFFRA would not be against an appropriate development on this site that was in line with the Effingham Neighbourhood Plan of “up to 9” dwellings” and provided for an appropriately sized graveyard extension and which, most importantly, was consistent with the NPPF so that it enhanced, rather than damaged, the Conservation Area and the setting of the nearby listed buildings. As this is demonstrably not such an appropriate development, EFFRA trusts that Guildford Borough Council will rightly refuse it.

Yours sincerely

Vivien White
Chairman