



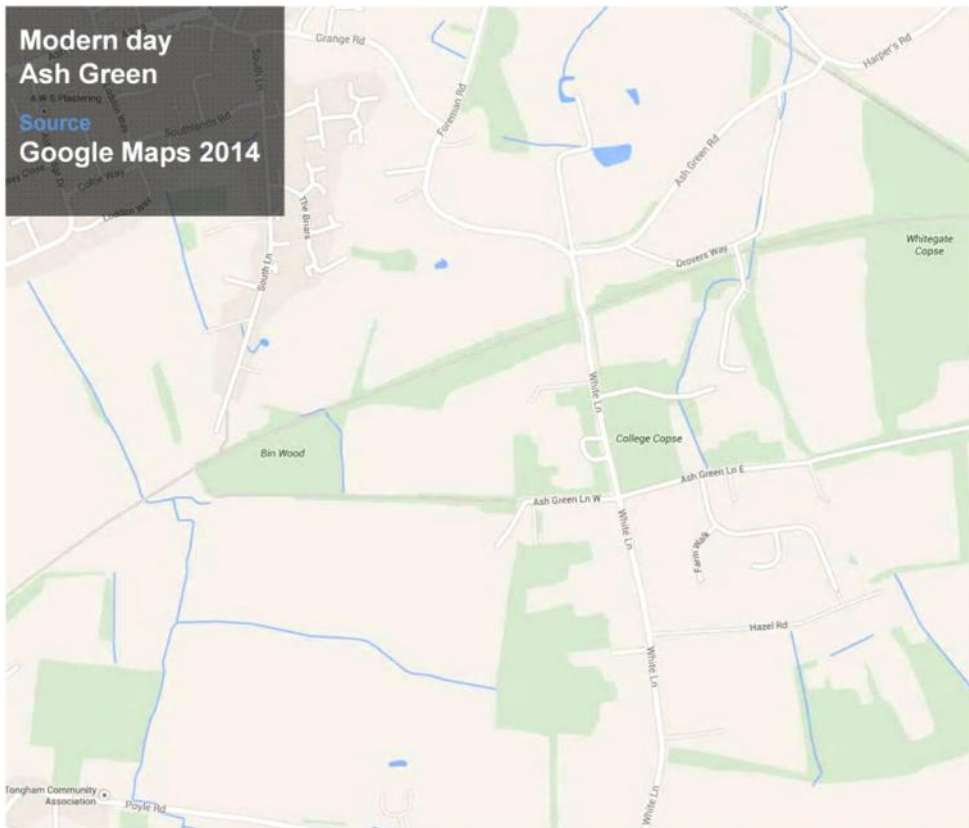
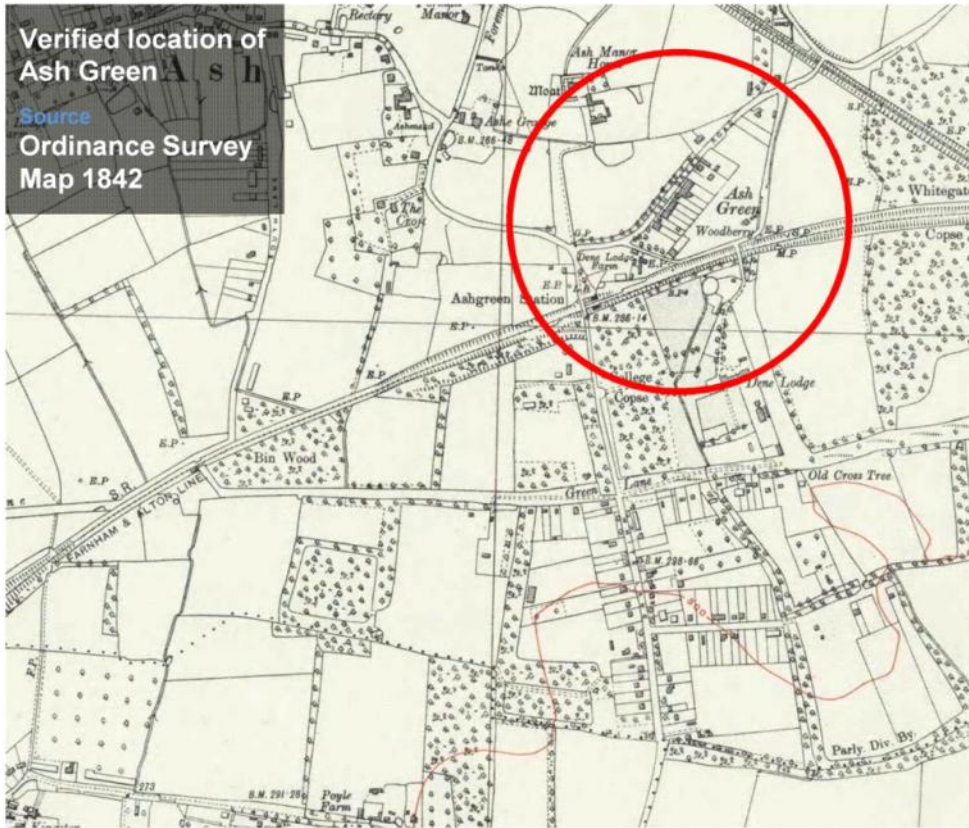
## **Policy 11 – Ash and Tongham Strategic Location for Growth - OBJECT**

### **Policy 11 - Comment 1**

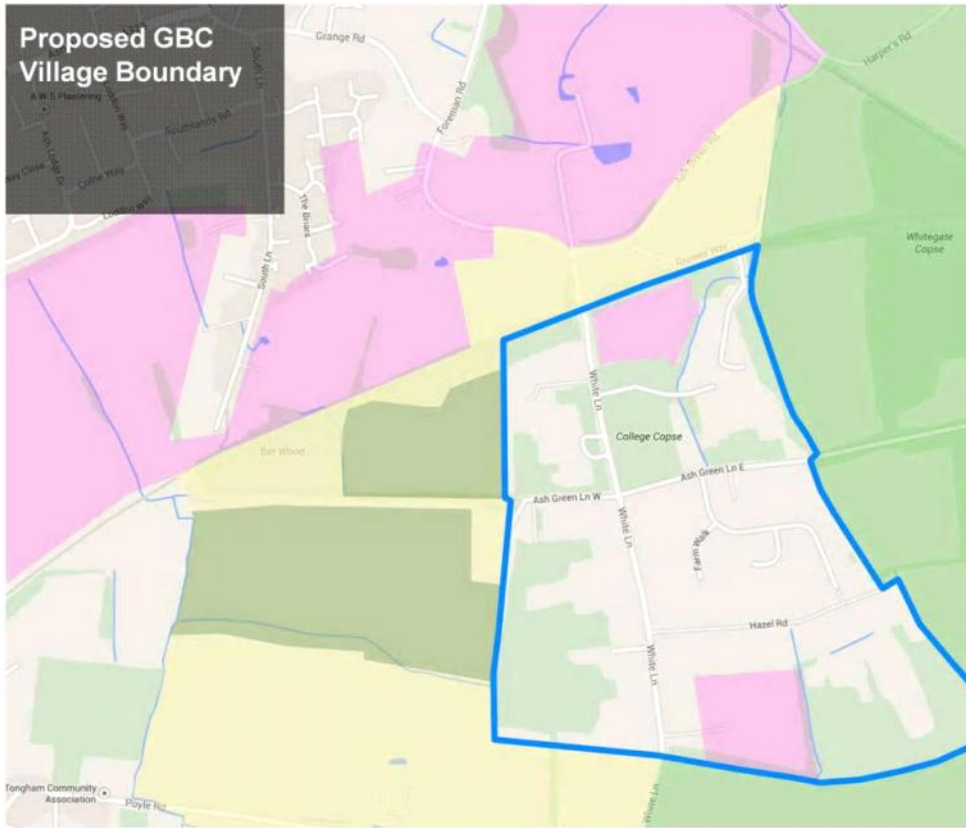
**The Settlement Boundary excludes part of Ash Green and is not fit for purpose.**

*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 prevent their merger. 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 Drivers 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 attached diagrams.**









## 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 too 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



## 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.

## Policy 9 – Villages and Major Previously Developed Sites - OBJECT

### Policy 9 - Comment 1

Ash Green should **not** be grouped within villages classed "appropriate development and redevelopment opportunities will be supported"

Policy 9 states that "...within the defined boundary of the following villages [including Ash Green] and major previously developed sites inset from the Green Belt, appropriate development and redevelopment opportunities will be supported."

- This statement infers that we are targeted for excessive development. Because of the protection previously offered by Policy RE4, and the increased development pressure which will be created by the adjacent 'Ash & Tongham Strategic Location for Growth', Ash Green should be included in the second list of villages where "small-scale or infill development and redevelopment opportunities that do not harm the main purposes of the Green Belt will be supported".
- Policy RE4 of the 2003 Local Plan has two purposes: (i) to prevent the coalescence to the west of the borough and (ii) to protect the intrinsic character of this specific area of the countryside. Paragraph 17 of the NPPF sets out that a core planning principle of the NPPF is that planning should "... recognise the intrinsic character and beauty of the countryside". As such, RE4 is fully in accordance with the NPPF and similar protection must be accommodated within the draft Local Plan.
- The statement (within the policy notes) that says "Ash Green will be identified as an inset village and defining a settlement boundary will enable appropriate development that helps meet the needs of the village" is wide open to interpretation.

## Policy 9 – Villages and Major Previously Developed Sites - OBJECT

### Policy 9 - Comment 2

**Any Further Development within Ash Green's Settlement Boundary needs to be proportional to the size of Ash Green.**

Policy 9 states that "...within the defined boundary of the following villages [including Ash Green] and major previously developed sites inset from the Green Belt, appropriate development and redevelopment opportunities will be supported."

- We acknowledge that there will be some development within Ash Green. This should be proportionate and there should be a maximum number of new homes permitted within a settlement boundary (during the Local Plan's life), which is expressed as a percentage of the total existing homes within a settlement boundary and proportionate throughout the borough. This policy also needs amending to take account of other proposed and existing developments which are nearby when considering future applications.
- We propose that the policy (in relation to Ash Green) is amended as follows:

*"...within the defined boundary of the following villages [including Ash Green] and major previously developed sites inset from the Green Belt, appropriate **small scale** development and redevelopment opportunities will be supported **where it is proportionate to the size of the community and the density and mix of housing are in character with the surrounding area. Nearby proposed and existing developments are material when considering future applications.**"*

## Policy 9 – Villages and Major Previously Developed Sites - OBJECT

### Policy 9 - Comment 3

**Areas of existing woodland within the Ash Green Settlement Boundary require protection.**

Policy 9 states that "...within the defined boundary of the following villages [including Ash Green] and major previously developed sites inset from the Green Belt, appropriate development and redevelopment opportunities will be supported."

- The areas of woodland proposed to be included within the Ash Green boundary should either be given explicit protection in the Local Plan or removed to outside the boundary as protected areas.

## Policy 9 – Villages and Major Previously Developed Sites - OBJECT

### Policy 9 - Comment 4

#### **This policy needs clarification about development of new businesses within Villages.**

Policy 9 states that *"We are also keen to retain existing and support the development of new local services and community facilities. In accordance with the NPPF, we will allow small-scale development for main town centre uses (see glossary) without applying the sequential approach. In Guildford borough, small-scale development means those of less than 280 sq m (gross)"*

- This paragraph requires clarification from GBC as the wording is unclear as to its intentions.
- New business developments (however well designed) within a village settlement boundary would require a strict impact assessment and must not be allowed to alter the intrinsic character of a village. Most "main town centre uses" would not be appropriate within a village.

## Policy 10 – Green Belt and the Countryside - OBJECT

#### **Countryside Beyond the Green Belt should carry the same weight as Green Belt**

Policy 10 states *"In the countryside not designated as Green Belt, only the following types of development will be permitted.....small scale development to maintain and enhance the rural economy"*

- This sentence should read "small scale **business** development to maintain and enhance the rural economy."
- Policy RE4 of the 2003 Local Plan has two purposes: (i) to prevent the coalescence to the west of the borough and (ii) to protect the intrinsic character of this specific area of the countryside. Paragraph 17 of the NPPF sets out that a core planning principle of the NPPF is that planning should "... recognise the intrinsic character and beauty of the countryside". As such, RE4 is fully in accordance with the NPPF and similar protection must be accommodated within the draft Local Plan.
- We do, however, strongly support the creation of new Green Belt to the south of Ash Green and propose that this is extended to include the Area of Separation which will surround our village. This will then provide the protection previously offered by RE4.



## Policy 2 – Borough Wide Strategy - OBJECT

**The provision for 13040 homes in Guildford Borough (652 per year) is too high.**

Policy 2 states "During the plan period (2011-31), we will make provision for 13,040 new homes, which equates to an annual requirement of 652 new homes a year, and 21.6 – 29.2 hectares of employment land to help meet the needs for new homes, support the economy and supply of 10,900 – 14,800 additional jobs."

- The basis for this number (the SHMA) has been disputed, and the housing number has been considered as inaccurate by many organisations including the ONS.
- Issues include the overstatement of the student population and the use of 5 year, rather than 10 year, statistics. (More detailed criticism of the calculations in the SHMA are provided by organisations including the GGG).
- The SHMA as been disputed and now superseded, therefore it's conclusion cannot be relied upon and must be recalculated to accurately reflect the housing requirement of Guildford Borough.

Ash Green  
**What happens next**



## Responses to the local plan by Monday 22<sup>nd</sup> September

- Website [getinvolved.guildford.gov.uk](http://getinvolved.guildford.gov.uk)
- email [localplan@guildford.gov.uk](mailto:localplan@guildford.gov.uk)
- Write to Local Plan Consultation, Planning Policy, Guildford Borough Council, Millmead House, Millmead, Guildford, GU2 4BB
- Drop in to 25 Swan Lane, Monday to Saturday, 10am to 4pm
- Call 01483 444471
- Fill in the AGRA letter with your name and address and we will send off for you.