Planning Policy (Local Plan Consultation) Guildford Borough Council Millmead House Millmead Guildford Surrey GU2 4BB



Ash Green Residents Association

19th July 2017

Dear Sir / Madam

We wish to object to the 2017 Proposed Submission of the Local Plan (Strategy and Sites) for the following reasons. (amendments shown in blue text)

#### 1. Policy P3 - Countryside

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

- 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, e Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."
- 4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."
- **Policy P3 Amend:** (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."

#### 2. Policy A29: Land to the south and east of Ash and Tongham

We object to the increase from 1200 to 1750 homes as this would increase the pressure of coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the "historic location of Ash Green", is inadequate and would need rewording to prevent this increased potential for coalescence.

- Requirement 6 Amend: "Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should-must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"
- Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

"Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected."

- Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.
- Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
  - The Street in Tongham
  - A331/A323 intersection and A331/A31 Intersection
  - A31/White Lane junction
- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

#### 3. Policy A28: Land to the east of White Lane, Ash Green

- Correct title of Policy A28 to say Ash <u>Green</u>, and not Ash.
- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

**Opportunities (1) Should read**: "To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site."

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

Regrettable the Local Plan continues to incorrectly identify the boundary of Ash Green. Ash Green Residents Association made a detailed response to the 2014 Local Plan Consultation and in particular raised their concerns that GBC's settlement boundary of Ash Green was incorrect and excluded the northern part of the village. AGRA also raised concerns regarding the boundary of the Ash & Tongham Urban Area (previously known as the Ash & Tongham Strategic Location for Growth) and its potential for coalescence with Ash Green. These concerns are detailed in our comments to Policy 11 of the 2014 Local Plan and we attach a copy at Appendix A for your information.

The Ash Green settlement boundary inaccuracy together with the Ash & Tongham Urban Area boundary inaccuracy are still present in the 2017 Draft Local Plan. We therefore ask that our 2014 comments are taken into account when considering the correct settlement boundary of Ash Green, the boundary of the Ash & Tongham Urban Area and a suitable area of separation between them.

Yours faithfully

Ash Green Residents Association.



APPENDIX A - AGRA Response to Local Plan Consultation 2014

Policy 11 - Ash and Tongham Strategic Location for Growth - OBJECT

### Comment 1

# The Settlement Boundary excludes part of Ash Green and is not fit for purpose.

Policy 11 states that "In order to protect Ash and Tongham and Ash Green we will designate an Area of separation between Ash and Tongham urban area and Ash Green to ensure that the settlements retain their individual character and <u>prevent their</u> <u>merger</u>. Within this Area of Separation, we would expect any development proposals to show how they contribute to the ongoing separate identity of the Ash and Tongham Urban Area and Ash Green."

- Appendix G of the Local Plan identifies the new settlement boundary for Ash Green as proposed by Guildford Borough Council. It stops at the old railway track and does not include Old Ash Green Station, Whiteways Cottage or the houses of Ash Green Road and Drovers Way.
- The plan therefore proposes to cut Ash Green in two, calling one part Ash Green and the other an "area of separation". This change would allow the boundary of Ash to be pushed out across the fields which separate Ash and Ash Green. The proposal therefore promotes the coalescence of Ash and Ash Green.
- The settlement boundary of Ash Green must include all the properties of Ash Green. Therefore the fields to the north and east of Ash Green Road must become the area of separation to comply with Policy 11 of the Draft Local Plan. We have illustrated this boundary with the following diagrams.

#### APPENDIX A (Cont) - AGRA Response to Local Plan Consultation 2014



#### APPENDIX A (Cont) - AGRA Response to Local Plan Consultation 2014

Policy 11 - Ash and Tongham Strategic Location for Growth - OBJECT

#### Policy 11 - Comment 2

The area of separation/buffer zone between Ash, Tongham and Ash Green must be protected by stronger and specific wording to prevent development on that land.

Policy 11 states that "Within this Area of Separation, we would expect any development proposals to show how they contribute to the ongoing separate identity of the Ash and Tongham Urban Area and Ash Green."

- This wording is far to weak to provide clear and specific protection from new housing development.
- New development within the separation zone must be resisted to ensure that separation is maintained between rural Ash Green and urban Ash/Tongham.
- We propose that this Area of Separation should be reclassified as Green Belt in order to provide suitable protection.
- If the areas allocated to SANG adjacent to Ash Green (including plot 108 on the map) are not brought forward as SANG then they should remain protected as Areas of Separation / Green Belt.

#### APPENDIX A (Cont) - AGRA Response to Local Plan Consultation 2014

Policy 11 - Ash and Tongham Strategic Location for Growth - OBJECT

#### Policy 11 - Comment 3

## Rural Ash Green is not a Strategic Area for Growth and should be distinguished as such from the Ash/Tongham Urban area.

Policy 11 states that "Land surrounding Ash and Tongham, as defined on the Policies Map and Inset Maps, will be designated as a Strategic Location for Growth to accommodate development."

- This wording is unclear and needs clarification from GBC. In particular the phrase "Land surrounding Ash and Tongham" is not defined clearly in the Policy Map and there is no boundary for the Strategic Area for Growth.
- We need clarification that Ash Green is outside of the Ash and Tongham Strategic Location for Growth, and GBC is not intent on focusing major development within Ash Green.