
Effingham Neighbourhood Plan post submission consultation representations

Comment ID	Respondent Organisation	Comment
ENP2017/1	EDF Energy	<p>Thank you for your email dated 16 March 2017.</p> <p>and letting us know about the neighbourhood plan. Please contact our customer care specialist over the phone at 0800 096 5060 their operating hours Monday to Friday (8 am to 8 pm) and Saturday (8 am to 2 pm) so that we can process your request further.</p>
ENP2017/2	Southern Water	<p>Thank you for your email below, I confirm however that Effingham is outside of Southern Water's operational area. We therefore have no comments to make on the neighbourhood plan in this instance.</p>
ENP2017/3		<p>I fully support the idea to designate Effingham as a neighbourhood area, to protect our green spaces, especially in our small area, with 3 very close schools, with increasingly busier roads due to Effingham Common Road becoming a cut through to and from the M25, also Lower Road has become very dangerous because of all the parked cars, and volume of traffic on both these roads now. More houses built in this area will worsen this situation.</p>
ENP2017/4		<p>I have been resident in Effingham, for 25 years. I would like to strongly support the Effingham Neighbourhood Plan. It represents a sensible and balanced approach that unites community needs with concern for the heritage of the village and the environment to deliver a sustainable plan. It has been thoroughly researched and consulted upon within the village with many public events and workshops. I feel it fairly reflects the views and aspirations of the village as a whole.</p> <p>In particular I would like to support : the Environment policies particularly ENP-ENV1 -3 covering Local Green Spaces, wildlife corridors and shared spaces. I also fully support ENP-ENV4 Dark Skies which is a unique and treasured aspect of Effingham life. Effingham has a key role to play in safeguarding our open countryside and wildlife habitats.</p>

		<p>The Housing policies ENP H1 and H2 should also be supported. Effingham needs smaller more affordable housing for younger people especially and I think this plan does a very good job of identifying sustainable sites that diffuse the impact on infrastructure across the village. There is considerable and well justified concern in Effingham for the congestion on village roads and the lack of public transport. The village is often gridlocked in the mornings and late afternoons and it is difficult to see how any housing can be realistically accommodated given the constraints on the infrastructure but I think this plan does a good job of identifying smaller more sustainable sites and delivering a more than fair share of new homes in the borough. The Site Allocation policies are fully consistent with an approach that balances the needs of the community with the importance of protecting and safeguarding land that serves the purposes of the Green Belt.</p> <p>I would also like to offer special support for ENP-C3 which proposes improvement of provision for local health services. This is an area of key concern in Effingham as residents do not have easily accessible primary health care provision.</p> <p>Overall this is an excellent plan and I think the Council should fully support and adopt it.</p> <p>Thank you</p>
ENP2017/7	Effingham Residents' Association	<p>This letter represents the comments of the Effingham Resident's Association (EFFRA) on the Effingham Neighbourhood Plan under Regulation 16. Details about EFFRA are given in the Appendix including details of current or former committee members who have been involved in the production of the Neighbourhood Plan.</p> <p>EFFRA strongly supports the Neighbourhood Plan subject to certain reservations expressed below. EFFRA considers the Plan to be a comprehensive, well-researched and produced document in most areas. It offers a sound strategy for the sustainable future of Effingham over the next fifteen years, and has much general support from residents. In particular, the policies on the environment, landscape and heritage are strongly supported. If agreed and applied, (subject to the reservations below), the Plan will help conserve the character and historic, rural setting of our village in the Green Belt, whilst allowing it to move forward with sustainable and sensitive development.</p>

EFFRA's reservations relate to the housing policies in the Plan on which it has expressed concerns from early in the planning process. These concerns do not relate to differences with the Qualifying Body on the overall vision for the parish (which EFFRA shares with the Qualifying Body), but specifically to the site allocations and housing numbers. Effingham is a parish which is currently washed over by the Green Belt and the National Policy Planning Framework (NPPF) governs what development is allowed in the Green Belt. The issue on which Effingham residents are most united is support of the Green Belt. For example, in EFFRA's 2016 survey of residents, 99% of respondents (242 out of 244) agreed that every effort should be made to protect Effingham's Green Belt. EFFRA is therefore concerned that any site allocations should be clearly allowed under the rules of the NPPF. The Neighbourhood Plan's Health Checks have clarified and resolved some of EFFRA's concerns. The first Health Check in October 2015 clarified that as the Qualifying Body could not alter Green Belt boundaries, all site allocations should be consistent with Green Belt policy in the NPPF. The second Health Check of 27th October 2016 and 30th January 2017 recommended a reduction in the Housing Numbers in line with evidence of local needs. These recommendations were followed by the Qualifying Body, but the second Health Check Examiner also expressed concerns about the three allocated sites where EFFRA has similar concerns which were expressed under Regulation 14. These relate to whether these sites can be developed under the NPPF Green Belt guidelines. The Qualifying Body did not fully address these concerns following the Health Check and before submitting the Plan for Regulation 16. As a result, EFFRA does not believe that the sites ENP-SA1, ENP-SA2 and ENP-SA3 can currently be allocated for development.

ENP-SA1: Land at Church Street known as the "Church Street Field" – up to 20 houses and an extension of the burial ground are proposed on this 0.7 ha site.

The three supporting factors do not appear to be valid.

1. NPPF paragraph 89 - 'limited infilling in villages.' EFFRA believes this site is too large to count as "limited infilling" under NPPF paragraph 89 and that the proposed number of homes is too great. The extension of the burial ground would also involve a change of use.
2. 2003 GBC Local Plan, policy RE3 - 'infilling on land substantially surrounded by existing development' and 'small scale housing developments appropriate to the scale of the locality.' This land is not substantially surrounded by existing development. There is residential development on two sides, with much of it being listed houses in the Conservation Area, one side is the Parish Graveyard and the fourth side is mainly the gardens and grounds of an important Grade 2 listed house whose setting would be affected by excess development on this site. We also do not believe that the housing proposed of "up to 20" would qualify as small scale.
3. 2016 Emerging Local Plan – within the Inset Boundary. The Local Plan is still draft and we are informed it has little weight in planning terms. Therefore we believe that its use as support for this site is premature.

EFFRA is also concerned about the number of “up to 20 houses” on this site which is at the centre of the Conservation Area, close to the Grade II* St Lawrence Church and overlooked by the Grade II The Lodge. EFFRA considers that building such a large number of houses on this site would substantially adversely affect the setting of these listed buildings and the appearance of the Conservation Area. This number (up to 20) appears to be in conflict with the Plan policies ENP-G2.2:

“Developments must not harm the significance of or the setting of these assets, nor be of a scale or proximity that harms the historic balance of features within the Conservation Area.”

The sensitivity of this site in Effingham’s Conservation Area is illustrated by Effingham’s Heritage Trail (copy enclosed) which shows the cluster of listed and other historic buildings close by, many of which it overlooks. The Trail can also be found at:

https://www.guildford.gov.uk/.../Effingham-Heritage-Trail/.../EffinghamHeritageTrail-A4_version_for_web

Effingham residents value their Conservation Area and celebrate it at Heritage Open Weekend which is well attended both by residents and visitors.

ENP-SA2: Land at ‘The Barn’, The Street – up to 16 homes, including the retention of The Barn and its conversion into smaller-sized family housing.

The three supporting factors do not appear to be valid.

1. *NPPF paragraph 89 - ‘limited infilling in villages.’* EFFRA does not believe that this site qualifies as “limited infilling.” Although on one side it abuts onto residential development, the greater parts of the other two sides border onto an agricultural field and a public allotment. We also consider that the site is too large at 0.7 ha and the number “up to 16” is too great.
2. *2003 GBC Local Plan, policy RE3 - ‘infilling on land substantially surrounded by existing development’ and ‘small scale housing developments appropriate to the scale of the locality.’* The site is not “substantially surrounded by existing development’ and, for the reasons in 1 above, this does appear to apply.
3. *2016 Emerging Local Plan – within the Inset Boundary.* As for ENP-SA1 we believe this carries little weight.

ENP-SA3: Previously Developed Land at Effingham Lodge Farm - up to 6 additional homes on the Allocated Site, subject to compliance with NPPF paragraph 89. Whilst EFFRA agrees that a very small area of the site may be classified as “previously developed” under NPPF paragraph 89, it believes there are insufficient grounds for delineating the large allocated site of 1.21 ha. The footprint of the previously developed site is likely to be considerably smaller and the buildings with this status need to be properly

identified through the planning process. The second Health Check Examiner also states that “1.21 ha. is considered to be excessive for a development of only 6 dwellings.”

With regard to ENP-SA1 and ENP-SA2 EFFRA does not accept the argument (on pages 80 and 81 of the Plan document) that the recent application at Chilworth (16/P/01409) of 10 dwellings on a 0.32 ha site and the application for another site nearby of 0.23 ha implies that, had the two been contiguous, one large infill site of 0.56 ha would have been acceptable as infill. It should also be noted that both ENP-SA1 and ENP-SA2 are each 0.7 ha i.e. 25% larger than the total of the two Chilworth sites. The circumstances of the Chilworth sites and the pattern of closely built housing around them are not similar to the Church Street site at Effingham. The Church Street site is at the heart of the Conservation Area, is looked over by a listed building and itself looks over other listed buildings. The few modern buildings on its north and east sides are detached in large gardens, reflecting the character and setting of the listed building which overlooks the site.

The three sites were supported by between 61 and 66% of residents who responded to EPC’s extensive survey of residents in the parish under Regulation 14 which had a 54% household response rate. However, residents were assured in the Summary and Guide accompanying the Survey (page 6) that these sites were “compliant with the NPPF.” In view of residents’ support for the Green Belt, their responses might have been very different if this assurance had not been given. EFFRA has not objected to the allocation of the sites ENP-SA1 and ENP-SA2 in the draft Local Plan, although it believes the numbers suggested for the Church Street site are too high because of the adverse effects on nearby heritage assets and that it will be reduced in the planning process when this is taken into account. However, as EFFRA is advised that the draft Local Plan has little weight as yet, EFFRA suggests that these sites should be deleted from the Neighbourhood Plan or their inclusion should wait until the Local Plan is approved. EFFRA also does not object to development on the small part of ENP-SA3 which is legally proven to be previously developed land.

EFFRA also has concerns about Policy ENP-H1 which defines the number of houses that must be built within the Plan area, and within the Plan period. EFFRA agrees there is a requirement for a greater number of smaller houses within the Plan area, with the reasons set out within Policy ENP-H2. However, Effingham does not have an expanding population. Hence, there is not a local need to expand the total number of houses, but rather a need to increase the number of smaller houses. GBC has identified that there is a market need to expand the number of houses within the borough for which Effingham is expected to accommodate a number of those houses. However, according to the NPPF, market need does not provide justification for building on the Green Belt. EFFRA agrees that there is the possibility to build more houses within Effingham. However, there are constraints where and how many houses can be built in compliance with the NPPF and the Local Plan. This may deliver more, or less than the number of houses defined in Policy ENP-H1. EFFRA is opposed to any other sites being developed other than those allocated in the Plans in order to meet the housing numbers in policy ENP-H1.

		In summary, EFFRA strongly supports the Effingham Neighbourhood Plan but has reservations on policy ENP-H1 and objects to the inclusion of the three allocated sites, ENP-SA1, ENP-SA2 and ENP-SA3 which it believes are contrary to the guidelines in the NPPF on the Green Belt.
ENP2017/8	Effingham Parish Council	I fully support the Effingham Neighbourhood Plan and particularly commend the Environment Policies.
ENP2017/9	Millgate Developments Ltd	<p><u>Representations to Effingham Neighbourhood Plan 2016-2030 Regulation 15 Submission.</u></p> <p>Millgate SUPPORTS the proposed allocation of land at Church Street for housing development. We note that a review of some 20 potential sites has been undertaken as part of the Neighbourhood Plan preparation in consultation with residents, community groups, landowners and the Borough Council. The review assessed the contribution each site made to the Green Belt. Other factors such as traffic implications were also considered.</p> <p>The assessment for the Church Street site concluded that it is substantially surrounded by development and development can be regarded as infilling within the village. It also considered that development of the site would not impact on the open character of the Green Belt or the village, there are no major biodiversity constraints, and development of the site would not harm the character of the Conservation Area.</p> <p>We note and support the statement in the Neighbourhood Plan that residential development of the site is considered to be compliant with the NPPF taking the <u>Gravesham</u> judgement into account and applying the definition of acceptable infilling in a village set out in the Guildford Borough Local Plan 2003.</p> <p>We also note that about 2/3rds of the respondents to the Draft Neighbourhood Plan Consultation carried out in 2016 supported the Church Street allocation. This indicates a positive and strong level of community support and an appreciation that it is important the Neighbourhood Plan allocates land for housing to meet local housing needs and to supplement the needs identified in the Council's Strategic Housing Market Assessment 2015.</p> <p>The site is vacant and there are no major physical or other constraints. The site is in a single ownership. It is immediately available for development and can be brought forward quickly for housing development to meet identified local needs.</p>

		<p>Millgate therefore supports the proposed allocation ENP-SA1 for 0.7 ha of land at 'Land at Church Street known as Church Street Field'.</p>
ENP2017/10	Guildford Borough Council	<p>OVERVIEW</p> <p>As the Guildford Borough Councillor for Effingham, and also a member of Effingham Parish Council and the Effingham Neighbourhood Plan Advisory Group, I commend this Neighbourhood Plan as representing the real aspirations of the Effingham community.</p> <p>It is based on very extensive community engagement, including:</p> <ul style="list-style-type: none"> • A Housing Requirements Survey carried out across the whole civil parish, with a response rate of over 60%, which enabled us to determine the number and type of new homes needed by the local community. • Public meetings and workshops to consider the detailed policies in the Plan, including the site selection process and the allocation of housing sites • A parish-wide consultation survey as part of the formal Regulation 14 consultation, when every household in the parish was given a 'Summary and Guide' document to the draft Neighbourhood Plan, which resulted in over 50% of households returning at least one survey form and very strong support for all policies in the Plan including the housing site allocations • Close consideration of the detailed comments made by individuals and organisations during the Regulation 14 consultation <p>The Neighbourhood Plan provides for:</p> <ul style="list-style-type: none"> • New homes to meet local needs, on allocated sites which are consistent with both the 2003 Guildford Local Plan and the 2017 Proposed Submission Local Plan • Protection for our heritage, landscape and Green Belt countryside • Strong policies to protect the environment, including biodiversity and wildlife, and local green spaces. • Policies to support and improve community facilities and infrastructure, including community buildings and provision for safe walking and cycling routes.

		<p>The Neighbourhood Plan has been prepared in close collaboration with Guildford Borough Council, and aims to be consistent with both current and emerging strategic planning policy for Guildford Borough as well as national planning policy.</p> <p>I am confident that this Neighbourhood Plan has the support of Effingham residents, and provides policies to encourage sustainable development in the village and wider parish.</p> <p>Liz Hogger</p> <p>Guildford Borough Councillor for Effingham</p>
ENP2017/11	Scottish and Southern Energy Power Distr	<p>I refer to your letter regarding your Effingham Neighbourhood Plan [UNC] .</p> <p>I can provide general guidance on the provision of electricity infrastructure and the treatment of any existing infrastructure in relation to future development.</p> <p>Connections for new development from existing infrastructure can be provided subject to cost and timescale.</p> <p>Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement required would normally be apportioned between developer and DNO (Distribution Network Operator) in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum timescales in these instances would not normally exceed around 2 years and should not therefore impede delivery of any proposed housing development.</p> <p>Where overhead lines cross development sites, these will, with the exception of 400kV tower lines, normally be owned and operated by Southern Electric Power Distribution.</p> <p>In order to minimise costs, wherever possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not practicable, or where developers choose to lay out their proposals otherwise, then agreement will be needed as to how these will be dealt with, including</p>

		<p>agreeing costs and identifying suitable alternative routing for the circuits. The existing customer base should not be burdened by any costs arising from new development proposals.</p> <p>To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with Southern Electric Power Distribution prior to submission of a planning application.</p> <p>I trust this is helpful to you at this current stage and can be included in your Strategy Document, but you can contact me directly on the above telephone number should you require any further advice particularly relating to specific sites.</p>
ENP2017/13	Highways England	<p>Thank you for inviting Highways England to comment on the above document.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3 and M25J10/A3 Ockham Interchange.</p> <p>We have reviewed this document and have no comments.</p>
ENP2017/12	Elmbridge Borough Council	<p>Thank you for your recent e-mail regarding the publication of the Effingham Neighbourhood Plan. I can confirm that we have no comments to make on the content but do request that Elmbridge Borough Council is kept informed of progress with regards to the plan.</p>
ENP2017/14	Marine Management Organisation	<p>The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p>

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might

affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

ENP2017/16

This letter has been prepared by WYG on behalf of the site owner Vanda Powell. It is submitted in support of the Effingham Neighbourhood Plan 2016-2030 (Regulation 15 submission) insofar as it proposes site SA2: Land at 'The Barn', The Street, as an allocated site for 16 new residential homes (net) including conversion of The Barn to smaller-sized family housing.

The recently published (April 2017) Draft Guildford Local Plan: strategy and sites (Reg 19, 2017) shows the Barn site removed from the Green Belt. The inseting of the site has been supported throughout the process, clearly justified within the Countryside and Green Belt study and Land Availability Assessment, along with previous iterations of both the Draft Guildford Local Plan and the Draft Effingham Neighbourhood Plan. We have attached copies of our previous representation within Appendix 1. & 2.

		<p>We reaffirm our support for the sites inclusion, which will deliver much needed housing for both Effingham Village and Guildford Borough. The site is currently available for this proportionate development and is highly deliverable over the next 1-5 years, under single ownership. Furthermore the site is within a highly sustainable location, supported by local amenities and facilities. As such it represents an excellent opportunity to provide sustainable housing within Effingham village.</p> <p>Policy SA2 has been developed as part of the 4 year process of producing the Effingham Neighbourhood Plan. This process has seen the site tested through rigorous assessments and through a pre-submission consultation stage.</p> <p>The sites inclusion as an inset site for allocated housing has been informed by a sound evidence base, which includes the Green Belt & Countryside Study and the Guildford Borough Land Availability Assessment. Both evidence reports concluded that the site should be removed from the Green Belt. This has been confirmed in the Draft Guildford Local Plan: strategy and sites (Reg 19, 2017) and will help to deliver much need new homes.</p> <p>We trust that this further strengthens the sites position within the Neighbourhood Plan ensuring that the policies are aligned. It is vital that the existing proposals within the Local Plan and Neighbourhood Plan are retained and that those areas and sites which are suitable and deliverable, particularly within 1-5 years, such as The Barn, remain. I trust that this letter has assisted Guildford Borough council's assessment of Policy SA2 as submitted by Effingham Parish Council.</p>
ENP2017/17	Environment Agency	<p>Thank you for consulting us on the Effingham Neighbourhood Plan.</p> <p>We welcome the revision of policy ENP-G4 Flooding to reflect the comments we provided in our letter reference WA/2011/111091/OR-05/PO1-L01 dated 5 July 2016.</p> <p>We support the Effingham Neighbourhood Plan as submitted.</p>
ENP2017/18	Surrey Hills AONB	<p>Dear Sir/Madam,</p> <p>On behalf of the Surrey Hills AONB Board the Effingham Neighbourhood Plan nearing the end of its public consultation is welcomed.</p>

		<p>The Plan is a substantive document that should prove to be helpful in guiding the determination of planning applications. The proposed policies relating to the Surrey Hills AONB appear to be appropriately worded.</p>
ENP2017/20	The Howard Partnership Trust	<p>We are writing on behalf of The Howard Partnership Trust (THPT) on the consultation on Effingham Parish Council’s Neighbourhood Plan Regulation 15 Submission document. THPT is one of the largest and most successful Multi Academy Trusts in Surrey with two schools located in Effingham: Howard of Effingham Secondary School and St. Lawrence Primary School. We welcome this opportunity to comment on the Effingham Neighbourhood Plan; these representations include specific observations on each school and some more general comments about the Plan.</p> <p>As we highlighted in our representations to the Draft Neighbourhood Plan in 2016, Howard of Effingham School and St Lawrence Primary School have been part of the Effingham community for over 75 years and have educated generations of local young people. The schools play a vital role within the local area and intend to continue to do so for many decades to come. Our proposals for investment in Howard of Effingham School demonstrate our commitment to the community. The freeholds of the school sites are held by THPT on behalf of the Secretary of State for Education. In this role we have a responsibility and some autonomy to provide the most appropriate and effective teaching and learning facilities required to meet the needs of our current and future students.</p> <p>We are pleased that the Neighbourhood Plan continues to recognise the importance of the schools to the village through the following policies - Policy ENP-C1: Sites of Community Importance and Policy ENP-C6: Schools. These policies state an intention to support proposals that would result in improvements and enhancements to our schools. We very much welcome that sentiment.</p> <p>We set out in our previous representations that proposals for the construction of an expanded replacement building for Howard of Effingham School on the Lodge Farm site, and the construction of 295 homes to enable that development, are due to be heard at Planning Inquiry next month. The proposals would equip the school with the facilities it needs to be able to provide the best quality education, and will make a significant contribution to meeting local housing need. They would also enable the school to expand its offer to the community and would help to address the traffic congestion problems identified in the supporting text on p.71 of the Neighbourhood Plan.</p> <p>We note that Brown’s Field continues to be proposed as a Local Green Space for the village and that its use for Minis Rugby on Sundays, from September through to April, is one of two reasons cited as to why the Neighbourhood Plan justifies this proposed designation. We would like to use this opportunity to highlight that the redevelopment proposals for Brown’s Field, Lodge Farm and</p>

		<p>the existing Howard of Effingham site, make clear provision for a replacement playing pitch that could be used by the Minis Rugby on Sundays. Therefore, this use would not be lost from the village in the event of Brown’s Field being redeveloped.</p> <p>We welcome the amendment made to the Plan to remove the erroneous reference to the potential closure of St Lawrence Primary School. A partnership school within THPT and a feeder school into Howard of Effingham, St Lawrence continues to be at the centre of Effingham village with its own plans for growth and development to meet the needs of local children. Over time, this will include a programme of re-investment in the existing buildings and fabric of the school.</p> <p>We note that there is an urgent need for new homes throughout Guildford and within Effingham, but that the housing target within draft Policy ENP-H1 has been reduced from 62 to 52 new homes during the Plan period.</p> <p>As you will be aware, national planning policy requires Neighbourhood Plans to support the strategic development needs set out within an up-to-date Local Plan. National policy also requires Neighbourhood Plans to be deliverable (NPPG, Ref. ID: 41-005-21040306). We note that the Regulation 15 Neighbourhood Plan has been informed by, and drafted on the basis of, the Draft Guildford Local Plan (June 2016) and the West Surrey SHMA (2015). We would highlight that updates to both of these documents have since been published, and will need to be examined by an independent Planning Inspector.</p> <p>In due course, the Neighbourhood Plan will need to reflect the outcome of the Local Plan process and also reflect the outcome of the planning appeal decision relating to Howard of Effingham School’s proposals. For these reasons, we have not considered it appropriate for us to rehearse issues in detail within these representations.</p>
ENP2017/21	Historic England	<p>Thank you for consulting Historic England about the above Neighbourhood Plan.</p> <p>The area covered by your Neighbourhood Plan includes within its boundary of the Effingham Conservation Area and a number of important designated heritage assets including the Grade II* Church of St Lawrence, and three vaults and tombs associated with it (all Grade II); a number of other Grade II listed buildings with a particular concentration in the village conservation area; and the Mediaeval Moated Site at Greatlee Wood, a Scheduled Monument. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area. We note also the generally open character surrounding the village and consider this to be a component of</p>

		<p>the historic character of the neighbourhood plan area that should be protected to preserve the close connection between the built-up area and adjacent open countryside, and key views into and out of the conservation area; e.g., views of the parish Church of St Lawrence.</p> <p>We note the inclusion of Objective b. Conservation and Enhancement of a Sustainable Environment (including historic fabric and heritage assets) and Policy G3 that aims to preserve and enhance these heritage assets. We are pleased to see a number of other references in the draft Plan, and in the Village Design Statement, to the historic character of the village and surrounds and the requirement to protect these from inappropriate forms of development that will erode their essential characteristics. In the light of the inclusion of these policies, objectives and supporting statements we would endorse the draft neighbourhood plan in respect of the requirements of the NPPF in respect of the historic environment.</p> <p>If you have not already done so, we would recommend that you speak to the historic buildings conservation team at Guildford Council together with the staff at Surrey County Council archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of the nondesignated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes that may be of value to preserve.</p>
ENP2017/19	Mole Valley District Council	<p>Thank you for the opportunity to comment on the Draft Effingham Neighbourhood Plan.</p> <p>Effingham Village is adjacent to the eastern boundary of Guildford Borough Council, and therefore has close links with Bookham in Mole Valley District Council in terms of its landscape and infrastructure, including health, schools and road networks.</p> <p>Policy ENP-ENV2</p> <p>As with our previous letter dated 18 July 2016, MVDC would welcome the proposed policies to preserve the landscape character of the area, including the preservation of the Green Belt between Bookham and Effingham. The work that has been done on wildlife corridors and green stepping stones (as shown in Fig 7 of the draft NDP) demonstrates the close relationship between Effingham and Bookham in this regard. There may be cross-boundary issues arising on this topic and it is something that MVDC will keep under review as our Local Plan is progressed.</p> <p>MVDC also welcomes the acknowledgement in the second paragraph of page 58 that Bookham and Ranmore Common (identified in Fig. 7 and policy ENP-ENV2) are not within the NDP area. However, MVDC would question if this makes it sufficiently clear that</p>

		<p>policy ENP-ENV2 applies only within the Effingham Neighbourhood Area. ENP-ENV2 cannot impose policy requirements on land which is outside the Neighbourhood Area, since this fall outside the definition of an NDP in s38A of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011).</p> <p>ENP-C3 and ENP-C6</p> <p>The improvement of medical and school facilities within Effingham would not be objected to where they are in accordance with national guidance and the emerging Guildford Local Plan. MVDC are pleased to see that policy ENP-C6 asks for a transport plan but would also stress that the identified congestion also impacts on the road network in Bookham, and as such would request that MVDC are consulted on any development that would affect this further.</p> <p>In our letter of 18 July 2016, MVDC asked that consultations with both Guildford and Woking and the Surrey Downs Clinical Commissioning Groups be carried out to address any potential cross boundary issues regarding the provision of primary health care. If the examiner is satisfied that sufficient consultations have been carried out MVDC would have no further comments on this matter.</p> <p>Site Allocations</p> <p>It is noted that Effingham NDP has highlighted sites for development that are currently within the Green Belt. These proposals do not seek to change the Green Belt Boundary and the NDP argues that the sites are considered to be infill developments and would fit within current strategic frameworks, including the NPPF and the existing and emerging Guildford Local Plans. While MVDC would not object to the allocation and development of these sites, they would ask the examiner to consider whether this interpretation of policy is consistent with the basic conditions.</p>
ENP2017/6		<p>The attached document provides my comments on Effingham Neighbourhood Plan, showing overall support for the Plan, but objections to Policies ENP-G5, ENP-H1, ENP-C4, ENP-SA1, ENP-SA2, ENP-SA3.</p> <p>[Text of attached document:]</p> <p>Comments on Effingham Neighbourhood Plan 2016-2030, Regulation 15 Submission.</p>

I support the Effingham Neighbourhood Plan (NP) overall, and am in broad agreement with most of the policies. I have issue with a number of the policies as I believe that they do not meet the basic conditions, and hence need to be modified to ensure they are compliant.

Policy ENP-G5

I **object** to policy ENP-G5, as the term “as it appears as matter of fact on the ground” has not been properly defined.

Policy ENP-G5 is a new policy, introduced after the Regulation 14 consultations. It is unclear why a new policy was required, rather than just clarification of Policy ENP-G1.

Policy ENP-G1 defines where housing should go, allocating specific sites, and defining policies for inside and outside the Settlement Area or its replacement. This was clear, and boundaries well defined.

Policy ENP-G5 is also defining where housing should go. However, it defines policies in relation to “as it appears as matter of fact on the ground”. This is a subjective boundary, with no formal definition. I do not know whether a site would be inside or outside this area. I am concerned a developer will use this policy to justify significant developments in places other than those defined in Policy ENP-G1, and hence include areas that have not been consulted upon.

The Policy should be revised so that the area which it is referring to is clearly shown on a map, which should not show any extension of the village.

Policy ENP-H1

I **object** to policy ENP-H1, as there is no local need for 52 houses. Effingham does not have an expanding population. What it does require are more smaller houses as set out in Policy ENP-H2.

The number of 52 homes is an arbitrary political number. The justification for the policy is rubbish, and uses alternative facts. I am extremely annoyed that politicians are incapable of providing the truth. The real reason, is that the population of the UK is growing, mainly due to immigration, and people have to be housed somewhere. Everyone wants to live in the South-east, and Surrey is a highly desirable place to live. The housing market in Effingham is very dynamic, people moving in and out of the area all the time for numerous reasons. However, what is not happening is that the population of Effingham is not expanding by a high birth rate. Hence

there is no justification to build more houses for the residents of Effingham. Residents may find it difficult to find houses in Effingham (e.g. for children or downsizing), but this is not because of an expanding population, but pressure from people outside of the area.

The number of houses that can be built within the plan area, are those that can be accommodated on the four sites, and the windfall sites. Any more houses will have a detrimental impact on the Green Belt; the rural landscape and the Area of Outstanding Natural Beauty. That may be more or less than 52 houses. If that results in less than 52 houses, then Policy ENP-H1 is unacceptable.

I support houses being built on the four sites identified in the plan, but not necessarily at the densities proposed, and I support houses being built on windfall sites which are small developments, such as two houses being built on a site which had one house. I do not support an arbitrary number of houses, which incidentally has changed from 62 in the Regulation 14 submission to 52 to the Regulation 15 submission, as a minimum. I am concerned that if the density of houses on the four sites is significantly reduced in reality, the policy becomes undeliverable, and opens up the possibility of unacceptable development elsewhere.

The Policy should be deleted.

Policy ENP-C4

I **object** to policy ENP-C4 as this is inappropriate development in the Green Belt.

Creating burial sites on Green Belt land is contrary to NPPF. Extending burial sites in the middle of a village is unacceptable, as that is where houses should be built.

The Policy should be deleted.

Policy ENP-SA1

I **object** to policy ENP-SA1, as this is not limited infilling within the Green Belt, and inappropriate development in a Conservation Area.

I support this site being used for houses. However, this policy as it currently stands is unacceptable for the following reasons:

1. The site is currently within the Green Belt, and hence those policies apply. The Policy should state that it requires a future Local Plan to inset the area from the Green Belt before development can commence, which is expected to occur within the plan timescale. The Policy needs to be reworded for the Neighbourhood Plan to be compliant with the Basic Conditions, if it went to a referendum now. Or the Neighbourhood Plan must wait until the Local Plan is approved.
2. 20 houses is not limited infilling in the Green Belt, and hence is not compliant with the NPPF para 89. Five houses would be a number which could be considered limited infilling. In the context of Effingham 20 houses is a significant number of houses to be built.
3. Policy ENP-C4 should be deleted, and hence condition removed.
4. The site is on land that is of higher elevation than the land to the north (Ambledown) and east (Effingham Place). The housing density is significantly higher than the land that it overlooks, including an important Grade 2 listed building, The Lodge, all within a Conservation Area. In addition there is parish Church to the south, also a Grade 2 listed building. Very difficult to see how this density of housing could be supported, and still be compliant with policy ENP-G2. A more realistic number of houses needs to be chosen that is appropriate for the site and location.

The Policy needs to be changed to reduce the number of houses to something more appropriate for its setting within the Conservation Area, and that the site needs to be inset from the Green Belt.

Policy ENP-SA2

I **object** to policy ENP-SA2, as this is not limited infilling within the Green Belt.

I support this site being used for houses. However, this policy as it currently stands is unacceptable for the following reasons:

1. The site is currently within the Green Belt, and hence those policies apply. The Policy should state that it requires a future Local Plan to inset the area from the Green Belt before development can commence, which is expected to occur within the plan timescale. The Policy needs to be reworded for the Neighbourhood Plan to be compliant with the Basic Conditions, if it went to a referendum now. Or the Neighbourhood Plan must wait until the Local Plan is approved.
2. 16 houses is not limited infilling in the Green Belt, and hence is not compliant with the NPPF para 89. In the context of Effingham 16 houses is a significant number of houses to be built.
3. The site only has development on one side. Development of the existing building is development of Previously Developed Land, and hence is allowable. However, the current garden is surrounded by agricultural land on two sides and the Allotments

		<p>on the third side. Hence development of the garden area is an intrusion into the openness of the Green Belt, and the rural landscape.</p> <p>4. Concerned about the safety of pedestrians and horse riders and the traffic using the bridleway to access the site, if access is from the north of the site.</p> <p>The Policy needs to be changed to state that the site must be inset from the Green Belt, or otherwise only the PDL may be developed.</p> <p>Policy ENP-SA3</p> <p>I object to policy ENP-SA3, as an excessively large area has been allocated for six houses, and concern about the deliverability of the policy.</p> <p>I do not believe that this policy is deliverable within the timescale of the plan. The policy places a number of conditions on a developer, which is likely to make the site not commercially viable. However, I do support the sentiment of the conditions. Therefore the policy is either likely to face legal challenge, resulting in extra costs (in rates) to the residents, or no development at all.</p> <p>An allocation of 1.21 hectares is excessive for the development of up to six houses. At the plan density of 34.6 dwellings per hectare, and area of approximately 0.17 hectares would be more appropriate.</p> <p>I do acknowledge that part of the land is previously developed land (PDL), and hence development is permitted within the Green Belt. Although the precise area which can be classified as PDL, has yet to be determined, and the number of houses that could support.</p> <p>The Policy needs to be changed to reduce the size of the area allocated for housing (e.g. western side), and ensure that the conditions are commercially deliverable.</p>
ENP2017/5	Natural England	<p>Thank you for your consultation on the above dated 16 March 2017 which was received by Natural England on the same day.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

The Effingham Neighbourhood Plan provides a good framework for supporting the natural environment within a village setting. However, we would like to make a few additions to ensure that all aspects of Natural England's remit are covered.

Policy ENP-ENV2 paragraph 3 states that 'proposals for new developments within a wildlife corridor or stepping stone site will be resisted unless they are able to demonstrate how they will deliver appropriate net gains in biodiversity'. We suggest adding suitable methods for calculating 'net gain' which can include the Defra biodiversity offsetting metric and the environment bank biodiversity impact calculator.

Paragraph 4 of this policy states that 'Harm is likely to be caused by the introduction or enlargement of barriers'. We suggest adding additional detail to this to state that walls and fences should be designed such that they do not represent a barrier for wildlife moving around the village.

There is no mention of Best and Most Versatile (BMV) agricultural land in the Plan. We would like to see a policy or at least a paragraph somewhere that ensures future development will avoid BMV land wherever possible. Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. Development should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#).

Further Recommendations

Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on connected habitat (and therefore species ability to adapt to climate change). We recommend that the final neighbourhood plan include:

- Policies around connected green space within the parish. Open green space, wild green space and Green Infrastructure can all be used to create connected green space suitable for species adaptation to climate change. Annex A provides examples of Green Infrastructure.
- A policy stating that new development should make an appropriate provision of green space in accordance with Guildford Borough Council's standards in place at the time of the determination of the application.

- Proposals for new residential development should provide wildlife corridors that allow wildlife to move from one area of habitat to another.
- The Neighbourhood Plan should consider climate change adaptation and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

Further general advice on the consideration of protected species and other natural environmental issues is provided within Annex A.

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic[1] website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here[2].

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here[3]. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here[4].

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic[5] website and also from the LandIS website[6], which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework[7] sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance[8] sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here[9]), such as Sites of Special Scientific Interest or Ancient woodland[10]. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here[11]) or protected species. To help you do this, Natural England has produced advice here[12] to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you

should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land[13].

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forest Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states “the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible”. . Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric and the environment bank biodiversity impact calculator.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this [14]).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

1 <http://magic.defra.gov.uk/>

2 <http://www.nbn-nfbr.org.uk/nfbr.php>

3 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

4 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

5 <http://magic.defra.gov.uk/>

6 <http://www.landis.org.uk/index.cfm>

7 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

8 <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

		<p>9 http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>10 https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>11 http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>12 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>13 http://publications.naturalengland.org.uk/publication/35012</p> <p>14 http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/</p>
ENP2017/15	East Horsley Parish Council	<p>Effingham Neighbourhood Plan: Regulation 16 Consultation</p> <p>On behalf of East Horsley Parish Council, I am writing to submit two comments set out below in relation to the Effingham Neighbourhood Plan, currently in a period of Regulation 16 consultation.</p> <p>These comments relate to two locations proposed under the Local Green Space policy reference ENP-ENV1, as follows:</p> <p>1. Great Ridings Wood</p> <p>Great Ridings Wood is an area of woodland which lies partly within the parish of East Horsley and partly within the adjacent parish of Effingham. These woodlands were acquired by East Horsley parish council in 1997 with the support of public donations. They are managed by The Woodland Trust as a woodlands reserve.</p>

These woodlands lie very close to the central residential area of East Horsley and are well used by many residents for a wide range of recreational purposes.

We believe that they meet the criteria required under the NPPF to justify their designation as a Local Green Space. As the land-owner, we have support this designation.

East Horsley Parish Council supports the proposed designation of Great Ridings Wood as a local green space in the Effingham Neighbourhood Plan.

2. Effingham Common

Effingham Common is an area of common land falling entirely within the parish of Effingham. The western side of this space lies on or close to the borders of East Horsley parish and is within easy walking distance of many houses lying in the northern and central part of our village.

Effingham Common is frequently visited by many of East Horsley's residents and represents one of the few open spaces of common land within easy access by foot or by bicycle. We believe it also satisfies the criteria required under the NPPF to justify its designation as a Local Green Space.

East Horsley Parish Council supports the proposed designation of Effingham Common as a local green space in the Effingham Neighbourhood Plan.

Report run at 18 Sep 2017 12:07:18. Total records: 21.