

26th February 2024

Chief Planning Officer
Development Management
Planning Services
Guildford Borough Council
Millmead
Guildford
GU2 4BB

Dear Sir/Madam

Warren Farm Cottages, Guildford Road, Effingham, Leatherhead KT24 5QG

Please find enclosed a full planning application submitted on behalf of our client, Effingham Golf Club, regarding proposed residential development at Warren Farm Cottages, Effingham.

The application is for demolition of existing buildings and erection of 5 two-storey replacement homes, including parking and landscaping. This application follows a previous refusal. The reasons for refusal have been fully considered in this new application.

Prior to the previous planning application, the applicant sought to undertake a pre-application consultation with the Local Planning Authority but after a significant amount of time had passed was eventually advised to withdraw it because of Council lack of available resources. The pre-application was submitted on 10 June 2022 and returned by the LPA on 20 October 2022.

The Applicants were again not able to make the most of a pre-application submission prior to submitting this current application due to the Local Planning Authorities position where pre-applications were only being accepted for Major schemes.

We and the Applicants are still keen to work with you on this application to reach an agreed positive position on a scheme that will improve the area.

The following documents are submitted as part of the application:

- This supporting letter by Union4 Planning,
- Supporting letter from Effingham Golf Club,
- Architect Plans by Mitchell Evans
- Topographic Survey
- Tree Survey and Plan by ACD,
- Building Condition Survey by ACS Property Consultants Ltd,
- Ecological Impact Assessment and Surveys by ACD,
- Transport Letter by Highway Planning Ltd
- Space Standards Response by Mitchell Evans.
- Sustainability Checklist

No application fee is payable as this submission is within 12 months of the previous decision.

It is important to note that as far as the Applicants can ascertain, the supporting letter from the Effingham Golf Club submitted to accompany the previous application was given no reference or weight in the previous planning application planning officers report.

Please ensure that the letter from the Club accompanying this current application is given full weight.

The site and surroundings

The application relates primarily to a group of cottages to the west of Effingham Golf Clubhouse and the site lies wholly within the Club's ownership. There are five in total in a terrace of buildings of differing build lines. They are situated to the east of the access track which also serves another dwelling to the west. There are several buildings and parking areas used by the golf course maintenance team to the south. There is also a further parking area north of the Cottage on the western side of the access road.

The group of cottages adjoins the Golf Club. Vehicle tracks from Warren Farm Cottages currently connect with the Golf Course. The Golf Club owns most of the land around the development site.

The cottages are two storeys in height and situated on rising ground. The general character of the wider area is one of detached large houses.

There are no short distance public views of the current cottages. There is a public footpath at some distance running diagonally to the west of the house opposite.

The road is private. It runs north to where it joins up with the A246 and is a single lane track. The A246 runs between Guildford and Leatherhead.

The site is located within Flood Zone 1 and is therefore at low risk of flooding.

The cottages were constructed around 1968 and have had ongoing residential use associated with the Golf Course. The golf club maintenance building and garage attached to the cottages are also proposed to be demolished. They are utilitarian structures, associated with the existing houses and no longer needed by the wider Golf Club operation.

The larger maintenance sheds and buildings on the other side of the lane are proposed to remain in use for golf club maintenance.

The site area is approximately 3860sqm.

Proposal/ Background

The site is currently made up of the five attached dwellings, their curtilages including gardens, outbuildings, greenkeepers building and garaging, including visitor spaces.

It is proposed that these buildings be demolished and replaced with a bespoke design of 5 two storey houses, which consolidate the built form in the area to a far greater extent than the previous application. The previous scheme was for 5 detached houses. The current scheme is for a terrace of three dwellings and two detached dwellings, pulling the build line back and away from the dwelling on the western side of the access track and opening up views of the green belt. These 5 outdated dwellings (and no longer needed golf club buildings) will, therefore, be replaced by modern standard and more energy efficient dwellings in an attractive setting that has views through and an informal setting, with significantly less hardstanding than the previous proposal.

The houses will remain accessed off the private road but importantly, only one access point is now proposed, as opposed to the five separate access points previously proposed and refused, reducing impact on the road, the street scene and the neighbouring property. Associated parking, turning and landscaping

will be provided to comply with the policy requirements. A visitor parking area is proposed opposite the new dwellings.

The Club reviewed the situation following a condition assessment of the buildings. Refurbishment of the existing houses is not economical, logical or energy efficient.

They have come to the view that not only is it unusual to provide accommodation associated with the Golf Club in the previous way, but it would also not be viable to refurbish them. The Club would be better served redeveloping them to provide modern standard energy efficient dwellings.

As indicated within the previous Change of Use application, the way the Club operates in terms of its staff has undergone significant changes since the 1968 permission, some 54 years ago. The Club does not have a need or operational requirement to house staff. As that need has dropped off, so has the usefulness and financial benefit to the Club.

Whilst there appears to have been an historic tie between the use of the buildings and the Club, the impact on the Green Belt in terms of built form has been the same, whether they are tied to the Club or not. In any case the issue of any tie is now considered to have fallen away as confirmed by the recent planning history and approval.

The existing dwellings are in very poor condition and are not energy efficient. Re-development is now considered the best way forward. The Club is seeking to make best use of this brownfield site for the benefit of the Club and ongoing maintenance of the clubhouse listed building.

Further details on the Club's reasons for this submission can be found in their supporting letter, forming part of this submission.

As noted above, prior to the previous planning application, the applicant sought to undertake, and submitted, a pre-application consultation with the Local Planning Authority but was told some months after submitting it that the Council did not have the resources to consider and respond to it. The subsequent application was therefore unable to benefit from the Council's advice. We were also again not permitted to enter into pre-application discussions with this application as the Local Planning Authority were not accepting pre-application submissions on non-major proposals. However, notwithstanding this, the proposals now address the previous reasons for refusal and positively respond to the location, according with the relevant adopted Development Plan policies, providing a marked improvement to the character and appearance of the area.

Relevant Planning History

Planning permission was granted for Cottage 5 to be converted into living accommodation in 1955 (GU/R4715). Permission was then granted in 1968 for cottages 1-5 to be used for residential use associated with the Golf Club (GU/R873/10/68/EFE).

A Certificate of Lawfulness for Existing Use was granted in 2021 in relation to Cottage 5 for continuous use as a self-contained residential unit (21/P/01234). The Certificate confirms that Cottage 5 is in lawful C3 use.

An application for the change of use of 1-5 Warren Farm Cottages from ancillary residential accommodation to golf club open market dwellings (Use Class C3) has been recently approved (21/P/01964).

The existing houses should therefore be treated as open market for the purposes of this current application.

A pre-application submission was made but the Council had insufficient resources to respond to it.

An application (23/00345) for Demolition of five two storey dwellings plus other buildings and erection of five two-storey detached dwellings, including parking and landscaping was refused on 25 May 2023.

A further pre-application submission prior to this application was not able to be made for the above reasons.

Planning Policy/Principle of Development in Green Belt

The Adopted Guildford Borough Local Plan 2019 shows the site as land within the Green Belt.

The Council adopted the Local Plan: Development Management Policies on 22 March 2023.

The latest September 2023 version of the National Planning Policy Framework (NPPF) has reiterated national protection for the Green Belt (GB) and the five purposes of including land within it. Paragraph 154 sets out the exceptions to 'inappropriate' development, listing seven types of development that are 'appropriate'.

It is considered that this proposed development benefits from exception g), which states the following will be 'appropriate', *"...limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: not have a greater impact on the openness of the Green Belt than the existing development;..."*

The proposed development complies with this exception and is acceptable in green belt terms for the following reasons:

- 1) The footprint of the proposed development, at 372.7 sq m, is significantly less than the existing footprint of existing residential and commercial buildings being removed on the site, at 440.4 sq m; a 15.4% reduction. This will, even just in itself, improve openness on the site significantly,
- 2) The proposed floor area is now only 19.8% greater, which is not considered materially significant in openness terms and is within the normal green belt parameters for 'appropriate' development. It is now significantly less than previously proposed and is more compact than both the previous refusal and existing overall footprint of existing buildings. The slight increase in floor area is offset by the reduction in the more important criterion of footprint. In overall terms, the proposed development would not have a greater impact on the openness of the Green Belt than the existing development,
- 3) Notwithstanding that the percentage increase is considered acceptable in its own right, account should also be taken of realistic permitted development extensions that could be implemented on the existing houses,
- 4) The location and siting of the proposed dwellings are now largely on the same footprint as the existing houses, overlapping the existing, creating significant openness around the dwellings, between the dwellings and on the site generally,
- 5) The gaps between proposed dwellings provide views through the development to open green belt, resulting in a lesser impact overall, with more openness and a more appropriate rural character,
- 6) The dwellings are cut into the site to ensure that the height of the proposed dwellings is acceptable in the sites context,
- 7) The proposal makes best use of the character of the area and contours of the land to ensure a comprehensive and sympathetic scheme, The nature of the surrounding landscape and self-contained position of the proposed dwellings within it also ensure no impact on the green belt in terms of openness.
- 8) The number of access points to the site has been reduced from five individual access points with parking to a single one accessing the parking area, to reduce and improve impact on rural character, openness, street scene and impact on neighbouring properties.
- 9) The road frontage to the site will have traditional rural boundary treatments, rather than the five separate access points proposed previously, increasing openness and street scene attractiveness in this respect also,

- 10) The golf club buildings to be demolished are no longer needed as there are sufficient other existing buildings on the golf club land.
- 11) The amount of hardstanding on the site has been significantly reduced since the previous application,
- 12) The hardstanding that is proposed is informal and rural in character, interspersed with landscaping in an attractive manner to reduce impact of hardstanding and parking on the openness of the green belt. It is now far more informal and less regimented than the previous proposal.

Whilst our strong view is that the proposals comply with the above exception and are, therefore, 'appropriate', if the Local Planning Authority disagrees for demonstratable and justified reasons, material considerations can be considered both individually and cumulatively to comprise very special circumstances, which can justify granting planning permission.

In this case, additional material considerations should be given material positive planning weight and both individually and cumulatively comprise very special circumstances, if required. They include:

- 1) Removing buildings that are outdated, in poor condition and in need of replacement,
- 2) Removing unsightly buildings and a site that is currently detrimental to the character and appearance of the green belt,
- 3) Providing sustainably constructed dwellings that will be exponentially more energy efficient and sustainable for the future at this site,
- 4) The supporting arguments set out in the accompanying supporting letter from the Golf Club, which should be given significant weight,
- 5) Generating income to assist the running of the Golf Club including ongoing maintenance of its listed clubhouse and associated property as well as needed improvements to facilities,
- 6) Help the Club maintain its position in and positive contribution to the community,

The above points demonstrate that the proposed development should now be considered both 'appropriate' and acceptable in principle, in green belt terms and in overall terms; and if not considered so, very special circumstances justify an approval.

Further material considerations are considered below.

Heritage

There are no heritage assets that would be affected by the proposed development, with the closest heritage assets being of sufficient distance that neither they nor their setting would be impacted upon.

Density

The proposal is to erect 5 replacement dwellings, so the density will remain the same, which is considered appropriate in this location.

Mix and Tenure

It is not normal practice for a mix to be specified on schemes which are not major developments. The dwellings are proposed as a mix of 2, 3 and 4 bedroom family dwellings, in the form of 3 attached and two detached homes. This is in keeping with the family home character of the area and the mix requested by the Local Planning Authority.

The houses meet nationally described Space Standards.

Affordable housing under Policy H2 is not required as it is below the 11-unit threshold and the site does not fall under a designated rural area. The units will therefore be sold or rented as open market dwelling-houses to support the Club as set out in the Golf Club letter.

Design and Layout

The proposed site layout consolidates the built form on the site to ensure no material spread from the general arrangement of existing buildings on the site. In fact, there is a significant receding of development away from the neighbouring property.

As referred to above, the site is well enclosed to the north and west. The golf course wraps around the site on the northern and western boundaries. However, there are also intervening agricultural fields with mature hedgerows which keep the site self-contained in short to middle distance views. Long distance views would be a cluster of buildings, associated with the farm setting in the same manner currently.

The site characteristics enable a different layout to be accommodated satisfactorily on the site suitable to a rural location, without any material harm.

There are examples in West Horsley that are similar to these proposals:

- 21/P/00247 - Proposed erection of four detached two-storey dwellings with associated garaging, access and landscaping, following the demolition of existing garage (resubmission of planning permission 20/P/00139, approved on 21/09/2020, to amend the site plan to reflect the new legal ownership) –previously approved at Silkmore Lane, West Horsley
- 20/P/01430 –Erection of 5 dwellings on Land at Britain’s Farm, West Horsley - approved.
- 19/P/02096 - Proposed erection of five two storey detached houses with garaging, associated landscaping and modification of existing access, Waterloo Farm, Ockham Rd North, West Horsley, which was approved on 25 July 2023.

It is also a wide plot, enabling suitable garden sizes and satisfactory distances between dwellings to be accommodated, enabling views through and around the development rather than a long wall as currently exists. The proposes houses would be of traditional design, with lower roofs than previously proposed, to address the Council’s previous comments regarding height. Proposed materials are appropriate to the character of the area i.e. brick, flint, elements of blackened weatherboarding and tile hanging at first floor level.

Each property has been provided with parking in an informal rural character arrangement, in accordance with the Council’s SPD parking requirements as well as the Neighbourhood Plan; Policy ENP R1. Visitor spaces exceed those required to ensure that no on-road parking will transpire.

The scheme will make use of existing mature boundary planting enhancing where necessary. Fencing around the site will be post and rail at the front to retain openness and close boarded fencing at the rear to provide privacy and enclosure for the prospective residents. The plot sizes have very generous gardens, with the majority up to 30m.

The design therefore is considered to accord with the requirements to reflect the distinct local character including landscape setting under Policy D1(4) and village character under D1(17). There are no important views of the surrounding landscape or local landmarks that will be impacted upon by the proposed development.

The dwellings meet the space standard figures set down in the Technical Housing Standards: nationally described space standards in accordance with Policy H1(3) Homes for all. Please see separate space standards document for sizes breakdown.

As set out within the National Planning Policy Guidance (NPPG) a Design and Access Statement is not required for minor developments not in a Conservation Area, but the following comments are made in relation to policy D1 Place shaping sub-sections:

- 1) The scheme responds to the landscape character through remaining within the existing residential

curtilage on the footprint (reduced over existing) of the proposed to be demolished buildings. The current dwellings form a long unbroken façade, whereas this scheme will open up gaps and views through the development. The design of the dwellings reflect the rural Surrey vernacular.

- 2) The dwellings are designed to modern building regulation standards and conforms to the Nationally Described Space Standards.
- 3) The scheme provides 5 bespoke designed dwellinghouses showing good proportions, in quality materials with additional detailing. They are a significant improvement over the utilitarian designed buildings on the site already and a further improvement over those refused in the last application.
- 4) The application will provide five new dwellings which will enhance and contribute to the distinct local character of the area having a rural appearance, replacing poor quality and poorly designed utilitarian structures.
- 5) This element is more applicable to strategic sites, but that said the group of new housing will form its own enclave within this part of the Golf Club's ownership.
- 6) The development fronts on to the road access, providing street interaction but also now protecting the character of lane appropriately as compared to the last scheme.
- 7) Again not really relevant to a minor application, but the existing boundary planting is proposed to be retained and enhanced where required.
- 8) The development responds positively to its space and does not provide any unsupervised or overlooked areas where crime could occur.
- 9) The development will be built to accessible building regulation standards.
- 10) The development incorporates elements of solar power capture to help contribute to the Government's energy agenda.
- 11) + 12) The development will respond to the smart places agenda as appropriate for an application of this scale.
- 13) To 18) These elements of the policy are not applicable to a development of this scale in a countryside location.

Consideration has also been given to the Guildford Residential Design Guide 2004 where appropriate when designing windows, porches and the roofscape.

Please also cross refer to the architects Design Statement for further evidence supporting the proposal.

Residential Amenity

All of the new houses will be provided with satisfactory gardens, which will all have good depth and are comparable to those existing and of other properties in the village. They all also have pedestrian side access for maintenance.

Overlooking will be minimised due to the location –the proposal pulls the houses away from the only existing other dwelling in the vicinity opposite the site. Consultation has taken place with the neighbouring residents and amendments have been made to the scheme to address comments made as far as possible. Substantial new planting will be provided along the new boundaries to ensure privacy between the existing and proposed new houses.

Flooding and Drainage

The site lies within Flood Zone 1 on the Flood Map for Planning. A specialist design response to address surface water flooding is therefore not required and accords with the Policy P4 requirements on flooding.

Previous Officer Reports for other minor housing applications e.g. 19/P/00635 notes that because they are not a major application there is no requirement for the scheme to provide SUDS drainage information.

The site is also below 1ha in size.

Access and Parking

The site will be accessed from the private road leading north to the A246.

Each property will have two parking spaces as a minimum which accords with both the Council's SPD parking standards as well as those of the Neighbourhood Plan.

As replacement dwellings the development should not be controversial, and no highway issues are anticipated.

The applicants have a highways consultant, Highway Planning Ltd, advising on the scheme. They have reviewed the layout and are happy that it meets all standards and requirements. A proportionate transport letter accompanies the planning application. As with the previous application (no reason for refusal on highways grounds) no material impacts would result from the development.

Trees

A tree survey has been carried out and the proposed development does not breach any of the root protection areas. The development proposal would enhance the site through good quality tree planting.

New structural planting will be proposed through the preparation of a landscaping scheme. Enhanced buffer planting of shrubs/trees will occur around the periphery of the site.

Ecology

The application is accompanied by an Ecological Impact Assessment undertaken by ACD.

The report has assessed suitable habitats and the presence/absence of protected species in the buildings and in the gardens of the houses. It has identified that there is a bat roost present on site which would require a license from Natural England to accompany works to the buildings.

In reference to Biodiversity Net Gain (BNG) the report recommends ecological enhancements to provide a suitable response. The level will be commensurate with the minor application nature of the proposal, considering the lack of protected species discovered on site.

It is noted that the Council has a policy on BNG within their emerging Local Plan Development Management Local Plan (P6/P7) which requires a 20% net gain on qualifying sites.

The Government however only require an enhancement at this point in time. Non-major residential planning applications will not be required to meet biodiversity net gain requirements until April 2024.

The scheme will provide biodiversity enhancement with the recommendations proposed and therefore meets the Local Plan and Government requirements.

Sustainability & Energy

The proposed development is to replace older housing stock, with more energy efficient buildings. These will significantly improve the carbon footprint of the site and will provide much needed housing early within the Local Plan period.

The application is accompanied by a Climate Change Energy and Sustainable Development Questionnaire. The proposed development will include air source heat pumps to the rear gardens, PV panels to south facing roof slopes and one electric charging point per house. As a minimum, thermal upgrades to the fabric will conform to the new building regs requirements that are to be adhered to from June 2022.

Conclusion

The site comprises replacement of older cottages and buildings on previously developed land at Warren Farm, Effingham.

Planning permission has been granted to enable all 5 dwellings to be open C3 residential use, one previously granted via certificate.

The replacement buildings would help provide the Golf Club with a positive revenue stream to help with their finances, rather than a drain on their resources as set out in the attached Club letter, which should be given significant weight (it appeared to be given no consideration or weight in the previous application).

The principle of development is established in this location through the policies within the adopted Local Plan. This will provide much needed and improved new family housing in the area.

The applicants have carefully considered the previous refusal (in lieu of a pre-application having not been accepted by GBC previously) and have fully addressed the previous concerns in this application.

The proposal is considered to comply with the Green Belt exceptions set down in paragraph 154 of the NPPF, but in addition there are strong material considerations in favour of granting the scheme, which are also capable of being considered very special circumstances in Green Belt policy terms, if required.

The proposed percentage reduction in footprint and slight enlargement of the replacement dwellings falls within acceptable parameters as 'appropriate development'; especially due to the significant site layout and building block changes that have taken place to ensure a more rural scheme.

The proposed development will be designed to a high standard, using appropriate materials, respecting and enhancing the character of the surrounding area.

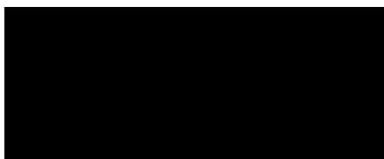
Access and parking have been designed to comply with highway standards as demonstrated on the plans. A minimum of two parking spaces per property is provided, together with some visitor parking, all in a more rural and attractive arrangement as compared to the previous application. The previous scheme proposed five access points whilst this scheme proposes one access point leading to an informal parking area, more in keeping with a rural area.

Residential amenity is protected by the sensitive layout of the proposed dwellings, enhancement of amenity through quality tree planting along the site boundaries and new planting within the site. Good-sized gardens are proposed in keeping with both the existing and other dwellings in the area. Given the distances, and orientation of dwellings shown within the layout there are also considered to be no overlooking concerns between the new houses and the existing neighbouring house.

Finally, there are no Arboriculture impacts or ecological constraints that cannot be mitigated against such that the scheme cannot come forward.

I look forward to hearing from you once this application has been validated, but if you need any further information in the meantime, please do not hesitate to contact us.

Yours faithfully



Andy Stellan
Director