

Consultation Statement

Appendix IV

Summary of Regulation 14 representations and changes made to the Neighbourhood Plan in response

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Consultation Statement

Appendix IV

1.

Representation and Response:
Guildford Borough Council



Effingham Neighbourhood Plan
Draft plan (regulation 14) consultation
Representation from Guildford Borough Council

15 July 2016

Introduction

This document is a representation from Guildford Borough Council (the Council) and has been submitted to Effingham Parish Council (EPC) during the pre-submission (regulation 14) consultation on the Effingham Neighbourhood Plan. This document is delivered by email to clerk2010@effinghamparishcouncil.gov.uk.

Background Information

Acronyms

NPPF - [National Planning Policy Framework](#)

NPPG - [National Planning Practice Guidance](#)

LAA - [Land Availability Assessment](#)

The basic conditions

Neighbourhood Plans must meet the [basic conditions](#). The basic conditions that neighbourhood plans must meet are (paraphrased):

- a. to have regard to national policies and advice contained in guidance issued by the Secretary of State.
- d. to contribute to the achievement of sustainable development.
- e. to be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- f. to not breach, and is otherwise compatible with, EU obligations.
- g. to meet prescribed conditions in relation to the Order (or plan) and comply with prescribed matters in connection with the proposal for the order (or neighbourhood plan).

(Please note, basic conditions b and c do not apply to neighbourhood plans so are not listed here.)

Regarding basic condition a, relevant sources of policy and guidance include the NPPF and NPPG.

Regarding basic condition d, the government's view on what constitutes sustainable development is set out in the NPPF.

Regarding basic condition e, the Council has set out which policies in the current Local Plan 2003 are considered strategic in an assessment available at
<http://www.guildford.gov.uk/neighbourhoodplanninginformation>.

General comments about the plan

The Council has previously advised that it could be beneficial to include the phrase “*subject to other policies in this plan*” in the text of policies. However, recent advice received by the Council suggests that this wording is superfluous as the plan should be read as a whole when decisions are taken. It is suggested to remove this wording, except where it is deemed necessary.

Map: Effingham Parish Context , page 9

The map is generally clear and sets out the context well.

However, it is suggested that hatching rather than solid colours should be used where layers overlap (e.g. where the Conservation Areas sit on top of the Settlement Areas) so the layer underneath can be clearly seen.

Paragraph 1, page 11

Please refer to the “Effingham Conservation Area” for clarity throughout the document.

Paragraph 2, page 11

Please refer to the “Proposed Submission Local Plan: strategy and sites 2016” when referring to the version of the new Local Plan consulted upon in June and July 2016 throughout the document.

3 a. Strategic Planning Context, page 15

Paragraph 2: The Local Plan deals with strategic matters beyond Green Belt boundaries and housing numbers. Suggest adding “amongst other things” to the last sentence.

3 c. Other relevant Matters, page 15

Suggest adding “*and high number of listed buildings*” after “*Conservation Area*”.

Thames Basin Heaths Special Protection Area (SPA), page 16

Paragraphs 1 and 2: Suggest revising for clarity as follows (or along similar lines):

The northern part of the parish lies within the 400 m to 5 km ‘Zone of Influence’ of the Ockham and Wisley Commons SPA (see Figure 2). Under the SPA Avoidance Strategy (2009 – 16) [SPAAS] net new residential development in this zone must provide or fund Suitable Alternative Natural Greenspace (SANG), which prevents increased residential pressure on the SPA by providing an alternative space for recreation. Developments of 10 homes or more must be within the catchment of the SANG that provides mitigation, while developments of 9 homes or fewer can be mitigated by

any SANG. Effingham Common is the only designated SANG in the area but, as it currently lacks a car-park, it has a catchment limited to 400 m. The availability of SANG mitigation in this area is therefore currently limited to developments of 9 homes or fewer, or larger developments within 400 m of Effingham Common.

All sites allocated for housing in this Neighbourhood Plan lie in the 5 to 7km zone, where only significantly large residential developments may require SANG mitigation, judged on a case by case basis. Since all sites have a proposed housing number less than 50, they do not require SANG mitigation and small scale development here is compliant with the SPA Avoidance Strategy.

It would be useful to state here whether Natural England have agreed that sites of fewer than 50 homes in the 5-7 km zone do not require SANG mitigation.

a. Housing Provision for local people to 2030, page 18

a. Housing Provision for local people to 2030: Please see the comments against Policy H1 later.

b. Conservation and Enhancement of a Sustainable Environment, page 18

Suggest changing final bullet point to (changes underlined): “*Historic fabric, including the Conservation Area and its setting, ensuring that designated and undesignated heritage assets most precious to the local community are conserved for future generations.*”

c. Community Services..., Page 18

The fifth bullet should read:

To mitigate ~~against~~ increasing traffic congestion.

This typographical error appears throughout the document.

Policy G1: A Spatial Plan for Effingham

The policy requires development within the AONB to conserve the AONB. It would be useful if the policy or supporting text sets out how this can be achieved, possibly by drawing on or referencing the Surrey Hills Management Plan.

The policy states: “*Development proposals located outside the Settlement Area or Inset Boundary and allocated sites will be required to demonstrate how they conserve the rural landscape of the Green Belt.*”

Green Belt policy is strategic and developments will be assessed in accordance with national policy and local strategic policy. The basic conditions require the neighbourhood plan to have regard to national policy and be in general conformity with local strategic policy. The Green Belt tests in current policy do not include conservation of the rural landscape.

To resolve this, it is suggested that this policy could omit reference to the Green Belt when seeking conservation of the landscape, potentially referencing the Council’s Landscape Character Assessment. National policy generally focuses on enhancing as well as conserving the natural environment, which should be reflected in this policy.

The policy states: “*Development proposals in close proximity to the AONB will be required to demonstrate that they will not result in the loss of important views to and from the AONB.*”

It is suggested that this should instead refer to “*important public views*” as a planning application will only consider public views. This would be consistent with the Surrey Hills AONB management plan policy LU5 which states “*Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.*”

Policy G2: Landscape, Heritage, Character and Design

The test for planning applications regarding heritage assets generally deals with “harm”. It is suggested the policy text should be changed as follows (changes underlined):

2. Reflect the historic settlement hierarchy, with St Lawrence Church as the focal point, and the nationally and locally listed (and proposed) heritage assets and their settings, identified in schedule (B), both within the Conservation Area and in the wider parish. Developments must not intrude upon harm the significance of or the setting of these assets, nor be of a scale or proximity that disturbs harms the historic balance of features within the Conservation Area.

4. Utilise materials and finishes in new buildings, walls and hard landscaping, which are consistent with the geology traditional built form and character of the locality, so for example clay, brick, tile, render and stone.

The following addition (underlined) is suggested to bullet point 7 in the supporting text: “*Sustaining the distinctive character of Effingham’s Conservation Area and contributing to its setting.*

The list of heritage assets on page 26 should include a link to the Historic England webpage for listed buildings at www.historicengland.org.uk/listing/the-list so the policy remains up-to-date.

On page 27, the following changes are suggested to the first sentence (underlined) for clarity: “*This list indicates the buildings and structures not currently in the statutory list for Effingham or on the Local List, but which are regarded in this Neighbourhood Plan as heritage assets.”*

Policy G3: Archaeology and the Historic Environment

It is suggested that the policy should be renamed “Heritage assets” to bring it in-line with national policy.

An alternative wording for policy G3 to bring it in line with national policy is suggested as follows:

G3 Historic Assets

All development proposals should conserve heritage assets (designated and non-designated) in a manner appropriate to their significance, including any contribution made by their setting.

Proposals that could have an impact on a heritage asset are required to demonstrate the asset’s importance and potential impact on its significance and how any harm has been avoided or minimised. As a minimum the relevant historic environment record should be consulted.

It is suggested that the following sentence should be added at the end of the supporting text beneath the policy: “*The local list will be reviewed to consider the potential for further inclusions in schedule B.*”

Policy G4: Flooding

To ensure that Policy G4 is fully consistent with the NPPF, it is recommended that alternative wording which more closely reflects paragraph 100 of the NPPF is used. Paragraph 100 states that “*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere*”. Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property. Paragraph 101 states that the sequential test, which aims to steer new development to areas with the lowest probability of flooding, should be used in areas at risk from any form of flooding.

Given that areas of the parish are susceptible to groundwater and surface water flooding, it is recommended that Policy G4 references the application of the sequential test. The NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Guildford Borough Council’s Strategic Flood Risk Assessment (undertaken for the whole of the borough) will provide the basis for applying this test.

The plan is also encouraged to refer to paragraphs 102-104 of the NPPF, which outline how the Exceptions Test should be applied if it is not possible for development to be located within areas at low risk of flooding.

Policy G4 currently states that “*proposals that direct development away from areas at highest risk of flooding in favour of lower risk areas will be supported, subject to other policies in this Plan*”. This wording could be interpreted as suggesting that flood risk is less significant as a development constraint than other factors. However, recent case law suggests that this should not be the case. The Inspector’s report for the June 2014 Examination in Public of the ‘Doncaster LDF Sites and Policies Development Plan Documents’ emphasises that a Council’s starting point should be to “*steer development away from areas with highest probability of flood risk*” and that “*It is only where it is ‘not possible’ to direct development to areas of lower flood risk that the Council can move on to apply the Exceptions Test. The test is not that it would be preferable to locate development in the areas of highest risk of flooding but that it should be impossible to do otherwise*”.

The Inspectors report also suggests that where it may not genuinely be possible to locate development in areas at low risk of flooding, the strategy adopted for delivering development should be revisited (rather than assuming it may be appropriate to develop in areas at greater risk of flooding).

Given the above it is recommended that the words “subject to other policies in this plan” is deleted from policy G4.

Policy H1: New Homes in Effingham and Housing Target for Effingham background paper

Regarding the housing target of 62 new homes used in Policy H1, it is recommended that it is clarified in this policy/supporting text that a target of 62 new homes is not a ceiling, and if and when this target is met, new homes will still be approved where appropriate. This would be supported by the Effingham Housing Target evidence base paper that identifies a housing need of up to 222 homes over the 15 year period of the neighbourhood plan.

It is noted that the plan relies on extant planning permissions to meet this target. The NPPF states, “*Sites with planning permission should be considered deliverable until permission expires, unless*

there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.” (footnote 11, page 12).

If relying on these sites for delivery, the examiner may expect to see some assessment of their likely implementation. 13/P/01805 will expire at the end of this year if not implemented. Also note regarding 15/P/00519 there is a history of revisions – however it is understood that the proposal has commenced and is near completion. As an example of assessment, see the section on results: completions and outstanding planning permission in the LAA (starting on page 13).

The supporting text for Policy H1 states “*Although not easy to quantify, these problems also restrict the number of homes which can be provided in the Neighbourhood area.*” However, there is no evidence presented in this section or referenced in section 10 to support this statement. The examiner of the plan may expect to see appropriate evidence provided if this statement is to be included. NPPF paragraph 32 states “*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*” so the appropriate evidence would likely need to demonstrate that the residual cumulative impacts of development would be “severe” in terms of the safe operation and/or operation of the Local Road Network.

Policy H2: Mix of Housing

It is suggested that the policy should be changed as follows (changes underlined):

“New residential development of 10 units or above is require to provide the following mix of housing, tenures, types and sizes...”

“New residential development of fewer than 10 units is required to provide the following mix of housing tenures, types and sizes...”

“New residential development should be designed wherever possible to discourage avoid future extension of small homes...”

The West Surrey Strategic Housing Market Assessment 2015 provides a breakdown of house sizes needed across Guildford, Woking and Waverley based on projections as:

- For affordable housing the need is 40% one bed, 30% two bed, 25% three bed and 5% four bed
- For market housing the need is 10% one bed, 30% two bed, 40% three bed and 20% four bed

The Effingham Neighbourhood Plan diverges from this to promote more one and two bed homes based on the findings of local needs for existing households in the parish from Effingham’s 2013 Housing Requirement Survey of households currently resident in the parish.

The supporting text states “*The 2015 ‘West Surrey Strategic Housing Market Assessment’ [SHMA] indicates a need in Guildford borough for 10% one-bedroom homes, 30% two-bedroom homes, 40% three-bedroom homes and 20% four+ bedroom homes*”. The text should clarify that this is for *market* homes.

The desire to provide more one and two bedroom homes for downsizing and an ageing population is recognised. However, the requirement for no more than 40% of two bedroom market homes to be flats needs to be considered carefully. From the House of Commons Briefing Paper *Housing an*

Ageing Population 2015 it is understood that people looking to downsize have a preference for two bedroomed properties, but there is also likely to be demand for step-free homes and these may more easily be provided in flats as opposed to houses. Bungalows could also help meet the need for step-free access.

It is noted that accessibility is addressed in more detail in Policy H4.

Paragraph 2 of the supporting text on page 35 uses the phrase “*narrow the gap in the existing market housing offer*” which is unclear. It is suggested the phrasing could be changed to “*ensure a more balanced housing stock*” or similar.

It should be noted in the supporting text that the Effingham Housing Requirements Survey was limited to those already living in the area so only identifies the needs of current residents, not future residents or non-residents.

Policy H3: Traveller Accommodation

Planning policies that deliver rural exception sites for traveller accommodation are supported by Planning Policy for Traveller Sites (PPTS, 2015). Policy H3 is supported.

A suggestion for the supporting text would be to offer some further clarity on the meaning of “*strong local connections to the civil parish of Effingham*”. PPTS states, “*A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection*”.

In the context of this policy, it is noted that the pitches referred to in this policy were approved at planning committee in June 2016, but this is subject to the signing of a S106 and therefore permission is not yet granted. Effingham Parish Council may wish to consider if and how they update this policy as the NP progresses with regards to this approval.

Policy H4: Specialist Housing

The provision of housing to meet the needs of older people or those with mobility problems is welcomed and consistent with the approach set out in the National Planning Policy Framework.

From the census data, we know that within Guildford borough the number of people aged 65 and above are expected to increase by 43% over the Local Plan period to 2033, and the West Surrey SHMA projects a significant increase in the number of people with mobility problems (58%). The West Surrey SHMA recognises the need for specialist housing including retirement housing, one and two bed roomed housing for the ‘early retired’ and step-free living.

The approach in Policy H4 is compatible with Guildford borough’s Proposed Submission Local Plan Strategy and Sites (June 2016) Policy H1: Homes for all which supports a wide choice of homes. The reasoned justification encourages a flexible housing stock to meet the needs of an ageing population including good design to ensure accommodation is adaptable and wheel-chair friendly.

Policy H5: Home Farm

Policy H5 could potentially conflict with local strategic policy and national policy on Green Belt development. It is suggested that “*and where consistent with Green Belt policy*” should be added at the end of the policy text.

It would be helpful to provide further information about what is meant by “*environmental improvements*”.

Given that this policy relates to a specific area, it is recommended that the area is identified on the proposals map.

There are some concerns about the second part of this policy; “*Proposals to replace existing dwellings within the western area of the Home Farm estate which have legally established use, including mobile homes, will be supported subject to other policies in this Plan.*”

There is an identified need in the borough for Traveller accommodation. NPPF says, “*To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*” (para 50).

This is further supported by Planning Policy for Traveller Sites (PPTS), which says, “*Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities*” (para 9).

It would not conform with national policy for mobile homes occupied by travellers (that meet the definition of a traveller for planning purposes as set out in PPTS) to be replaced by bricks and mortar housing that is not conditioned for traveller occupation. This would result in the loss of traveller accommodation, which is not supported, and which would place increasing pressure on traveller accommodation in the borough, particularly given that the Council is not currently able to demonstrate a five year supply of traveller accommodation.

We recommend that this policy is amended to ensure that it is clear that the loss of traveller accommodation (*sui generis* use) to residential (C3) use is not acceptable whilst there is an identified need for traveller accommodation in the borough. The extant Local Plan 2003 Policy H5 states the loss of specialised types of housing accommodation, including residential mobile homes, will not be permitted. This is a strategic policy, and the neighbourhood plan must be in general conformity with it in order to meet the basic conditions.

The Proposed Submission Local Plan Strategy and Sites (June 2016, Policy H1: homes for all) states, “*Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted*”. (p.31). Traveller accommodation is considered specialist housing.

Policy EN1: Local Green Spaces

Policy EN1 designates Local Green Spaces (LGS). The NPPF sets out criteria for Local Green Spaces, which include that the space must not be an extensive tract of land. The Backwell Neighbourhood plan examination found that a site of 19 hectares or more constituted an extensive tract of land and therefore could not be designated as Local Green Space. Two areas of proposed LGS are larger than this threshold (Effingham Common and Great Ridings Wood at roughly 34ha

and 23ha respectively). The Council does not object to these designations, but it seems unlikely these will be successful at examination.

The above notwithstanding, Great Ridings Wood appears to be part of a larger area of woodland. It is not clear from the supporting text why this particular area of the woodland is demonstrably special and worthy of the LGS designation. It may be helpful to set out clearly for the examiner the reason for this LGS boundary.

All of the proposed LGSs are currently within the Green Belt. Sites 1, 2, 7 and 8 fall outside the proposed inset boundary so would remain in the Green Belt should the Local Plan be taken forward in its most recent form. The NPPG (Local Green Space, para. 10) states:

"If land is already protected by Green Belt policy... then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

One potential benefit in areas where protection from development is the norm (e.g. villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community."

It is noted that the plan has provided a justification in the supporting text under the policy as to why the LGS designation is justified for Green Belt sites and it is agreed that this meets the NPPG.

Recreation Field, Middle Farm Place Local Green Space

This Council owned parcel of land falls within the proposed inset (Green Belt) boundary for the village of Effingham. Whilst there are no proposals at the current time by the Council as landowner to change the use of the land from open space, the Council would not want to prejudice any future Council decision on how to use or develop the land and wishes to keep its options open. For this reason, the Council objects to the proposal for this parcel of land to be designated as Local Green Space in the draft Neighbourhood Plan.

Policy EN2: Wildlife Corridors and Stepping Stones

The policy states that wildlife corridors “*should be 100 metres wide*” and the supporting text (page 43) states that the policy “*recommends a wildlife corridor width of 100 metres*” (our underlining). The corridors appear on the maps on page 44, 46, 47 and 48 and seem to have a fixed width. Is the plan designating these corridors (as opposed to recommending them) or is the map indicating the broad location of the corridors? To bring certainty to planning decisions, it would be helpful if the policy makes it clear whether the boundaries of the corridors are being designated as on the maps.

Policy EN3: Shared Spaces

No comments.

Policy EN4: Dark Skies

No comments.

Policy EN5: Air Quality

No comments.

Policy C1: Sites of Community Value

No comments.

Policy C2: King George V Hall and Playing Fields

This site is proposed to stay in the Green Belt in the emerging Local Plan. Facilities for recreational use are supported in this location. However, there is some potential for this policy to conflict with national policy.

Any replacement building for same use must not be materially larger (our underlining).

A new medical building on this site would not be consistent with national Green Belt policy (or the emerging local plan).

Additional surface car parking within the Green Belt would not be consistent with national policy, unless it could be classified as "*local transport infrastructure which can demonstrate a requirement for a Green belt location*". This notwithstanding, it is recommended that the policy should specify impermeable surfaces so as not to increase runoff.

It is suggested that the policy should be more specific regarding whose satisfaction any car parking management plan needs to meet.

Policy C3: Local Health Services

As with Policy C2, there is potential for conflict with national Green Belt policy. In relation to the extension of King George V Hall, it is suggested that the following text should be added: "*and where consistent with national Green Belt policy, including any extension or alteration not being disproportionate to the original building.*"

Policy C4: Community Burial Facilities

Change of use to burial space is not consistent with national Green Belt policy. It is noted that the neighbourhood plan promotes development on this site as limited infilling within a settlement, which may not be inappropriate in the Green Belt under NPPF paragraph 89, but this paragraph only applies to the construction of new buildings (including appropriate facilities for cemeteries) and not change of use to burial grounds.

The emerging Local Plan proposes to inset site SA1 from the Green Belt. Therefore the use of the site for an extended burial ground is supported by the Council. However, delivery of the burial ground may depend on the insetting of the site from the Green Belt.

Policy C5: Broadband and IT Services

It is suggested that the policy is reworded to support proposals for “*telecommunications equipment needed to improve coverage / speeds*” (rather than “*community facilities*”), otherwise this part of the policy does not really address land-use.

Policy C6: Schools

It is suggested that text should be added that identifies that two of the schools (St. Lawrence and St Teresa's) would be in areas designated as green belt, and would therefore need to comply with Green Belt policy.

Within Green Belt, as appropriate development, school sites can be subject to:

- limited infilling or complete redevelopment provided no greater impact on the openness of Green Belt
- extended or altered providing not disproportionate over size of the original building
- replaced, provided in the same use and not materially larger than the building it replaces

Should “*new developments, ...or extensions*” not meet these limitations, very special circumstances would need to be demonstrated to justify such development.

Policy C7: Community Learning and Wellbeing

Wording “*of particular interest*” reads rather oddly for a development plan policy. We suggest amending along the lines of “*in particular, strong support will be given to...*” if that is appropriate.

Policy R1: Car Parking

The first part of the policy requires all new residential developments within the neighbourhood area to provide off road parking and sets out minimum standards. The supporting text references NPPF paragraph 39. The [written ministerial statement](#) (that refers to parking standards) from the then Secretary of State for Communities and Local Government dated 25 March 2015 is also relevant and could also be referenced here for completeness.

The justification presented highlights the limited availability of public transport, high local car ownership levels, and a significant level of concern with inadequate parking provision as expressed through the residents' survey. The justification also specifies locations and times of the day where and when on-street car parking can present a particular problem. A local example of overflow parking resulting from a recent development is also cited.

Based on the examination of the Burpham Neighbourhood Plan, Guildford's only adopted neighbourhood plan to date, it is considered that the examiner may agree that this justification supports the policy for residential development as proposed.

It is not clear whether the second part of the policy, relating to the vehicles of visitors and delivery vehicles accessing new residential developments, involves a requirement to consider additional off-street car parking above and beyond that specified in the first part of the policy. It is suggested that this should be explained in the supporting text.

With respect to the third part of the policy relating to parking provision for non-residential developments, this mirrors the policy approach in the adopted Burpham Neighbourhood Plan (April

2016). Since the Burpham Neighbourhood Plan was prepared and adopted, and in parallel with the consultation on the Draft for Consultation of the Effingham Neighbourhood Plan, the Council has consulted on the Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016). In the 2016 Draft Local Plan, in Policy I3: Sustainable transport for new developments, the proposed policy with respect to the provision of vehicle parking for new developments is framed such that off-street vehicle parking be provided according to where this is necessary in order to manage the Local Road Network. In other words, local circumstances will determine the appropriate provision. As described in the Reasoned Justification in paragraph 4.6.23, a new Vehicle Parking Supplementary Planning Document (SPD) is to be prepared to provide further advice. It should be therefore be considered whether the third part of the policy should be amended to include its own table of minimum standards (which could reproduce the existing maximum standards as minimum standards, if this is considered appropriate), rather than rely on a table in the Council's SPD which is now proposed to be superseded and replaced with an SPD which does not include borough-wide maximum parking standards.

The Council supports the final part of the policy where it proposals for improved car parks in the area for the purposes as defined.

Policy R2: Sustainable movement: Cycle Routes, Footways and Pedestrian Routes

This policy is supported. However, many, if not all, of the provisions do not deal with land use issues. Potentially, this policy could be removed to the aspirational policies section of the plan.

Policy LE1: Safeguarding Village Shops and Retail Facilities

The policy and supporting text refer to the designation of the parade as a Local Centre and its Primary Shopping Area (PSA) in the 2016 Emerging Local Plan. The boundary of this PSA is the same as the boundary of the Local Centre in Effingham within the 2003 Local Plan. Given the limited weight that can be given to the emerging Local Plan at this stage, the policy would benefit from also referring to the Local Centre in the adopted Local Plan 2003 (saved policy S9).

The policy states that proposals for food takeaways within 500m of a school will not be accepted. We suggest replacing the word “*accepted*” with “*supported*”, or “*granted permission*” if a stronger position is needed, as the Council cannot refuse to accept a planning application.

The supporting text regarding the Vineries garden centre being unsuitable for other retail uses may benefit from referencing the conditional permission for the garden centre which prohibits other retail uses on the site.

Policy LE2: Effingham’s Rural Economy

It is suggested the first bullet of the policy should be amended as follows (changes underlined): “*the sustainable growth and expansion of all types of business and enterprise in Effingham parish will be supported, through conversion of existing buildings where appropriate and provision of well-designed new buildings of appropriate scale, provided they are in accordance with Green Belt and other policy requirements; and*”

It is suggested the last sentence of the policy should be amended as follows (changes underlined):
"All proposals are required to be compliant with should respect the character and appearance of the Conservation Area...".

6 g. site allocation policies, page 62

It is suggested the first bullet should be amended as follows (changes underlined): "*The site is not currently a viable employment or community asset within the parish, and is not proposed to be designated as a Local Green Space.*"

The second bullet should refer to Green Belt policy.

As written, the fourth bullet sounds like any sites within the 5km SPA zone have been excluded. Whilst it is agreed that sites within the 5km SPA zone are likely to lead to increased residential pressure on the SPA, and that impacts on the SPA should be avoided as a first step, there is an established mitigation principle in place (the provision of SANG). If development in this zone is avoided because of the current lack of strategic SANG capacity in the area, the bullet could helpfully state this. It should be noted that this situation is unlikely to be permanent and this should be factored in to the plan making process.

Policy SA1: Land at Church Street known as the ‘Church Street Field’

It is suggested that the third line in the considerations section of the site proforma should be amended as follows "*Within Conservation Area and setting of a listed building*".

Policy SA2: Land at ‘The Barn’, The Street

It is suggested that item 2 in the list within the site proforma should be amended as follows "*Design in keeping with the Conservation Area character and respecting the setting of The Barn*".

Policy SA3: Previously-developed land at Effingham Lodge Farm

No comments.

Policy SA4: Land at ‘Orchard Walls’, Beech Avenue

It is noted that the total provision from site allocations is 52 (net). It is therefore assumed that the 6 homes at SA4 is also net. The LAA 2016 identifies 5 (net) 6 (gross) for this site. The NP therefore identifies potential for 1 additional home. This is not considered to be problematic, and it would be for a planning application to consider the appropriate quantum, but it may be helpful for the plan to identify the difference and explicitly say that the figures are net, if that is the case.

Policy SA5: Land at ‘The Yard’, Guildford Road

The purpose of this site allocation is not clear given that the site has planning permission for the use and the quantum proposed in the allocation (which is acknowledged in the site allocation). Should it be added to the list of extant planning permissions?

7. Delivery Principles, page 81

The final paragraph on page 81 should be amended as follows (changes underlined) in order to meet national policy: “*If the site is in the AONB no major development can be considered for support...*”.

8. Proposals map, page 83

The inclusion of a proposals or policies map is very useful and helps the reader to understand at a glance areas of land that have been allocated or designated for certain uses or protections. Items on the proposals map should be linked to policies in the neighbourhood plan.

The current proposals map shows a number of designations that are not being made through the neighbourhood plan, for example an inset boundary, green belt sensitivity and the SPA 5km boundary.

We suggest including a different map (perhaps referred to as an overview map or context map) which sets out any relevant existing policy designations that provide context for the plan. The proposals/policies map should then be reserved for showing allocations or designations made through the neighbourhood plan, such as wildlife corridors and stepping stones, site allocations and Local Green Space.

9. Effingham Actions and Aspirations

This section presents non-land use policies that do not form part of the development plan and will not be assessed during the examination.

Action 5, page 87

The final sentence of the first paragraph of the policy states: “*The sites to be included on the Register are.*”. As Assets of Community Value nominations are determined by the Council against criteria set by legislation, this sentence could more accurately read “*The sites to be nominated for inclusion on the Register are.*”

This is a useful list of local priorities for infrastructure investment that can potentially be funded by S106 planning contributions or by the CIL neighbourhood proportion (once GBC adopts the CIL).

Village Design Statement

The Village Design Statement addresses a range of design issues, including many that may fall under permitted development. As the document forms guidance, this may be acceptable, but it should be noted that the application of the guidance in permitted development would be voluntary only.

Page 3

Typographical error where the text refers to the “*Doomsday Book*” rather than the “*Domesday Book*”

Pages 10 and 11

Typographical error: Text refers to brick “*noggin*” rather than “*nogging*”

Page 6

Suggest including “*height*” in the list in the following sentence “*new buildings adjacent to traditional ones should link through elements such as scale, form, colour and materials*”.

Page 7

The following changes are suggested (underlined):

Effingham’s buildings use a wide range of materials and finishes which may be locally specific; maintenance, improvement or extensions should respect the host; new buildings should explore the existing local palette of materials (clay tiles, bricks, flint etc.), colour and finishes or justify innovative solutions (~~flint, clay tiles, etc.~~). Simple variation in finishes creates rhythm in the facades of these dwellings. Boundary features enhance the setting of buildings. High quality, well designed, contemporary architecture can complement the diversity of settlements or may require a well-wooded setting in a low density area (as above).

It is not clear what “*may require a well-wooded setting in a low density area*” means. Suggest clarifying or deleting this text.

It is not clear whether cypresses are native species to Surrey. Can this be confirmed?

The above text could helpfully note that trees within the Conservation Area are protected.

Page 8

The following changes are suggested (underlined):

Always aim for harmony with the height and massing of existing development; retain existing density and relationship between roof scape and tree cover street scene when viewed from outside the settlement. Respect the hierarchy of the village and the design ~~code~~ of existing buildings. Promote high quality innovative sustainable design that is ecologically and environmentally sound.

Use ~~representative trees~~ & trees of local species and appropriate landscape design but retain existing trees wherever possible. Use native varieties of trees and shrubs where new planting schemes are required.

It is not clear what is meant by the comment about the relationship between roof scape and tree cover. We suggest the above amendment or clarifying what this means.

Street signage and furniture is to be kept to the minimum to reduce clutter and as required for safety purposes, in keeping with the rural character of the village.

Page 9

The following changes are suggested (underlined):

Given that these large buildings are set back from the road in their own grounds, there is often no consistent building line. As a result, this some parts of the Conservation Area has have an informal character.

Successful development proposals will demonstrate an emphasis on:

- *Retaining the traditional legible hierarchy of buildings in relation to pattern of scale, heights, spaces and volumes created by the church, larger houses and smaller dwellings at the centre.*
- *Avoiding interruption of existing views of the frontages of Listed / Locally Listed frontages visible from the street and their setting;*
- *Respect for existing vistas or overlooks and the setting of the conservation area.*

Page 10

The following changes are suggested (underlined):

Brick is seen throughout the Conservation Area and is the predominant material, but it is often rendered, roughcast or stuccoed and painted finished in shades of white or cream, for example at The Lodge (at Effingham Place on Lower Road). Generally, very early bricks are a red/orange in colour and have the natural undulations associated with texture of their handmade origins.

Similarly, treatment to walls of renders and paint should be lime based, or micro porous paint used to replace existing painted surfaces.

After brick, this form of wall finish is the most common throughout the Conservation Area, especially associated with high status buildings. It is generally painted finished in white or cream.

There are several examples of the use of clay tile hanging in the Conservation Area. This is frequently used as a damp proofing measure in older buildings and will often be on the southwest-facing wall to protect the building from the prevailing wind, which brings the rain. A group of 20th century houses on the north side of Lower Road also utilises clay tile hanging as a decorative feature as does an earlier building.

Flint is widely used particularly in older buildings as it is easily obtained from the chalk geology. A lot of flint is used in boundary walls, and was later adopted as the style for buildings associated with the Lovelace estate. It is also prominently used in the parish church. It is seen both knapped (with its flat face exposed) and un-knapped (as nodules of flint, coursed and uncoursed), and often complemented in the boundary walls by brick dressings and capping. It is important that the correct mortar is used with flint; frequently lime mortar, and that the correct method of laying is followed.

Page 11

The following changes are suggested (underlined):

There are some examples of the use of weatherboarding to agricultural buildings within the Conservation Area and it is seen to the short bell-turret on the parish church, the Home Farm buildings, comprising timber-framed barn, the relocated apple store in the grounds of Browns Field, and the Old Village Hall (now Colet's). Typically, the use of feather edge boarding is prevalent

Effingham is fortunate to have a small but significant survival of timber framing. It is limited to older farmhouse and farm buildings and is often weather boarded. Some is hidden behind later re-fronting or weatherboarding such as in timber framed barns. The survivals of exposed timber framing

include houses that exhibit timber framing in the local tradition, originally with wattle and daub infill. When these collapsed, they were filled with brick noggin. Recent work at Home Farm House to renew the 17th century wet dash-stucco revealed examples of all of these. The stucco was lime based and the subsequent painting was with lime-based paint finish. Timber framing is also found to the Barn at Home Farm, covered by weatherboarding.

In “Roofs and Roofing materials”, suggest moving the first sentence on solar panels to the end of the paragraph as it is not the most important element. Suggest moving the whole paragraph to after the paragraph on “Natural slate” for the same reason.

Plain clay tile is the most commonly used roofing material within the Conservation Area. Where seen, it is of a red/orange/brown colour and varies in its texture and camber depending upon whether the tiles are handmade or machined.

The prevalent styles are flint walling with appropriate matching lime based mortar; low walls or low hedges; open, rural-style fencing; no Automated 'compound style' gates; no-high close-boarded fences or dense, high dark hedging such as Leylandii should be avoided. An important feature is open views of not closing fields / properties off by and lack of visual barriers which promote an dispel the important sense of open-ness; the need is to preserve the light-filled and open aspect of the parish as much as possible.

Page 12

The following changes are suggested (underlined):

These should be in keeping with the house design and should retain existing styles, means of opening, materials, proportions and glazing bar patterns. New fenestrations, which will allow leakage of artificial, light at night (light pollution) and/or create excessive daylight shining / reflection in sunlight, which interrupts a vista by its presence, should be avoided.

The insertion of factory made standard windows of all kinds, whether High quality new windows in timber, aluminium, galvanised steel or plastic is almost always damaging to encouraged to retain the character and appearance of historic buildings and should be avoided. Alternative materials such as aluminium and uPVC often cannot accurately reproduce historic details and character, and are not normally acceptable for replacement window within the Conservation Area.

Page 12 states “Signage requires planning permission.” Signage generally falls under the advertising consent process, which is separate from the planning permission process. Not all signage requires consent.

Page 13

The first paragraph is unclear. Suggest rewriting for clarity.

As noted at the beginning of this section, many of these guidelines address permitted development, so would be advisory only.

Response to Regulation 14 representation from Guildford Borough Council

Guildford Borough Council gave a very detailed and helpful representation (see 1 (a)). For ease of reading, the sections of this representation are quoted in full in the **black** text below.

Effingham Parish Council's response to the comment and resultant revision to the Neighbourhood Plan is given in **blue**.

General comments about the plan

The Council has previously advised that it could be beneficial to include the phrase "*subject to other policies in this plan*" in the text of policies. However, recent advice received by the Council suggests that this wording is superfluous as the plan should be read as a whole when decisions are taken. It is suggested to remove this wording, except where it is deemed necessary.

Wording removed from all policies.

Map: Effingham Parish Context , page 9

The map is generally clear and sets out the context well. However, it is suggested that hatching rather than solid colours should be used where layers overlap (e.g. where the Conservation Areas sit on top of the Settlement Areas) so the layer underneath can be clearly seen.

Map changed to use hatching.

Paragraph 1, page 11

Please refer to the "Effingham Conservation Area" for clarity throughout the document.

Done.

Paragraph 2, page 11

Please refer to the "Proposed Submission Local Plan: strategy and sites 2016" when referring to the version of the new Local Plan consulted upon in June and July 2016 throughout the document.

Done.

3 a. Strategic Planning Context, page 15

Paragraph 2: The Local Plan deals with strategic matters beyond Green Belt boundaries and housing numbers. Suggest adding "amongst other things" to the last sentence.

Done.

3 c. Other relevant Matters, page 15

Suggest adding "*and high number of listed buildings*" after "Conservation Area".

Done.

Thames Basin Heaths Special Protection Area (SPA), page 16

Paragraphs 1 and 2: Suggest revising for clarity as follows (or along similar lines):

The northern part of the parish lies within the 400 m to 5 km 'Zone of Influence' of the Ockham and Wisley Commons SPA (see Figure 2). Under the SPA Avoidance Strategy (2009 – 16) [SPAAS] net new residential development in this zone must provide or fund Suitable Alternative Natural

Greenspace (SANG), which prevents increased residential pressure on the SPA by providing an alternative space for recreation. Developments of 10 homes or more must be within the catchment of the SANG that provides mitigation, while developments of 9 homes or fewer can be mitigated by any SANG. Effingham Common is the only designated SANG in the area but, as it currently lacks a car park, it has a catchment limited to 400 m. The availability of SANG mitigation in this area is therefore currently limited to developments of 9 homes or fewer, or larger developments within 400 m of Effingham Common.

All sites allocated for housing in this Neighbourhood Plan lie in the 5 to 7km zone, where only significantly large residential developments may require SANG mitigation, judged on a case by case basis. Since all sites have a proposed housing number less than 50, they do not require SANG mitigation and small scale development here is compliant with the SPA Avoidance Strategy.

Wording revised as suggested.

It would be useful to state here whether Natural England have agreed that sites of fewer than 50 homes in the 5-7 km zone do not require SANG mitigation.

Statement to this effect has been inserted.

b. Conservation and Enhancement of a Sustainable Environment, page 18

Suggest changing final bullet point to (changes underlined): “*Historic fabric, including the Conservation Area and its setting, ensuring that designated and undesignated heritage assets most precious to the local community are conserved for future generations.*”

Wording revised as suggested.

c. Community Services..., Page 18

The fifth bullet should read:

To mitigate against increasing traffic congestion.

This typographical error appears throughout the document.

Wording corrected here and elsewhere.

Policy G1: A Spatial Plan for Effingham

The policy requires development within the AONB to conserve the AONB. It would be useful if the policy or supporting text sets out how this can be achieved, possibly by drawing on or referencing the Surrey Hills Management Plan.

Wording included within the policy.

The policy states: “*Development proposals located outside the Settlement Area or Inset Boundary and allocated sites will be required to demonstrate how they conserve the rural landscape of the Green Belt.*”

Green Belt policy is strategic and developments will be assessed in accordance with national policy and local strategic policy. The basic conditions require the neighbourhood plan to have regard to national policy and be in general conformity with local strategic policy. The Green Belt tests in current policy do not include conservation of the rural landscape.

To resolve this, it is suggested that this policy could omit reference to the Green Belt when seeking conservation of the landscape, potentially referencing the Council’s Landscape Character Assessment. National policy generally focuses on enhancing as well as conserving the natural environment, which should be reflected in this policy.

Reference to Green Belt deleted, and wording inserted referencing the LCA. However it is not clear that development should be ‘required’ to ‘enhance’ the rural landscape, so this has not been included.

The policy states: “*Development proposals in close proximity to the AONB will be required to demonstrate that they will not result in the loss of important views to and from the AONB.*”

It is suggested that this should instead refer to “*important public views*” as a planning application will only consider public views. This would be consistent with the Surrey Hills AONB management plan policy LU5 which states “*Development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.*”

Wording revised as suggested.

Policy G2: Landscape, Heritage, Character and Design

The test for planning applications regarding heritage assets generally deals with “harm”. It is suggested the policy text should be changed as follows (changes underlined):

2. *Reflect the historic settlement hierarchy, with St Lawrence Church as the focal point, and the nationally and locally listed (and proposed) heritage assets and their settings, identified in schedule (B), both within the Conservation Area and in the wider parish. Developments must not intrude upon harm the significance of or the setting of these assets, nor be of a scale or proximity that disturbs harms the historic balance of features within the Conservation Area.*

4. *Utilise materials and finishes in new buildings, walls and hard landscaping, which are consistent with the geology traditional built form and character of the locality, so for example clay, brick, tile, render and stone.*

The following addition (underlined) is suggested to bullet point 7 in the supporting text: “*Sustaining the distinctive character of Effingham’s Conservation Area and contributing to its setting.*”

Wording revised as suggested.

The list of heritage assets on page 26 should include a link to the Historic England webpage for listed buildings at www.historicengland.org.uk/listing/the-list so the policy remains up-to-date.

Link included.

On page 27, the following changes are suggested to the first sentence (underlined) for clarity: “This list indicates the buildings and structures not currently in the statutory list for Effingham or on the Local List, but which are regarded in this Neighbourhood Plan as heritage assets.”

Wording revised as suggested.

Policy G3: Archaeology and the Historic Environment

It is suggested that the policy should be renamed “Heritage assets” to bring it in-line with national policy.

Original policy preferred for readability by residents who are not professional planners.

An alternative wording for policy G3 to bring it in line with national policy is suggested as follows:

G3 Historic Assets

All development proposals should conserve heritage assets (designated and non-designated) in a manner appropriate to their significance, including any contribution made by their setting.

Proposals that could have an impact on a heritage asset are required to demonstrate the asset’s importance and potential impact on its significance and how any harm has been avoided or minimised. As a minimum the relevant historic environment record should be consulted.

The wording was modified to include the suggested wording, but explicit reference archeological remains was retained to meet the request from Historic England in their comment on the Strategic Environmental Assessment Screening report, 6 November 2015.

It is suggested that the following sentence should be added at the end of the supporting text beneath the policy: "*The local list will be reviewed to consider the potential for further inclusions in schedule B.*"

This is dealt with in the supporting text of G2 (B)

Policy G4: Flooding

To ensure that Policy G4 is fully consistent with the NPPF, it is recommended that alternative wording which more closely reflects paragraph 100 of the NPPF is used. Paragraph 100 states that "*inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere*". Local Plans should apply a sequential, risk based approach to the location of development to avoid where possible flood risk to people and property. Paragraph 101 states that the sequential test, which aims to steer new development to areas with the lowest probability of flooding, should be used in areas at risk from any form of flooding.

Given that areas of the parish are susceptible to groundwater and surface water flooding, it is recommended that Policy G4 references the application of the sequential test. The NPPF states that development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Guildford Borough Council's Strategic Flood Risk Assessment (undertaken for the whole of the borough) will provide the basis for applying this test.

New paragraph concerning sequential test inserted into the policy wording

The plan is also encouraged to refer to paragraphs 102-104 of the NPPF, which outline how the Exceptions Test should be applied if it is not possible for development to be located within areas at low risk of flooding.

Wording of supporting text reviewed and modified.

Policy G4 currently states that "*proposals that direct development away from areas at highest risk of flooding in favour of lower risk areas will be supported, subject to other policies in this Plan*". This wording could be interpreted as suggesting that flood risk is less significant as a development constraint than other factors. However, recent case law suggests that this should not be the case. The Inspector's report for the June 2014 Examination in Public of the 'Doncaster LDF Sites and Policies Development Plan Documents' emphasises that a Council's starting point should be to "*steer development away from areas with highest probability of flood risk*" and that "*It is only where it is 'not possible' to direct development to areas of lower flood risk that the Council can move on to apply the Exceptions Test. The test is not that it would be preferable to locate development in the areas of highest risk of flooding but that it should be impossible to do otherwise*".

The Inspectors report also suggests that where it may not genuinely be possible to locate development in areas at low risk of flooding, the strategy adopted for delivering development should be revisited (rather than assuming it may be appropriate to develop in areas at greater risk of flooding).

Given the above it is recommended that the words "subject to other policies in this plan" is deleted from policy G4.

Wording revised as suggested.

Policy H1: New Homes in Effingham and Housing Target for Effingham background paper

Regarding the housing target of 62 new homes used in Policy H1, it is recommended that it is clarified in this policy/supporting text that a target of 62 new homes is not a ceiling, and if and when this target is met, new homes will still be approved where appropriate. This would be supported by the Effingham Housing Target evidence base paper that identifies a housing need of up to 222 homes over the 15 year period of the neighbourhood plan.

The policy wording and supporting text has been revised following the 2017 Health Check, and to clarify that the revised target of 52 homes to meet local housing need is a minimum. The Effingham Housing Target evidence base paper has also been revised to emphasise local housing need, as recommended by the Health Check report.

It is noted that the plan relies on extant planning permissions to meet this target. The NPPF states, “*Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.*” (footnote 11, page 12).

If relying on these sites for delivery, the examiner may expect to see some assessment of their likely implementation. 13/P/01805 will expire at the end of this year if not implemented. Also note regarding 15/P/00519 there is a history of revisions – however it is understood that the proposal has commenced and is near completion. As an example of assessment, see the section on results: completions and outstanding planning permission in the LAA (starting on page 13).

All the sites with extant planning permission have been reviewed and only those likely to be delivered are now included.

The supporting text for Policy H1 states “*Although not easy to quantify, these problems also restrict the number of homes which can be provided in the Neighbourhood area.*” However, there is no evidence presented in this section or referenced in section 10 to support this statement. The examiner of the plan may expect to see appropriate evidence provided if this statement is to be included. NPPF paragraph 32 states “*development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*” so the appropriate evidence would likely need to demonstrate that the residual cumulative impacts of development would be “severe” in terms of the safe operation and/or operation of the Local Road Network.

The supporting text of this policy has been significantly revised as recommended by the 2017 Health Check Report and this wording is no longer included.

Policy H2: Mix of Housing

It is suggested that the policy should be changed as follows (changes underlined):

“*New residential development of 10 units or above is require to provide the following mix of housing, tenures, types and sizes...”.*

“*New residential development of fewer than 10 units is required to provide the following mix of housing tenures, types and sizes...”.*

“*New residential development should be designed wherever possible to discourage avoid future extension of small homes...”.*

Wording revised as suggested.

The West Surrey Strategic Housing Market Assessment 2015 provides a breakdown of house sizes needed across Guildford, Woking and Waverley based on projections as:

- For affordable housing the need is 40% one bed, 30% two bed, 25% three bed and 5% four bed
- For market housing the need is 10% one bed, 30% two bed, 40% three bed and 20% four bed

The Effingham Neighbourhood Plan diverges from this to promote more one and two bed homes based on the findings of local needs for existing households in the parish from Effingham's 2013 Housing Requirement Survey of households currently resident in the parish.

The supporting text states "The 2015 'West Surrey Strategic Housing Market Assessment' [SHMA] indicates a need in Guildford borough for 10% one-bedroom homes, 30% two-bedroom homes, 40% three-bedroom homes and 20% four+ bedroom homes". The text should clarify that this is for market homes.

[Wording revised as suggested.](#)

The desire to provide more one and two bedroom homes for downsizing and an ageing population is recognised. However, the requirement for no more than 40% of two bedroom market homes to be flats needs to be considered carefully. From the House of Commons Briefing Paper Housing an Ageing Population 2015 it is understood that people looking to downsize have a preference for two bedroomed properties, but there is also likely to be demand for step-free homes and these may more easily be provided in flats as opposed to houses. Bungalows could also help meet the need for step-free access.

It is noted that accessibility is addressed in more detail in Policy H4.

[More detail is given in the supporting text about the limited requirement for flats. \(Note that policy H4 is now policy H3 in the submission Neighbourhood Plan\).](#)

Paragraph 2 of the supporting text on page 35 uses the phrase "narrow the gap in the existing market housing offer" which is unclear. It is suggested the phrasing could be changed to "ensure a more balanced housing stock" or similar.

[Wording revised as suggested.](#)

It should be noted in the supporting text that the Effingham Housing Requirements Survey was limited to those already living in the area so only identifies the needs of current residents, not future residents or non-residents.

[Wording revised as suggested.](#)

Policy H3: Traveller Accommodation

Planning policies that deliver rural exception sites for traveller accommodation are supported by Planning Policy for Traveller Sites (PPTS, 2015). Policy H3 is supported.

A suggestion for the supporting text would be to offer some further clarity on the meaning of "strong local connections to the civil parish of Effingham". PPTS states, "*A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection*".

In the context of this policy, it is noted that the pitches referred to in this policy were approved at planning committee in June 2016, but this is subject to the signing of a S106 and therefore permission is not yet

granted. Effingham Parish Council may wish to consider if and how they update this policy as the NP progresses with regards to this approval.

The 2017 Health Check suggests this policy may be superfluous, and the S106 has now been signed, and the pitch allocation process started. Policy H3 is no longer considered necessary and has therefore been deleted from the Submission Neighbourhood Plan. Reference to Traveller Accommodation is now made in the supporting text of policy H1.

Policy H4: Specialist Housing

The provision of housing to meet the needs of older people or those with mobility problems is welcomed and consistent with the approach set out in the National Planning Policy Framework.

From the census data, we know that within Guildford borough the number of people aged 65 and above are expected to increase by 43% over the Local Plan period to 2033, and the West Surrey SHMA projects a significant increase in the number of people with mobility problems (58%). The West Surrey SHMA recognises the need for specialist housing including retirement housing, one and two bedoomed housing for the 'early retired' and step-free living.

The approach in Policy H4 is compatible with Guildford borough's Proposed Submission Local Plan Strategy and Sites (June 2016) Policy H1: Homes for all which supports a wide choice of homes. The reasoned justification encourages a flexible housing stock to meet the needs of an ageing population including good design to ensure accommodation is adaptable and wheel-chair friendly.

Support noted. This policy has been renumbered and is now ENP-H3 in the Submission Neighbourhood Plan.

Policy H5: Home Farm

Policy H5 could potentially conflict with local strategic policy and national policy on Green Belt development. It is suggested that "*and where consistent with Green Belt policy*" should be added at the end of the policy text.

Wording revised as suggested.

It would be helpful to provide further information about what is meant by "*environmental improvements*".

The wording is as used in policy H15 of the 2003 Guildford Local Plan, and it would be over-prescriptive to give examples since any proposals would be considered on their own merits as to whether they were environmental improvements.

Given that this policy relates to a specific area, it is recommended that the area is identified on the proposals map.

Map 5A has been inserted to show the area covered by the policy.

There are some concerns about the second part of this policy; "*Proposals to replace existing dwellings within the western area of the Home Farm estate which have legally established use, including mobile homes, will be supported subject to other policies in this Plan.*"

There is an identified need in the borough for Traveller accommodation. NPPF says, "*To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);”* (para 50).

This is further supported by Planning Policy for Traveller Sites (PPTS), which says, “*Local planning authorities should set pitch targets for gypsies and travellers as defined in Annex 1 and plot targets for travelling showpeople as defined in Annex 1 which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities*” (para 9).

It would not conform with national policy for mobile homes occupied by travellers (that meet the definition of a traveller for planning purposes as set out in PPTS) to be replaced by bricks and mortar housing that is not conditioned for traveller occupation. This would result in the loss of traveller accommodation, which is not supported, and which would place increasing pressure on traveller accommodation in the borough, particularly given that the Council is not currently able to demonstrate a five year supply of traveller accommodation.

We recommend that this policy is amended to ensure that it is clear that the loss of traveller accommodation (*sui generis* use) to residential (C3) use is not acceptable whilst there is an identified need for traveller accommodation in the borough. The extant Local Plan 2003 Policy H5 states the loss of specialised types of housing accommodation, including residential mobile homes, will not be permitted. This is a strategic policy, and the neighbourhood plan must be in general conformity with it in order to meet the basic conditions.

The Proposed Submission Local Plan Strategy and Sites (June 2016, Policy H1: homes for all) states, “*Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted*”. (p.31). Traveller accommodation is considered specialist housing.

This topic has been the subject of considerable discussion between Effingham Parish Council and Guildford Borough Council over several years, and it was established that although many of the dwellings on the Home Farm estate with legally established residential use are owned and occupied by Gypsies or Travellers, the residential use is not restricted to Traveller occupation. The dwellings may have been occupied by non-Travellers during the ten year period to gain established use, and they can be legitimately sold to and occupied by non-Travellers. Replacement of mobile homes which have legally-established residential use does not therefore constitute loss of Traveller accommodation. The Parish Council regards it as discriminatory to attempt to attach a ‘Traveller occupancy’ condition to a planning permission based in the ethnicity of the current occupant; Traveller residents faced with this have pointed out to the Parish Council that such a condition would make it impossible to obtain a mortgage to build the bricks-and-mortar housing.

An explanation of this has been added to the supporting text of this policy.

This policy has been renumbered as ENP-H4.

Policy EN1: Local Green Spaces

Policy EN1 designates Local Green Spaces (LGS). The NPPF sets out criteria for Local Green Spaces, which include that the space must not be an extensive tract of land. The Backwell Neighbourhood plan examination found that a site of 19 hectares or more constituted an extensive tract of land and therefore could not be designated as Local Green Space. Two areas of proposed LGS are larger than this threshold (Effingham Common and Great Ridings Wood at roughly 34ha and 23ha respectively). The Council does not object to these designations, but it seems unlikely these will be successful at examination.

The above notwithstanding, Great Ridings Wood appears to be part of a larger area of woodland. It is not clear from the supporting text why this particular area of the woodland is demonstrably special and worthy of the LGS designation. It may be helpful to set out clearly for the examiner the reason for this LGS boundary.

All of the proposed LGSs are currently within the Green Belt. Sites 1, 2, 7 and 8 fall outside the proposed inset boundary so would remain in the Green Belt should the Local Plan be taken forward in its most recent form. The NPPG (Local Green Space, para. 10) states:

"If land is already protected by Green Belt policy... then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space."

"One potential benefit in areas where protection from development is the norm (e.g. villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community."

It is noted that the plan has provided a justification in the supporting text under the policy as to why the LGS designation is justified for Green Belt sites and it is agreed that this meets the NPPG.

The supporting text has been revised and a detailed 'Local Green Space Assessment Table' has been added as an Appendix to the Plan, to address all the points made here.

Recreation Field, Middle Farm Place Local Green Space

This Council owned parcel of land falls within the proposed inset (Green Belt) boundary for the village of Effingham. Whilst there are no proposals at the current time by the Council as landowner to change the use of the land from open space, the Council would not want to prejudice any future Council decision on how to use or develop the land and wishes to keep its options open. For this reason, the Council objects to the proposal for this parcel of land to be designated as Local Green Space in the draft Neighbourhood Plan.

The Parish Council notes that this objection is made by the Borough Council as landowner rather than for planning reasons, and maintains that it is appropriate to designate this Field as Local Green Space. The detailed reasons for the designation are set out in the 'Local Green Space Assessment Table' in the Appendix to the Plan,

Policy EN2: Wildlife Corridors and Stepping Stones

The policy states that wildlife corridors "should be 100 metres wide" and the supporting text (page 43) states that the policy "recommends a wildlife corridor width of 100 metres" (our underlining). The corridors appear on the maps on page 44, 46, 47 and 48 and seem to have a fixed width. Is the plan designating these corridors (as opposed to recommending them) or is the map indicating the broad location of the corridors? To bring certainty to planning decisions, it would be helpful if the policy makes it clear whether the boundaries of the corridors are being designated as on the maps.

Wording changed to 'designate' the wildlife corridors to be 100 metres wide.

Policy EN3: Shared Spaces

No comments.

Policy EN4: Dark Skies

No comments.

Policy EN5: Air Quality

No comments.

Policy C1: Sites of Community Value

No comments.

Policy C2: King George V Hall and Playing Fields

This site is proposed to stay in the Green Belt in the emerging Local Plan. Facilities for recreational use are supported in this location. However, there is some potential for this policy to conflict with national policy.

Any replacement building for same use must not be materially larger (our underlining).

A new medical building on this site would not be consistent with national Green Belt policy (or the emerging local plan).

Reference to 'medical services' has been removed from the wording

Additional surface car parking within the Green Belt would not be consistent with national policy, unless it could be classified as "*local transport infrastructure which can demonstrate a requirement for a Green belt location*". This notwithstanding, it is recommended that the policy should specify impermeable surfaces so as not to increase runoff.

Wording clarified to state increased car parking will be supported if it reduces the need for on-street parking, which causes significant problems on nearby roads. Assuming 'impermeable' is an error, the policy now requires 'permeable' surfacing to any increased car parking provision.

It is suggested that the policy should be more specific regarding whose satisfaction any car parking management plan needs to meet.

Purpose of the management plan has been clarified 'to minimize negative impact for residents such as on-street car parking'. This can be judged by the planning authority.

Policy C3: Local Health Services

As with Policy C2, there is potential for conflict with national Green Belt policy. In relation to the extension of King George V Hall, it is suggested that the following text should be added: "*and where consistent with national Green Belt policy, including any extension or alteration not being disproportionate to the original building.*"

The policy has been amended to remove the specific reference to the King George V Hall.

Policy C4: Community Burial Facilities

Change of use to burial space is not consistent with national Green Belt policy. It is noted that the neighbourhood plan promotes development on this site as limited infilling within a settlement, which may not be inappropriate in the Green Belt under NPPF paragraph 89, but this paragraph only applies to the construction of new buildings (including appropriate facilities for cemeteries) and not change of use to burial grounds.

The emerging Local Plan proposes to inset site SA1 from the Green Belt. Therefore the use of the site for an extended burial ground is supported by the Council. However, delivery of the burial ground may depend on the insetting of the site from the Green Belt.

Wording changed to specify that any proposals for burial facilities must be consistent with the current Local Plan.

Policy C5: Broadband and IT Services

It is suggested that the policy is reworded to support proposals for “*telecommunications equipment needed to improve coverage / speeds*” (rather than “community facilities”), otherwise this part of the policy does not really address land-use.

Wording revised as suggested.

Policy C6: Schools

It is suggested that text should be added that identifies that two of the schools (St. Lawrence and St Teresa’s) would be in areas designated as green belt, and would therefore need to comply with Green Belt policy.

Within Green Belt, as appropriate development, school sites can be subject to:

- limited infilling or complete redevelopment provided no greater impact on the openness of Green Belt
- extended or altered providing not disproportionate over size of the original building
- replaced, provided in the same use and not materially larger than the building it replaces

Should “*new developments, ...or extensions*” not meet these limitations, very special circumstances would need to be demonstrated to justify such development.

Wording revised as suggested.

Policy C7: Community Learning and Wellbeing

Wording “*of particular interest*” reads rather oddly for a development plan policy. We suggest amending along the lines of “*in particular, strong support will be given to...*” if that is appropriate.

Wording revised as suggested.

Policy R1: Car Parking

The first part of the policy requires all new residential developments within the neighbourhood area to provide off road parking and sets out minimum standards. The supporting text references NPPF paragraph 39. The written ministerial statement (that refers to parking standards) from the then Secretary of State for Communities and Local Government dated 25 March 2015 is also relevant and could also be referenced here for completeness.

Written ministerial statement now included in the supporting text.

The justification presented highlights the limited availability of public transport, high local car ownership levels, and a significant level of concern with inadequate parking provision as expressed through the residents’ survey. The justification also specifies locations and times of the day where and when on-street car parking can present a particular problem. A local example of overflow parking resulting from a recent development is also cited.

Based on the examination of the Burpham Neighbourhood Plan, Guildford’s only adopted neighbourhood plan to date, it is considered that the examiner may agree that this justification supports the policy for residential development as proposed.

It is not clear whether the second part of the policy, relating to the vehicles of visitors and delivery vehicles accessing new residential developments, involves a requirement to consider additional off-street car parking above and beyond that specified in the first part of the policy. It is suggested that this should be explained in the supporting text.

Policy wording revised to clarify that additional off-street space is required for visitors and delivery vehicles.

With respect to the third part of the policy relating to parking provision for non-residential developments, this mirrors the policy approach in the adopted Burpham Neighbourhood Plan (April 2016). Since the Burpham Neighbourhood Plan was prepared and adopted, and in parallel with the consultation on the Draft for Consultation of the Effingham Neighbourhood Plan, the Council has consulted on the Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016). In the 2016 Draft Local Plan, in Policy I3: Sustainable transport for new developments, the proposed policy with respect to the provision of vehicle parking for new developments is framed such that off-street vehicle parking be provided according to where this is necessary in order to manage the Local Road Network. In other words, local circumstances will determine the appropriate provision. As described in the Reasoned Justification in paragraph 4.6.23, a new Vehicle Parking Supplementary Planning Document (SPD) is to be prepared to provide further advice. It should be therefore be considered whether the third part of the policy should be amended to include its own table of minimum standards (which could reproduce the existing maximum standards as minimum standards, if this is considered appropriate), rather than rely on a table in the Council's SPD which is now proposed to be superseded and replaced with an SPD which does not include borough-wide maximum parking standards.

Wording for non-residential development and commercial development revised to allow case-by-case judgement of appropriate parking provision.

The Council supports the final part of the policy where it proposes for improved car parks in the area for the purposes as defined.

Support noted.

Policy R2: Sustainable movement: Cycle Routes, Footways and Pedestrian Routes

This policy is supported. However, many, if not all, of the provisions do not deal with land use issues. Potentially, this policy could be removed to the aspirational policies section of the plan.

Comment noted, however this is retained as a policy to reflect the significant public concern about improved pedestrian and cycle facilities.

Policy LE1: Safeguarding Village Shops and Retail Facilities

The policy and supporting text refer to the designation of the parade as a Local Centre and its Primary Shopping Area (PSA) in the 2016 Emerging Local Plan. The boundary of this PSA is the same as the boundary of the Local Centre in Effingham within the 2003 Local Plan. Given the limited weight that can be given to the emerging Local Plan at this stage, the policy would benefit from also referring to the Local Centre in the adopted Local Plan 2003 (saved policy S9).

Wording revised as suggested.

The policy states that proposals for food takeaways within 500m of a school will not be accepted. We suggest replacing the word "accepted" with "supported", or "granted permission" if a stronger position is needed, as the Council cannot refuse to accept a planning application.

This paragraph has been deleted from the policy.

The supporting text regarding the Vineries garden centre being unsuitable for other retail uses may benefit from referencing the conditional permission for the garden centre which prohibits other retail uses on the site.

The planning condition is now explained in the supporting text.

Policy LE2: Effingham's Rural Economy

It is suggested the first bullet of the policy should be amended as follows (changes underlined): “*the sustainable growth and expansion of all types of business and enterprise in Effingham parish will be supported, through conversion of existing buildings where appropriate and provision of well- designed new buildings of appropriate scale, provided they are in accordance with Green Belt and other policy requirements; and*”

It is suggested the last sentence of the policy should be amended as follows (changes underlined): “*All proposals ~~are required to be compliant with~~ should respect the character and appearance of the Conservation Area...*”.

Wording revised as suggested.

6 g. site allocation policies, page 62

It is suggested the first bullet should be amended as follows (changes underlined): “*The site is not currently a viable employment or community asset within the parish, and is not proposed to be designated as a Local Green Space.”*

Wording revised as suggested.

The second bullet should refer to Green Belt policy.

Wording revised.

As written, the fourth bullet sounds like any sites within the 5km SPA zone have been excluded. Whilst it is agreed that sites within the 5km SPA zone are likely to lead to increased residential pressure on the SPA, and that impacts on the SPA should be avoided as a first step, there is an established mitigation principle in place (the provision of SANG). If development in this zone is avoided because of the current lack of strategic SANG capacity in the area, the bullet could helpfully state this. It should be noted that this situation is unlikely to be permanent and this should be factored in to the plan making process.

Wording revised.

Policy SA1: Land at Church Street known as the ‘Church Street Field’

It is suggested that the third line in the considerations section of the site proforma should be amended as follows “*Within Conservation Area and setting of a listed building*”.

Wording revised as suggested.

Policy SA2: Land at ‘The Barn’, The Street

It is suggested that item 2 in the list within the site proforma should be amended as follows “*Design in keeping with the Conservation Area character and respecting the setting of The Barn*”.

Wording revised as suggested.

Policy SA3: Previously-developed land at Effingham Lodge Farm No comments.

Policy SA4: Land at ‘Orchard Walls’, Beech Avenue

It is noted that the total provision from site allocations is 52 (net). It is therefore assumed that the 6 homes at SA4 is also net. The LAA 2016 identifies 5 (net) 6 (gross) for this site. The NP therefore identifies potential for 1 additional home. This is not considered to be problematic, and it would be for a planning application to consider the appropriate quantum, but it may be helpful for the plan to identify the difference and explicitly say that the figures are net, if that is the case.

Wording revised to clarify that a net increase of 5 homes is proposed for this site..

Policy SA5: Land at ‘The Yard’, Guildford Road

The purpose of this site allocation is not clear given that the site has planning permission for the use and the quantum proposed in the allocation (which is acknowledged in the site allocation). Should it be added to the list of extant planning permissions?

Policy SA5 has been deleted since work has now started on this site, and the site is included in the ‘commitments’ list of extant planning permissions.

7. Delivery Principles, page 81

The final paragraph on page 81 should be amended as follows (changes underlined) in order to meet national policy: “*If the site is in the AONB no major development can be considered for support...*”.

Wording revised as suggested.

8. Proposals map, page 83

The inclusion of a proposals or policies map is very useful and helps the reader to understand at a glance areas of land that have been allocated or designated for certain uses or protections. Items on the proposals map should be linked to policies in the neighbourhood plan.

The current proposals map shows a number of designations that are not being made through the neighbourhood plan, for example an inset boundary, green belt sensitivity and the SPA 5km boundary.

We suggest including a different map (perhaps referred to as an overview map or context map) which sets out any relevant existing policy designations that provide context for the plan. The proposals/policies map should then be reserved for showing allocations or designations made through the neighbourhood plan, such as wildlife corridors and stepping stones, site allocations and Local Green Space.

The proposals map has been revised to show the allocations and designations in the central part of the Plan Area. Existing policy designations are shown in the revised context maps, Figures 2 and 3.

9. Effingham Actions and Aspirations

This section presents non-land use policies that do not form part of the development plan and will not be assessed during the examination.

Action 5, page 87

The final sentence of the first paragraph of the policy states: “*The sites to be included on the Register are:*”. As Assets of Community Value nominations are determined by the Council against criteria set by legislation, this sentence could more accurately read “*The sites to be nominated for inclusion on the Register are:*”

[Wording revised as suggested.](#)

This is a useful list of local priorities for infrastructure investment that can potentially be funded by S106 planning contributions or by the CIL neighbourhood proportion (once GBC adopts the CIL).

Village Design Statement

The Village Design Statement addresses a range of design issues, including many that may fall under permitted development. As the document forms guidance, this may be acceptable, but it should be noted that the application of the guidance in permitted development would be voluntary only.

[The Village Design Statement is intended as guidance and does not form part of the Neighbourhood Development Plan.](#)

Consultation Statement

Appendix IV

2.

Representation and Response:

Surrey County Council

From: Planning Consultations
[<planning.consultations@surreycc.gov.uk>](mailto:planning.consultations@surreycc.gov.uk)
Date: Mon, 18 Jul 2016 12:58:41 +0100
To: Jon Short <clerk2010@effinghamparishcouncil.gov.uk>
Cc: Sue Janota <sue.janota@surreycc.gov.uk>, Kath Harrison
<kath.harrison@surreycc.gov.uk>
Subject: Surrey County Council's Comments on the Effingham Neighbourhood Plan

Dear Sir or Madam

Thank you for consulting Surrey County Council on the Effingham Neighbourhood Plan. Officers at Surrey County Council have considered this plan and they are impressed with the quality of the document. Our specialist Landscape and Archaeology teams have made some suggestions that are intended to be helpful and which you may like to take into consideration when preparing the next version of the plan. I have also noticed a very small error on Map SA3 where Lutyen's Close has been renamed "Lutchens Close."

The comments I have received are set out under the relevant headings below.

Landscape

Excellent piece of work from a landscape perspective. I particularly like the extensive and detailed work undertaken in identifying key views. I would suggest only a few things that could improve the landscape character section:

1. An inset map of the character areas to show their relationship with the Parish;
2. Some analysis of how each of the character areas and their key characteristics contribute to the character and setting

of the village.

For example: -

- Ockham and Clandon Wooded Rolling Claylands - key characteristics = pastoral and arable farmland with woodland = rural agricultural setting/ wooded setting/enclosed by woodland and hedgerows
- Clandon Open Chalk Farmland - key characteristics = undulating open pastoral farmland = dramatic open views to and from edge of settlement.

3. Use this analysis to add 'respecting the landscape character of the setting of Effingham' to Landscape Character and Heritage Policy G2 which would conserve the underlying character of the countryside around Effingham within the Parish as well as key views and vistas. This follows the policy guidance on setting of heritage assets in para 128 and 129 of the NPPF.

Archaeology

Heritage issues are well-considered, and compliment existing planning provisions rather than replicate or compete with them. In this regard, the authors of the plan should be commended. The following additional points may be of use.

- I'm particularly pleased by and supportive of the inclusion of strategic views in this document. Such concerns are poorly-served by existing national and local planning policy.
- The policy on Archaeology could be a little more precise: existing provisions in the NPPF and Guildford local plan require assessment and/or identification of remains prior to determination, in order to inform decision-making. Policy G3 requires proposals to demonstrate that they avoid or minimise harm to sites recorded in the HER, but stops short of requiring

HER searches to be included as part of this demonstration. The existing and NP policies compliment each other clearly, but in circumstances where only the latter applies, the HER evidence base will be lacking and the authors' may wish to address this.

- Policy G3 also only takes account of the known archaeology recorded in the HER. The HER can only record archaeology that has been previously discovered, and the majority of Surrey has never been archaeologically explored. This means that there are areas where nothing is recorded on the HER, but which still might contain significant archaeological deposits. Part of the purpose of desk-based assessment (outlined in the NPPF, paragraph 128) is to assess a site for its unknown potential. The policy could include a brief provision for supporting the archaeological assessment of large sites - defined elsewhere in the county and in the Guildford Borough local plan as being those over 0.4ha in size - to ensure the possibility of hitherto unknown archaeological remains existing on a development site can be investigated.
- Policy G3's supporting text suggests that the existing Area of High Archaeological Potential may require extension. The authors' might wish to know that an exercise in reassessing every AHAP in Surrey is currently underway. They would be advised to contact Alex Egginton, Archaeological Officer at Surrey County Council, for more information and to pass on any data they consider that might support revisions to the existing AHAP. The county-wide AHAP revision is scheduled to conclude in mid-2017

I have no comments to make with regards to the allocated sites, beyond noting with approval that where they are likely to have archaeological implications, this has already been noted. A small typo to correct occurs in point 3. of SA1 (Land at Church Street), where the section on minimising archaeological harm refers to policy G4, when it should actually refer to G3. The same typo occurs in SA2 and SA3 - I assume perhaps as a hangover from a

previous version of the NP with different policy numbering.

I hope these comments are useful.

Kind regards

Katharine Harrison
Principal Spatial Planning Officer
Environment and Infrastructure
Surrey County Council
County Hall
Kingston Upon Thames
KT1 2DY

Telephone: 020 8541 9453

Response to Regulation 14 representation from Surrey County Council

Effingham Parish Council has taken account of Surrey County Council's helpful comments as summarised below:

Lutyens Close

Unfortunately the spelling mistake 'Lutchens Close' on the map of SA3 is incorporated on the Ordnance Survey map used as a basis for this map.

Landscape

1. A map of the landscape character areas has now been included (Map 2a).
2. Brief analysis of how each of the character areas and their key characteristics contribute to the character and setting has been included in the supporting text of ENP-G2 (A) Schedule of Views and Vistas.
3. The suggested wording is now used in 2. of Policy wording for ENP-G2

Archaeology

We note the support for policy G3, however we have relied on the provisions of the Local Plan to require further archaeological assessment rather than including this within the Neighbourhood Plan policy.

Incorrect policy reference in SA1, SA2 and SA3

These have now been corrected.

Consultation Statement

Appendix IV

3.

Representation and Response:
Environment Agency

Jon Short
Clerk to Effingham Parish Council
3 Home Barn Court
The Street
Effingham
Surrey
KT24 5LG

Our ref: WA/2011/111091/OR-
05/PO1-L01
Your ref:
Date: 05 July 2016

Dear Mr Short

Effingham Neighbourhood Plan Regulation 14 Pre-Submission Consultation

Thank you for consulting us on the Effingham Pre-Submission Neighbourhood Plan. We have reviewed the Effingham Neighbourhood Plan 2016-2030 Draft for Consultation, dated 19 April 2016, and have the following comments to make.

Policy G4 – Flooding

We welcome the inclusion of this policy. However, for the sake of accuracy and completeness we wish to note that there are some areas surrounding Pikes Pool and Herons Reach which have been identified as being in Flood Zones 2 and 3 and, therefore, at Medium to High Risk of flooding from rivers. Consequently we recommend a wording change to paragraph 4, page 30, of the supporting text to reflect this:

The Environment Agency categorises ~~all areas of the village~~ most of the Parish at low risk of flooding from rivers and groundwater.

Site Allocation Policies

We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1. If further site allocations within Flood Zones 2 & 3 were to come forward then they would be subject to the flood risk Sequential Test, and if necessary the Exception Test.

The Local Authority will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your neighbourhood plan area. The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites and sustainable drainage measures can compliment other objectives such as enhancing green spaces.

Final comments

Once again, thank you for consulting us on this matter. If you have any further questions please do not hesitate to contact me.

Yours sincerely

Mr Oliver Rathmill
Sustainable Places I Planning Advisor

Direct dial 0208 4747 682
E-mail planning-farnham@environment-agency.gov.uk

Response to Regulation 14 representation from Environment Agency

Effingham Parish Council has amended the supporting text of policy G4 as recommended by the Environment Agency.

We are pleased to note approval that the site allocations have been directed to areas at the lowest probability of flooding, within Flood Zone 1.

Consultation Statement

Appendix IV

4.

Representation and Response:

Natural England

Date: 02 June 2016
Our ref: 186969
Your ref: Effingham Neighbourhood Development Plan



The Neighbourhood Plan Team
Effingham Parish Council

BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Effingham Parish Council

Publication of the Effingham Neighbourhood Development Plan – Draft For Consultation

Thank you for your consultation on the above dated 30/05/2016.

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.

Natural England only have one minor comment, other than that we are supportive of the produced document.

Policy EN2 – please can you remove the reference to Natural England from the policy itself regarding widths of green corridors

We am more than happy to see reference in the supporting text of the policy as you already have it, and we agree it reflects the conversation from earlier in the year. This policy is your policy, so we don't think it is necessary to reference us within it. We are very rarely referenced in policies as a whole, only normally when it comes to Thames Basin Heaths and SANG agreement.

For clarification of any points in this letter, please contact Marc Turner on 02080267686. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Marc Turner
Senior Planning Adviser

Thames Valley Area Team

Response to Regulation 14 representation from Natural England

Effingham Parish Council is pleased to note that Natural England are supportive of the consultation Neighbourhood Plan.

The reference to Natural England has been removed from the policy wording of EN2 (Wildlife Corridors and Stepping Stones), and we are pleased that Natural England are in agreement with the supporting text of EN2 on their advice concerning the 100 metre width of wildlife corridors.

Consultation Statement

Appendix IV

5.

Representation and Response: Surrey Wildlife Trust

From: Mike Waite <Mike.Waite@surreywt.org.uk>
Date: Fri, 8 Jul 2016 11:05:02 +0100
To: Jon Short <clerk2010@effinghamparishcouncil.gov.uk>
Cc: Sarah Jane Chimbwandira <SarahJane@surreywt.org.uk>, Dan Knowles <Dan.Knowles@guildford.gov.uk>
Subject: Effingham Neighbourhood Plan Regulation 14 consultation

To the Parish Clerk, Effingham Parish Council:

Thank you for this opportunity to comment on your emerging Neighbourhood Plan. These comments may be viewed as both those of Surrey Wildlife Trust (SWT) and the Surrey Nature Partnership. We (SWT) communicated our early desire to work with you on your Neighbourhood Plan in a letter to Guildford Borough Council, dated 19/02/2013 (attached). We have corresponded with your Neighbourhood Plan team more recently on developing policy for Wildlife Corridors.

We have some comments on the earlier sections, but will mainly comment on Chapter 6c. Environmental Policies, and specifically on policies EN1-2 & EN4. Suggested insertions and corrections are indicated in red font.

1. There are a number of places within the plan where 'Sheepleas' has been misspelled as 'Sheapleas' (inc. Fig. 2 , p.9).
2. p.10, para.2; ..serving as an alternative **recreational open space** to the **unit of the Thames Basin Heaths** Special Protection Area (SPA) of Ockham and Wisley Commons to the north of the parish (and see similar mis-reference on p.16). And later.. **skylarks** (ie. one word).
3. Fig.2 & Fig.3; these maps usefully locate relevant SNCI, but with no adjacent reference to this acronym/designation (the first mention is on p.15, section 3c.).
4. We welcome and support Specific Objective 5b., bullet 5 (p.18).
5. We welcome policy G4 Flooding, with its requirement for SuDS. Perhaps mention might be added here to the parish presence within the catchment of the River Mole (in contrast with the rest of Guildford borough within the River Wey catchment).

6. p.40, A (or perhaps better at C.) Great Ridings Wood – reference could be made to the section of Great Ridings Wood being SNCI, primarily for its botanical and ornithological interest. Part of the wood is owned/leased by the Woodland Trust, we believe. We especially welcome your proposed application of the new LGS designation on Effingham and Banks Commons, given their biodiversity interest and in the absence of an adopted SNCI designation.

7. EN 2: Wildlife Corridors and Stepping Stones. We welcome and support this innovative and precedential approach to the identification of wildlife corridors for purposes of protection in the planning system. We do have some suggestions for enhancing the clarity of the policy however, as follows;

The Plan identifies woodland and grassland both wildlife corridors and stepping stones of suitable habitat for plant and animal to support movements of wild flora and fauna [or plants and animals] between designated Sites of Special Scientific Interest (SSSI) at Ranmore Common, Sheepleas and Bookham Commons, as well as Sites of Nature Conservation Importance (SNCI) at Great Ridings Wood, Thornet Wood and Effingham Common Golf Course. Wildlife corridors should aspire to be a minimum 100 metres wide, as advised by Natural England, and made up of an unimpeded, open green corridor which may include hedgerows as well as open land grassland and woodland.

..Harm is likely to be caused by the introduction or enlargement of barriers such as buildings, roads, hard landscaping and artificial lighting, and by the re-direction of water sources or water courses, that would effect the severance or narrowing of wildlife corridors.

1. Sheeplees = Sheepleas

..wildlife stepping stones, which are patches of habitat..

2. Important Woodland stepping stones are:

Oldlands Wood, Horseclose Copse (Ancient Woodland), Kiln Field Coppice (Ancient Woodland), Hermitage Plantation, Greatlee Wood, Great Ridings Wood, Effingham Common, Bank's Common, including Bank's Lane, Thornet Wood (Ancient Woodland).

3. Grassland stepping stones are:

Effingham Golf Course (a Site of Nature Conservation Importance), Effingham Common (SANG) and Banks Common, supported by grassland corridors that include grass verges are identified as particularly important to the movement of grassland-dependent wildlife.

Justification. Roads, railway tracks...

Effingham sits within a wildlife triangle with an where SSSI occupy each apex (Ranmore Common, Sheepleas and Bookham Commons), making wildlife movement across the parish a particularly important issue for biodiversity conservation. Large parts of Effingham also fall within two Biodiversity Opportunity Areas, Thames Basin Lowlands BOA TBL02 and North Downs BOA ND02; where the maintenance and enhancement of connectivity for wildlife movement both within and between BOAs, through the protection, restoration and creation of priority habitats is a primary aim.

..This is particularly relevant to the Effingham Neighbourhood Plan..

Wildlife corridors and stepping stones of suitable habitat in the parish help sustain and preserve wildlife in the recognised biodiversity 'hotspots' (SSSI and SNCI), by enabling species to move between and occupy colonise new areas when their populations expand or food sources or other natural resources are lacking in their core habitats can no longer support them, and to enable animals to find new mates in neighbouring regions so that further genetic interchange diversity can increase and have a positive impact on the overall population.

Much of England's biodiversity is now restricted to the remaining protected wildlife sites, which consist largely of semi-natural habitats, where less-mobile species are increasingly vulnerable to chance-driven, local extinction. However, surviving in small, isolated sites is difficult for many species, especially in view of future the longer term and given climate change. Wildlife corridors allow exchange of individuals between populations.

This policy recommends a wildlife corridor width of a minimum 100 metres, in recognition of advice from Natural England and specialist international research. The corridor should be 100 metres of open green land, hedgerows or woodland. This width is based on communication and email advice from Natural England to the Effingham NP Steering Group [E 5], and research sponsored by the US Dept. of Agriculture (National Agroforestry Center) which recommends a width of 330 feet (100 metres) for small mammals and birds.

From the suggestions for textual improvements above, it can be seen we

are recommending that SSSI and SNCI should be viewed on relative parity as 'building blocks' in the ecological network, to which the wildlife corridors and stepping stones are then essential in providing connectivity. In justification of this, NPPF para.117 states; "...planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and **locally designated** sites of importance for biodiversity, wildlife corridors and **stepping stones** that connect them and areas identified by local partnerships for habitat restoration or creation [ie. BOA]. This clearly implies 'locally designated sites' (ie. SNCI) should not in themselves be viewed as stepping stones, as they have an elevated importance.

We feel the following section 'Protected Sites' is largely superfluous and potentially confusing. This is partly as the 'light touch' explanation (or misplaced detail) of which the following is an example; ..In 2005 parts of Ockham and Wisley Commons were included in the Special Protection Area (SPA) of the Thames Basin Heaths to protect the Dartford Warbler, Nightjar and Woodlark.. just provide grounds for additional confusion on behalf of the reader. The methodology for identifying wildlife corridors across Effingham parish is well-researched, reasoned and otherwise sound, but probably should be saved from appearing in the core of the Plan.

Fig.7. Sheapleas = Sheepleas. If our recommendation above is taken up, ie. to equate the importance of SSSI and SNCI as building blocks (ie. not demoting SNCI to stepping stones), then Figures 7-10 may require some adjustments. Some of the differentiating colours for the various types of stepping stones appear more-or-less identical.

p.45. This explanatory information on the identified wildlife corridors is very helpful, especially to assist interpretation of the Figures 7-10 (but see also the need for some correction here should our recommendation be taken up on the elevated role of SNCI).

8. EN4. Dark Skies, p.51. ..it can cause health problems and **can also impact the normal behaviour of** wildlife.

9. R1 Car Parking, p.58. Mention could be made here to the preference for permeable surfacing for car parks, cross-referenced with Policy G4 Flooding.

10. Schedule of Evidence and Supporting Documents. These might also

include Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network (Surrey Nature Partnership, December 2015), as well as Biodiversity & Planning in Surrey (Surrey Wildlife Trust, May 2014).

11. Glossary (your 11., not 10.) You may need to revisit the definitions of Wildlife Corridor and Wildlife Stepping stone in regard to our comments above. The definition from 'A Living Landscape for Surrey' (SWT 2010) is as follows; "A chain or series of physically connected wildlife habitats/sites, offering a potential conduit for colonisation and dispersal of species populations through an otherwise hostile landscape. Most wildlife corridors will vary considerably in their effectiveness for different species or species groups." I hope these comments are useful, Yours sincerely,

Mike Waite MCIEEM
Living Landscapes Manager (Strategic)
Surrey Wildlife Trust
School Lane | Pirbright | Surrey | GU24 0JN
Tel. **07854 163664**

email. [<mailto:mike.waite@surreywt.org.uk>](mailto:mike.waite@surreywt.org.uk)

Chair Biodiversity Working Group



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Are you a member of Surrey Wildlife Trust?

Help protect Surrey's wildlife by joining as a member or making a donation. Surrey Wildlife Trust cares for more than 9,000 hectares of the county's countryside and could not carry out vital conservation work without the support of members, supporters and volunteers. To join and to find out more about the benefits of SWT membership, visit www.surreywildlifetrust.org/join.

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Response to Regulation 14 representation from Surrey Wildlife Trust

Effingham Parish Council has taken account of Surrey Wildlife Trust's helpful comments as summarised below:

1. Sheepleas

The spelling has been corrected in various places

2. Section 2b

Wording concerning SANGs and skylarks has been amended as suggested.

3. Fig 2 and 3

The meaning of the acronyms is given in the Glossary.

4. Objective 5b

We welcome SWT's support for the objective:

'To conserve and enhance the environment of the Plan Area in terms of its:

- Biodiversity and wildlife spaces and corridors'

5. G4 Flooding

SWT's support for this policy is welcomed, and the comment about the River Mole catchment has been added to the supporting text.

6. EN1 Local Green Spaces (now ENV1)

We are pleased to note SWT's support for the designation of Effingham Common and Banks Common as Local Green Spaces.

7. EN2 Wildlife Corridors and Stepping Stones (now ENV2)

Effingham Parish Council is pleased to note SWT's comment on policy EN2:

'We welcome and support this innovative and precedential approach to the identification of wildlife corridors for purposes of protection in the planning system.'

The rewording suggested by SWT to improve clarity has been largely followed in the policy and the supporting text, including regarding both SSSI and SNCI as 'building blocks' and revising the wording of the 'Protected Sites' section.

8. EN4 Dark Skies (now ENV4)

Supporting text reworded as suggested.

9. R1 Car parking

We note the suggestion about permeable surfacing for car parks, but don't think this is appropriate in a policy which is concerned with amount of car parking space, which may include garages.

10. Schedule of Evidence

The suggested documents are useful but do not seem appropriate for inclusion in the Schedule of Evidence.

11. Glossary

SWT's suggested definition of a wildlife corridor has been added.

Consultation Statement

Appendix IV

Summary of Representations from Organisations and Individuals, and EPC Responses

The representations included in the following pages were either sent as individual letters or emails, or were significant extra comments attached to the Regulation 14 consultation survey.

Organisations and land-owners are named, but the names of individual residents have been withheld as promised during the Regulation 14 consultation.

The representations have been summarised in the tables to include the key points made and the Parish Council's response to those comments ; however the original full representations will be made available to the Neighbourhood Plan Examiner if required. The responses were consider and recommended to the Parish Counci by the Effingham Neighbourhood Plan Advisory Group (ENPAG).

Unless otherwise indicated, references to the 'Health Check' refer to the January 2017 Health Check undertaken following the Regulation 14 consultation and prior to Regulation 15 submission.

Key

EPC	Effingham Parish Council
NP	Neighbourhood Plan
GBC	Guildford Borough Council
NPPF	National Planning Policy Framework
HRS	Housing Requirements Survey, 2013
ELF	Effingham Lodge Farm

Effingham Residents Association EFFRA	Organisation
COMMENTS	EPC RESPONSE
<p>EFFRA supports the Specific Objectives of the Plan and policies G2, G3, G4, H2, H3, H4 and H5, and has 'strong support' for policies EN1, EN2, EN3, EN4 and EN5 and support for policies C1, C2, C3, C4, C5 and C6, R1 and R2.</p> <p>EFFRA has reservations about policies G1, LE1, SA1, SA2, SA4 and SA5.</p> <p>EFFRA do not support policies H1, and SA3.</p>	<p>Noted.</p>
<p>G1 Support for policy G1 apart from EFFRA's disagreement with policy SA3 and reservations about SA1 and SA2. We think there should be a reference in this policy to high sensitivity Green Belt as categorised in GBC's draft Local Plan. SA3 is situated on high sensitivity Green Belt.</p>	<p>EPC note the point about SA3 and high sensitivity green belt and agree this is important to resist planning applications by developers in the Green Belt including land categorised in the 'Green Belt and Countryside Study' as 'high sensitivity' Green Belt. However SA3 is justified by NPPF para 89 and development here can be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>Adding wording about 'high sensitivity' to the policy is unnecessary as under the NPPF all Green Belt has the same restrictions and developers must demonstrate special circumstances for developing on Green Belt land no matter its sensitivity.</p>
<p>H1 Do not support this policy. Effingham is currently washed over by the Green Belt and only sites that can be built under the terms of the NPPF should be considered. Object to the housing target of 62 new dwellings.</p>	<p>All the sites allocated for housing are compliant with both NPPF and recent case law, as well as the 2003 Local Plan. The 2016 draft Local Plan shows the intention of GBC to inset Effingham. If the village is inset (and EPC have, with two suggested alterations to the boundary, not opposed the inset) then all the site selections, apart from SA3, will come within the inset boundary.</p> <p>EPC has a different view on setting the housing target numbers than EFFRA. The Regulation 14 consultation survey showed 73% of respondents agreeing with policy H1 and the EPC approach. The housing target number has been reduced to 'a minimum of 52' following guidance from the Health Check examiner.</p>
<p>H1 We do not accept that 52 houses were shown to be needed in the 2013 EPC Housing Requirements Survey and we do not accept that EPC has the right to add an additional 10 three bed houses to this figure to "support financial viability".</p>	<p>Following Health Check examiner's advice, the additional 10 three-bedroom homes has been removed from the target.</p> <p>Regarding the Housing Requirements Survey (2013) EPC and EFFRA have differing views and EPC are satisfied that 52 new houses over the plan period is the appropriate target indicated by detailed analysis of the 2013 Housing Requirements Survey.</p>

	<p>The Health Check examiner commented that 'The justification to Policy H1 is clear and it is supported by robust evidence', supporting use of the Housing Requirement Survey as the basis for the housing target.</p>
H1 GBC has not imposed any housing target on Effingham; although it has a borough-wide housing target based on national needs, it is directing this largely outside the Green Belt. It is proposing to inset Effingham and has proposed three sites in the Land Availability Assessment totalling 43 houses. We believe two sites cannot be built unless Effingham is inset.	<p>The NP is required to recognise there will be some inward migration to Effingham and the Parish has an obligation to help meet the objectively assessed borough-wide need for extra homes, as far as possible given the Green Belt constraints.</p> <p>Regarding the insetting of Effingham from the Green Belt, in EPC's response to the GBC Local Plan consultation in June and July 2016 EPC made an alternative proposal on the inset boundary but otherwise did not oppose the proposals for the insetting of the village.</p> <p>The two sites that EFFRA suggest 'cannot be built on' have both been judged to be appropriate on the basis of NPPF para 89 concerning limited infilling in a village together with recent case law that a site outside the Local Plan settlement boundary can be within a village as a matter of fact on the ground.</p>
LE1 This policy appears to have been taken from policy E9 of the 2016 Emerging Local Plan and has not been adapted to Effingham's status as a rural village. Such terms as 'town centre' and 'local centres' are inappropriate.	<p>The phrases referred to are planning policy terms in the context of Local Economy policies; they are technical planning terms and are not meant to imply any alteration in Effingham's rural status.</p>
SA Policies EFFRA believes that EPC is only permitted to consider sites that can be built under the NPPF. The site scoring system was neither objective nor consistent. Despite the weakness of the Site Allocation Criteria we believe that only two sites are capable of being built under the NPPF.	<p>All the SA policies have been discussed with planning officers at GBC and with a specialist planning barrister. Both GBC planning officers and the barrister agree these are reasonable policies and are consistent with the NPPF. EPC has full confidence in the site selection criteria and scoring system.</p> <p>The Health Check examiner commented: 'I have considered the background document "Selection of Allocated Sites for Housing". This demonstrates that a robust assessment of potential sites has been undertaken and consulted upon with the community.'</p>
SA1 We believe the size of the site is 0.7ha and the number of houses proposed, 20, plus an extension to the graveyard is too large to qualify as limited infilling and that it can only be built under the NPPF if Effingham is inset. The number of proposed houses, 20, is too great for the site. We do not believe that a density of 33 dwellings per hectare, comparable with Middle Farm Place, is acceptable for small-scale cottage-style homes in the village centre.	<p>EPC is proposing that the site can accommodate 20 dwellings based on a housing density comparable to that of Middle Farm Place. Designs for around 20 new dwellings on the site are not seen as inappropriate to this site and its location in the Conservation Area. The policy requires that development proposals should be small-scale and in keeping with the cottages on the western side of Church Street. The final number of dwellings will depend on the design and will be decided via the planning process.</p> <p>There is no clear definition of 'limited infilling' but there is a precedent within planning permissions in Guildford Borough suggesting that up to 20 homes may be</p>

	acceptable if it is in character with the surrounding area. GBC's Land Availability Assessment 2016 suggests 22 dwellings would be appropriate on this site.	
SA2	EFFRA believe that the size of this site is 0.7ha and the number of houses proposed, 16, is too large to qualify as limited infilling and can only be built under the NPPF if Effingham is inset.	EPC considers that 16 dwellings is a reasonable number to be considered limited infilling on this site. Again the final number of dwellings and their design will be decided via the planning process. GBC's Land Availability Assessment 2016 suggests 16 dwellings would be appropriate on this site.
SA3	This site is on High Sensitivity Green Belt and is valuable agricultural land in a rural village within site of the Conservation Area. The policy states this is previously developed land as defined by the NPPF but it is not clear if any of the land fulfil this criterion. Any PDL is unlikely to support 6 houses. Such a policy could be abused by the owners who might attempt to claim "Permission in principle" under section 150 of the new Housing and Planning Act, 2016, to build a greater number of homes. SA3 should be deleted as it is: high sensitivity Green Belt, the land is important for wildlife and is a wildlife corridor, it should continue in agricultural use, any application would not be able to demonstrate that the openness of the Green Belt will be maintained and that it would not exacerbate traffic congestion.	EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development. The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor. EPC disagrees about green belt being designated as high sensitivity having more importance than low or medium sensitivity green belt. In planning terms there is only green belt and no hierarchy of importance. EPC have taken professional advice on this policy, as encouraged by EFFRA, and the advice is that proposing this site for development as a site selection, as it has met site selection criteria for 6 houses, is reasonable.

The Howard Partnership Trust	Organisation and Landowner
COMMENTS	EPC RESPONSE
Howard of Effingham School has been part of the Effingham community for over 75 years and has educated generations of local young people. We feel we play a vital role in the community, and our proposals for investment and expansion to meet local demand can enhance this even further.	EPC agrees that the Howard of Effingham School is an important part of the Effingham community and wishes to support its continuing success. However EPC believes that there is insufficient evidence of local demand to justify expansion of the school.
We are pleased that the Draft Neighbourhood Plan makes several references to our school and is supportive of its future role. As you will be aware, proposals for the construction of an expanded replacement building for Howard of Effingham School on the Lodge Farm site, and the construction of 295 new homes to enable that development are currently subject of a Planning Appeal which will be heard in Spring 2017 and to which the Parish Council has been accepted as a Rule 6 party. The issues will clearly be discussed there and, we believe, this will give all parties the best opportunity to focus on the very special circumstances that we consider support our plans for housing development to fund the development of the new school. Ultimately, the Neighbourhood Plan will need to reflect the outcome of that decision. I hope you will understand and excuse us, therefore, if we do not respond at length to the Draft Neighbourhood Plan with details of our case for the new development.	<p>Comment noted.</p> <p>However the case for the planning application currently at appeal is based on 'very special circumstances' to allow development which is inappropriate in the Green Belt under NPPF paragraph 89 and the 2003 Local Plan.</p> <p>The Neighbourhood Plan proposes new homes at a level consistent with the needs identified by the local community and is based on compliance with both the NPPF, the 2003 Local Plan and consistent with the 2016 Emerging Local Plan. EPC therefore believes the Neighbourhood Plan, which is being submitted pursuant to Regulation 15 before the Inquiry for the Planning Appeal has taken place, should not anticipate any particular outcome of that appeal.</p>
You will also be aware that Neighbourhood Plans should support the strategic development needs set out in the Local Plan, the latest draft of which is currently subject to a parallel consultation. For ease of reference, we attach our representations to that document, as both plans are required to have regard to the same national policies which place a strong emphasis on the need to facilitate new and expanded schools.	<p>EPC notes the representation to the 2016 Local Plan consultation.</p> <p>The Neighbourhood Plan is entirely consistent with the strategic development needs set out in the latest draft Local Plan and has regard to national policy as set out in the NPPF.</p>
We welcome the principle of Policy C6 of the Draft Neighbourhood Plan that proposals for new developments, refurbishment or extensions to the existing schools in Effingham will be supported. We further note that Planning Practice Guidance (Reference ID: 41-005- 20140306) says that Neighbourhood Plans must be deliverable. The detailed supporting information to our planning application demonstrates that practically the school can only be expanded by being moved to another, adjacent, site. This would also enable traffic congestion problems identified in the	<p>Support for the principle of policy C6 is noted.</p> <p>The further comments relate to matters which will be considered at the Planning Appeal.</p>

supporting text on page 56 of the Draft Neighbourhood Plan, to be addressed.	
We would like to express our concern at the reference made in the supporting text to Policy C6 to the potential closure of St Lawrence Primary School. As one of the schools that form part of the Trust, we can confirm we have no intention of closing that school. We would be grateful if you would consider removing or re-writing that paragraph to make this point clear.	EPC thanks the Howard Partnership for this reassurance. The text has been reworded to clarify that St Lawrence Primary School is being proposed for inclusion on the Local Planning Authority Register of Assets of Community Value. This does not imply there are any current plans for its closure.
As ever, we are more than happy to discuss any of these issues with the Parish Council at any time.	EPC welcomes continuing dialogue with The Howard Partnership.

Vanda Powell	Landowner (The Barn)
COMMENTS	EPC RESPONSE
G1: Agree more local housing needed.	Noted.
G2: Needs to be a balance between supporting housing and protecting environment.	Noted.
H1, H2: Target of 62 supported. Developments must still be viable. This may mean larger houses may be required, and constraints of sites may also influence house sizes.	Support for housing target noted. EPC agrees developments must be financially viable, and the housing mix policy H2 therefore allows for up to 20% larger homes (three or more bedrooms) on sites of 10 units and above, and up to 50% larger homes on sites of fewer than 10 units.
R1: Parking provision should take account of whether the site is central to the village.	EPC believes adequate parking is required on all sites within Effingham parish, as car-ownership levels are high throughout the area. Public transport is poor so that cars are needed to access services and facilities not available in the village.
SA2: Representation concerning The Barn to GBC 2016 Local Plan consultation is attached.	EPC acknowledges the representation made to GBC, and this was taken into account when allocating The Barn for residential development in Neighbourhood Plan policy SA2.
We support the Neighbourhood Plan and specifically allocation SA2.	Support noted.

Mr Andrew Bedford	Landowner
COMMENTS	EPC RESPONSE
Shortfall in allocation numbers. It is very conceivable that only 32 units will be delivered or allocated over the next 15 years. However if Effingham does not provide sufficient allocation then when Guildford does not meet its housing supply the door will be open for the Berkeley development on Effingham Lodge Farm courtesy of the Secretary of State.	EPC see all the site allocations as deliverable in the plan period. Having regard to the sites with extant planning permission and likely windfall sites, there is a sufficient buffer and it is anticipated the housing target will be met.
Lyons Field is a suitable alternative development site and can provide an additional 16 – 20 dwellings of 2 and 3 bedrooms. This would provide a back-up site allocation of deliverable housing in the plan period - if some of the site allocations do not deliver.	<p>There has been a public presentation of the proposed development on Lyons Field. EPC notes that the Lyons Field proposal includes affordable housing and it is stated that building work would be progressed sympathetically so that Effingham did not become a building site.</p> <p>Lyons Field was initially allocated as a housing site at an early stage in the process. However following the publication of the draft Emerging Local Plan in April 2016, all potential sites were rescored to take account of the Local Plan strategy of protecting 'high sensitivity' Green Belt. This rescored resulted in the de-selection of Lyons Field, which is a greenfield site within high sensitivity Green Belt as defined in the Guildford Borough 'Greenbelt and Countryside Study'.</p> <p>The Regulation 14 Consultation Survey included a question to determine whether or not the use of this site for housing had strong community support. 520 responses were received to this question, of which 71% opposed development on Lyons Field, 5% were neutral, and 24% were in favour of development. Given the clear majority against development, Lyons Field has not been allocated for housing in the final Submission Neighbourhood Plan.</p>
SA2 The Barn. It is questionable whether the highways authority will permit access over a single track for more than 5 dwellings. EPC admit they have not undertaken any feasibility study on the ability of this land to provide 14-16 units. 5 units is a more realistic figure.	This site is included in the Guildford Land Availability Assessment, which states that the narrow access is not considered to be a highway safety constraint on development of the site. Both GBC and the landowner state that 14 to 16 dwellings are planned. The area of land on which the Barn sits is within the area that GBC are proposing to inset, and in their response to the GBC draft Local Plan EPC stated that they supported the inset in this part of the village. The final number of dwellings that could be built on this site depends on design, access and the granting of planning permission.
SA3 The most extraordinary allocation of land for development by EPC. <ul style="list-style-type: none"> • It is well outside the settlement area 	EPC has looked at every area of land that has been proposed by developers and others for our site selections. We have carefully and consistently used evaluation criteria to judge each of the sites proposed for development.

<ul style="list-style-type: none"> • It is owned by Berkeley Homes who wish to develop the whole site • The NP is seeking to provide Berkeley Homes with 1 hectare of land on which they can build 6 houses. By giving Berkeley Homes an inch they have the ammunition and planning expertise to take a mile. <p>Why are EPC endorsing such a development opportunity for Berkeleys?</p>	<p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development. Advice from GBC planners and the barrister is that the site allocation on the area of previously developed land does not provide a precedent for the further development of the whole of Effingham Lodge Farm.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor.</p>
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Individuals 1 & 2 (similar)	Residents
COMMENTS	EPC RESPONSE
<p>I am unable to complete the survey as it stands. The questions asked are worded in such a way that it is impossible to show one's objections. Myself and my partner believe that the proposal is poorly thought out and would be detrimental to the area. The infrastructure is simply not there to support the potential no. of inhabitants that 62 new homes would bring.</p>	<p>EPC entered the Neighbourhood Planning process to protect Effingham from over-development and to direct new housing developments to those areas of the village best suited to support development.</p> <p>Guildford Borough Council through their Local Plan have a borough-wide housing target to meet and Effingham will have to take its share.</p> <p>The housing target has been reduced in the revised NP to 'a minimum of 52 new homes' to meet local housing need, based on the Housing Requirements Survey in 2013.</p> <p>This is not a parish council target, it is an Effingham residents' requirement for housing over the plan period 2016 – 2030 as expressed in the HRS.</p> <p>By proposing a NP suitable to the village and by setting a housing target based on local housing need we are looking to focus future development within the village and on brown field land and thus protect our Green Belt and the green spaces of particular importance to residents.</p> <p>EPC does not agree that the infrastructure is unable to support the target number of around 52 new homes.</p>
<p>Being new to the area, we naturally assumed that the role of EPC was to protect our area. How disappointed we were to find that you are actually suggesting we build more houses than Guildford borough council are requesting! Utter madness!</p>	<p>EPC have done, do and will protect Effingham. We are sorry you are disappointed that EPC are proposing a small amount of extra housing but we are doing so in order to meet local housing need and to protect Effingham, its Green Belt and its green spaces from over-development.</p> <p>GBC's Land Availability Assessment 2016 proposed three sites for development in Effingham with a minimum development of 43 houses. The GBC figure is not a target and Effingham may be faced with a different number in the final Local Plan.</p> <p>Following the Regulation 14 survey and a recent Health Check EPC are proposing a target of 52 new homes in the plan period of 2016 – 2030.</p>
<p>We are particularly opposed to the site known as SA2 - The Barn. This beautiful house sits behind the shops and along a track. I am utterly shocked that you are</p>	<p>GBC's Land Availability Assessment 2016 suggests 16 dwellings would be appropriate on this site.</p>

<p>even entertaining the idea of splitting this house into flats and building within the garden area. This is not a suitable site for multiple dwellings and I am very surprised that this house is not protected in some way, listed / conservation area or such like.</p>	<p>EPC considers that 16 dwellings is a reasonable number to be considered limited infilling on this site. The final number of dwellings and their design will be decided via the planning process.</p> <p>The Barn is one of three of the buildings imported by Mr Diamandidi which are proposed for inclusion on the Effingham Local List, in policy G2 of the NP, in order to protect it. In recognition of the importance of The Barn, SA2 requires its retention and conversion into smaller family-sized housing.</p>
<p>Wouldn't EPC be better off trying to introduce some protection to block those greedy developers intent on destroying our countryside?</p>	<p>The basis of neighbourhood planning is land use and a balance needs to be struck between protecting the village from over-development and the development of homes required by GBC and residents through the Housing Requirements Survey. The NP allows residents to direct housing to areas where new developments can best be supported whilst protecting those areas that are precious to residents.</p>
<p>We do believe that the suggested cycle route, improvements to shops, KGV and protection of nature trails, should already be high on the agenda of the Parish council.</p>	<p>This is certainly the case. The NP in its entirety is a major priority of the Parish Council.</p>

Individual 3	Resident
COMMENTS	EPC RESPONSE
<p>Introduction:</p> <p>I do not believe policy SA3 is deliverable.</p> <p>I do not believe that Policy H1 and the Site Selection Criteria are robust, and hence they are open to legal challenge, which could invalidate the housing policies.</p> <p>The Survey being conducted as part of the formal consultation is open to fraud, and consequently it won't be possible to have any confidence in the results. It would be possible to trivially alter the result of the survey by destroying unfavourable forms or adding favourable forms.</p>	<p>We note your concern over SA3 and address this in more detail below.</p> <p>Policy H1 and the Site Selection criteria have been discussed with the Guildford Borough Council (GBC) planning department, a planning barrister and have been subject to a second Health Check and have been found to be appropriate and reasonable.</p> <p>EPC has full confidence in the site selection criteria and scoring system.</p> <p>The Health Check examiner commented: 'I have considered the background document "Selection of Allocated Sites for Housing". This demonstrates that a robust assessment of potential sites has been undertaken and consulted upon with the community.'</p> <p>We note your concerns expressed about the survey and can reassure you there were robust checks and measures in place to ensure its validity. These include carefully set out procedures for those involved in its preparation, distribution and collection. The Parish Clerk is the custodian responsible for storage and management of information contained within the responses. All residents are able to view their own personal responses as they are held as public records.</p> <p>Effingham Parish Council has no doubts that the survey results are a true and correct record of the views of the residents who participated by returning their completed surveys.</p>
<p>Policy G1.</p> <p>I do not support this Policy because of the inclusion of Site SA3.</p> <p>References to the allocated sites should be removed from the wording of the Policy. Instead simply replace with the words "together with the specific sites allocated in this Neighbourhood Plan".</p> <p>The Policy should be reworded to add the following: <i>Development proposals within High</i></p>	<p>We note your views on SA3 and will address them below.</p> <p>The policy wording has been revised in accordance with the recommendations of the Health Check Examiner.</p> <p>Adding the suggested comment about 'high sensitivity' green belt is unnecessary as under the NPPF as all green belt has the same</p>

<p><i>Sensitivity Green Belt will be required to demonstrate how they conserve or improve the openness of the Green Belt.</i></p>	<p>restrictions and developers must demonstrate special circumstances for developing on green belt land no matter what its sensitivity.</p>
<p>Policy G2</p> <p>I support the Local Views, that they should be retained. Schedule A.</p> <p>I have some concerns about some of the “Local Assets” – Schedule B.</p> <p>Item 4 The British Legion Building is not a heritage asset in any aspect.</p> <p>Item 10. The group of Diamantidi buildings have no historic value to Effingham</p> <p>Item 13. Walls are not really assets.</p> <p>Item 15. Portable buildings are not assets.</p> <p>Item 23. Walls are not really assets.</p>	<p>Support noted.</p> <p>Following the Regulation 14 survey the British Legion building has been removed from the Effingham Local List.</p> <p>The comments on the other buildings are appreciated but EPC believes they all have merit as heritage assets. This view was supported by residents at the Regulation 14 survey.</p>
<p>Policy H1.</p> <p>1. I do not support this policy, and I find the rationale offensive. I need some rationale that is actually believable and not trying to prove that black is white.</p> <p>The Housing Requirement Survey conducted in 2013 cannot be used to justify any target for new houses within Effingham. The Survey is biased and the analysis of the results deeply flawed.</p> <p>2. The Parish Council has erred when they state that the parish “needs” more houses. For the Parish to need more houses, the Council would need to show through national statistics, that Effingham has a growing population. This means that the birth rate must exceed the death rate. This they have failed to do. In reality Effingham does not have a growing population, so does not “need” more houses.</p> <p>Even the most elementary analysis of official statistics shows that Effingham does not have a growing population, and hence does not require any extra housing.</p> <p>3. Guildford Borough Council (GBC) has not imposed any housing target on Effingham. They are proposing in the Local Plan to Inset the village from the Green Belt, and have identified three sites for 42 houses. However it should be noted that as the village is</p>	<p>Opposition noted.</p> <p>1. EPC does not agree the 2013 Housing Requirements Survey (HRS) was biased or the results flawed. The survey, consultation process and rationale were discussed with the planners at GBC, and the HRS survey questions and the distribution and collection process were supported by them.</p> <p>The housing target in H1 was set at 62 to allow for some larger houses to aid financial viability. However on the advice of the Health Check examiner, the target in H1 has been reduced to 52, exactly the number resulting from the HRS.</p> <p>The Health Check examiner commented that ‘The justification to Policy H1 is clear and it is supported by robust evidence’, supporting use of the Housing Requirement Survey as the basis for the housing target.</p> <p>2. We do not understand the comment that Effingham does not have a growing population. The 2001 census shows the population of Effingham as 2556 in 993 households and the 2011 census shows the population as 2711 in 1054 households.</p> <p>3. Although GBC has not imposed any housing target on Effingham, the Emerging Local Plan takes account of three sites with proposed 43 dwellings in total. This is not a target nor a minimum number of housing units for Effingham, it is solely a site</p>

<p>currently washed over by the Green Belt, the two larger sites would only be possible under National Policy if the village is Inset from the Green Belt.</p> <p>4. It is doubtful that all the sites identified in the NP are deliverable within the timescale of the Plan.</p> <p>5. The only reason to set a housing target can only be for personal political gain, to support immigration into the village, which the Parish Council has no mandate whatsoever to pursue.</p>	<p>allocation by GBC. In the Neighbourhood Plan we set our 52 unit housing target as a minimum for the plan period, and the allocated sites are all compliant with the 2003 Local Plan, the NPPF and recent case law. EPC has agreed to the GBC inset proposals in the draft Local Plan – with two suggested improvements to make the inset clearer.</p> <p>4. EPC has discussed all its site selections with the landowner/developer and believes all the sites are deliverable.</p> <p>5. EPC refutes the suggestion that there is any personal or political gain by members of the parish council in setting a housing target. The parish council has the legal right to propose a NP, the Regulation 14 consultation survey demonstrated residents are content with the housing target (73% of respondents agreed with policy H1) and the NP will only be adopted if it has majority support at a referendum.</p> <p>The NP is required to recognise there will be some inward migration to Effingham and the Parish has an obligation to help meet the objectively assessed borough-wide need for extra homes, as far as possible given the Green Belt constraints.</p>
<p>Policy C2.</p> <p>I support the improvement of facilities of KGV. However, I am concerned about the increase in hard surfaces which seem excessive. It is very important that any changes retain the current open green character of the playing fields.</p> <p>As to whether or not a particular improvement is acceptable or not, that will be dependent on the details.</p>	<p>We acknowledge your support for improvement of facilities of KGV. We agree it is an important green space for the village and have proposed it as a Local Green Space to strengthen its protection as a green space of importance to residents.</p> <p>Any proposal for the KGV would be judged on whether it provides enhanced facilities for recreation, leisure or residents' well-being whilst preserving the general green character of this area.</p>
<p>Policy C4.</p> <p>I do not support the extension of the existing Parish Council Burial Ground using part of the Church Street Field site allocated for development in SA1.</p> <p>.</p>	<p>Noted.</p>
<p>Policy LE1.</p> <p>Effingham is a rural village. I do not understand the term "town centre" as used in the Policy.</p>	<p>The phrases referred to are planning technical terms in the context of Local Economy policies, they are used to clarify the policy and are not meant to imply any alteration in Effingham's rural status.</p>

<p>This Policy needs to be reworded so that it is specific to Effingham.</p>	<p>The policy is specific to Effingham. The policy sets out proposals to safeguard village shops and retail facilities.</p>
<p>SA Policies</p> <p>The Site Allocation Scoring is biased and inconsistent. The scores for each site are highly subjective, and makes no sense when comparing the scores for two similar sites on some particular attributes.</p> <p>I am not convinced that the Site Allocation Scoring would stand-up to a legal challenge.</p> <p>The Site Scoring must be redone so that:</p> <p>It is based on objective criteria, which are defensible.</p> <p>It is consistent between sites.</p> <p>Applied to all sites under consideration (e.g. any site within 100 meters of an existing group of 20+ houses)</p> <p>Explain the criteria for considering a site, so as far as possible all potential sites are considered with the Parish.</p>	<p>EPC does not agree with these comments.</p> <p>All the SA policies have been discussed with planning officers at GBC and with a specialist planning barrister. Both GBC planning officers and the barrister agree these are reasonable policies and are consistent with the NPPF.</p> <p>EPC has full confidence in the site selection criteria and scoring system. The site scoring has been based on planning criteria and it has been applied consistently to all the sites brought forward by landowners and developers. All sites within the Plan Area that were brought forward by landowners and developers have been considered using the criteria in a consistent manner.</p> <p>As mentioned above, the Health Check examiner commented: 'I have considered the background document "Selection of Allocated Sites for Housing". This demonstrates that a robust assessment of potential sites has been undertaken and consulted upon with the community.'</p>
<p>Policy SA1.</p> <p>In principle I am not against this site to be used for housing, as it can be considered infilling within the village, and it would not affect the openness of the Green Belt.</p> <p>However, I do not consider the development of 20 houses as limited infilling (too many houses). For this site to be acceptable under NPPF, it would require the village to be Inset from the Green Belt.</p>	<p>The NP is proposing that the site can accommodate 20 dwellings based on a housing density comparable to that of Middle Farm Place. The final number of dwellings will depend on the design and will be decided via the planning process.</p> <p>There is no clear definition of 'limited infilling' but there is a precedent within GBC suggesting that up to 20 homes may be acceptable if it is in character with the surrounding area, and would be compliant with the 2003 Local Plan, the NPPF and recent case law, even if the village is not inset as proposed in the 2016 Emerging Local Plan.</p> <p>GBC's Land Availability Assessment 2016 suggests 22 dwellings would be appropriate on this site.</p>
<p>Policy SA2.</p> <p>In principle I am not against this site. Building houses in the garden of the site would only be permissible under NPPF if the site (along with the village) was Inset from the Green Belt. This would require the current draft of</p>	<p>EPC considers that 16 dwellings it is a reasonable number to be considered limited infilling on this site. As for SA1 above, development of SA2 would be compliant with the 2003 Local Plan, the NPPF and recent case law, even if the village is not inset as</p>

<p>the Local Plan, 2016, to be adopted. There is no way that this could be considered limited infilling – the map very clearly shows open fields on three sides! Conversion of the existing buildings is permissible NPPF.</p> <p>Access to the site would need to be resolved. The existing access to the site is not suitable if extra houses are built.</p>	<p>proposed in the 2016 Emerging Local Plan. GBC's own Land Availability Assessment 2016 suggests 16 dwellings would be appropriate on this site.</p> <p>Again the final number of dwellings and their design will be decided via the planning process, and access would need to be acceptable in highways terms.</p>
<p>Policy SA3.</p> <p>I do not support this policy. Effingham Lodge Farm (ELF) is located on High Sensitivity Green Belt, and should remain open countryside, both the whole of ELF, and the site proposed in Policy SA3.</p> <p>The Policy is undeliverable. Berkley Homes the current owners of the site are very unlikely to agree to the conditions, because the Policy is commercially unviable.</p> <p>The size of the plot is disproportionately large to the number and type of houses proposed.</p> <p>The status of Previously Developed Land is unresolved.</p> <p>I am deeply concerned about the implication of the new Housing and Planning Act, 2016 and section 150 which provides "Permission in Principle". My grave concern is that Berkley Homes will use this clause to build a large number of houses on site SA3, rather than the 6 proposed in the NP. Policy SA3 should be deleted.</p>	<p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development. The fact that this land is categorised as 'high sensitivity' does not override planning policy for previously developed land in the Green Belt, since in planning terms there is only green belt and no hierarchy of importance.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor.</p> <p>This site was discussed with Berkeley Homes (the landowners) at an early stage in the NP process, however there was no response from them during the Regulation 14 consultation. Therefore we have no knowledge that Berkeley Homes disagree with the conditions of policy SA3 and there is no evidence that the policy is commercially unviable. EPC consider this policy is reasonable and deliverable.</p> <p>EPC have taken professional advice on this policy, and the advice is that proposing this site for development as a site selection, as it has met site selection criteria for 6 houses, is reasonable and would not act as a precedent for further development.</p>

<p>Lyons Field</p> <p>I do not support any development on this site. The site is located on High Sensitivity Green Belt land which means it meets all the criteria for Green Belt. I do not consider the development as infilling.</p>	<p>We note that you do not support this site. The reason for the question in the survey was to find out if there was support for the development of Lyons Field from residents. It turned out that there was little support for the development of the site in the survey, and Lyons Field will not be allocated for development within the NP.</p>
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Individuals 4,5,6,7 (similar)	Residents
COMMENTS	EPC RESPONSE
<p>Fully endorse the sites allocated at Church Street and Beech Close which are already within the central part of the village.</p>	<p>Noted.</p>
<p>Policy SA2</p> <p>The Barn has access issues and highway issues and cannot deliver what you say it can.</p>	<p>GBC's Land Availability Assessment (LAA) 2016 suggests that 16 dwellings would be appropriate on this site.</p> <p>In the LAA GBC planners take the position that the narrow access is not considered to be a highway safety constraint on development of the site for up to 16 dwellings. It says that at times when two cars meet going in opposite directions they could use the passing area or one car could reverse back to allow the other to pass.</p> <p>Policy SA2 requires that '<i>Access from The Street should be designed to improve sight-lines, avoid loss of parking space for the shops and ease flow of traffic.</i>'</p>
<p>Policy SA3</p> <p>Effingham Lodge Farm-is in green belt and GBC says it will stay in green belt. Why are you concerned with allocating 6 houses on a hectare. Also anything built on that should be windfall and we shouldn't be paying any lip service to Berkeleys or acknowledging they can build anything on that site.</p>	<p>EPC have taken professional advice on this policy. The advice is that proposing this site for development as a site selection, as it has met site selection criteria for 6 houses, is reasonable.</p> <p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p>

	<p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site.</p> <p>By proposing this site as an allocation, rather than leaving it to come forward as windfall, the NP is able to require an overall improvement in the environment over the whole area of Effingham Lodge Farm. Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor.</p>
The Yard	<p>This was originally a site selection before planning permission was granted.</p> <p>This site for five one bedroom dwellings has received planning permission and is now under construction, and has therefore been removed as a site allocation in the revised NP.</p> <p>Extant planning permissions, as well as site allocations, all count towards the number of homes the NP is expected to deliver during the plan period of 2016 to 2030.</p>
Lyons Field	<p>Why did you remove Lyons Field from the allocation list- this seems a sensible alternative, where a smallish infill development could achieve what Effingham wants in the long term.</p> <p>Lyons Field was initially allocated as a housing site at an early stage in the process. However following the publication of the draft Emerging Local Plan in April 2016, all potential sites were rescored to take account of the Local Plan strategy of protecting 'high sensitivity' Green Belt. This rescored resulted in the de-selection of Lyons Field, which is a greenfield site within high sensitivity Green Belt as defined in the Guildford Borough 'Greenbelt and Countryside Study'.</p> <p>The Regulation 14 Consultation Survey included a question to determine whether or not the use of this site for housing had strong community support. 520 responses were received to this question, of which 71% opposed development on Lyons Field, 5% were neutral, and 24% were in favour of development. Given the clear majority</p>

	against development, Lyons Field has not been allocated for housing in the final Submission Neighbourhood Plan.
I feel that unless Effingham can deliver the correct housing numbers, which with The Barn and Effingham Lodge taken out will not be achievable, we will be doing this again in a very short time or we will become Guildford's dumping ground.	EPC see all the site allocations as deliverable in the plan period. Having regard to the sites with extant planning permission and likely windfall sites, there is a sufficient buffer and it is anticipated the housing target will be met. It is not anticipated that GBC will allocate any further housing sites to Effingham in the Emerging Local Plan.

Individuals 8 & 9 (similar)	Residents
COMMENTS	EPC RESPONSE
We have looked through this document and find it extremely well-presented and interesting.	Thank you, and your comments are noted.

Individual 10	Resident
COMMENTS	EPC RESPONSE
<p>G1.</p> <p>I am not against the proposal for 43 homes proposed in the GBC draft Local Plan, but do not agree with the number and sites proposed in the NP.</p>	<p>The GBC Land Availability Assessment (LAA) 2016 identified three sites in Effingham suitable for development. Adding the figures together the Emerging Local Plan proposes that 43 new houses could be built in total on the three sites. This is not an exhaustive list of sites from GBC nor is it a GBC target. It is GBC's expected number from those sites.</p> <p>The Neighbourhood Plan (NP), following the Regulation 14 survey and a recent Health Check, is proposing a target of 52 new homes on four sites, as a minimum.</p>
<p>H1. The GBC draft LP proposes 43 new homes the NP must accord with that figure.</p>	<p>As above, the NP housing target is in accordance with the Emerging Local Plan.</p>
<p>H3. I do not agree to more than the six traveller sites approved in June 2016.</p>	<p>H3 Traveller Accommodation is now superfluous as planning permission for the six new pitches has now been given, and the policy has therefore been removed.</p>
<p>EN2</p> <p>The western section of Effingham Lodge Farm should be included in the ELF corridor.</p>	<p>Policy EN2 proposes supporting and sustaining the wildlife habitats, networks and corridors in Effingham. There is a 100m wide wildlife corridor on the eastern part of ELF and this is marked on the policy maps, and this corridor requires the protection of the NP. A wildlife corridor is not considered appropriate on the western section.</p> <p>The policy is based on the NPPF and on wildlife habitats and networks as defined in "The Natural Choice", Natural Environment White Paper of 2011.</p>
<p>EN 3,4,5</p> <p>I agree with these policies.</p> <p>But what facilities do EPC propose to provide for low pollution transport?</p>	<p>Thank you for your support of these policies.</p> <p>EPC will not provide facilities directly. Policy EN5 states that the Plan will support development proposals that facilitate low-pollution transport. Where a developer proposes, for instance, charging points for electric vehicles the NP will support this, if it does not contravene other policies in the NP.</p>
<p>C1</p> <p>I agree with sites 3-13.</p> <p>I would hate to see the pubs close but pubs are closing across the country all the time. I do not see how the plan can stop development of these sites.</p>	<p>If approved, the Effingham NP plan will be incorporated into the GBC Local Plan and both plans will inform and direct planning in Effingham. Any developer will have to recognise the sites on this list as places of importance to the community.</p> <p>The NP will ensure that proposals from developers that result in either the loss of or significant harm to a Site of Community Importance will be resisted, unless it can be clearly demonstrated that the operation of</p>

<p>I would hate to see the British Legion close but EPC cannot ensure these sites are protected from development.</p>	<p>the asset or the ongoing delivery of its community use is no longer financially viable, or that the community use of the asset will continue to be provided on an alternative site.</p>
<p>C2, C3 Effingham is not large enough to sustain a medical practice. I am against the urbanisation of the KGV.</p>	<p>Noted. The intention of NP policy is to support facilities for health provision clinics of various sorts, rather than a free-standing medical practice.</p> <p>Any proposal for the KGV would be judged on whether it provides enhanced facilities for recreation, leisure or residents' well-being whilst preserving the general green character of this area.</p>
<p>C5 I consider sufficient learning opportunities already exist in the area.</p>	<p>Noted.</p> <p>However, Policy C5 is focusing on learning opportunities in IT skills and there is certainly continuing demand for introductory and basic IT courses.</p>
<p>R1 How do EPC propose to alleviate the parking problem with regard to the village? Not by concreting the grass in front of the shops?</p>	<p>Policy R1 seeks to ensure that new developments have regard to the adequate provision of parking spaces, so ensuring that enough parking spaces are provided in new built housing developments so that residents' parking does not spill-out on to nearby roads.</p> <p>It also directs that parking for commercial and non-residential developments shall be at least at the necessary level to avoid off-site parking.</p> <p>The policy supports the principle of improvement of car parking provision for village services, but does not propose specific sites.</p>
<p>R2 Fine words but are they deliverable?</p>	<p>Policy R2 is referring to proposals from developers and others about cycle routes, footways and pedestrian routes. The policy will inform developers and planners on the sort of proposals which would be suitable uses of S106, CIL contributions or other 'planning gain' monies.</p>
<p>LE2 The development of the Yard is contrary to this policy. I do not favour commercial development in a rural village.</p>	<p>The Yard has now received planning permission and construction has started. The development retains a retail/office unit within the new buildings.</p> <p>The NP aims to support Effingham's rural economy, and this policy ensures that proposals respect local character and encourage environmental improvements.</p>
<p>SA1 and SA2. Given GBC's proposed Insetting I reluctantly do not disagree with these policies.</p>	<p>Noted.</p>

<p>SA3.</p> <p>I am appalled by this site being proposed in the NP given Berkeley Homes ambitions for the whole of ELF.</p> <p>This site is high sensitivity Green Belt and must be removed from the NP.</p>	<p>EPC have taken professional advice on this policy. The advice is that proposing this site for development as a site selection, as it has met site selection criteria for 6 houses, is reasonable.</p> <p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site.</p> <p>By proposing this site as an allocation, the NP is able to require an overall improvement to the environment over the whole area of Effingham Lodge Farm. Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor.</p> <p>High sensitivity green belt is not recognised under the NPPF as all green belt has the same restrictions and developers must demonstrate special circumstances for developing on green belt land no matter its sensitivity.</p>
<p>SA4</p> <p>I agree if in keeping with the surrounding properties.</p>	<p>Noted</p>
<p>SA5</p> <p>This is a windfall site. The NP should make an allowance that there will be more windfall sites in the next 15 years.</p>	<p>New Policy G5 has been written to take into account how the NP will assess the suitability of future sites for residential development, including windfall.</p> <p>The supporting text of Policy H1 has been updated to give information about the inclusion of windfall numbers that could come forward over the next 15 years.</p>
<p>Lyons Field</p> <p>Classed as 'High Sensitivity Green Belt' in the GBC draft Local Plan.</p>	<p>Opinion noted.</p> <p>Lyons Field was initially allocated as a housing site at an early stage in the process. However following the publication of the draft Emerging Local Plan in April 2016, all potential sites were rescored to take</p>

While I do not support proposals to develop this site it makes more sense to develop than SA3.	<p>account of the Local Plan strategy of protecting 'high sensitivity' Green Belt. This rescored resulted in the de-selection of Lyons Field, which is a greenfield site within high sensitivity Green Belt as defined in the Guildford Borough 'Greenbelt and Countryside Study'.</p> <p>The Regulation 14 Consultation Survey included a question to determine whether or not the use of this site for housing had strong community support. 520 responses were received to this question, of which 71% opposed development on Lyons Field, 5% were neutral, and 24% were in favour of development. Given the clear majority against development, Lyons Field has not been allocated for housing in the final Submission Neighbourhood Plan.</p>
Effingham Actions and Aspirations	Thank you for the comments on Actions and Aspirations for Effingham.
<p>Further Comment</p> <p>Given the drubbing that the draft NP received from the first Health Check examiner I am appalled that EPC have not engaged a professional consultant to vet the new draft before releasing it for consultation with residents.</p>	<p>At the time of the first Health Check in 2015 Effingham was one of the first villages situated solely in the Green Belt to produce a draft NP, and in fact that Health Check provided valuable advice about neighbourhood planning in that context.</p> <p>The advice in that original 2015 Health Check was fully taken into account and the NP was significantly revised before the Regulation 14 consultation in 2016, working closely with planners from GBC, and taking advice from a barrister specialising in planning law.</p> <p>A second health check was undertaken in January 2017 prior to Regulation 15 submission, and further minor amendments made to ensure the NP meets the basic conditions required by the Neighbourhood Planning Regulations, including compliance with green belt policy.</p> <p>The Health Check Examiner commented: "The draft Neighbourhood Plan (NP) contains much to commend it and it is clear that considerable research and consultation has been undertaken to prepare the plan for this attractive village."</p>

Individual 11	Resident
COMMENTS	EPC RESPONSE
<p>I find it unfathomable that the Norwood Council Car Park could not be used for development, instead of the Conservation area, where extra cars are not sustainable and there is not the infrastructure. If other streets asked for a free council car parking area solely because they didn't want to use their own drives it would be seen as laughable. Comments from the EPC that the council have not made it available, have they even been asked, or it suggested to them by EPC.</p> <p>It is also missed opportunity that Whites Garage could have been contacted with the possibility of a similar development as the Yard (with Heritage and conservation area considerations) this would be a far more sustainable position for development than Church Street or the Barn.</p> <p>You have not input for comment on the Design Statement therefore I will comment on the Design Statement at a later date.</p>	<p>The Norwood Road car park was considered as a site selection, but was not taken forward after initial screening as it was judged to be a much needed community facility serving the local shop and residents around Norwood Road. The process is fully explained in the evidence base document 'Selection of Allocated Sites for Housing', available on the EPC website.</p> <p>EPC took a decision not to canvass for sites but rather to advertise that they were interested in landowners and developers coming forward with sites for the NP. GBC in their search for sites for the Local Plan did the same. The TW White site was suggested by a resident and considered. It was not taken forward after initial screening as it is a place of employment with recent substantial investment. Again, this is fully explained in the evidence base document 'Selection of Allocated Sites for Housing'.</p> <p>Noted. The Village Design Statement is a valuable guidance document but is not a formal part of the NP and so does not require formal consultation at this stage.</p>

Individual 12	Resident
COMMENTS	EPC RESPONSE
<p>While in favour in principle of a reasonable amount of housing development within the Effingham area, discussion has failed to pay adequate attention to the development of sites near Lower Road, and the serious situation regarding the Lower Road. This road is already extremely congested and cannot adequately support the volume of traffic already in existence, let alone any additional traffic which the implementation of proposed (Berkeley Homes) housing plans would create.</p> <p>The reason for this situation is primarily the Howard of Effingham school and the number of cars parked by schoolchildren. In addition, there is other traffic which the school generates (including large school buses).</p> <p>Among the solutions are:</p> <ol style="list-style-type: none"> 1. Relocating the Howard of Effingham school. Moving the school to another site in a less heavily congested location (not one directly opposite the school's present position as suggested by Berkeley Homes). 2) Providing a parking area, either within the school grounds or close by, so that schoolchildren no longer feel it necessary to use the Lower Road. If the school itself was unwilling to make land available could not part of the Lodge Farm site be allocated? 3) Creating a Sixth Form College elsewhere. Since the cars causing the parking problem must belong to children old enough to drive, removing children of seventeen and older from the school should also remove the parking problem. 4) Improving the Lower Road by widening the road. The simplest way to achieve this would be to tarmac over the grass verge opposite the school for use as a parking space for school cars. <p>As it appears there is little possibility of any such action being advocated, or even considered, by those currently engaged in formulating plans for the redevelopment of Effingham, it seems to us that it would be foolish to offer whole-hearted support for any plan to build on sites requiring access from and egress onto the Lower Road.</p> <p>We could not, therefore, support any plan for residential development of the Lodge Farm and Church Street Field sites.</p> <p>The Lower Road has to be improved before any further housing development, no matter how little, can occur in that area.</p>	<p>EPC notes your frustration with the congestion and parking on Lower Road especially during the school day, and your four suggested solutions to the problem. Unfortunately these are beyond the scope of a Neighbourhood Plan.</p> <p>You write that you cannot support the SA1 and SA3 site selections as you feel that it would cause more traffic in Lower Road. Policy SA1 is proposing Church Street Field for up to 20 homes which could be about 40 extra cars. Policy SA3 is proposing the previously developed land on Effingham Lodge Farm for up to additional 6 homes which could be about 12 extra cars. EPC does not see an extra 52 cars making any difference to parking as NP policies would ensure sufficient provision for off-street parking for these vehicles. They may increase traffic on the road slightly but not to the level that it would be if the Berkeley Homes proposals for around 250 homes with access to Lower Road were to be accepted.</p> <p>The NP plan does propose policies to counter parking and congestion issues: ENP-ENV5, ENP-R1 and R2.</p> <p>EPC shares your concerns about the congestion and parking along Lower Road and will continue to press Surrey County Council (SCC) for additional traffic control and safety measures, working with residents and the schools.</p>

Individual 13	Resident
COMMENTS	EPC RESPONSE
The time frame of this Neighbourhood Plan (2016 to 2030) is different from that of the GBC draft Local Plan (2013 to 2033).	The time period for a Neighbourhood Plan (NP) may differ from the Local Plan. A 15 year time period was considered appropriate based in the time period covered by the Housing Requirements Survey which provided evidence of local housing need.
EPC should consult with their neighbouring authority, especially with those who will be affected by these plans. Also residents adjacent to the ward boundary should be consulted.	EPC had several meetings with neighbouring parish councils and the Neighbourhood Forum Bookham Vanguard during the preparation of this NP, and all neighbouring authorities were consulted as part of the Regulation 14 consultation. Residents living adjacent to the ward boundary were welcome to the various meetings held to discuss the NP as it was developed, and EPC is aware that several did so.
It appears that the advice of the "Health Check" examiner has been ignored, especially with regard to proposals for housing on green belt sites.	The advice in the original Health Check in October 2015 was fully taken into account and the NP was significantly revised before the Regulation 14 consultation in 2016. A second health check was undertaken in January 2017 prior to Regulation 15 submission, and further minor amendments made to ensure the NP meets the basic conditions required by the Neighbourhood Planning Regulations, including compliance with green belt policy.
Although there has been an allowance in the draft Neighbourhood Plan for "windfall" developments it is much lower than it should have been. The Neighbourhood Plan should seek to meet future housing needs of Effingham residents from a few small identified sites with the remainder coming from windfall developments.	Provision has been made for windfall sites within policy H1. The NP needs to demonstrate that the housing target is deliverable, and cannot depend entirely on windfall sites for this.
G1: Strongly disagree, because the policy "steers housing development to be within the settlement boundary, as defined by the Guildford Local Plan...". Likely to cause confusion for those with no internet or access to a printed copy of the NP. Does not agree with inset boundary proposed in 2016 Emerging Local Plan and this should not be used in policy G1.	Policy G1 has been reworded to make clear that this strategy relies on the 2003 Local Plan settlement boundary together with sites which comply with NPPF paragraph 89 and recent case law. The 2003 settlement boundary and the proposed inset boundary were clearly marked on a map in the printed 'Summary and Guide' delivered to all households in the parish together with the Consultation Survey Questionnaire. Hard copy of this and the full NP was available to view in the Parish Room for those without internet access.

<p>G2:</p> <p>Agree with the intent of this policy, but strongly disagree with the selectivity exercised in the selection of views deemed to be important.</p> <p>Concerned that certain views have been excluded because they would be harmed by development on the allocated sites, particularly SA3.</p> <p>British Legion building has no architectural merit and should not be on the Effingham Local List.</p>	<p>Support for the intent of G2 is noted.</p> <p>The views were selected on their merits, irrespective of possible development on the allocated sites.</p> <p>EPC does not agree that the development of up to 6 new homes on the allocated site at Effingham Lodge Farm would be harmful to views. Any development here would be accompanied by removal of derelict glasshouses and permanent buildings outside the allocated site, leading to an overall improvement to openness and benefiting views.</p> <p>EPC agrees with the comment about the British Legion building and this has now been removed from the Effingham Local List.</p>
<p>G3: Strongly agree</p> <p>G4:</p> <p>I strongly agree that housing should be directed away from areas that are prone to flood and would suggest that this be extended to include areas with a history of subsidence problems. Concerns that the detail of this policy is incorrect, and the risk of flooding from surface water is understated. Any SUDs used should have management systems in place to ensure maintenance in perpetuity.</p>	<p>Support noted</p> <p>The wording and supporting text for this policy have been amended as recommended by the Environment Agency in their response to the Regulation 14 consultation.</p>
<p>H1:</p> <ol style="list-style-type: none"> 1. Strongly disagree with this policy. 2. The pro-rata calculation of a need for 222 houses have nothing to do with the needs of Effingham residents, and the pro-rata calculation is flawed as it is based on a flawed SHMA. 3. There were errors in the Effingham resident's housing survey. The methodology of the survey was such that it estimated total future needs of current residents, not the number of additional dwellings needed because of population growth. This means that a large part of this demand could be met from the normal process of selling existing houses via the housing market. 4. Other adjustments were also unwarranted, for example, a pro rata increase to reflect the fact that 60% of households responded to the survey, so the number of houses required was increased by a factor of 67%. 	<ol style="list-style-type: none"> 1. Noted. 2. The pro rata calculation used the procedure recommended in the Planning Advisory Service Advice Note 'Housing Needs Assessment for Neighbourhood Plans', issued on 30 July 2015, which was based on the SHMA. However following advice from the second Health Check Examiner, this calculation is now given less significance than the local housing need shown by the Housing Requirement Survey (HRS). 3. EPC considers that the housing target reflects the responses from residents in the HRS, and is based on an accurate and robust analysis of the survey results. In particular, the HRS showed a demand for more one and two bedroom homes than could become available through the normal market process, since the stock of smaller homes in Effingham is very limited. 4. No pro-rata increase was made in the detailed analysis shown in document E1, 'Housing Target for Effingham'. The calculation of the number of houses needed was based on the households responding to the HRS.

<p>5. There was an error in the statement in the NP: “Analysis of Land Registry and Planning Application data over the last five years demonstrates that about a third of existing two-bedroom homes have already received planning permission to extend, reducing the number of two-bedroom homes available from existing housing stock even further.”</p> <p>6. A “viability” addition should not be included in the housing target for Effingham.</p>	<p>5. Agreed. This has been corrected, and now reads: “Analysis of Land Registry and Planning Application data over the last five years demonstrates that about a third of the two-bedroom homes sold in that period have already received planning permission to extend, reducing the number of two-bedroom homes available from the existing housing stock even further.”</p> <p>6. The viability addition has been removed from the housing target, which is now ‘a minimum of 52 new homes’ based on the HRS analysis.</p>
<p>H2:</p> <p>1. Disagree with this policy.</p> <p>2. Comments in the Housing Mix section appear to suggest that Effingham should have the same proportion of 1 and 2 bedoomed houses as Guildford town – which is clearly nonsense; given that Guildford has a much higher population of younger people than Effingham. The mere fact that the housing mix is different does not demonstrate a shortfall, nor the degree of the shortfall.</p> <p>3. There are other errors in this section. The text suggests the number of one bedoomed homes in the parish is negligible – in fact it is 42, and this number is recorded in the statistics section of the draft Neighbourhood Plan.</p> <p>4. Similarly, the suggestion that one third of two bedoomed homes had received planning permission in the last five years to extend was entirely incorrect.</p> <p>5. There was a reference to a continuing trend to extend two bedoomed homes, which is fanciful.</p> <p>6. Comments about downsizing suggest a belief that the only issue that prevents downsizing is the availability of suitable accommodation. This demonstrates a misunderstanding of the downsizing situation.</p>	<p>1. Noted.</p> <p>2. Comparison is also made with the proportions of one and two bedroom homes across the whole borough, not just with the town. Taken together with the evidence of demand for smaller homes in the HRS, EPC believes these figures clearly indicate there is a shortfall in smaller homes.</p> <p>3. The comment related to the number of ‘market’ homes, whereas the figure of 42 includes housing association properties (for example Effingham Housing Association manages several one-bedroom apartments) and council housing. When these are excluded, the remaining number of ‘market’ one-bedroom homes can reasonably be described as negligible.</p> <p>4. This statement has been corrected as described above.</p> <p>5. Based on actual planning applications, EPC does not regard this statement as fanciful.</p> <p>6. EPC does not suggest that the shortfall in smaller homes is the only issue preventing downsizing, but the HRS clearly indicates it is a major issue.</p>
<p>H3, H4, H5: Neutral on these policies, with some comments on H3</p>	<p>Noted.</p> <p>H3 Traveller Accommodation is now superfluous as planning permission for the pitches has now been given, and the policy has been removed.</p>
<p>EN1, C2:</p> <p>Neutral on policy EN1.</p> <p>I would strongly agree with this policy if it were not for the statement <i>Development on King</i></p>	<p>Comments noted.</p> <p>EN1 has been reworded and this comment removed, since it is covered in policy C2.</p>

<p><i>George V Fields which enhances their recreational value will be supported, as set out in policy C2.</i></p> <p>I do not agree with the proposals in C2, which will increase the area under concrete substantially – policy EN1 refers to green spaces, but Policy C2 is to concrete over part of one of the green spaces, so it is a grey space policy. The beauty of KGV Fields is that they are green, so they should remain green. I strongly disagree with C2.</p>	<p>EPC does not agree that the proposals in C2 imply any intention whatsoever to substantially concrete over the King George V Fields, since improved recreation facilities here would be required to be sympathetic to the green character of the space and to Green Belt policy.</p>
<p>EN2 to EN5: Strongly agree.</p>	<p>Support noted.</p>
<p>Site allocation policies</p> <p>Site selection criteria were not compatible with the “Health Check” guidance provided by Mr McGurk in his report of October 2015 and his advice has been ignored.</p> <p>The Parish Council have decided that NPPF paragraph 89 applies to the allocated sites, but have done this apparently without reference to case law or previous decisions by the Inspectorate. They have had no independent legal advice. Consequently it was not prudent to include the allocated sites within the draft Neighbourhood Plan.</p>	<p>The NP has been significantly revised following the October 2015 Health Check, and Mr McGurk’s advice has not been ignored. Independent legal advice has also been taken on the revised NP.</p> <p>All the SA policies have been discussed with planning officers at GBC and with a specialist planning barrister. Both GBC planning officers and the barrister agree these are reasonable policies and are consistent with the NPPF. Recent case law has also been taken into account.</p> <p>EPC has full confidence in the site selection criteria and scoring system.</p> <p>The examiner who carried out a second health check in January 2017 commented: ‘I have considered the background document “Selection of Allocated Sites for Housing”. This demonstrates that a robust assessment of potential sites has been undertaken and consulted upon with the community.’</p>
<p>SA1 Church Street Field</p> <p>Strongly disagree.</p> <p>This is a Green Belt site in the Conservation Area and it is not surrounded by development on all four sides. 20 dwellings could not be considered to be a “limited infill” as required under paragraph 89 of the NPPF. Development here would cause harm to the openness of the Green Belt.</p> <p>The proposed density is too high compared with surrounding area including cottages on Church Street.</p> <p>Development here would not conform with Policy D4 of the 2016 Emerging Local Plan as it would not respect the surrounding landscape.</p>	<p>Disagreement noted.</p> <p>All the sites allocated for housing are compliant with both NPPF and recent case law, as well as the 2003 Local Plan.</p> <p>EPC is proposing that this site can accommodate 20 dwellings based on a housing density comparable to Middle Farm Place. Designs for around 20 new dwellings on the site are not seen as inappropriate to this site and its location in the Conservation Area. The policy requires that development proposals should be small-scale and in keeping with the cottages on the western side of Church Street. The final number of dwellings will depend on the design and will be decided via the planning process.</p> <p>There is no clear definition of 'limited infilling' but there is a precedent within planning permissions in Guildford Borough suggesting that up to 20</p>

	<p>homes may be acceptable if it is in character with the surrounding area. GBC's Land Availability Assessment 2016 suggests 22 dwellings would be appropriate on this site and these have been included in the overall housing target for the borough in the 2016 Emerging Local Plan.</p>
<p>SA2 The Barn</p> <p>Strongly disagree.</p> <p>Describing the site as being partially surrounded by development on three sides is incorrect; the reality is that development is confined to the eastern boundary, with the rear gardens of 7 properties forming this boundary, and some low rise development along about 40% of the northern boundary.</p> <p>The housing density in the surrounding area is very low. With net housing of 16 proposed for this site, (17 in total) the housing density would be 24.3 dwellings/ha, much higher than the surrounding area.</p> <p>Adding 16 dwellings to this site could not possibly be considered as infill – the number of dwellings proposed is not “limited infill”.</p> <p>Developing this site in this way would also contravene the requirements of Policy D4 in the GBC 2016 draft Local Plan and would harm the openness of the Green Belt.</p>	<p>Disagreement noted.</p> <p>All the sites allocated for housing are compliant with both NPPF and recent case law, as well as the 2003 Local Plan.</p> <p>The density proposed here is significantly less than the existing density of 34.6 dwellings per hectare in nearby Middle Farm Place.</p> <p>EPC considers that 16 dwellings it is a reasonable number to be considered limited infilling on this site. The final number of dwellings and their design will be decided via the planning process. GBC's Land Availability Assessment 2016 suggests 16 dwellings would be appropriate on this site and these have been included in the overall housing target for the borough in the 2016 Emerging Local Plan.</p>
<p>SA3 Effingham Lodge Farm</p> <p>I strongly disagree with this site selection.</p> <p>This site is described as “previously developed land” but this has not been defined within the NPPF. If the definition is based on buildings and hardstanding that have permanent planning permission, as is likely, then the area that could be described as previously developed land is very limited. Neighbourhood Plan has no certainty of meeting the conditions of paragraph 89 of the NPPF.</p> <p>This site does not appear in GBC 2016 draft Local Plan – it is in an area designated in the 2016 draft Local Plan as “high sensitivity green belt”. It is outside the existing settlement boundary and so is protected by its green belt status.</p> <p>The proposed housing density is very low – 6 dwellings on a 1.2ha site, giving a density of 5 dwellings/ha. A comparison with other proposed housing densities in this Neighbourhood Plan would suggest this is a</p>	<p>Disagreement noted.</p> <p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Therefore a development in conformity with SA3 would not provide a precedent for further development on ELF.</p> <p>Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or</p>

<p>“Trojan Horse” proposal, with many more dwellings to follow on this site.</p> <p>Concern that new buildings here would be closer to the road if the building line of the British Legion Hall is followed and would have a greater impact on the landscape than the existing development.</p>	<p>managed as open natural grassland, protecting wildlife and the wildlife corridor, and EPC considers this would result in an overall improvement to the Green Belt and its openness.</p> <p>The supporting text has been expanded to describe the pre-application advice from GBC on the principle of a development of six homes on the Allocated Site. The advice commented that the existing permanent buildings, access and car park ‘would reasonably be classed as previously developed’ and recommends that new homes should be set back from Lower Road in keeping with the building line of the existing houses at 408 and 410 rather than the British Legion Hall.</p>
<p>SA4, SA5</p> <p>Agree with both these sites, which are examples of windfall sites.</p>	<p>Support noted.</p>
<p>Action 5: Community Assets</p> <p>I strongly disagree with the proposed list of community assets. In particular, I disagree with any private businesses being listed as community assets – they are business ventures. If they fail, they should be allowed to fail, and in the normal course of events, placed on the open market. If EPC wish to bid for these ventures or properties then they should seek approval from residents before making a bid, rather than have blanket approval through this list.</p>	<p>Disagreement noted.</p> <p>EPC regards public houses and local shops as community assets as they are important to a vibrant sustainable village community.</p> <p>Registering them as community assets gives EPC or residents or other organisations the opportunity to bid to acquire the asset; it does not give ‘blanket approval’ to EPC to make such a bid.</p>
<p>Open question</p> <p>I strongly disagree with the proposal to build on Lyons Field.</p>	<p>Opinion noted.</p> <p>Over 70 % of residents responding to this open question were opposed to development on this land, and it will not be included as a site allocation in the NP.</p>
<p>Further Comments</p> <p>Two sites (SA4 and SA5) are examples of windfall sites – and others have been put forward during 2016, including a site on Norwood Road and the Old Post Office. Although not all have been approved, these show clearly that the rate of windfall development is enough to meet the needs of Effingham residents, and that the housing target of 43 houses across the Parish by 2033 in the GBC 2016 Local Plan could be met by windfalls. There is no need to nominate sites in the green belt in this Neighbourhood Plan, or in the GBC 2016 draft Local Plan.</p>	<p>As stated above, provision has been made for windfall sites within policy H1. The NP needs to demonstrate that the housing target is deliverable, and cannot depend entirely on windfall sites for this.</p> <p>This is consistent with the approach taken in the 2016 Emerging Local Plan, where the delivery of 43 new homes in Effingham depends on three of the sites allocated in the NP, SA1, SA2 and SA4, which are all included in GBC’s Land Availability Assessment.</p>

Individual 14	Resident
COMMENTS	EPC RESPONSE
<p>G1.</p> <p>I support the proposal for 43 homes. This figure must not be tampered with.</p>	<p>There is no proposal for the development of 43 new homes in Effingham. If this refers to Guildford Borough Council's (GBC) Land Availability Assessment (LAA) 2016, this document identified three sites in Effingham suitable for development. Adding the figures together GBC proposed that 43 new houses could be built in total on the three sites. This is not an exhaustive list of sites from GBC nor is it a GBC target. It is GBC's expected number from those sites.</p> <p>The Neighbourhood Plan (NP), following the Regulation 14 survey and a recent NP Health Check, is proposing a target of 52 new homes, to be delivered in the allocated sites and on sites with extant planning permission.</p>
<p>H1. Object to the housing target of 62 new dwellings it should be 43.</p>	<p>The Neighbourhood Plan (NP), following the Regulation 14 survey and a recent NP Health Check, has a revised housing target of 52 new homes. The figure of 43 you quote is not a GBC target it is a minimum development figure for three sites in the 2016 LAA, as described above.</p>
<p>H3. No more than six traveller sites please. They are locals and represented on our Committee.</p>	<p>H3 Traveller Accommodation is now superfluous as planning permission for the six pitches has now been given, and the policy has been removed.</p>
<p>EN2</p> <p>The western part of Effingham Lodge Farm should be integrated with the valuable ELF open space.</p>	<p>Policy EN2 is proposing supporting and sustaining the wildlife habitats, networks and corridors in Effingham. There is a woodland wildlife corridor on the eastern section of ELF and this is marked on the policy maps, and it requires the protection of the NP. The policy is based on the NPPF and on wildlife habitats and networks as defined in "The Natural Choice", Natural Environment White Paper of 2011.</p> <p>Policy SA3 requires the clearing of all glasshouses and permanent buildings from ELF outside the small Allocated Site, providing for the integration of all the open space on ELF as you suggest.</p>
<p>EN 3,4,5</p> <p>I agree with these policies.</p> <p>How can we provide facilities for low pollution transport?</p>	<p>Support noted.</p> <p>Policy EN5 states that the Plan will support development proposals that facilitate low-pollution transport. Where a developer proposes, for instance, charging points for electric vehicles the NP will support this, if it does not contravene other policies in the NP.</p>

<p>C1</p> <p>Support numbers 3 to 13, but not 1 and 2 (the public houses). Their future is uncertain and EPC may not be able to protect them from development. These two sites could be used for windfall development. The same would apply to number 14, the British Legion, which is sad as it is a place where old forces members could be close to each other and reminisce.</p>	<p>If approved, the Effingham NP plan will be incorporated into the GBC Local Plan and both plans will inform and direct planning in Effingham. Any developer will have to recognise the sites on this list as places of importance to the community.</p> <p>The NP will ensure that proposals from developers that result in either the loss of or significant harm to a Site of Community Importance will be resisted, unless it can be clearly demonstrated that the operation of the asset or the ongoing delivery of its community use is no longer financially viable, or that the community use of the asset will continue to be provided on an alternative site.</p> <p>Number 14, the British Legion, has now been deleted from this policy.</p>
<p>C2 This small community does not need a medical practice.</p>	<p>Noted. The intention of NP policy is to support facilities for health provision clinics of various sorts, not necessarily a free-standing medical practice.</p>
<p>C4 Support</p>	<p>Noted.</p>
<p>C5 Facilities for learning exist or are near at hand.</p>	<p>Noted.</p> <p>However, Policy C5 is focusing on learning opportunities in IT skills and there is certainly continuing demand for introductory and basic IT courses.</p>
<p>R1</p> <p>How do EPC propose to alleviate the parking problem with regard to the village? Not by concreting over our attractive Green Belt?</p>	<p>Policy R1 seeks to ensure that there is adequate parking in new built housing so that residents' parking does not spill-out on to nearby streets.</p> <p>It also directs that parking for commercial and non-residential developments shall be at least at the necessary level to avoid off-site parking.</p> <p>These NP policies are to protect the Green Belt from spill-out parking, and being concreted over.</p>
<p>LE2</p> <p>It would be wrong to develop the Yard.</p> <p>There must be no commercial development in a rural village.</p>	<p>The Yard has now received planning permission and construction has started.</p> <p>The NP aims to support Effingham's rural economy, and this policy ensures that proposals respect local character and encourage environmental improvements.</p>
<p>SA1 and SA2.</p> <p>There is a need for some insetting in the Green Belt and I agree with the tasteful development of SA1 and SA2.</p>	<p>Noted.</p>

<p>SA3.</p> <p>The history of Effingham Lodge Farm is described from personal knowledge.</p> <p>I want no development on this land. The six houses proposed are undeliverable. Berkeley Homes will want to develop the whole 80 acres not just the six houses.</p> <p>The land is top quality Grade 2 agricultural land, and the site declared high sensitivity Green Belt – glass houses would not have been erected at a cost of £100,000 per acre on rubbish soil!</p> <p>The two houses next to the British Legion were built for the Van de Bergs for management in the 1980s. They are purely for farm employees. They are not permanent and no change of use has been agreed. This 1.5 hectares is Green Belt.</p>	<p>The description of the history of the site, the greenhouses, the two employee houses and the quality of the agricultural land at the site is noted.</p> <p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Therefore a development in conformity with SA3 would not provide a precedent for further development on ELF, and would preserve the good quality agricultural land.</p> <p>Policy SA3 requires the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor, and EPC considers this would result in an overall improvement to the Green Belt and its openness.</p> <p>The information about the two houses is noted.</p>
<p>SA4 OK if in keeping with the surrounding properties.</p>	<p>Noted</p>
<p>SA5</p> <p>This is a windfall site. The NP should make an allowance that there will be more windfall sites in the next 15 years.</p>	<p>New Policy G5 has been written to take into account how the NP will assess the suitability of future sites for residential development, including windfall.</p> <p>The supporting text of Policy H1 has been updated to give information about the inclusion of windfall numbers that could come forward over the next 15 years.</p>
<p>Lyons Field</p> <p>Classed as 'High Sensitivity Green Belt' in the GBC draft Local Plan.</p>	<p>Over 70 % of residents responding to this open question were opposed to development on this land, and it will not be included as a site allocation in the NP.</p>
<p>Effingham Actions and Aspirations</p>	<p>Comments on Actions and Aspirations for Effingham are noted.</p>

Individual 15	Resident
COMMENTS	EPC RESPONSE
I am writing to support the additional planning possibility of the Lyons field area.	<p>Lyons Field was initially allocated as a housing site at an early stage in the process. However following the publication of the draft Emerging Local Plan in April 2016, all potential sites were rescored to take account of the Local Plan strategy of protecting 'high sensitivity' Green Belt. This rescored resulted in the de-selection of Lyons Field, which is a greenfield site within high sensitivity Green Belt as defined in the Guildford Borough 'Greenbelt and Countryside Study'.</p> <p>The Regulation 14 Consultation Survey included a question to determine whether or not the use of this site for housing had strong community support. 520 responses were received to this question, of which 71% opposed development on Lyons Field, 5% were neutral, and 24% were in favour of development. Given the clear majority against development, Lyons Field has not been allocated for housing in the final Submission Neighbourhood Plan.</p>
I believe it is necessary to bring Effingham up to the required number of new houses needed by GBC for the area without them having to reconsider the Howard of Effingham plan.	<p>The 2016 GBC draft Local Plan has not required Effingham to provide for the development of a specific number of new dwellings. GBC's Land Availability Assessment (LAA) 2016 has identified three sites in Effingham suitable for development that could take 43 new houses in total, however this is not a target it is a minimum figure. The Neighbourhood Plan (NP), following the Regulation 14 survey and a recent NP Health Check, is proposing a target of 52 new homes, again this is a minimum. The Neighbourhood Plan therefore meets the requirements of GBC's 2016 Emerging Local Plan for new homes in Effingham.</p>
I have no personal interest in the site, other than a wish to stop the larger Howard of Effingham proposition but to find the 60+ houses Effingham needs.	<p>EPC is confident that all the sites selected have a good prospect of development and that a minimum of 52 new dwellings will be built within the plan period.</p>
Policy SA2 I do not believe that the Barn site will yield very many houses.	<p>GBC's Land Availability Assessment (LAA) 2016 suggests that 16 dwellings would be appropriate on this site.</p>
Policy SA3	<p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make</p>

<p>Effingham lodge farm will not be developed in a small way by Berkeley's who will still hope one day to develop the whole area.</p>	<p>a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Therefore a development in conformity with SA3 would not provide a precedent for further development on ELF.</p> <p>This site was discussed with Berkeley Homes (the landowners) at an early stage in the NP process, however there was no response from them during the Regulation 14 consultation. Therefore we have no knowledge that Berkeley Homes disagree with the conditions of policy SA3 and there is no evidence that the policy is commercially unviable. EPC consider this policy is reasonable and deliverable.</p>
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Individual 16	Resident
COMMENTS	EPC RESPONSE
<p>EPC have proposed sites for development that cannot be built on under NPPF paragraph 89. In the Health Check carried out in October 2015 the examiner stated on page 16 that sites should not be allocated in the Green Belt that would clearly be constrained by Green Belt policy. This referred to both SA1 and SA3.</p>	<p>All allocated sites are judged to be appropriate on the basis of NPPF para 89 together with recent case law that a site outside the Local Plan settlement boundary can be within a village as a matter of fact on the ground.</p> <p>The Neighbourhood Plan was significantly revised following the 2015 Health Check, and a second Health Check on the revised Plan was undertaken in 2017. The Health Check examiner commented: 'I have considered the background document "Selection of Allocated Sites for Housing". This demonstrates that a robust assessment of potential sites has been undertaken and consulted upon with the community.'</p>
<p>The minimum housing target is not based on credible analysis. Effingham needs to develop a limited amount of new housing as it has done over the last five years, but it must be on sites permitted under the NPPF and the housing needs to be appropriate both for the needs of the village and the specific locations of the proposed sites.</p>	<p>The minimum housing target in policy H1 has been revised to 52 as advised by the Health Check examiner.</p> <p>The minimum housing target figure of 52 comes from the Housing Requirements Survey that EPC conducted in 2013. In EPC's view this figure is an accurate and robust analysis of residents' requirements over the plan period.</p> <p>The Health Check examiner commented that 'The justification to Policy H1 is clear and it is supported by robust evidence.', so supporting use of the Housing Requirement Survey as the basis for the housing target.</p>
<p>Policy G1.</p> <p>Support with exceptions of sites SA1, SA2 and SA3. I would like support of the concept of high sensitivity Green Belt from the draft Local Plan included in the Plan.</p>	<p>We agree it is important to resist planning applications by developers in the Green Belt including land categorised in the 'Green Belt and Countryside Study' as 'high sensitivity' Green Belt, and 'high sensitivity' was included in the criteria for site selection in the Neighbourhood Plan.</p> <p>However adding wording about 'high sensitivity' to NP policy is unnecessary as under the NPPF all Green Belt has the same restrictions and developers must demonstrate special circumstances for developing on Green Belt land no matter its sensitivity.</p>
<p>Policy G2</p> <p>Support Local Views but think there should be more consultation on heritage assets on the Effingham list as some are very questionable.</p>	<p>EPC has made changes in the local heritage assets following comments in the Regulation 14 consultation. However, we view the Effingham local heritage list as a living entity, with new heritage assets being added from time to time when their heritage value becomes apparent.</p>

<p>Policy H1.</p> <p>It is not based on a real need as Effingham does not have a growing population and it makes insufficient allowance for windfall which has given Effingham a higher new housing rate than the Guildford average over the last five years.</p>	<p>EPC considers the housing target reflects the responses from residents in the 2013 Housing Requirements Survey, and is based on an accurate and robust analysis of the survey results.</p> <p>The NP is required to recognise there will be some inward migration to Effingham and the Parish has an obligation to help meet the objectively assessed borough-wide need for extra homes, as far as possible given the Green Belt constraints.</p> <p>EPC anticipates that the housing target is deliverable based on the use of allocated sites, sites with extant planning permission and likely windfall sites, which together provide a sufficient buffer to ensure that the housing target will be met. It would not be acceptable to rely on windfall sites to meet the minimum target.</p>
<p>Policy EN1.</p> <p>I support the concept of Local Green Spaces, but am concerned about the support for development of King George V Fields which I think is contrary to the policy.</p>	<p>Support for concept noted.</p> <p>The intention of NP policy on the King George V Fields is to support the provision of enhanced facilities for recreation, leisure or residents' well-being whilst preserving the general green character of this area.</p> <p>The wording about acceptable development at the King George V Fields has been removed from the policy wording of ENV1, but is retained in C2.</p>
<p>Policy LE1</p> <p>This policy appears to refer to a town rather than a village and needs appropriate revision.</p>	<p>The phrases referred to are technical planning terms in the context of Local Economy policies. They are used to ensure clarity for planners and are not meant to imply any alteration to Effingham's village status.</p>
<p>SA Policies.</p> <p>EPC has looked at Green Belt sites that cannot be built on under NPPF para 89 –SA1, SA2 and SA3. Sites SA1 and SA2 are proposed as development sites in the Guildford Draft Local Plan where they will be able to be developed if they are in the proposed village inset. Disagree that they can currently be built on as limited infilling as they are too large and the proposed number of houses too great for this to apply.</p>	<p>All the SA policies have been discussed with the planners at GBC, and EPC is satisfied that all the sites allocated for housing are compliant with both NPPF and recent case law, as well as the 2003 Local Plan.</p> <p>SA1 and SA2 have been judged to be appropriate on the basis of NPPF para 89 concerning limited infilling in a village together with recent case law that a site outside the Local Plan settlement boundary can be within a village as a matter of fact on the ground. There is a precedent of planning permissions within Guildford Borough suggesting that up to 20 homes on a site may be acceptable as 'limited infilling' if it is in character with the surrounding area.</p> <p>SA3 is discussed below.</p>
<p>SA1 The number of houses proposed for SA1 is too large. The calculation was originally from GBC figures of the size of the site as</p>	<p>EPC is proposing that the site can accommodate up to 20 dwellings based on a housing density comparable to Middle Farm Place. Designs for</p>

<p>1.13ha instead of the correct 0.7ha. The proposed number of houses would give a density of about 31dph, which is much too high for this site. This site is at the heart of the historic village and Conservation Area and probably was the site of the medieval manor house of Effingham East Court. Such a density of houses in view of the church and other listed buildings would be quite inappropriate and damaging to the historic character of the village. It is also against policy G2.</p>	<p>around 20 new dwellings on the site are not seen as inappropriate to this site and its location in the Conservation Area.</p> <p>The policy requires that development proposals should be in accordance with G2 and should be small-scale and in keeping with the cottages on the western side of Church Street. The final number of dwellings will depend on the design and will be decided via the planning process.</p> <p>GBC's Land Availability Assessment 2016 suggests 22 dwellings would be appropriate on this site.</p>
<p>SA3 Any PDL on this site is likely to be very small and if six houses were built on this area of high sensitivity Green Belt it is hard to see how they could not affect its openness. It is also not deliverable as the owners, Berkeley Homes, are very unlikely to agree to the conditions of the policy.</p>	<p>EPC takes the view, after consultation with both GBC planners and a barrister who specialises in planning matters, that the developer could make a planning application now for development on the previously developed land at ELF and according to the advice it could be granted planning permission if it has no greater impact on the openness of the Green Belt than the existing development.</p> <p>The wording of the supporting text for this policy has been revised to clarify that the allocation is consistent with NPPF para 89 and that the requirement for any development to have no greater impact on the openness of the Green Belt than the existing development provides an effective cap on the number of homes that could be built on the site. Therefore a development in conformity with SA3 would not provide a precedent for further development on ELF.</p> <p>This site was discussed with Berkeley Homes (the landowners) at an early stage in the NP process, however there was no response from them during the Regulation 14 consultation. Therefore we have no knowledge that Berkeley Homes disagree with the conditions of policy SA3 and there is no evidence that the policy is commercially unviable. EPC consider this policy is reasonable and deliverable.</p>

Individual 17	Resident
COMMENTS	EPC RESPONSE
<p>G1.</p> <p>I support the development of housing and a new school on Effingham Lodge Farm. The whole of the Effingham Lodge Farm site should be considered for development.</p>	<p>EPC looked at all the development sites in Effingham brought forward by landowners and developers. We considered, assessed and scored all sites against planning criteria. Consideration was given to the proposal for the whole of Effingham Lodge Farm (ELF) to be a site selection, but against planning criteria the site scored poorly compared to other sites, because ELF is in the green belt outside the settlement area.</p> <p>Other planning aspects also counted against this site, e.g. a large number of houses here would lead to much increased traffic problems.</p> <p>Since the assessment of sites Guildford Borough Council (GBC) has come forward with its Green Belt sensitivity policy and according to this ELF is judged as high sensitivity green belt.</p>
<p>G2</p> <p>E1 & E2 - have these been included in order to be able to object to future planning applications by Berkeley Homes? There are many beautiful views in and around Effingham that should be preserved but currently Effingham Lodge Farm is an eyesore.</p> <p>I understand that the Parish Council would like to see this land redeveloped and made more accessible to the public in return for limited planning permission but at the moment the brownfield site in the forefront of these views is just not attractive and I think it's wishful thinking to believe that the owner of this site would develop what is effectively their private land in this way.</p>	<p>Views E1 and E2 have been chosen for their visual attractiveness. E1 looks towards the Thorne Wood SNCI across ELF, and E2 towards the village Conservation Area, and both are very attractive views. EPC believes that policy SA3 could lead to a significant visual improvement at ELF.</p> <p>The NP, through Policy SA3, is proposing a small development on the previously developed land at ELF which would lead to a significant improvement to the environment and to the views of the site. Residential development proposals on the Allocated Site should:</p> <ul style="list-style-type: none"> ● Be designed to enable open views through the development towards Thorne Wood and to reflect the 'edge of settlement' location ● Avoid harm to the wildlife corridor through the open Green Belt land to the east ● Be designed to be in keeping with the adjoining Effingham Conservation Area. ● Demonstrate that the proposal does not harm the setting of Effingham

<p>As regards (B) Schedule of Local Heritage Assets, I assume that you have agreement from the current owners for all the assets on the current list to be included. There are some buildings on the list that might be historical but are not beautiful, for example The British Legion, some of the buildings at St Lawrence Primary School and arguably Colets (The Old Village Hall). I do agree that buildings of historical interest should be preserved, but only those that really enhance the village.</p>	<p>Conservation Area or views into or out of Effingham Conservation Area.</p> <ul style="list-style-type: none"> ● Demonstrate that the proposal does not adversely affect the settings of The Red House and Yard, Lower Road (Grade II Listed) or 'Our Lady of Sorrows' Church (locally listed) by virtue of design or impact on significant views. ● Demonstrate that the proposal avoids or minimises harm through impact on non-designated archaeological remains in accordance with ENP-G3, noting that this site is close to the Area of High Archaeological Potential (2003 Local Plan). <p>Landowners of the heritage sites have been given the same opportunities to comment on the NP as residents. Both landowners and residents will have further opportunities to give their views in the GBC consultation, and at the referendum.</p> <p>As a result of the Regulation 14 survey the British Legion has been removed from the Effingham Local List of heritage assets. We view the Effingham local heritage list as a living entity, with new heritage assets being added from time to time when their heritage value becomes apparent.</p>
<p>G3</p> <p>If there are sites of archaeological interest there should be a plan to do something about these areas i.e. investigate and/or excavate. I do not agree that areas within the settlement area should be vetoed for development "just in case" where there is no plan for any archaeological investigation.</p>	<p>The policy does not veto sites and NP policies are not intended to plan for or organise archaeological investigations. This policy states that development proposals are required to demonstrate that they avoid or minimise harm through impacts on non-designated archaeological remains recorded either in Surrey County Council's Historic Environment Record and or in records concerning the Area of High Archaeological Potential set out in the Guildford Local Plan.</p>
<p>H1. I support the provision of new homes in Effingham. I would support even more new housing as an enabler for a new secondary school or other community improvement. I think schemes which are likely to benefit the wider Effingham community (under Section 106 or other means) should be favoured by this plan.</p>	<p>Noted.</p>
<p>H2</p> <p>I disagree with the mix of housing proposed. I appreciate that this is based on the Housing</p>	<p>We note your disagreement with the proposed housing mix but would confirm that this is based on the 2013 Housing Requirements Survey (HRS) and</p>

<p>Requirements Survey but I question whether the people answering the survey responded based on definite plans backed up with financial resources (as we did). Is there really an unfulfilled demand for 1 and 2 bedroom homes in this area? Have you consulted estate agents?</p> <p>It is one thing for older people to talk about downsizing, but how many in reality are going to do that and stay in the area? Likewise how many single people (young adults or divorcees) will be able to afford to buy in this area.</p> <p>Whilst it's important to take into account the needs of the current population in Effingham and it is logical that some larger properties will be vacated in the next few years, it's just as important to look at the bigger picture and consider the housing requirements at the macro level.</p> <p>The fact is more homes are required right across Surrey (and the rest of the country) and Effingham's housing plan needs to take into account the likely demand from people who don't yet live here as well as the wishes of the current population.</p>	<p>recommendations from GBC that we require some residential development to be smaller and more affordable properties.</p> <p>EPC considers that the proposed housing mix reflects the responses from residents in the HRS, and is based on an accurate and robust analysis of the survey results, which took account of whether people wanted to stay in this area. In particular, the HRS showed a demand for more one and two bedroom homes than could become available through the normal market process, since the stock of smaller homes in Effingham is very limited.</p> <p>The NP recognises this need for smaller homes and this policy is about delivering the housing mix that meets the assessed local need. Developers are already starting to meet the need for 1 and 2 bedroom properties and two recent planning applications in Effingham are proposing to build five new 1 bedroom and two new 2 bedroom homes in the village.</p> <p>EPC is very aware of the bigger picture – the macro level. GBC are supportive of the NP, the site selections and the housing mix. Indeed the site selections in the 2016 draft Local Plan are matched in the NP.</p>
<p>H3, H4, H5</p> <p>I support these policies.</p>	<p>Noted.</p>
<p>EN1</p> <p>I'm not sure about Browns Field being designated as a LGS. It's owned by The Howard and is locked most of the time, therefore not usable by the wider community. Likewise, I hadn't realised that The Jubilee Garden even existed, so I'm not sure that this is available to the whole community (this might be my misunderstanding but if there are community assets in our village we should all know about them!). In any case, only sites open to the wider public should be designated as LGS unless you have the consent of the owner.</p>	<p>Planning Practice Guidance says that owners whose properties are proposed as LGS should be contacted at an early stage and landowners have opportunities to make representations in respect of the proposals in the draft NP.</p> <p>All owners of proposed Local Green Space (LGS) have been contacted about proposals to designate their land as LGS, but it is not essential to have their agreement to the designation. In the case of Jubilee Gardens the land owner has given permission. In the case of Browns Field the land owner has not agreed; however Browns Field is used regularly for sport, particularly rugby, with over 120 children playing and training there from September through until April each year. It is designated as LGS due to its recreational value and historic significance.</p>

	<p>Please note that at the Regulation 14 survey 95% of residents returning surveys (54% of households in Effingham returned at least one survey) agreed with this policy.</p>
EN2 I am not qualified to comment on this aspect of the plan. It all seems logical in theory but as a general point, these wildlife corridors and stepping stones should not be used as a blanket barrier to development, rather further investigation should be undertaken by qualified specialists to determine the specific impact. For this reason I cannot agree to the sentence "proposals for new developments within a wildlife corridor or stepping stone will be resisted other than in very special circumstances", particularly when the phrase "special circumstances" is not defined.	<p>A conservation specialist was involved in developing this policy. The policy has also been scrutinised by both Natural England who recommended the width of the corridors and by Surrey Wildlife Trust, who support the policy and who helped clarify the wording.</p> <p>The term "very special circumstances" is a planning term often used in relation to building on the green belt. There are many good definitions of this term on line.</p> <p>Please note that at the Regulation 14 survey 96% of residents returning surveys (54% of households in Effingham returned at least one survey) agreed with this policy.</p>
EN4 I support this, but I think the key word here is "safety". Any lighting required to enhance safety should be positively viewed.	<p>The policy supports lighting wherever the safety of road users and others is concerned. This policy seeks to enhance and sustain Effingham as a dark skies village, taking account of the safety of residents and visitors.</p>
C1 I disagree with this. This shouldn't be about the sites per se but about the value/benefit to the community. Furthermore, when evaluating any proposed changes, the value should not be assumed but tested with the community, particularly those who use or have been users of the service. So, I would prefer to read a list that says: Public House {Sir Douglas Haig, The Plough) Places of religious meeting (st Lawrence Church etc) Local retail outlets (Post Office, butcher, baker, supermarket etc) Primary School (St Lawrence Primary) Pre-School Nursery (xxx, xxx, xxx) Railway Station Etc	<p>All the policies in the NP have been designed with community involvement; EPC has consulted widely and on many occasions with our local Effingham community. In the Regulation 14 survey 95% of residents returning surveys (54% of households in Effingham return at least one survey) agreed with this policy.</p> <p>Whilst recognising your view that this policy should be about value/benefit, the basis of Neighbourhood Plans has to be land use and therefore has to be specific about the sites which are included. The policy accepts that proposals leading to a loss of sites of community importance will not necessarily be resisted if the community use is provided on an alternative site, which allows community value/ benefit to be taken into account regardless of the site.</p> <p>We note your list shows many sites that are already included in C1. (The Railway Station – Effingham Junction railway station is in East</p>

	Horsley, and as such will be part of the East Horsley NP.) So in this regard much of your list is recognised by the NP.
C2 I support this policy.	Noted.
C3 I support the provision of Local Health Services in Effingham, however I feel that the wording of the question in the HRS was likely to elicit a high positive response that doesn't reflect true need i.e. most residents have cars and are able to travel to neighbouring villages to visit the doctor.	Comments noted
C4 I support a garden of remembrance and a place for interment of ashes but I do not support extension of burial facilities in Effingham.	Comment noted.
C5 I support this policy.	Noted
C6 I strongly disagree with this policy. A strategic/holistic view needs to be taken. Any development of schools should be primarily about improving the quality of the education that can be provided and that is the most important thing. It is unrealistic to expect schools to develop on their current sites and improve parking without severely impacting on the learning environment (which is already compromised). Any scheme that seeks to improve the learning environment and educational provision for the future generations of children in this village should be favourably viewed, particularly where children's safety would be improved and current traffic congestion would be alleviated. The mention of exploring Free School options is unnecessary in the context of St Lawrence Primary school. Have you consulted with the schools about this? I strongly believe that this should be removed from this plan. I refer to my earlier comments relating to C1 that the important thing is the service/value to the community rather than the site itself and in this context, the only important thing is the continued provision of a "good" primary education for the children in this village.	<p>The parish council is a strong supporter of all the schools in Effingham. Some parish council colleagues have experience of teaching including at large secondary schools where the norm is for the school to develop on its existing site. We question whether there is any evidence that children's performance is impacted by properly organised new extensions on existing school sites.</p> <p>Public consultations have shown that there is strong support for any new extensions to the three schools in Effingham to be on their existing sites.</p> <p>The mention of the Free School option has been removed from the NP following consultation with The Howard Partnership Trust.</p> <p>The text has been reworded to clarify that St Lawrence Primary School is being proposed for inclusion on the Local Planning Authority Register of Assets of Community Value which would enable alternative community uses for the building to be explored should it no longer be used as a primary school.</p>

R1, R2 I support these policies.	Noted
LE1 I support most of this policy but I cannot support the sentence "Proposals for new food takeaways within 500m of schools will not be accepted because of the potential negative impact on the health of school children." Regulation of what children eat is about parenting and education. It is not up to the Parish Council to intervene on this type of issue. Furthermore, food takeaways (or restaurants with takeaway options) might actually be highly beneficial to the wider Effingham community.	We agree and this sentence has been removed from the policy.
LE2 I support this policy.	Noted
SA1 I support this policy as long as vehicular access is onto Lower Road rather than Church Road.	Policy SA1 includes a requirement that 'the main vehicular access to the site should be from Lower Road to the north, with pedestrian access onto Church Street.'
SA2. I support this policy.	Noted
SA3. Disagree - I would like to see enabling development and a new school on this site. This is an opportunity of a generation missed.	We note your views. Policy SA3 allows a small amount of residential development (up to six additional houses) in return for requiring the land outside the Allocated Site to be either kept in agricultural use or managed as open natural grassland, protecting wildlife and the wildlife corridor. EPC considers this would result in an overall improvement to the Green Belt and its openness, and would benefit our environment. At the recent Regulation 14 survey 66% of residents returning surveys (54% of households in Effingham returned at least one survey) agreed with this policy.
SA4, SA5 I support these policies.	Noted
Community Aspirations.	Comments Noted

<p>Lyons Field</p> <p>Currently this is an eyesore and so I have no objection to housing on this site. The caveat would be that I would support development of Effingham Lodge Farm to enable a new school over and above any other development.</p>	<p>Comments Noted</p>
<p>Other</p> <p>I appreciate the detailed work that has gone into this plan. My observation is that it's been done very much from a "bottom up" perspective rather than 'top down". It would be much more interesting to start from a place of "what do we want Effingham to be like in 50 years' time?" i.e. with a real focus on creating a vibrant community for the 21st century and to plan for that, rather than to take the status quo and try and preserve it as far as possible.</p> <p>Sadly, I know that I'm in a minority when it comes to taking a bigger picture view and really embracing change for the greater good of society. Hence, I suspect the development of this plan has been necessarily done to appease the change-adverse majority currently living in this village, rather than to deliver against the needs of the future residents.</p>	<p>The Effingham NP has been designed in the context of planning guidance and the NPPF, which requires a NP to support sustainable development, and in consultation with GBC, land owners, statutory consultees including Natural England, and extensive consultations with residents and village groups.</p> <p>Consultations with local residents is essential in neighbourhood planning and many of those who support the plan also see themselves 'taking a big picture view' of the future needs of residents of Effingham, Guildford, and the wider area.</p> <p>EPC does not agree that the NP has been developed to appease the 'change-averse majority'; the Plan does propose some significant change to provide the extra homes the village needs, and all policies in the NP were supported by at least 2/3 of respondents to the Regulation 14 survey.</p> <p>Neighbourhood planning is chiefly about land use over the plan period, in the case of the NP 2016 - 2030. An NP gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided. This we have been seeking to do in building the NP.</p>