



Mr. J. Busher,
Senior Planning Officer,
Guildford Borough Council,
Millmead House, Millmead,
Guildford, Surrey,
GU2 4BB

13 April 2021

Dear Mr. Busher

**21/P/00428 | Howard Of Effingham School, Lower Road, Effingham, Leatherhead, KT24 5JR
Reserved matters application pursuant to outline permission 14/P/02109 approved on
21/03/2018, to consider appearance, landscaping, layout and scale in respect of the erection of 99
dwellings.**

EFFRA is concerned that this reserved matters application is not compliant in a number of areas with the outline application agreed by the Secretary of State and the parameter plans with which it had to largely accord and that there are serious problems with the design that need to be addressed. EFFRA also believes it is impossible to fully assess the detail of the application as inadequate plans, drawings and documentation have been submitted.

The design submitted varies little from the illustrative layout submitted with the original application which was widely criticised at the Inquiry. The Inspector acknowledged these criticisms and said that there was "ample flexibility for the Council to control the layout at reserved matters stage." We ask that Guildford Borough Council do this.

The concerns EFFRA has about the proposed design and layout are as follows:

Overdevelopment and perceived density - Up to 99 dwellings were approved for this site. Berkeley Homes has applied for 99 dwellings with 85% of the 80 market (or "private" as termed by Berkeley Homes) dwellings having 3 or more bedrooms and 29% having 4 or 5 bedrooms. It is a concern that the number of 2 bedroom dwellings is so low. What also is of concern is that although the design has a calculated dph of 28 in line with the parameter plan the density feels much higher and out of character with other parts of Effingham This is due to the number of three storey dwellings, many other dwellings having excessive roof height (which could of course be later used for conversion to extra rooms) and extra rooms in a number of houses designated as dressing rooms (that could easily be used as extra bedrooms) and the provision of very small gardens. In the current situation providing adequate outside space for new dwellings is essential. Many of the buildings appear more suited to a city than a rural village like Effingham.

Effect on Street Scene in Lower Road – Lower Road is an important entry road into the village and the Conservation Area. EFFRA believes that the proposed design will provide an unsuitable street scene for this important road, which will also be damaging to the Conservation Area.

- The height and urban style of the buildings proposed to front Lower Road are unsuitable for the village and will not suit its rural character. Eight urban style buildings of over 10.5 metres are proposed to front onto Lower Road. This is contrary to the Buildings Height Parameter Plan 742344 which designated no buildings of over 10.5 metres at the front of the site. Berkeley Homes says this “slight deviation” is acceptable to “create a greater variety of built form.” However, the Inspector specifically restricted tall buildings to the centre of the site so as to partially shield them from view. We believe the effect would be out of character and very damaging.
- The draft Effingham Conservation Area Appraisal identified the tree cover that lines Lower Road as seen from the Effingham Conservation Area as important to its character. Any approved design should aim to increase this cover rather than diminish it as the application appears to do. The plan in the Design & Access Statement appears to show a number of low shrubs rather than trees, but the planting layout and strategy is sketchy. A plan A315 PP01-04 is mentioned but does not appear to be available.
- The use of an access road directly behind Lower Road on the eastern part of the site with little plant cover between it and Lower Road will further urbanise Lower Road and in our view is poorly designed.
- There appear to be no pavements at the front of the west side of the site. This is the current situation in front of that part of the school, but it is important for the street scene, the safety of those living on the site and to encourage walking rather than the use of cars that there should be continuous pavement on the south side of Lower Road in front of the site.
- A drawing or mock-up of the proposals is needed to help in understanding the effect on the street scene.

Effect on KGV Playing Fields and Effingham Conservation Area – The site backs onto the woodland of the KGV Playing Fields, managed by the Effingham Village Recreation Trust, which are part of the Effingham Conservation Area. The application has not sufficiently taken this into account, to try to minimise the impact of the development on it.

- The proposed access road at the back of the site is only separated from the woodland by a narrow strip of land which will result in unnecessary noise and air pollution to the woodland. Gardens backing onto the woodland would have allowed better passage for wildlife and less pollution. The view from the woodland which is part of the Conservation Area and which at this point has well used public footpaths will also be damaged, whereas a sensitive design would avoid this. The development should be shielded by tree and plant cover from the view from the Conservation Area and footpath users.
- The KGV Playing Fields have also been prone to unauthorised travellers’ and vehicular incursions which have been costly and caused inconvenience. For this reason also roads should not be sited close to the boundary and it should be ensured that no vehicle can access the KGV Playing Fields from the site.
- The current trees and hedges on the site and in the neighbouring KGV Playing Fields are incorrectly shown on the plan on page 45 of the Design and Access Statement part 3. The existing hedges on the boundaries must be retained and protected with sufficient clearance from buildings so that they are not damaged. Similarly, houses should be located so that they do not disturb the roots of trees on the KGV Playing Fields. Houses on plots 30, 56 and

62 are proposed to be sited too close to the boundary and will cause damage to trees and hedges.

Open Space – The Land Use Parameter Plan 742339 provided that a minimum of two hectares of open space should be provided on this site and the Effingham Lodge Farm site. Berkeley Homes believes that it is providing marginally more open space on the site than in the outline scheme (page 45 Design & Access Statement), although the site still appears cramped. EFFRA said in its letter of 25th November 2019 on the Reserved Matters application for the Effingham Lodge Farm site that it believed the amount of open space on the Effingham Lodge Farm site was less than in the outline application and it believed this would need to be made up on the southern site. It requests Guildford Borough Council to ensure that two hectares are provided in total on the two sites in line with the parameter plan.

Inadequate Links to local footpath network – Berkeley Homes identified an opportunity in this development to create a link to the wider footpath network and future open space/ community land (Design & Access Statement page 29). Unfortunately, this opportunity has not been taken and the design encourages the use of cars instead of the public footpath network and is therefore not sustainable. Directly to the south of this site is a network of public footpaths leading to the KGV Playing Fields, St Lawrence Church and the village shops. There is currently an entrance to these paths from the Howard School which has been deleted in this application so that no link from the site is provided to them. Such an access should be provided, as instead to access the paths, residents would have to take a lengthy detour out of the site to join footpath 75 to the east of the site. It should be noted that the route of footpath 75 is incorrectly shown on page 47 of the Design and Access Statement part 3 and is misleading.

Effect on Designated Graveyard of All Saints Church and Little Bookham Conservation Area – the eastern boundary of this site overlooks a designated graveyard extension of All Saints Church, Little Bookham and also the Little Bookham Conservation Area. Currently, a hedge separates the designated graveyard from this site, but this has been removed in the application and dense housing has been placed very close to the boundary. This is perhaps explained by the fact that neither the Little Bookham Conservation Area nor the proximity of the designated graveyard has been included in the Constraints identified in Part 1 of the Design and Access Statement (page 28). These need to be agreed as additional constraints and a hedge and space retained between the site and the designated graveyard with no properties overlooking it. Note the incorrect routing of footpath 75 in the previous point.

Parking – Whilst the application meets the requirements for each dwelling in the Local Plan and Effingham Neighbourhood Plan, 13 visitor spaces for 99 dwellings is inadequate. Lower Road is a busy road and visitor parking needs to be contained inside the site. No mention is made of complying with SCC's standards for electric car charging, nor is location of any points on individual properties.

Dark Skies – The Effingham Neighbourhood Plan codifies Effingham's long standing Dark Skies policy under policy ENP-ENV4. This development, like the one on the northern side of the road, makes extensive use of velux windows and roof lights which cause light pollution. EFFRA asks that conditions are attached to ensure the provision of window blinds. Any exterior lighting on this development should be in accordance with this policy and kept to a minimum for safety purposes only.

Drainage – EFFRA has concerns about surface water drainage due to known issues both with extensive flooding during high rainfall events and the poorly maintained system downstream.

The Drainage Strategy Report section 1.8 notes ‘the school surface water drainage drains via infiltration systems. The site has an overflow pipe discharging via a surface water pipe believed to be leading into the dry pond that is located at Water Lane.’ - this does not provide much confidence having drainage overflow leading to a pond which no longer exists, having been filled in long ago.

Section 3.6 says the infiltration rate will be good and shallow SUDs features will be effective. However we know that in 2013/2014 the school playing fields were unusable, with spring water coming off Manor House Lane and the KGV Playing Fields to the south and water coming to the surface in the middle of the field under artesian pressure. This is consistent with the Government mapping of long term flood risk indicating an area of the site being at high risk of surface water flooding.

Bat Roost - A bat roost was detected in the 2016 survey of the School site. Hence before any work commences on the site, a full bat survey (by a licenced professional) is required, at an appropriate time of year, to determine the current status of bats on the site, and whether a licence is required from Natural England, and what mitigation measures will be necessary.

Gatekeepers Lodge – Whilst EFFRA welcomes the retention of the Gatekeepers’ Lodge in line with the Inspector’s recommendation, there is a lack of detail about it including the overdue maintenance we understand it requires.

By its own admission (Design & Access Statement Part 1 page 27), Berkeley Homes has not consulted the village community on the layout of this site since a preliminary consultation before its submission in 2014. We believe that if Berkeley Homes had consulted the village instead of submitting the criticised design it might have avoided many of the above problems. We also believe that the documentation for the application is inadequate. There are no separate site plans, some missing floor plans and no mock up views of the site, in particular of the views from Lower Road and the areas surrounding the other boundaries.

EFFRA is very disappointed that Berkeley Homes has submitted such a poor design which is below the standard that would be expected from a major developer. It requests that Guildford Borough Council ensures that the issues identified are addressed, as envisaged by the Inspector at the Inquiry, and a design appropriate to Effingham is submitted before a reserved matters application for this site is approved.

Yours sincerely

Effingham Residents Association
(DJ King, Hon. Sec.)