



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

FAO Ms K Jethwa

18th December 2020

Dear Ms Jethwa

**Planning Reference 19/P/01726 Land at, Church Street, Effingham, KT24
Proposed erection of 17 dwellings including access, parking and landscaping (amended
plans received 08.12.2020 with changes to housing mix, appearance, burial ground
extension and visitor parking).**

Following review by the committee, I have been instructed to lodge a strong objection to the amended plans for this application. We believe that, apart from the graveyard extension, the proposed revisions are token in nature and as such do not address the comprehensive objections set out in EFFRA's letter of objection dated 31st August 2020. Those objections therefore still apply and are in summary:

1. The revised application is non-compliant with policy ENP-SA1 of the adopted Effingham Neighbourhood Plan which stated that there should be only up to 9 dwellings on this site. The insetting of the site does not affect this policy as the Neighbourhood Plan Inspector was aware of it and gave the Parish Council the choice of designating the number of dwellings for the site which would then be policy for the Plan period or waiting until the site was inset. If the Parish Council had chosen to wait for insetting he still saw the sensitive position of the site in the Conservation Area close to many heritage assets as a major constraint which would severely limit any increase in numbers. The Parish Council chose to designate the site for up to 9 dwellings which was overwhelmingly voted for by residents at Referendum and then adopted by Guildford Borough Council as policy. It therefore remains the policy for the site.

2. It is non-compliant with policy ENP-H1, as there is no requirement for extra homes above the fifty allocated in the policy, especially with planning approval having been given to Berkeley Homes for 295 new dwellings in Effingham.
3. The housing mix the applicants propose is non-compliant with ENP-H2. The applicants claim in para 7 of their Housing Mix Statement: *“The Plan states there should be a review approximately every five years to investigate whether these housing needs have changed. No review has yet taken place.”* They claim this review date refers to the date of the Housing Requirements Survey. This is a misquote as the Neighbourhood Plan actually states: *“This policy of the Neighbourhood Plan should be reviewed at approximately five-yearly intervals, to investigate whether the housing needs in the Plan Area have changed.”* The sentence refers to the date the Plan went out to referendum and was adopted i.e. 2018 and such a review is only needed by 2023. Thus the mix in the Neighbourhood Plan stands as agreed policy.
4. There is no justification for increasing the number of dwellings on the site to increase the owners’ and developers’ profit margin to what they may regard an acceptable level. The Government’s Planning Practice Guidance makes this very clear - Paragraph: 011 Reference ID: 10-011-20180724 Revision date: 24 07 2018 states: *“Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.”*
5. The development would harm the Conservation Area and the nationally listed heritage assets nearby contrary to national guidelines in the NPPF and in the ENP (policies ENP-G2, 3 & 4) and the Local Plan policies HE4 and D3. The harm was clearly set out in our previous letter and cannot be overstated.

As regards the modifications to the previous design, whilst a larger area allocated to the graveyard extension is welcomed as now complying with the provision in ENP-SA1 for a suitable graveyard extension, the result of allocating this land without reducing the number of dwellings is that the 17 dwellings have been squeezed into a tighter space. They are consequently even more out of keeping with the neighbouring properties, particularly in Effingham Place which overlooks this piece of land.

Other issues of concern in the design are:

- The heights of the dwellings in the previous design were of particular concern as they would dominate the Conservation Area because of the topography of the land. However, the reduction in the height of the houses is negligible and will make little difference to the harm done.
- The parking provision remains inadequate with only two visitor spaces, which is a direct consequence of trying to squeeze too many dwellings onto a small piece of land.
- It is also noted that there are five 6 metre exterior lights proposed which is in direct contravention of Effingham’s Dark Skies policy and is particularly insensitive on this piece of land at the heart of the Conservation Area and next to the parish graveyard which is known for its bats and owl sightings. Additionally, the two dwellings closest to the sensitive graveyard have roof lights at ground floor level which are a hazard to the nocturnal wildlife there.
- The application needs to retain the existing appearance of the tree and native species hedge along the Church Street boundary to retain the character of the

Conservation Area in line with the provisions of the NPPF, but EFFRA is concerned that the removal of the secondary line of trees and the shrubs between the large trees in the line on the boundary will change the appearance of this historic hedge and result in this hedge being insufficiently dense to shield Church Street street scene from the new development.

EFFRA remains extremely concerned about the damage this development would cause to the village and Conservation Area and trusts for these reasons that the amended application will be refused.

Yours faithfully,

Effingham Residents Association
(D.J. King, Hon. Sec.)