



CONSULTATION STATEMENT

ASH NEIGHBOURHOOD PLAN 2025 - 2045



Prepared by: Ash Neighbourhood Planning Committee

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Ash Neighbourhood Plan

(Regulation 22(1)(c) Statement of Ash Parish Council)

1. Introduction

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2). Part 5 of the Regulations sets out what a Consultation Statement should contain:

Contains details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan (NDP);

Explains how they were consulted;

Summarises the key issues and concerns raised by the persons consulted;

Describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

1.1 Purpose

This Consultation Statement has been prepared to accompany the Ash Neighbourhood Plan when put forward to Guildford Borough Council for approval to progress to the examination stage. It is a summary of the consultation process undertaken to engage the community living and working, or having businesses or landed interests, in the Parish of Ash.

The Ash Neighbourhood Plan (designed to cover the period up to 2045) was prepared with the local community in the Parish by the Ash Neighbourhood Planning Committee, appointed by Ash Parish Council and with expert advice, guidance, and support from consultants Oneill Homer.

The process followed was intended to foster community engagement and feedback, through public meetings, face to face engagement, stalls, posters, banners, newsletters and electronic communications via email, social media and online channels used by the Parish of Ash and the Parish Council.

As the draft plan emerged there have been regular Neighbourhood Planning Meetings, where the members of the Neighbourhood Planning Committee gave an update, and Councillors and Parishioners could comment and make enquiries. As the draft plan progressed to completion it was reviewed and formally confirmed at a full public Parish Council meeting.

1.2 Background Information To The Consultation On The Neighbourhood Plan

The specific Neighbourhood Plan journey began on 12 February 2024 when the Parish Council resolved to start the process for producing a Neighbourhood Plan for the Ash area as per the following minute :

266. Neighbourhood Plan For Ash Parish Council. (agenda item 9)

Members to consider the Clerks report about creating a Neighbourhood Plan for the Ash Parish Council area.

and it was :

- 1) Agreed that a subcommittee be created to progress the Neighbourhood Plan and appoint Oneill Homer as contractors.**
- 2) Agreed that some of the Council's reserves are used to start the process and apply for the grant once the window reopens.**

On 26 April 2024 an application was made to Guildford Borough Council which confirmed the designation of the Neighbourhood Area as the entire Parish of Ash.

On 20 May 2024 during the Annual Meeting of the Council the Neighbourhood Planning Committee was formed and the first meeting was held on 25 June 2024.

Committee Members :

Chairman: Cllr Carl Cookson (Ash South Ward)
Vice Chairman: Cllr Fiona White (Ash Wharf Ward)
Cllr Philip Bellamy (Ash Wharf Ward)
Cllr Paul Golding (Ash South Ward)
Cllr Michael Moriarty (Ash Wharf Ward)
Cllr Carla Morson (Ash Vale Ward)
Cllr John Tonks (Ash Wharf Ward)

The community were actively encouraged to attend all meetings (which were all publicly advertised) and to participate during meetings.

The Ash Parish Council website ([Ash Neighbourhood Plan | Ash Parish Council](#)) displays all the stages the Neighbourhood Plan for everyone to be able to view.

Terms of reference for the Neighbourhood Plan for the Parish of Ash (Appendix 1).

In October 2024 Ash Parish Council carried out early engagement with drop-in sessions at The Ash Centre and an online survey (poster in Appendix 2) which identified the following visions for Ash that formed the basis of our plan :

- A cohesive village community
- Creating a thriving local economy
- Improving infrastructure
- Controlling and planning development to enable local people to stay in Ash
- Respecting the design and character of different areas
- Protecting our rural and urban green spaces
- Providing facilities for everyone

Between October 2024 and March 2025 work progressed with the Neighbourhood Plan. Ash Parish Council carried out a resident engagement event with drop-in sessions at The Ash Centre on the 7 April and a further online survey during April 2025 (poster in Appendix 3). The survey could be completed off-line through the Parish Office so that we didn't exclude anyone from the process.

Between October 2024 and May 2025 work progressed through guidance from the contractor Oneill Homer and hard work from the Parish Clerk, Councillors, and public members of the Neighbourhood Planning Committee to get to Regulation 14. Residents from the community and Ash Green Residents Association attended a number of meetings and helped in the policy formation.

The Regulation 14 consultation was conducted online and off-line. It was advertised on noticeboards around the Parish (Ash Parish Council Offices, Ash Wharf next to Bridges, Approach towards Ash Railway Station, Approach towards Ash Vale Railway Station, Ash Museum, Outside Ash Library, Shawfield Recreation Ground & Ash Green) at a stall during the Ash Parish Council Fete on 28 June 2025, social media and on the Parish Councils website (poster in Appendix 4) over a six-week period from the 16 June 2025 to 31 July 2025. Statutory and non-statutory consultees, (list in Appendix 5) were contacted directly by the Parish (consultation wording in Appendix 6). The consultation included both the draft Neighbourhood Plan itself and the SEA, and in addition to being published online a paper copy was available at Ash Library and the Parish Council Offices for anyone to view (open Monday to Friday 8am – 4pm). Responses were accepted via email or by post to the parish office.

Regulation 14 responses were reviewed by our consultants Oneill Homer and the findings summarised in a report (Appendix 8) along with a File Note on ASH1 and 4, by our consultants (Appendix 8)

The Regulation 14 responses were discussed by the Neighbourhood Planning Committee on 07 October 2025 and residents of the Parish of Ash. It was clear that ASH4 Design in Ash Village Green was causing concern to local residents and the Ash Green Residents Association. Following the meeting, this was discussed further by the Clerk, the Chair of Neighbourhood Planning Committee and the consultant from Oneill Homer. It was agreed that the consultant from Oneill Homer would speak to Guildford Borough Council and see what course of action could be agreed to enable the plan to move forward. Guildford Borough Council subsequently agreed to attend an informal meeting with Ash Parish Council on the 11 November 2025 and the consultant from Oneill Homer to try and ensure the policy could be revised to ensure that both the Borough Council and the residents were comfortable that it met their requirements. At this meeting it was agreed that stronger wording could be used to support the gap policy, but the map would remain unchanged. Cllr Sue Wyeth-Price kindly agreed to review and submit updated wording to enable our consultants Oneill Homer to finalise the wording for ASH4.

The final draft of the pre-submission Neighbourhood Plan was presented to the Parish Council at the meeting held on 08 December 2025, where it was approved to submit the Neighbourhood Plan to Guildford Borough Council under Regulation 15 (see minute in Appendix 9).

2 Production of the Neighbourhood Plan

2.1 Objective & Approach

The objective of the Neighbourhood Plan for the Parish of Ash consultation process was :

To involve as much of the community as possible throughout all consultation stages of Plan development so that the Plan was informed by the views of local people and other stakeholders from the start of the Neighbourhood Planning process.

Ensure that consultation events took place at critical points in the process where decisions needed to be taken, engaging with as wide a range of people and groups as possible.

Ensure that progress, including following consultation, was shared with local people in a variety of formats and media.

2.2 Timeline Summary

Timing	Activity
12 February 2024	Ash Parish Council (APC) agreed to producing a Neighbourhood Plan using the consultants Oneill Homer (ONH).
13 February 2024	ONH appointed
8 March 2024	Application made to Guildford Borough Council (GBC) for the designation of the Neighbourhood Area as the entire Parish of Ash.
26 April 2024	GBC confirmed designation of Ash Neighbourhood Area. This means that Neighbourhood Planning activity can commence in the designated area.
20 May 2024	Neighbourhood Planning Committee members established at the Annual Parish meeting of the Council.
25 June 2024	Ash Neighbourhood Planning Committee agreed a preliminary vision and objectives for the Neighbourhood Plan.
26 June 2024	APC Clerk applied for funding and technical support with Locality.
22 July 2024	Locality grant obtained.
4 September 2024	APC Clerk and ONH have a meeting with AECOM for Design Codes Technical Support.
7 – 18 October 2024	APC carry out early engagement for the Neighbourhood Plan with the community.
24 October 2024	APC Clerk and ONH have a meeting with AECOM for Housing Need Assessment.
7 November 2024	APC Clerk and ONH have a meeting with AECOM for Design Support.
5 December 2024	APC Clerk, Members of Neighbourhood Planning Committee, nominated residents and AECOM have a face-to-face meeting and tour of the Parish of Ash for the Design Codes & Guidance Document.
8 January 2025	APC Clerk and ONH have a meeting with AECOM for HRA Technical Support.
Timing	Activity

14 January 2025	APC Clerk applied for further funding with Locality.
6 February 2025	Locality further funding grant obtained.
25 February 2025	APC Clerk and ONH have a meeting with AECOM for SEA Technical Support.
7 April 2025	APC Resident Engagement Event.
6 May 2025	Neighbourhood Planning Committee approves the draft Neighbourhood plan to proceed to Regulation 14 consultation subject to comments from landowners on the Local Green Spaces list (letters sent to landowners with deadline of 31 May 2025 for initial feedback).
16 June – 31 July 2025	Regulation 14 Consultation takes place, details issued on website, social media, posters on noticeboards and display at Ash Library.
28 June 2025	Neighbourhood Planning information stall during the APC Fete.
October – November 2025	Neighbourhood Planning Committee reviews report on consultation with ONH.(Appendix 7 & Appendix 8) AGRA (Ash Green Resident Association) representatives – who were the main group that directly engaged with the plan – joined our Neighbourhood Planning meeting and discussed their feedback. APC and ONH have informal meeting with GBC to discuss the gap and policy wording. A way forward with the gap and policy wording agreed.
08 December 2025	Full Council approved final draft of the plan for submission to GBC under Regulation 15. (Appendix 9)

3. Summary of key issues and concerns raised during the Consultation.

3.1 Feedback Summary

The feedback received throughout the development of the Ash Neighbourhood Plan has been positive. The Neighbourhood Plan that has been produced reflects a clear, strong, and coherent vision for Ash through to 2045.

The Ash Neighbourhood Plan recognises the importance of both the historic buildings, the village

centre, employment and of the rural setting of Ash Green, prioritising the protection of green spaces within Ash, as well as the safeguarding of community facilities. No suitable sites for development were identified during the Neighbourhood Plan process, and a design code to ensure that any development is in keeping with the current characteristics of different parts of Ash.

Please note that a separate summary of the representations received from the statutory bodies below has been prepared in conjunction with Oneill Homer and is shown in Appendix 7.

Representations received from:

Guildford Borough Council
Surrey County Council
Natural England
Historic England
St Mary's Church
Ash Green Residents Association (AGRA)

Other statutory bodies were consulted but none have made representations, including neighbouring councils.

Four residents submitted comments.

3.2 Community feedback table

This table summarises the feedback received from the community and non-statutory bodies during the Regulation 14 consultation process.

Representation and Response
<p>We appreciate the opportunity to comment on the pre-submission draft of the Ash Neighbourhood Plan (2024–2045). Having reviewed the core plan and supporting documents—including the SEA Environmental Report, Housing Needs Assessment, and Design Guidelines—We wish to provide detailed feedback championing specific areas where the Plan must be strengthened to serve all Ash residents.</p> <ol style="list-style-type: none">1. Protecting each of the four conurbations of Ash, Tongham, Ash Vale and Ash Green retaining the character and cohesiveness of each area.2. Provide supporting infrastructure as part of any planning development. Including creating and upgrading the road systems. Ensuring that there are enough school and nursery places for families moving in the area. Providing new doctors' surgeries to care for the increasing population in the area. Undertake risk assessments for things such as flooding and other environmental considerations. Improving Ash Vale train station for commuters, including disability access.3. Prioritise Affordable Homes for Disadvantaged People. The Housing Needs Assessment (June 2025) confirms a critical requirement for mixed-tenure housing—including social rent and shared ownership—to cater to low-income households, young families, and older residents wishing to downsize. However, Policy ASH8 (Housing Mix, Type & Tenure) lacks firm targets or mechanisms to deliver these homes. We urge that the Plan:<ul style="list-style-type: none">• Sets a minimum affordable housing target—ideally $\geq 35\text{--}40\%$ social and intermediate tenure—on all qualifying brownfield sites.• Guarantees at least 50% of affordable units are for social rent.• Encourages homes tailored for older people, single-parent families, and key workers, with accessibility features. <p>Without these commitments, we risk reinforcing the existing pattern of owner-occupation skewed toward purchase/rental, with limited options for many in Ash who need it most.</p> <ol style="list-style-type: none">4. Less reliance on car travel, better traffic strategy. The SEA identifies strong sustainable transport aims—ASH13 Active Travel supports walking, cycling, low-emission vehicles, and public transport integration. Yet key elements are missing:<ul style="list-style-type: none">• Specific safe-cycle routes connecting Ash Village, Ash Vale, and Ash Green to schools, the station, and shops5. Improved cycling infrastructure near the Basingstoke Canal Conservation Area in Ash Vale, residents identified the canal-side towpath as a valuable cycling corridor. The Plan should:<ul style="list-style-type: none">• Upgrade surfaced routes for year-round all-weather cycling and e-bikes.• Provide cycle parking at key nodes, Ash Vale station, metro stops, shops.• Link canal routes to local schools and station via protected on-road lanes. <p>These enhancements would reduce car dependency and foster healthier, more climate-resilient travel habits.</p>

6. Enhanced shopping & leisure amenities policy ASH5 aims to protect district and local centres, even proposing new local hubs near Star Lane or within development zones. To meet real need:

- Commit to at least one new community-scale retail/leisure use in emerging developments south of Ash.
- Prioritise mixed-use facilities including a small supermarket, café, and flexible community spaces (i.e. The Chapel)
- Retain and enhance existing small shops: Wharf Road, around the station, and Ash Street windfall opportunities
- Prioritise development of shopping facilities offering family's healthy cost effective eating options. There are currently households, especially on the new estates who find it cheaper and easier to order fast food.
- Creation of allotments, using sites such as the land in the middle of Hammersley Drive. Allowing people to cultivate home grown food, providing residents with a healthy leisure activity and enhancing local nature/biodiversity.

This will support walkable neighbourhoods, help to improve the health of local residents and reduce journeys out of Ash.

7. Better NHS & healthcare access Ash is growing and ageing. The Plan currently lacks any policies referencing healthcare infrastructure. We propose:

- A requirement for new development or mixed-use schemes to allocate space/licenses for GP surgery expansion, pharmacy, or community health hub.
- We watch with interest how the land between the doctor's surgery and the Chapel will be used. This is an opportunity that should not be wasted. In some ways it is a litmus test for how committed the Planning authority is to the local residents. This could be an opportunity for a community health hub with additional car parking all of which could be connected to the voluntary work at the chapel.
- A commitment to liaise with NHS Surrey and Integrated Care systems to manage capacity at both Ash and neighbouring surgeries.
- Provisions for new off-site surgery bus routes, parking, or park-and-ride aligned with public transport policy.

This ensures residents don't face overburdened healthcare resources as housing increases.

8. Protecting valuable natural resources, the SEA strongly supports maintaining biodiversity, wetlands, and heathland near Ash, protecting local gaps to avoid coalescence, and safeguarding SSSI habitats (like Thames Basin Heaths and Brookwood Heaths). To enhance this:

- Confirm Local Gap zoning between Ash, Ash Green, and Tongham—protecting open countryside.
- Expand designation of Local Green Spaces under ASH11 to include canal corridors, commons, and hedgerow networks.
- Insist on biodiversity net gain, integrated SuDS, native planting, and linkages to green corridors in all developments.

These actions will reinforce Ash Parishes character while contributing to climate resilience and ecological health.

Summary:

Ash Parishes' forward-looking plan rightly emphasizes brownfield- first development and design sensitivity. However, to meet the needs of all residents and future generations, it must:

- Area/Recommended Addition
- Protect each conurbation/Maintaining the characters of Ash, Ash Vale, Ash Green and Tongham
- Provide Supporting infrastructures/Upgrading roads/pathways, ensure enough schools places & doctors surgeries including safe parking
- Affordable Housing/Targets for social and intermediate housing tenure
- Transport/Active travel routes, traffic calming, Chester Bridge crossings
- Cycling/Canal towpath upgrade, bike parking, safe links
- Local Amenities/New retail-leisure hub, protected existing shops, provision for allotments
- Healthcare/NHS space provision, capacity planning
- Environmental/Local Gaps, green space protection, biodiversity gains
- The Ranges/Give back the access that the MOD took/removed from the community

We would greatly appreciate being kept informed on progress and key decision making that impacts on Ash Parish.

Representation and Response

I write on behalf of Ash Green Residents Association (AGRA) in commenting on the Ash Neighborhood Plan.

AGRA greatly welcomes the plan and the opportunity it had to comment on drafts.

The major aspect on which AGRA has comments regards the provision of a buffer/gap between Ash Green and Ash as required by the Guildford Local Plan. In that respect AGRA strongly supports the gap which the plan proposes around the Ash Manor cluster of heritage buildings, namely, in essence, the field between Ash Manor and Ash Green Road. However, AGRA has considerable concern about the absence of any provision of a buffer/gap between Ash Green and Ash to the West of White Lane/Forman Road. Such a gap was proposed in the draft Neighborhood Plan but was withdrawn at the request of GBC. Nevertheless, without such a gap there will be nothing to distinguish Ash Green and Ash to the West and thereby be in conflict with the Guildford Local Plan. We appreciate this problem but nevertheless express the strongest possible desire to see a gap/buffer here which could compromise the field to the west of White Lane /Forman Road from the White Lane Bridge to The Croft. AGRA hopes that this minimal, small gap of a field will be seriously considered by APC.

These comments were fully supported by a General Meeting of Ash Green Residents held 9 July at which 60 residents attended.

Representation and Response

Please see below my comments on the Draft Neighbourhood Plan:

ASH4 DESIGN PRINCIPLES ASH GREEN (INCLUDING LOCAL GAP)

In my opinion the "Local Gap" is insufficient to serve the stated purpose of preventing coalescence between Ash and Ash Green.

The diagram below shows the boundary of Ash Green and the Proposed Local Gap. The land immediately to the north and northwest of the Local Gap is not protected by this policy (Marked 1 in the diagram). The boundary of Ash extends to the new development along Foreman Road adjacent to the railway line and extending either side of the Ash Road Bridge (Stonehill Road). This is shown as the red hatched area. The Bloor Homes development at May and Juniper Cottages in Ash Green Road (The Paddocks) and the approved development at The Firs in Ash Green Road are shown as the hatched green area. These developments are in Ash Green as it is defined in the LPSS Policy A31 (6) which specifically states "The properties along Ash Green Road form part of Ash Green village". Any development taking place in this unprotected area (marked 1) would not leave any gap between Ash and Ash Green. This would allow coalescence, which should be prevented as stated in Policy A31 (6) of the LPSS.

The "Local Gap" to the south at the junction of Foreman Road and White Lane would also be insufficient as this would leave a gap of less than 20 meters between Ash Green and Ash. Ash already extends to the boundary with Ash Green, therefore any development on the land marked 2 on the diagram would lead to the coalescence of Ash with Ash Green.

Please refer to email for map

I am aware that GBC have written to APC with their comments on the proposed Local Gap. Section 3.5 of that response misrepresents the nature of the separation/buffer zone in that it only discusses any proposed new development being separated from Ash Green Road. The wording of Policy A31 looks to prevent the coalescence between Ash and Ash Green.

I am fully aware that GBC has permitted development of fewer houses than allocated in the local plan for some sites and that Policy A31 only states "Approximately" 1750 homes. There is no specific requirement for exactly 1750 homes. GBC has referred to the need for additional houses in paragraph 3.13, where it appears that one of the main drivers for GBC's objections is the need to obtain contributions from developers to cover the cost of the Ash Road Bridge. Indeed, GBC have contracted with Homes England to raise £11 million from contributions and are substantially short of their commitment. This would suggest a financial motivation for their objections which run contrary to the LPSS which demands a buffer zone to prevent coalescence between Ash and Ash Green.

A "Local Gap" would not run contrary to the LPSS, rather it would strengthen the policy to prevent coalescence.

ASH8 HOUSING MIX, TYPE AND TENURE

I am concerned that recent applications have submitted amendments to the s.106 agreements, and to the planning applications, to remove the commitment to affordable housing. Whilst I welcome any commitment which aims to provide homes for those on lower incomes, this policy can only be delivered if GBC, as the LPA, insist on the 40% affordable housing mix and enforce any commitment. Is there any way this policy can be strengthened?

Representation and Response

Open Green Space - item numbered 20 should be named Mansfield Open Space

Representation and Response

Thanks for the chance to comment on the draft neighbourhood plan. I think it's a good step forward, and I really appreciate the effort that's gone into it. It's clear there's a genuine attempt to keep Ash and Ash Green feeling like proper, distinct communities, despite all the development pressures we've been under in recent years.

That said, I do have a few concerns and suggestions.

ASH2–ASH4 – Design Principles in Ash, Ash Vale and Ash Green (pp. 15–17)

The design policies are welcome, especially the effort to respect local identity. But in Ash Green, I'm concerned about the weakening of the green buffer between the village and the rest of Ash. In ASH4 (Clause C), the "Local Gap" is mentioned, but its boundaries are not clear, and maps in the plan seem to show that it's already narrowing — particularly near Foreman Road and Briar's Field. It would help if the plan firmed this up with a stronger definition or boundary to prevent future coalescence.

ASH7 – Replacement Dwellings (p. 22)

This policy refers to sustainable design and energy performance, which is great — but it's unclear what's actually meant by 'energy efficient and sustainable design' in practice?

It would be helpful if the plan explained whether this includes zero-carbon-ready standards, and whether it's enforceable (e.g. through specific conditions or design codes), rather than just encouraged.

ASH8 – Housing Mix, Type and Tenure (p. 25)

While I understand shared ownership is a government-backed option, in practice I support the aim to deliver affordable homes, especially for younger families, but I'd like to see more clarity. The policy refers to a 60:40 split between rented and shared ownership, but doesn't define what kind of rent — social rent or affordable rent — and that matters.

From what I'm seeing at Guildford Borough Council, developers are increasingly applying to very affordable housing conditions because housing associations are reluctant to take on small Section 106 schemes. If no registered provider comes forward, homes are dropped or switched to shared ownership — which often fails to meet real local needs.

Shared ownership is also far from ideal. I've read complaints in the national Press from new residents about high service charges, unclear responsibilities, and real problems trying to resell their share. It's not genuinely affordable for many, especially younger or lower-income residents.

That's why I believe this plan should place stronger emphasis on delivering homes for social rent wherever possible — it's more stable, better understood, and more likely to meet the actual needs especially in our area of the borough. The Parish should also encourage early engagement with registered providers, to avoid lastminute changes that undermine the policy.

It may help if developers are expected to engage with Registered Providers early in the process, so delivery models are agreed before conditions start being renegotiated.

ASH13 – Active Travel (p. 32)

I welcome this policy — the general support for walking and cycling is much needed — but as it stands, it feels too vague to deliver real impact. What's missing are concrete proposals: new footpaths, cycle links, safer road crossings, or improved connections to Ash station and local schools.

There's also a long-overdue need to address seasonal flooding along the old railway track — it's a key corridor for non-car travel, linking the school in the SW and Ash Green in the SE, but regularly becomes unusable. And while Harpers Road is mentioned, I find it hard to see how any pedestrian provision there is workable: the road is narrow, with blind corners, and already under pressure. Realistically, it's just not suitable for shared walking access — especially now that two developments have already been approved there, which frankly shouldn't have been.

Without clearer priorities and more grounded plans, this policy risks being a good idea on paper that won't translate into practical improvements on the ground.

Ash Vale Ward and the surrounding countryside

I also noticed that Ash Vale Ward isn't really mentioned in the plan. That may be because there's little developable land there, but it's still part of the community and deserves at least some recognition.

More broadly, the countryside between Ash, Tongham, and south of Ash Green toward the Hogs Back feels vulnerable to creeping development. I realise that much of this lies outside the Parish boundary — in Tongham, Wanborough or Normandy — but it would be helpful for the plan to acknowledge these risks. Even a short reference to cross-boundary pressures and known constraints would show that the Parish is alert to the wider context.

If the Ash Parish Neighbourhood Plan is to shape development meaningfully, it must sit alongside and feed into Guildford's Local Plan review — especially in areas close to settlement boundaries or adjoining parishes.

Monitoring and Enforcement – Supporting Text (esp. p. 26)

Lastly, I'd like to raise the issue of enforcement. In the past, planning conditions haven't always been strongly followed through at parish level. I understand that Guildford Borough Council holds the legal powers, but I hope the Parish will be more proactive in pressing GBC to ensure that approved conditions and commitments are properly enforced. Without that local pressure and follow-up, even a well-written policy can lose its value — and credibility — if not enforced. That would be a real shame.

Thanks again for putting the plan together and for inviting feedback. I appreciate the effort and hope these suggestions are helpful.

Representation and Response

Please see below my comments on the Draft Neighbourhood Plan

ASH4 DESIGN PRINCIPLES ASH GREEN (INCLUDING LOCAL GAP)

In my opinion the "Local Gap" is insufficient to serve the stated purpose of preventing coalescence between Ash and Ash Green.

The diagram below shows the boundary of Ash Green and the Proposed Local Gap. The land immediately to the north and northwest of the Local Gap is not protected by this policy (Marked 1 in the diagram). The boundary of Ash extends to the new development along Foreman Road adjacent to the railway line and extending either side of the Ash Road Bridge (Stonehill Road). This is shown as the red hatched area. The Bloor Homes development at May and Juniper Cottages in Ash Green Road (The Paddocks) and the approved development at The Firs in Ash Green Road are shown as the hatched green area. These developments are in Ash Green as it is defined in the LPSS Policy A31 (6) which specifically states "The properties along Ash Green Road form part of Ash Green village". Any development taking place in this unprotected area (marked 1) would not leave any gap between Ash and Ash Green. This would allow the coalescence which should be prevented as stated in Policy A31 (6) of the LPSS.

The "Local Gap" to the south at the junction of Foreman Road and White Lane would also be insufficient as this would leave a gap of less than 20 meters between Ash Green and Ash. Ash already extends to the boundary with Ash Green, therefore any development on the land marked 2 on the diagram would lead to the coalescence of Ash with Ash Green.

Please refer to email for map

I am aware that GBC have written to APC with their comments on the proposed Local Gap. Section 3.5 of that response misrepresents the nature of the separation/buffer zone in that it only discusses any proposed new development being separated from Ash Green Road. The wording of Policy A31 looks to prevent the coalescence between Ash and Ash Green.

I am fully aware that GBC has permitted development of fewer houses than allocated in the local plan for some sites and that Policy A31 only states "Approximately" 1750 homes. There is no specific requirement for exactly 1750 homes. GBC has referred to the need for additional houses in paragraph 3.13, where it's apparent that one of the main drivers for GBC's objections is the need to obtain contributions from developers to cover the cost of the Ash Road Bridge. Indeed, GBC have contracted with Homes England to raise £11 million from contributions and are substantially short of their commitment. This would suggest financial motivation for their objections which run contrary to the LPSS which demands a buffer zone to prevent coalescence between Ash and Ash Green.

A "Local Gap" would not run contrary to the LPPS, rather it would strengthen the policy to prevent coalescence.

ASH8 HOUSING MIX, TYPE AND TENURE

I am concerned that recent applications have submitted amendments to the s.106 agreements, and to the planning applications, to remove the commitment to affordable housing. Whilst I welcome any commitment which aims to provide homes for those on lower incomes, this policy can only be delivered if GBC, as the LPA, insist on the 40% affordable housing mix and enforce any commitment. Is there any way this policy can be strengthened?

Representation and Response

Please can I add the following comments to the Ash Parish Neighbourhood Plan consultation Section:

ASH4 DESIGN PRINCIPLES ASH GREEN (INCLUDING LOCAL GAP)

I'd like to stress the importance of getting an adequate local gap that separates Ash from Ash Green. It's welcome to see this included in the plan but it is more limited than I expected and not what I saw in the draft Ash Parish Neighbourhood plan earlier which I believe was challenged by GBC.

Two things in particular stick out about the gap/buffer:

- The local gap to the southwest where Foreman Road goes round to meet White Lane needs to be extended over a much wider area to even be recognised as a gap. This contradicts the Guildford Local Plan which requires a buffer to prevent coalescence of Ash and Ash Green, and I don't think a normal person would recognise the proposal in this area as a gap.

- Historic England guidance to previous planning applications to the north and northeast of Ash Manor indicated this area was in the setting. Therefore, to prevent any more cumulative harm to the historic assets this area to the north and northeast up to the railway line, where not already approved for housing, should be included in the gap. This would prevent any more cumulative harm to the historic assets. Sites close to or in the setting which are already in place or approved are Chester Bridge, the Persimmon site round it, Orchard Farm, Streamside and the Bloor site at May and Juniper cottages.

ASH8 HOUSING MIX, TYPE AND TENURE

I note the commendable target for affordable homes that is always addressed in each planning application. However recently there have been many cases of developers getting planning approval with ~40% affordable homes and then not being able to find Registered Providers (RPs) to own and manage affordable homes for them. I believe what happens then is that the houses are sold at normal rates at a significant advantage and profit to the

developers. It is not right that planning approval is given with a set of parameters and then changed after the event not realising the public benefits of affordable housing. What can be done in the plan to address this?

ASH13 ACTIVE TRAVEL

As an avid cyclist and walker I'm really pleased to see this section of the plan. What I would say is that I would like Ash to have better links out wider such as Guildford, Ash Vale, etc. For example cycling, living in Ash Green the Guildford Local Plan indicates to either take the A323 to Guildford or go via the Christmas Pie trail off road. The issue is that the A323 is for experienced cyclists only and even then, now the Chester Bridge is in, it is so busy it is horrible to cycle down. The Christmas Pie trail is lovely in summer but in the winter it is a mud bath made much worse as some Ash Green parts are BOATs and therefore shared with 4x4s and motorbikes that cut it up badly.

What I'd like you to do is address how these long-distance routes can be joined up and the parts in Ash Parish made more hospitable to cyclists and walkers. Think of your son or daughter riding or walking along it to school.

Thank you for doing this consultation and please take these comments into account.

4. Conclusion

The process to develop this Neighbourhood Plan has provided a good opportunity for community engagement across a wide variety of topics that have a significant impact on the daily lives of all who live in Ash. At each stage of the process close attention has been given to all input and feedback to ensure that the final policies are an accurate reflection of the views and aspirations of the Ash community.

Appendix 1

Neighbourhood Planning Committee Terms Of Reference

Purpose

The objective of the steering group is to produce a Neighbourhood plan for Ash.
The group shall dissolve when either the Neighbourhood plan is adopted, or it is agreed to no longer pursue the plan.

Constitution

The group shall consist of up to 7 members.
Up to 7 of these members shall be Parish Councillors, with membership decided by the Parish Council.
The Clerk, or other officer of the Parish Council, shall attend each meeting to facilitate, advise, and take notes.

Accountability

Notes of each committee group meeting shall be available for the Parish Council and the public for viewing.
The committee shall provide progress reports to the Parish Council and relevant committees.
All members of the public shall be able to attend and observe meetings.

Financial Control

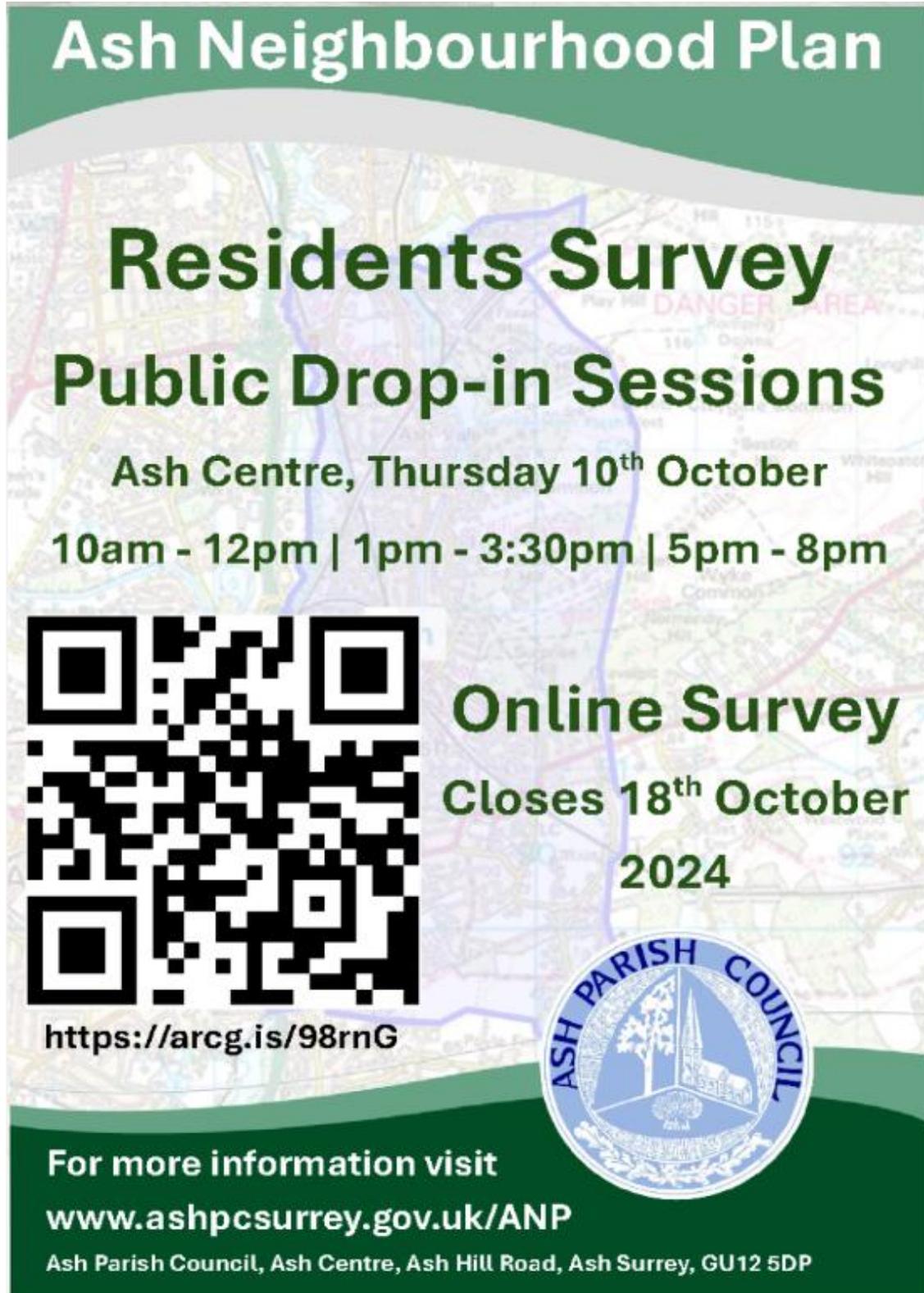
The Clerk and the Chair of Neighbourhood Planning Committee with the guidance of the consultant Oneill Homer will decide how any grant funding is spent.
The Clerk, in discussion with the committee, shall be able to incur expenditure up to the amount given for exclusive use on the Neighbourhood plan, by the Council or other body.
All expenditure must be in accordance with the Parish Council's Financial Regulations.

Conduct and Decision-making

All members of the group shall conduct themselves in accordance with the general obligations of the Parish Council's code of conduct.
In accordance with the principle that the Neighbourhood plan be community-led, Standing Orders 16 (b) to (f) shall not apply for the purposes of this committee.
The quorum of the group will be one third of the membership.
All members of the group shall be eligible to vote on all matters.
The Parish Council reserves the right to vary these terms of reference at any point.

Appendix 2

Early Engagement Session Poster



Ash Neighbourhood Plan

Residents Survey

Public Drop-in Sessions

Ash Centre, Thursday 10th October

10am - 12pm | 1pm - 3:30pm | 5pm - 8pm



Online Survey

Closes 18th October

2024



<https://arcg.is/98rnG>

For more information visit

www.ashpcsurrey.gov.uk/ANP

Ash Parish Council, Ash Centre, Ash Hill Road, Ash Surrey, GU12 5DP



Ash Neighbourhood Plan

RESIDENT

ENGAGEMENT EVENT

THE ASH CENTRE 7TH APRIL

10AM - 12PM | 2PM - 4PM | 6PM - 8PM

TAKE PART ONLINE

WWW.ASHPCSURREY.GOV.UK/ANP



ONLINE SURVEY

CLOSES 13TH APRIL



For more information visit
www.ashpcsurrey.gov.uk/ANP

Ash Parish Council, Ash Centre, Ash Hill Road, Ash Surrey, GU12 5DP



Ash Neighbourhood Plan

REGULATION 14

CONSULTATION

AVAILABLE ONLINE FOR

COMMENTS

TO VIEW THE PLAN VISIT

WWW.ASHPCSURREY.GOV.UK/ANP

CONSULTATION

CLOSES 31ST JULY



For more information visit

www.ashpcsurrey.gov.uk/ANP

Ash Parish Council, Ash Centre, Ash Hill Road, Ash Surrey, GU12 5DP

Appendix 5

Statutory & Non-Statutory Consultees

Local Government Bodies :

East Hampshire District Council
St Martha Parish Council
East Horsley Parish Council
Ockham Parish Council
Ripley Parish Council
Guildford Borough Council
Worplesdon Parish Council
Wanborough Parish Council
Shalford, Peasmarsh and Chilworth Community Council
Seale and Sands Parish Council
East Clandon Parish Council
West Clandon Parish Council
Elstead Parish Council
Council for British Archaeology
Elmbridge Borough Council
Hampshire County Council
Shackleford Parish Council
Shere Parish Council
Runnymede Borough Council
Wokingham Borough Council
Tandridge District Council
Surrey Heath Borough Council
Pirbright Parish Council
Godalming Town Council
Albury Parish Council
Epsom & Ewell Borough Council
Compton Parish Council
Wotton Parish Council
Effingham Parish Council
Ockham Parish Council
Crawley Borough Council
Hart District Council
West Horsley Parish Council
Send Parish Council
Bramley Parish Council
Artington Parish Council
Bracknell Forest Borough Council
Munstead & Tuesley Parish Council
Tongham Parish Council
Normandy Parish Council
Surrey County Council
Woking Borough Council
Witley & Milford Parish Council
Rushmoor Borough Council
Reigate and Banstead District Council
Tandridge District Council
Puttenham Parish Council
Waverley Borough Council
Spelthorne Borough Council
Chichester District Council
Horsham District Council
Hart District Council
Mole Valley District Council

Abinger Parish Council
Bisley Parish Council
Ewhurst with Ellens Green Parish Council
Cranleigh Parish Council
Farnham Town Council
Tilford Parish Council
Peper Harow Parish Council
Royal Borough Kingston
The Gypsy Council

Homes and Communities Agency :

Homes England
Natural England

Environment Agency :

Environment Agency South East

Historic England :

Historic England

Network Rail :

Network Rail

Highways :

National Highways
Highways England

Electronic Communications :

Vodafone
Virgin Media
BT Group PLC
Waldon Telecom Ltd

Healthcare :

NHS Surrey and Sussex Area Team
NHS Property Services Ltd
NHS Clinical Commissioning Group (Guildford and Waverley)
NHS England South

Energy/Utilities Companies :

Scottish and Southern Energy Networks (SSEN)
Southern Gas Networks
EDF
National Gas Transmission
SGN
UK Power Networks

Water Companies :

Affinity Water Ltd
Sutton and East Surrey Water Company
South East Water

SES Water
Thames Water

Developers :
Bewley Homes

Churches :
St Peters Church
St Mary's Church
Holy Angels Church

Scouts & Guides :
Explorer Scouts
1st Ash Vale Scouts
Hybrid Scouts
Guides

Sports :
Ash United FC
Ash United Youth
Ash Tennis Club

Groups :
Ash Green Residents Association (AGRA)

Appendix 6

Wording used for all Statutory and Community consultees

Dear Sir or Madam,

Ash Parish Council (the designated body) has now reached the pre-submission stage of the Ash Neighbourhood Plan, and we are pleased to make the document available for consultation from Monday 16th June until Thursday 31st July 2025.

Details of the Pre-Submission Ash

Neighbourhood Plan can be viewed on our web site at:

[Ash Parish Council Neighbourhood Plan Regulation 14 Consultation | Ash Parish Council](#)
[Ash Neighbourhood Plan | Ash Parish Council](#)

In addition, a printed copy is available for viewing at The Ash Centre, Ash Hill Road, Ash, Surrey GU12 5DP

We invite you to make comments or raise any queries on the Ash Neighbourhood Plan. Please do so by email to office@ashpcsurrey.gov.uk by the deadline of Thursday 31st July 2025

If you wish to communicate in writing, please do so to Ash Neighbourhood Plan at the following address:

Ash Parish Council
The Ash Centre
Ash Hill Road
Ash, Surrey
GU12 5DP

Any comments made after that deadline may not be considered by APC. Anyone submitting comments to APC must provide an email or postal address and contact name. APC will keep this information confidential. However, it must forward information to Guildford BC in due course for the sole purpose of notifying all those that have submitted comments that it has received a final version of the plan for examination.

Yours sincerely,

Cllr Michael Moriarty

On behalf of the Ash Neighbourhood Plan Committee

Emailed by :

Alison Watmore

Parish Clerk to the Council

Ash Parish Council

The Ash Centre

Ash Hill Road

Ash

Surrey

GU12 5DP

www.ashpcsurrey.gov.uk

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APPENDIX 7

ASH NEIGHBOURHOOD PLAN

REGULATION 14 ANALYSIS NOTE OF STATUTORY BODY AND COMMUNITY REPRESENTATIONS

AUGUST 2025

1. Introduction

1.1 This note summarises the representations made by the statutory bodies on the Pre-Submission version of the Ash Neighbourhood Plan (ANP) during its 'Regulation 14' consultation period which ran from the 16th June to the 31st July 2025. It concludes by recommending main modifications to the ANP so that it may be submitted to the local planning authority Guildford Borough Council (GBC), to arrange for its examination and referendum.

2. Representations

2.1 Representations have been received from:

Ash Green Residents Association
Guildford Borough Council
Historic England
National Highways
Natural England
Rushmoor Borough Council.
St Mary's Church and Local Groups.
Surrey County Council

2.2 The other statutory consultees (as listed in the supporting Consultation Statement) were consulted but none have made representations.

2.3 National Highways, Natural England, Historic England and Rushmoor Borough Council raised no specific issues on the ANP.

3. Analysis

3.1 The representations include suggested modifications to the policies and supporting text of the document. This note focuses only on those of greater substance as all those referencing editorial updates can be addressed by the group in finalising the document.

3.2 Ash Green Residents Association (AGRA) submitted two representations. The first from the secretary as follows:

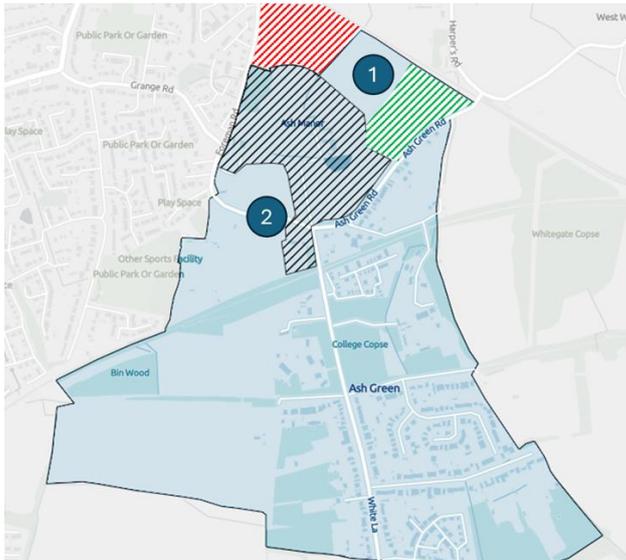
AGRA greatly welcomes the plan and the opportunity it had to comment on drafts. The major aspect on which AGRA has comments regards the provision of a buffer/gap between Ash Green and Ash as required by the Guildford Local Plan. In that respect AGRA strongly supports the gap which the plan proposes around the Ash Manor cluster of heritage buildings namely, in essence, the field between Ash Manor and Ash Green Road. However, AGRA has considerable concern about the absence of any provision of a buffer/gap between Ash Green and Ash to the West of White Lane/Forman Road. Such a gap was proposed in the draft Neighbourhood Plan but was withdrawn at the request of GBC. Nevertheless without such a gap there will be nothing to distinguish Ash Green and Ash to the West and thereby be in conflict with the Guildford Local Plan. We appreciate this problem but nevertheless express the strongest possible desire to see a gap/buffer here which could compromise the field to the west of White Lane /Forman Road from the White Lane Bridge to The Croft. AGRA hopes that this minimal, small gap of a field will be seriously considered by APC.

As noted by AGRA, the majority of the proposed gap to the West of White Lane/Foreman Road was removed at the request of GBC as it was their view that its inclusion would fail basic conditions through being in conflict with the local plan. However, they have not raised an issue with the single field to the west of White Lane Bridge being included. It cannot extend all the way to the Croft, but we hope this provides at least a single field gap albeit within the defined boundary of the strategic A31 policy boundary.

A second response was received from Sue Wythe Price, who states that the “Local Gap” (ASH4) is insufficient to serve the stated purpose of preventing coalescence between Ash and Ash Green.

The diagram below shows the boundary of Ash Green and the Proposed Local Gap. The land immediately to the north and northwest of the Local Gap is not protected by this policy (Marked 1 in the diagram). The boundary of Ash extends to the new development along Foreman Road adjacent to the railway line and extending either side of the Ash Road Bridge (Stonehill Road). This is shown as the red hatched area. The Bloor Homes development at May and Juniper Cottages in Ash Green Road (The Paddocks) and the approved development at The Firs in Ash Green Road are shown as the hatched green area. These developments are in Ash Green as it is defined in the LPSS Policy A31 (6) which specifically states “The properties along Ash Green Road form part of Ash Green village”. Any development taking place in this unprotected area (marked 1) would not leave any gap between Ash and Ash Green. This would allow the coalescence which should be prevented as stated in Policy A31 (6) of the LPSS.

The “Local Gap” to the south at the junction of Foreman Road and White Lane would also be insufficient as this would leave a gap of less than 20 meters between Ash Green and Ash. Ash already extends to the boundary with Ash Green, therefore any development on the land marked 2 on the diagram would lead to the coalescence of Ash with Ash Green.



I am aware that GBC have written to APC with their comments on the proposed Local Gap. Section 3.5 of that response misrepresents the nature of the separation/buffer zone in that it only discusses any proposed new development being separated from Ash Green Road. The wording of Policy A31 looks to prevent the coalescence between Ash and Ash Green.

I am fully aware that GBC has permitted development of fewer houses than allocated in the local plan for some sites and that Policy A31 only states “Approximately” 1750 homes. There is no specific requirement for exactly 1750 homes. GBC has referred to the need for additional houses in paragraph 3.13, where it appears that one of the main drivers for GBC’s objections is the need to obtain contributions from developers to cover the cost of the Ash Road Bridge. Indeed, GBC have contracted with Homes England to raise £11 million from contributions and are substantially short of their commitment. This would suggest a financial motivation for their objections which run contrary to the LPSS which demands a buffer zone to prevent coalescence between Ash and Ash Green. A “Local Gap” would not run contrary to the LPSS, rather it would strengthen the policy to prevent coalescence.

This suggestion has been referred to GBC for a consideration as to whether they would consider the inclusion of the area marked 1 on the map to be contained with the designated Local Gap.

ASH8 HOUSING MIX, TYPE AND TENURE

I am concerned that recent applications have submitted amendments to the s.106 agreements, and to the planning applications, to remove the commitment to affordable housing. The policy can only be delivered if GBC, as the LPA, insist on the 40% affordable housing mix and enforce any commitment. Is there any way this policy can be strengthened?

There is unfortunately no way to further strengthen the policy, as noted, this is an enforcement issue and is often centred around viability or the inability to secure a registered provider.

3.3 St Mary's Church and Local Groups. Are supportive of the plan but would like to see it strengthened around retaining the character and cohesiveness of each of the conurbations, ensuring sufficient school places, doctors surgeries flood risk assessments and improvements including disability access to Ash Vale train station.

The Design Codes and Guidance that sit with policies ASH2, ASH3 and ASH4 are the only policy levers available in terms of retaining character and the protection and promotion of local shops, employment spaces, protection for green spaces and community facilities are intended to reinforce and strengthen cohesiveness. Whilst the provision of school places and new doctors surgeries falls outside of the plan the improvement to access at Ash Vale station could be added to the Active Travel Policy as an identified opportunity for improvement. It is noted that APC already have funds earmarked to assist with delivery of step free access to the station.

They would also like to see firm targets for the delivery of affordable housing in ASH8 including on all qualifying brownfield sites.

Affordable housing requirements can only be imposed on major developments and in accordance with the NPPF due to viability on brownfield sites, the requirement may need to be lowered, so the ANP would not meet basic conditions should it impose a higher standard that that set out in national policy.

In terms of the request to see a guarantee of at least 50% of affordable units being social rent, GBC has recommended the policy in the Local Plan which sees 70% rental / 30% home ownership for affordable units, is either mirrored or relied upon. The group have requested the inclusion of three additions to the Active Travel Policy (ASH13)

- Specific safe-cycle routes connecting Ash Village, Ash Vale, and Ash Green to schools, the station, and shops.
- Traffic-calming measures on Ash Hill Road, Star Lane, and surrounding road networks to reduce speeds and support near-destination active travel.
- Prioritised pedestrian and cycle crossings at Chester Bridge, with lighting and smooth surfaces, especially following its February 2025 opening.

The first two could be included as opportunities for improvement. In respect of the third, it is understood that the bridge is designed to include a shared use path for pedestrians and cyclists, however the Guildford LCWIP notes that usage levels are likely to be low as pedestrians will still be able to use the more direct current alignment crossing the railway tracks via the footbridge at Ash Station, so is more likely to be used by cyclists.

The group has also identified improvements to cycling infrastructure along the canal side towpath (upgrading the surface for all year-round use) cycle parking at key nodes, Ash Vale Station, metro stops and shops and using the canal route to link to local schools and the station via protected on-road lanes.

Whilst cycling is legally permitted on towpaths the priority is for pedestrians. It is unlikely that an engineered surface (or lighting) would be approved as the area due to the sensitive nature of the location (biodiversity and a designated conservation area) but appropriate upgrades could be considered for year round use, so with that

caveat, the first two could be added as opportunities. In respect of the third, this could be added as an opportunity but without identifying specific routes. Without an evidence base to establish the suitability of the specific routes in terms of road width, it would need to be a general principle of support for the establishment of such routes where identified.

In respect of ASH5, local shops the suggested inclusions are as follows:

- Commit to at least one new community-scale retail/leisure use in emerging developments south of Ash. The ANP has identified the area where a community retail use would be supported. As the developments are strategic and not allocations within the NP it will be for the parish council to request such a facility in future planning applications in this area where appropriate or support any standalone proposal for a new retail unit in this area (as per ASH5)
- Prioritise mixed-use facilities including a small supermarket, café, and flexible community spaces (i.e. The Chapel). Flexible use community spaces which are adaptable in this way would be supported under ASH9 Community Facilities, however, given the Chapel is with close proximity of the existing district centre, any supermarket would likely need to be part of a use class F2 proposal, rather than be considered a town centre use.
- Retain and enhance existing small shops: Wharf Road, around the station, and Ash Street windfall opportunities. This is the aim of ASH5
- Prioritise development of shopping facilities offering families healthy cost effective eating options. There are currently households, especially on the new estates who find it cheaper and easier to order fast food. The ANP is unable to legislate to this degree as the planning system does not extend to the occupiers of facilities per se. That said, national guidance does restrict the introduction of new fast food takeaway outlets within proximity of local schools.
- Creation of allotments, using sites such as the land in the middle of Hammersley Drive. Allowing people to cultivate home grown food, providing residents with a healthy leisure activity and enhancing local nature/biodiversity. The parish council currently has 110 allotment plots used by local people and would support the provision of new plots on appropriate sites where there is a demand (accessible, with water on site and parking for those who need it) . Currently plots at Shawfields are being subdivided when they become available to increase number of plots available.

The group also raise the issue of better NHS and Healthcare Access, noting it is not within the plan, requiring space for a GP or health hub to be allocated. This was previously undertaken on the land identified in ASH9 but whilst the land was secured, the developer was unable to secure a provider to take on the site. As per the comments above, the policy will support the development of flexible community use facilities including those that could be used for healthcare provision. The Chapel has been identified by the group – is included within ASH9

Finally, the group wish to see the plan expand the Local Green Spaces (ASH11) to include the canal corridor (already designated as a conservation area) commons and hedgerow networks.

As set out in the supporting text, the Local Green Space designation has a number of specific criteria which must be met to confer a designation. One of these is that there is not already a protection on the land (eg commons). Also, the designation unfortunately cannot extend to cover a network of hedgerows as it would not meet the criteria.

3.3 Surrey County Council has submitted a detailed response which is summarised and set out below.

Subject matter	Issue	ANP Response
Environmental	<p>No reference to BNG (legal since 2024) or Local Nature Recovery Strategy (LNRS). Add BNG requirements and reference/support for LNRS in the Plan; ensure at least 10% biodiversity net gain (BNG) policy.</p> <p>Barbastelle bats are Near Threatened, not Endangered; indigenous species planting should use climate resilience. Additionally, where recommendations for planting indigenous species are made, we recommend adding a sentence stating planting requirements should use climate resilient species.</p>	<p>As stated BNG is now a legal requirement and therefore is not required to be included within any ANP policy, although it can be referenced in the supporting text.</p> <p>NPC may wish to consider the inclusion of the emerging LNRS in the supporting text and the addition of the following policy wording into ASH10 <i>“Development proposals should align with and contribute to the delivery of the (emerging) Local Nature Recovery Strategy, to maximise nature recovery in the local area”</i></p> <p>Correct bat status and consider the additional of reference to climate resilient species.</p>
SEA	Noted that LNRS is not referenced and should be included	LNRS was not available (in draft) when the SEA was prepared as it is only now out for public consultation which will be noted in supporting text.

Subject matter	Issue	ANP Response
Heritage	Feel that a lack of dedicated heritage section in the plan is a missed opportunity	The NPC considered the inclusion of a heritage section as part of the scoping of the ANP but were content to rely upon the inclusion of heritage matters in the design code and guidance. Local Views are not included as part of the plan.
Design Code – Flood Risk	There are a number of suggested amendments to the Design Code in terms of flood risk and sustainable drainage.	Permission will need to be sought from AECOM to make the changes to the Design Code. The ANP can also include a detailed Flood Risk Map to illustrate the various types of flood risk
Health	Notes the ANP may wish to include reference to healthcare provision, preventative health and how spatial planning may address local health needs, citing their new guidance for Health in Neighbourhood Planning	The ANP profile page could be expanded to include details of local healthcare provision.

3.4 Guildford Borough Council has submitted a detailed response which is summarised and set out below.

Section/ Policy	Issue	ANP Response
General	<p>3.1 It is helpful if all paragraphs in the policies and supporting text are numbered in some way, as the introductory sections are presently. Different numbering systems can be used to distinguish policy from supporting text. Numbering paragraphs ensures that specific paragraphs can be easily referred to in planning application documents and decisions.</p> <p>3.2 Please ensure the document meets accessibility standards in order to avoid the need for the Council to alter the document after submission. National guidance on accessibility can be found here: Publishing accessible documents - GOV.UK. Word has a built-in accessibility checker and other accessibility checkers are available for free online.</p> <p>3.3 The Policies Map should be included as a separate document available to download at a high resolution for those who do not wish to use the online neighbourhood plan map. Please choose layer styles that do not obscure layers beneath and ensure the resolution is high enough that boundaries are unambiguous.</p>	<p>Paragraphs to be introduced in supporting text to aid clarity.</p> <p>The submission version of the plan will be checked for accessibility standards.</p> <p>The policies map will be included as a separate document.</p>
ASH1	<p>Part 1 of the policy “directs all significant residential, employment, commercial and cultural development to the built-up areas of Ash and Ash Vale”. There is no clear boundary to this area, which could create ambiguity. For clarity, the policy should refer to the Local Plan Ash and Tongham Urban Area, the boundary for which is on the Local Plan policies map.</p>	<p>Recommend updating policy wording to state ...built up areas of Ash, Ash Vale and Ash Green.</p>
ASH1	<p>The Ash Green Boundary as proposed is too large and thus there is a conflict between the policy wording, which only allows for small infill development and the existence of the local gap, countryside and strategic allocations within the defined area and as such does not comply with basic conditions. It is noted the issues set by GBC could be largely resolved if the boundary for Ash Green is drawn more tightly around the settlement, taking account of the AT2 and AT3 character areas</p>	<p>It is understood that the local community of Ash Green consider the boundary as set out in the policy to be the correct one for Ash Green and would not wish to see it reduced in size. To reconcile this with the need for the ANP to recognise that there will be more than just infill</p>

Section/ Policy	Issue	ANP Response
	and the Local Plan Green Belt, countryside, urban area and Site A31 boundaries. The Council can provide GIS data for these layers if this would be helpful.	development, due to the strategic allocation, the adjusted policy wording, as set out above is proposed.
ASH1	Development in Ash Green refers to small scale infill development. This should be amended to to small scale development within the settlement boundary or something along those lines.	Policy wording to be updated.
Design Guidance and codes	<p>Section SPE.03 on page 35 provides guidance for infill and backland developments. It states, “With regards to backland development, this should be resisted unless in exceptional circumstances.” This sets a very strong test for backland development that does not accord with other parts of the design guidance where it sets out how backland development can be appropriate and can preserve and enhance local character. It also conflicts with paragraph 73 (d) of the NPPF which requires “giving great weight to the benefits of using suitable sites within existing settlements for homes”, does not appear to be “positively prepared”, and therefore conflicts with basic condition a. It is suggested the sentence is removed from the document.</p> <p>Figure 39 on page 49 is a picture of a street but is strongly centred on a single house. There is a negative caption beneath criticising the design. Please consider removing the picture or replacing it with a generic picture, or possibly a picture showing the wider development, as the resident of the house shown may not appreciate having their home criticised.</p>	<p>NPC to consider removal of “With regards to backland development, this should be resisted unless in exceptional circumstances” to comply with basic condition a.</p> <p>The caption to accompany the image on figure 39 is considered to be factual and need not be removed.</p>
ASH4	<p>The Council objects to the requirement that “development as a whole will not be of a size and scale that would detract from the character of the rural landscape” because the proposed Ash Green policies map boundary would apply this restriction across large parts of Site Allocation A31 and thereby prohibit delivery of the strategic site. If the Ash Green boundary is amended as suggested previously, this objection can be removed.</p> <p>The policy requires development to have full regard to criteria including “conserving and enhancing the hedgerow network and hedgerow trees, particularly in proximity to the urban edge where hedgerows can provide a strong landscape pattern and framework.” It is suggested that this should include some reference to native hedgerows. Surrey has a particular problem with non-native and invasive species frequently used as hedging – Cherry</p>	<p>See response to ASH1 above.</p> <p>NPC to consider updating of policy wording to include reference to “native” hedgerows.</p>

Section/ Policy	Issue	ANP Response
	Laurel for example. Such hedges should not be conserved or enhanced (increased) and should ideally be replaced with native hedgerows.	
ASH4	Local Gap – GBC support the gap as set out but suggests a slight amendment to the policy wording as follows: “Development will not be permitted in this area if it would result in the joining of the two settlements, or the erosion of their separate identities by virtue of their closer proximity”	NPC to consider updating policy wording.
ASH5	<p>The plan should demonstrate that Clause A has had regard to national guidance on the sequential test for out of centre development of main town centre uses (NPPF paragraphs 91-92) in order to accord with basic condition a.</p> <p>The supporting text suggests that the purpose is to support and protect “convenience and local services that reduce their dependence on travelling further afield” defined further down in the text as Class E(a) convenience food retail stores up to 280 sqm, Class E(b) cafes and Class F2 local community uses. Not all Class E uses would be classed as essential local shopping and service facilities meeting everyday needs, and as the draft policy wording refers to any Class E use then it would also support those Class E uses that do not meet everyday needs including, for example, offices and indoor leisure uses. If the intention is to support only the uses set out above rather than all Class E uses, then the policy text could explicitly list the uses that it supports. Alternatively, it could simply state that it supports “convenience and local services” and define those uses in the supporting text.</p> <p>Clause C – suggests updating wording to read as follows: <i>Proposals that comprise one or more uses defined in Clauses A must demonstrate that the site is accessible by walking, cycling and/or public transport from established residential areas in safe and convenient ways.</i></p> <p>It is not clear whether all of points 1-3 of clause D apply or if an application would be considered suitable in principle if it only complied with one of these points. The</p>	<p>Supporting text to note that in respect of Clause A the local authority will seek to apply the sequential test to proposals for new Class E(a) and E(b) uses as these are considered to be appropriate for town centres. Applicants will therefore need to demonstrate that there is no availability of sites within the defined district and local centre first, before demonstrating the sustainability of their chosen locations outside of these area.</p> <p>Update policy wording to explicitly list the uses supported.</p> <p>NPC to consider updating policy wording as suggested.</p> <p>NPC to consider use of the word “and” after i), and “or” after ii). Given that Local Plan policy</p>

Section/ Policy	Issue	ANP Response
	<p>use of 'and' or 'or' at the end of each point, or stating that any or all apply in the first sentence, would help to clarify this.</p> <p>Point 1 could be considered unnecessary considering LPSS Policy E9 already requires 12 months' marketing for Class E(a) uses that meet everyday needs, although points 2 and 3 are not covered in LPSS Policy E9 and would help to strengthen the existing protection for local shops.</p>	<p>allows for Class E(a) marketing requirements but not for E(b) or F2, this clause should remain.</p>
ASH6	<p>Clause A supports intensification of specific uses at the SEL and LIEL. It also appears to support the extension of the boundary of these areas. The support for extending the sites is somewhat at odds with the rest of the approach - the plan identifies the boundaries of the SEL and designates the boundaries of the LIEL but then undermines those boundaries by supporting expansion. The supporting text could helpfully explain why the policy does this and set out a justification for it.</p> <p>Clause B , suggested rewording" Proposals for the change of use of land or premises on the Locally Important Employment Location to a non Class B2 use (including residential led proposals) will only be acceptable where schemes comprise a mix of uses that retains commercial units within the site and avoids the net loss of employment opportunities."</p> <p>GBC feel the policy wording is also too strict as it does not account for viability issues and suggests that a marketing clause such as that found in the Local Plan should be considered to ensure the policy complies with basic conditions and does not result in a derelict site.</p>	<p>The intention was not to extend the boundary but to extend the build development within the existing site boundaries. This will need to be made clear in the supporting text to avoid confusion.</p> <p>NPC to consider incorporating the proposed amended wording.</p> <p>NPC to consider the addition of a new clause which states, "<i>Redevelopment or change of use to a non employment use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use, other Class B uses or for alternative employment generating uses, for a continuous period of at least 18 months prior to submission of a planning application.</i>"</p>
ASH7	<p>GBC suggest splitting the policy into two – replacement dwellings and climate change and sustainability or maintaining a single policy but renaming it climate change and sustainability containing a clause on replacement buildings.</p>	<p>Recommend splitting policy into two – Energy Efficiency and Replacement Buildings.</p>

Section/ Policy	Issue	ANP Response
	<p>Clause A (iv)– suggests using the words “ecological enhancement” rather than Biodiversity Net Gain and explaining in the supporting text that the policy is not seeking to apply the national/local minimum 10%/20% BNG requirement to exempt development such as Custom and Self Build (CSB)</p> <p>Clause C – should state “provisions of Clause D”</p> <p>If the intention is to encourage high levels of sustainability by relaxing design requirements, the policy could extend beyond terraced and apartment styles and also allow for detached/semi-detached homes or buildings that use modern methods of construction (e.g. modular homes) as these can sometimes have a unique character.</p> <p>Clause D and E requires further clarification and supporting text information for the benefit of the examiner to show precedents that the policy has been accepted and/or other evidence that indicates the requirement is deliverable and viable.</p>	<p>NPC to consider updating Clause A policy and supported text as set out.</p> <p>Clause C to be corrected.</p> <p>Yes the intention is to encourage high levels of sustainability but also to avoid poor use of land; i.e demolishing multiple houses and replacing with fewer, so do not suggest adding in reference to detached or semi-detached homes.</p> <p>NPC to consider updating the policy wording to read: <i>“Where schemes that maximise their potential to meet this standard by proposing the use of modern methods of construction and the use of terraced and/or apartment building forms of plot size, plot coverage and layout that are different to those of the character area within which the proposal is located, this will be supported, provided it can be demonstrated that the scheme will not have a significant harmful effect on the character area</i></p> <p>NPC to consider updating Clause D to read as follows:</p> <p><i>All planning permissions granted for replacement buildings should demonstrate that they have been tested to ensure the buildings will perform as predicted, including planning conditions to require post construction test</i></p>

Section/ Policy	Issue	ANP Response
	<p>Planning conditions must meet the national tests, which include being: necessary, enforceable and reasonable.</p> <p>As set out previously, Clause D refers to “buildings” while the policy is for replacement dwellings, so it is unclear whether this means residential buildings, non-residential buildings or both. If it includes dwellings then there is a question of how the applicant will be able to undertake corrective action once the dwelling is occupied. We assume additional monitoring would also be necessary after the corrective action to ensure the improvements have addressed the identified poor energy performance.</p> <p>The supporting text for Clause D of the policy states “every building in a consented development scheme of any size is subject to Post-Occupancy Evaluation (POE) including actual metered energy use, and to submit the report to the local planning authority”</p> <p>Requiring this for every building on large development proposals would be onerous for applicants and impact the performance of the planning department. It is suggested that a better approach could be to allow information to be submitted for each standard building model (given that larger developments tend to use standard designs).</p> <p>Clause F supporting text – consider omitting bullet point 2 so as not to duplicate bullet point 1 and on the basis that the Future Homes Standard will be incorporated into Building Regulations</p>	<p><i>information (prior to occupancy) and provision of a Post Occupancy Evaluation report to the local planning authority within a specified period, unless both are exempted by Clause C. Where the report identifies poor energy performance and makes recommendations for reasonable corrective action, the applicant must demonstrate that those actions have been implemented before the condition will be discharged.</i></p> <p>The supporting text can be updated to illustrate how the planning condition meets the national tests and also to explain that in Clause D the information may be submitted for each standard building model (given that larger developments tend to use standard designs) to ensure the requirement is not over burdensome.</p> <p>The supporting text paragraphs for Clauses C and D would be clearer if they were swapped to mirror the order of the policy clauses. ANP to consider for Cluse D supporting text to allow information to be submitted for each standard building model (given that larger developments tend to use standard designs).</p> <p>NPC to consider updating supporting text to clause F as set out.</p>

Section/ Policy	Issue	ANP Response
ASH8	<p>Clause A considered to be a repetition of the Local Plan but principle supported.</p> <p>Clause B – GBC do not consider there is insufficient evidence to apply a local affordable housing tenure mix as there is no local connection test for affordable homes and any departure from the Local Plan is not considered to meet basic conditions. Should be 70/30 not 60/40</p> <p>Clause D states all development proposals should be delivered as accessible and adaptable dwellings in accordance with BR M4(2). Part 4 of Policy H1 of the LPSS requires 10% of new homes to be BR M4(2) and 5% of new homes to be BR M4(3), and only on sites of 25 homes or more. Consequently, the neighbourhood plan goes some way beyond the Local Plan requirement. A short justification is provided in the supporting text, but further evidence for the benefit of the examiner would be helpful to demonstrate that a 100% requirement is needed (rather than e.g. 50% or 30%) and reasonable/viable – see PPG “Housing: optional technical standards” for further guidance on evidence. The government consulted on extending M4(2) to all new homes in July 2022 and the impact assessment and other background documents for this consultation may be useful.</p>	<p>NPC to review the HNA to determine if sufficient evidence to justify departure from Local Plan in Clause B</p> <p>Additional supporting text for Clause D using guidance as suggested.</p>
ASH9 Community Assets.	<p>Clause A (ii) should add at the end: “...<i>provided the location of the site is in accordance with the sequential test outlined in the NPPF for main town centre uses (where applicable)</i>”.</p>	<p>NPC to consider additional text as set out.</p>
ASH10 Green and Blue Infrastructure	<p>The first paragraph of the policy is descriptive and sounds like supporting text - it does not appear to contain any land use policy so should be outside the policy wording. It can be moved to the supporting text beneath the policy, or kept as an introduction, but in either case the words “as shown on the Policies Map” should be removed and added to Clause A.</p> <p>Clause A GBC notes that some of the land designated as Green Infrastructure on the policies map appears to be private gardens (e.g. the corridor that runs north from ‘The Oaks’ at Wandle Close) and that this policy could place a significant</p>	<p>NPC to consider updating policy wording for intro and Clause A as set out.</p> <p>ONH to review Natural England Priority Habitat mapping and adjust where necessary.</p>

Section/ Policy	Issue	ANP Response
	<p>constraint on that land. Please ensure that the network is mapped correctly and that landowners have been consulted.</p> <p>Clause B requires open space on larger schemes and landscaping areas on smaller schemes to be connected to adjoining green infrastructure assets. The second and final sentences should be swapped round so it does not confuse open space and landscaping areas.</p> <p>Not all infill schemes will include landscaping. The current second sentence should include “(where relevant)” after “landscape schemes” to make it clear that the policy is not requiring all infill schemes to provide landscaping.</p> <p>Clause C In the first sentence, it is not clear what “connected habitats suitable for species adaptation to climate change” means. This could be rewritten or explained in the supporting text.</p> <p>There are two clause Ds.</p> <p>Supporting text</p> <p>The text celebrates the protected, endangered and rare wildlife that can be found in the area and notes an abundance wildlife at Ash Manor pond, including Egyptian geese. Please note, Egyptian geese are designated nationally as an Invasive Alien Species.</p> <p>Policies Map The policies map identifies areas of “priority habitat”. It is not clear whether this is included within the Green Infrastructure Network and would be constrained as set out above because “priority habitat” is not referenced anywhere in the plan text, but please note that some of the mapped boundaries cover land that is now developed and comprises sealed surface and private gardens (e.g. the land parcel at The Croft). The plan should explain what the relevance of the mapped priority habitats is, and it would be help to evidence the policy if information about the priority habitats is provided for each parcel along with the source of the data.</p>	<p>NPC to confirm if happy to re-order wording in clause B and introduced the words “where relevant” as set out.</p> <p>Clause C to be expanded upon in supporting text.</p> <p>Rename 2nd clause D as Clause E</p> <p>Noted. NPC may wish to remove from supporting text.</p> <p>Priority habitats are included within GI network and this can be added to the policy text. Supporting text to explain the relevance of priority habitats and the source of the data</p>

Section/ Policy	Issue	ANP Response
ASH12 Thames Basin Heath	<p>In the third paragraph of the supporting text, the following sentence appears to have been left in erroneously: “Recreational impacts on the bird populations are avoided or mitigated through the provision of”.</p> <p>The next sentence accurately describes the SPA mitigation measures.</p> <p>The fifth paragraph of the supporting text states “The Habitat Regulations Assessment (HRA) has concluded that the Ash Neighbourhood Plan will not affect the integrity of European sites in relation to recreational pressure.” The SEA report indicates that a HRA will be undertaken. We could not see the completed HRA on the website. It is important that this is complete before the final version of the neighbourhood plan is drafted so that any HRA recommended measures are incorporated into the plan and in order to accord with basic condition f.</p>	<p>Erroneous text to be removed.</p> <p>Draft HRA has now been received and is being reviewed to consider any changes required to the ANP as a result</p>
ASH13 Active Travel	<p>It would be helpful for the plan to make direct reference to the Guildford Borough Local Cycling and Walking Infrastructure Plan (LCWIP) and policy ID9 as these provide a useful basis for improvement and investment in walking and cycling in the borough and they identify potential routes within the neighbourhood area.</p> <p>Paragraph 2 For clarity, paragraph 2 of the policy should be amended to state “including the addition of new walking and cycling routes...” (or words to that effect).</p> <p>Paragraph 3 Where paragraph 3 of the policy refers to footpaths it may be more appropriate for this to say footway (as in paragraph 4 of the policy). Footways (pavements) run parallel to roads, while footpaths are typically rights of way away from highways.</p> <p>The paragraph refers to “GBC Local Plan (2016 – 2036 or subsequent version)”. The Local Plan Strategy and Sites runs from 2015-2034.</p> <p>Supporting text Under “identified areas...” in the supporting text, it would be more appropriate to say “footways” rather than “footpaths” (in the context of Foreman Road and Harpers Road).</p>	<p>NPC to consider inclusion of the amendments as suggested.</p>

Local community representations.

A small number of representations have been made by members of the community as follows:

Respondent 1 (PB) notes that the Local Green Space (20) named Open Space off Collins Gardens, should be renamed Manfield Open Space to give it its correct title. – [Mapping/Policy wording to be updated as necessary.](#)

The respondent has usefully also provided further information as to why this space should be protected. [This should be added to the Local Green Spaces Report.](#) The other details raised by the respondent do not relate to the NP and are matters for the parish council to respond to separately.

Respondent 2 (PF) wished to stress the importance of getting an adequate local gap that separates Ash from Ash Green.

- *The local gap to the south west where Foreman Road goes round to meet White Lane needs to be extended over a much wider area to even be recognised as a gap. This contradicts the Guildford Local Plan which requires a buffer to prevent coalescence of Ash and Ash Green and I don't think a normal person would recognise the proposal in this area as a gap.*
- *Historic England guidance to previous planning applications to the north and north east of Ash Manor indicated this area was in the setting. Therefore to prevent any more cumulative harm to the historic assets this area to the north and north east up to the railway line, where not already approved for housing, should be included in the gap. This would prevent any more cumulative harm to the historic assets. Sites close to or in the setting which are already in place or approved are Chester Bridge, the Persimmon site round it, Orchard Farm, Streamside and the Bloor site at May and Juniper cottages.*

[In respect of point 1, GBC have indicated that the inclusion of a gap within this area would not meet basic conditions, as there is already a strategic site allocation within this area. The proposal as presented therefore does not contradict the Local Plan. Point 2 has also been raised by AGRA and will be referred to GBC for a further view on its inclusion.](#)

In respect of ASH8 Housing Mix and Type the respondent is concerned at the inability of developers to secure registered providers and thus not delivering the approved affordable housing on site and what the NP could do to address this. [This is not a unique situation and is frustrating; however, the NP can only provide the policy lever.](#)

In respect of ASH 13 Active Travel, the respondent welcomes the policy but is concerned about poor connectivity between Ash and nearby areas such as Guildford and Ash Vale, noting the A323 is unsafe for all but the most experienced cyclists and the Christmas Pie Trail is impassable in winter due to mud and damage from 4x4s and motorbikes (particularly on BOATs in Ash Green).

They urge the plan to address - Improved, all-season long-distance cycling and walking links. Safer, family-friendly infrastructure, suitable for children walking or cycling to school.

[The concern is noted and whilst the NP cannot address routes outside of its area, the Parish Council could certainly consider a request to Surrey ROW to restrict access to the BOAT in the winter by vehicles to alleviate this issue.](#)

Respondent 3 (JF) raises concerns about the weakening of the "Local Gap" (ASH4) stating the boundaries are unclear, particularly near Foreman Road and Briar's Field, risking coalescence and need stronger definition. As set out in other responses, due to the existence of the strategic policy A31 the Gap is unable to include a wider area as it would be in opposition to the Local Plan and would restrict development which has already been agreed in principle in this location.

In relation to ASH7 the respondent would like to see more clarity over what is meant by “energy efficient and sustainable design.” Seeks clarity on whether this includes zero-carbon-ready standards and whether it will be enforceable through conditions or design codes.

It will be mixture of both, with compliance with the design code expected as a material consideration in the determination of any application. The clauses relating to post occupancy evaluation and post construction information would need to be enforced through condition.

In relation to ASH8 the respondent would prefer to see a greater emphasis on social rent to better meet local need and more engagement with RPs to prevent last minute changes.

The intention behind the policy wording to allow RPs to set the mix on a case by case basis was to help alleviate the issue over local inability to secure RPS due to an overly prescriptive mix. However it is noted from the response from GBC that they wish to see the social rent as per the Local Plan and note that this is to accommodate the wider district need as local connection is not a factor in determining the allocation of social rental properties.

In respect of ASH13 – Active Travel, the respondent requests:

- Concrete proposals for new footpaths, cycle routes, safe crossings, and better links to Ash station and schools.
- Action on seasonal flooding along the old railway track, a key walking/cycling corridor.
- Recognition that Harpers Road is unsuitable for pedestrian access due to safety issues and existing development pressures.

The respondent notes that Ash Vale Ward isn't really mentioned in the plan. More broadly, the countryside between Ash, Tongham, and south of Ash Green toward the Hogs Back feels vulnerable to creeping development. Whilst much of this land lies outside the Parish boundary — in Tongham, Wanborough or Normandy they feel it would be helpful for the plan to acknowledge these risks. Even a short reference to cross-boundary pressures and known constraints would show that the Parish is alert to the wider context

Noted.

4. Conclusions & Recommendations

4.1 The representations are generally supportive of the ANP and, with some modifications as detailed above, it is considered that it can proceed to the Regulation 15 submission stage without further consultations.

5. Next steps

The Steering Group will need to update the supporting text where appropriate to reflect both the statutory consultee responses and community responses. The group will need to then consider if it is comfortable with the proposed policy wording changes and discuss with ONH the updating of the submission version of the ANP. Once all amendments/updates have been made then ONH will update the Policies Map. The group will then need to finalise their Consultation Statement.

Once the submission version of the ANP Plan is ready, ONH will also prepare the Basic Conditions Statement and the Parish Council will need to approve its submission version of the Plan to send to Guildford Borough Council for the Regulation 15 and 16 process.

Appendix 8

CLIENT ADVICE NOTE

Project: Ash Neighbourhood Plan
Ref: 4024_008
Date: 29th August 2025

REGULATION 14 RESPONSES – GBC update

Following the review of the Regulation 14 responses two queries were raised in respect of ASH1 relating to the Ash Green Boundary and ASH4 over the extent of the proposed Local Gap which required further liaison with GBC. The questions and responses are set out below. The conflict for both is with the strategic allocation as it is currently contained within the boundary defined by the AGRA as Ash Green. The only remedy to ASH1 is therefore, as originally recommended by GBC, to direct all development to the defined urban area (as set out in the Local Plan) as it falls within the parish. (see image 1 below which we would then use on the policy map) This comprises the built-up areas of Ash, Ash Vale and the A31 site. By definition this restricts development elsewhere in the parish, including the remainder of Ash Green (outside of the A31 boundary)



The GBC further response is set out below for completeness.

Ash Green boundary

The Council would very likely not support the current proposed boundary if it restricts or reduces development within the open land south of Foreman Road that forms part of strategic site A31, as this would impact strategic housing delivery. The NPPF states: "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".

If we have understood correctly, your proposal is to amend ASH1 (and I believe you would also need to amend ASH4) to remove references to restrictions on development in the open land south of Foreman Road - e.g. the "small scale, infill" restriction in ASH1 and prohibition on development of "a size and scale that would detract from the character of the rural landscape" in ASH4 - and replace it with a policy that directs development to Ash, Ash Vale and Ash Green.

Our view is that such a policy when combined with the proposed Ash Green Boundary would still appear to restrict development within the land south of Foreman road because it directs development towards existing built-up areas and therefore away from the open land. Ash and Ash Vale are outside the Ash Green Boundary so really the policy, if tied to the Ash Green boundary, would only direct development to Ash Green.

If the policy that directs development to Ash, Ash Vale and Ash Green would be independent of the Ash Green Boundary then this could be acceptable if it clearly acknowledges the need to deliver site A31 and does not appear to restrict development on the open land within it (i.e. the aforementioned restrictions on development in ASH1 and ASH4 are removed). Presumably in this case the Ash Green boundary would become a policy that governs character and design only. I would highlight that the design code character area for Ash Green stops at the edge of the village and the design code does not cover the open land. If the intention would be to confer the AT2 (Ash Green) design guidance to the open land then the Council very likely would not support this because it would seek a dph of 12, much lower than the dph of 30 applied to AT3 on the edge of Ash at the other side of the open land. As an extension to Ash, the AT3 density of 30 is more likely to be appropriate and would align with the expectations for the site in terms of housing delivery.

One of our comments on the regulation 14 plan was:

"Part 1 of the policy "directs all significant residential, employment, commercial and cultural development to the built-up areas of Ash and Ash Vale". There is no clear boundary to this area, which could create ambiguity. For clarity, the policy should refer to the Local Plan Ash and Tongham Urban Area, the boundary for which is on the Local Plan policies map."

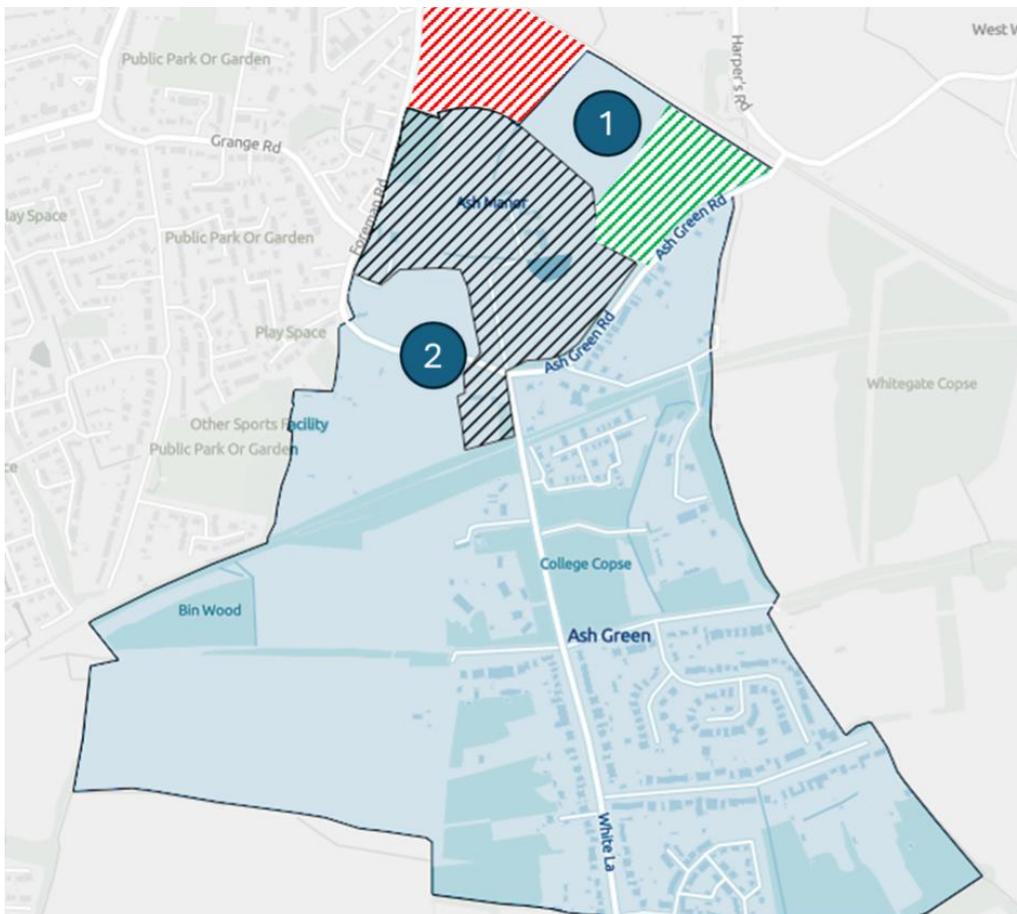
The Local Plan Urban Area covers all of the remaining land of site A31 so if our proposed change above is made (along with removal of other clauses that restrict development within A31) we would not be concerned about restricting delivery. However, the proposal in your email is to change the policy instead to direct development to the built-up areas of Ash, Ash Vale and Ash Green, which would not include the open land, and we therefore assume that the parish will not be taking our proposed change forward. As a result, our objection set out in the Regulation 14 response would remain. If you do change it to direct development to the Urban Area as we suggested, then our view is that the current proposed Ash Green boundary is inconsistent with this because it would cover part of the Urban Area. I think overall it is not clear what is trying to be achieved with the Ash Green boundary, other than limiting or restricting development in the A31 open land which would be a clear conflict with strategic policy, the NPPF and also with the local gap policy as currently worded, and the countryside policy which under ASH1 appears to restrict development to "enhancing the natural environment, or the Green Belt, as relevant".

We suggest that if the Ash Green boundary is retained as is, then the NP must ensure that all policies that apply to it (including design policies) avoid restricting or reducing development in site A31 in order

to meet with the basic conditions. We also recommend that the NP sets out why it is appropriate that the boundary covers land that is designated for development and will become urban in order to provide a justification for the boundary at examination.

ASH4 – Local Gap -

Respondent Sue Wythe Price, requested the gap be extended as per the image below. From our previous discussions with GBC it was made clear that the area marked 2 would not be able to be included due to the existing A31 designation upon it, as the gap would effectively restrict development coming forward (although it was noted GBC did not object to the first field to the west of the road being included which was helpful) but we referred the question over the area marked 1 for a further view. This issue as per the above, is that GBC see the whole of the A31 strategic site as part of the built up area and as such the area marked one would therefore not be a “gap” as it is the area between two parcels of the urban area as defined in the Local Plan (see image above) Therefore in order to comply with basic conditions the gap, as proposed in the Regulation 14 is the maximum extent possible.



Again, the GBC further response is set out below for completeness.

We think the proposed gap extension to the north is problematic for a few of reasons.

Strategic road link

The main issue is that the land in question (parcel 1 on your map) is intended provide a section of road linking the residents of May and Juniper (the green hatching on your map) with the Ash Road Bridge. As you can see from the image below, development of the road is already underway on eastern side of the proposed gap and the roundabout has been delivered to the west.



The [committee report for Land at Foreman Road, Ash](#) (the red hatching on your map) sets out the importance of this route: "The application site forms part of the wider Ash and Tongham site allocation (policy A31). So as not to prejudice development of the wider allocation it is fundamental that the application delivers links to allow for future connections to the land to the south. The southern connection would allow the future delivery of a primary allocation route as identified in the Strategic Development Framework SPD". The SDF SPD shows the "primary access route" passing through land parcel 1, so this route cannot be completed unless land parcel 1 delivers the missing road link:

-  Open space
-  Existing buildings
-  Enclosed public spaces
-  On-site primary routes
-  Access to development areas
-  Key off-site routes
-  New roundabout
-  Access to Ash Manor only
-  Key pedestrian and cycle routes / PRoW
-  Ash Road bridge
-  Railway line
-  Railway station
-  Existing gypsy and traveller's site
-  Water bodies
-  Provision of flood compensation land (area subject to detailed assessment)
-  Allocated land not included in study area
-  Possible access



Restricting development within land parcel 1 would likely remove the only mechanism to deliver the missing stretch of road. Our view is that this would have strategic implications and conflict with the basic conditions on that basis.

Impact on housing delivery

Parcel 1 is part of site allocation A31, so we would be concerned about the impact of housing delivery and meeting strategic needs etc. as with the southern part of the proposed gap.

Appropriateness

The May and Juniper development is a new housing development, so extending the gap to land parcel 1 would have the effect of creating a buffer between two new housing developments. It is not clear what value this would have. If the aim is for a green buffer to the west of new housing development then arguably the bridge development already provides such a buffer, given the extent of open land it includes either side of it and the separation that it creates.

In conclusion therefore, the submission version of the plan will need to alter the boundary of the defined urban area in ASH1 to include the land within the strategic site A31 but will therefore only direct development to the defined urban area (omitting the remainder of Ash Green)

In respect of ASH4, it will not be possible to extend the proposed local gap boundary beyond that set out in the pre-submission version of the plan.

Appendix 9

Minute of Ash Parish Council meeting held on 08 December 2025 :

102. Final Draft of the Neighbourhood Plan for the Parish of Ash. (*agenda item 10*)

Members approved the final draft of the Neighbourhood Plan for the Parish of Ash so that it can be submitted to Guildford Borough Council under Regulation 15.