

**Guildford Borough Council Hearing Session -
Matters 9 and 11**

Land North of Poyle Road, Tongham, Surrey

Prepared by Turley and Eleanor Trenfield

Landscape Architects Ltd

On behalf of Crownhall Estates Ltd

(Respondent Number: 17380865)

May 2018

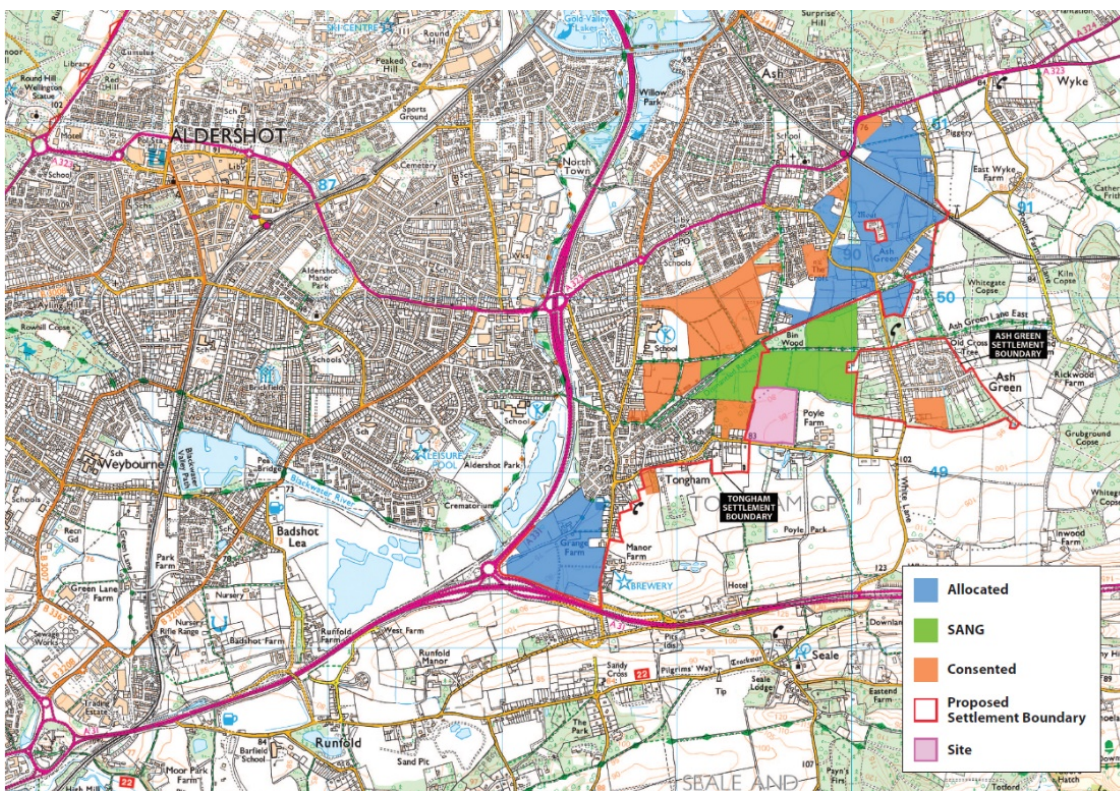
Turley

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1. Introduction

- 1.1 This Statement has been prepared by Turley, Motion and Eleanor Trenfield Landscape Architects Ltd. on behalf of Crownhall Estates (Respondent Number: 17380865), in relation to Matter 9: Spatial Strategy, Green Belt and Countryside Protection and Matter 11: Site Allocations in relation to allocation A29.
- 1.2 Crownhall Estates has an interest in land to the east of Tongham (north of Poyle Road), which is not subject to a draft allocation, and is part of an area identified within the Draft Local Plan as an extension to the Green Belt. This land is shown on the plan at **Appendix 1**.
- 1.3 The image below illustrates the Site's location (pink), surrounding consented development (buff), consented SANG (green), draft allocations (blue) and proposed settlement boundaries (red).



- 1.4 Crownhall Estates supports the allocation of Sites to meet the housing demand within Guildford (in order to significantly boost the supply of housing). Crownhall Estates is a member of the Guildford Housing Forum which has provided comments on matters 1-8.
- 1.5 Crownhall Estates considers that the Site at Tongham is an appropriate land parcel for allocation, which is not in the Green Belt, thereby reducing the need to release other

land from the Green Belt and without the need for exceptional circumstances to be demonstrated for it to be allocated.

- 1.6 This site was the subject of an application (GBC ref: 17/P/01315) for up to 150 dwellings. This application was refused by Guildford Borough Council.
- 1.7 Furthermore, Crownhall Estates considers the potential designation of the land to the east of Tongham as new Green Belt land unjustified. The Pegasus Green Belt and Countryside Study (GBCS) on which Guildford has based the decision to allocate new land within the Green Belt does not provide a clear rationale for this new Green Belt designation and is therefore flawed. The Council has not demonstrated the exceptional circumstances to justify this area of new Green Belt.
- 1.8 We set out our response to the questions posed by the Inspector in response to matters 9 and 11, where relevant to our client's previous submissions, in Section Two of this Statement. Our comments have regard to national planning policy guidance and other material considerations.

2. Matters 9: Spatial Strategy, Green Belt and Countryside Protection

9.1 Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?

2.1 The Council professes in Policy S2 that their preferred spatial strategy is as follows:

- Guildford town centre
- Urban areas
- Inset villages
- Identified Green Belt Villages

2.2 The Council, however, notes that these locations cannot accommodate all new development and as such, they will need to release land for allocation in the following areas: Countryside beyond the Green Belt, around Ash and Tongham, urban extensions to Guildford, as well as a new settlement at the former Wisley airfield and development around villages.

2.3 It, therefore, interesting to note that a site such as that at land north of Poyle Road - located adjacent to a sustainable urban area (identified as the joint most sustainable settlement alongside Guildford in the Council's settlement hierarchy) and within the Countryside beyond the Green Belt – is proposed to be included as new Green Belt land, rather than for housing growth, seemingly contradictory to the Council's own spatial strategy.

2.4 Whilst we note that there is a need to release Green Belt sites in order to address the Council's housing targets, we do not consider that there is robust evidence to demonstrate exceptional circumstances to designate new areas of Green Belt, especially within such a sustainable location. These locations have the potential to make an important contribution towards the supply of new housing in the Borough.

9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- **The spatial distribution of existing and future need for housing**

2.5 The Guildford Borough Settlement Hierarchy, published in May 2014, was prepared in order to inform the production of the Local Plan. This piece of work was prepared in order to promote sustainable development and to inform the strategic approach to development. Settlements were ranked in terms of their sustainability through the use of a number of 'Sustainability Indicators' including the presence of shops, schools and other community facilities, access to public transport and employment opportunities.

- 2.6 This document identified Ash and Tongham as an urban area, ranking the settlement as the joint most sustainable settlement alongside Guildford. The Council categorise urban areas as being the main focus for development in the Borough.
- 2.7 Ash and Tongham is also currently not located within the Metropolitan Green Belt and as such, throughout the preparation of the plan, there was no need for the Council to demonstrate exceptional circumstances to direct housing to this location. Thus, Ash and Tongham certainly represents one of the most logical growth areas in the Borough alongside Guildford.
- 2.8 Distribution options for development and the settlement hierarchy in the Borough are also explored in the updated Sustainability Appraisal (2017), also, prepared in order to inform the emerging Local Plan. Following the Guildford area, the Ash and Tongham Urban Area remains the next most sustainable location to maximise growth; namely to “deliver as much of the residual housing as possible”.
- 2.9 Notwithstanding the above, Countryside beyond the Green Belt is also considered as a location for development with two options to deliver either low growth (1,146 dwellings) or high growth (1,746 dwellings) around the Ash and Tongham area. Within this context, it is seemingly illogical that our client’s site has been proposed for Green Belt designations.
- 2.10 Furthermore, we note that despite the spatial strategy identified in the evidence base, around half of the housing allocations within the Local Plan are proposed on sites released through Green Belt amendments. Whilst we acknowledge the need to release Green Belt in order to meet the housing needs, we consider that the Council’s strategy does not align with the evidence base. In other words, the Council has not adequately considered Countryside Beyond the Green Belt in the most sustainable locations.
- 2.11 The potential development of our client’s site clearly aligns with the evidence gathered in the aforementioned documents. This is owing to the fact that it falls within the Countryside beyond the Green Belt, adjacent to the Tongham settlement boundary and as such, development would represent an appropriate extension to the Tongham Urban Area, identified to be one of the most sustainable settlements within the Borough.
- 2.12 It is our opinion, that the Council’s own evidence base pre-empted the decision not to allocate this site as explained below.

Land Availability Assessment

- 2.13 We note with interest the Council’s most recently published Land Availability Assessment (May 2016) which assesses land north of Poyle Road under site reference 79. The assessment reveals that the site is deemed available and achievable. However, the site was discounted on suitability grounds on the basis that it was proposed as Green Belt land.
- 2.14 Whilst this Local Plan has not been prepared within the context of the draft revised NPPF, it serves as a useful reference for ascertaining the Government’s current position. The draft revised NPPF indicates that the Government considers that Local

Planning Authorities must exhaust all other reasonable options before concluding that exceptional circumstances exist. In any event, considering this Plan against the current NPPF, the Council has not satisfied the relevant tests. There are sites which are available and can deliver housing, at sustainable settlements, outside of the Green Belt. This warrants detailed consideration, and should not have been discounted in that manner.

2.15 Therefore, we do not consider that this is a robust process to assess land availability and would argue that the Land Availability Assessment should be used as the *starting point* for such assessment as part of the wider evidence base. In other words, as mentioned earlier, we consider that the proposed designation of sites as Green Belt is pre-emptive and does not adequately consider the development credentials of sites currently not in the Green Belt.

2.16 Furthermore, this approach does not align with the Council's own evidence base which states in Volume 1 of the Greenbelt and Countryside Study that states in Paragraph 1.12:

"Potential development ought to be explored within these Potential Development Areas [Countryside beyond the Green Belt sites in Ash and Tongham] prior to those located within the Green Belt."

Green Belt

2.17 Approximately 89% of Guildford is within the Green Belt, as stated in paragraph 2.23 of the Draft Local Plan Submission, December 2017.

2.18 The NPPF states that exceptional circumstances are required when altering the Green Belt boundary. The Study provides no clear rationale (in the main report or the addendum) to justify the exceptional circumstances that require additional land to be **added** to the Green Belt within the Borough of Guildford.

2.19 GBC states in paragraph 4.102 of the Guildford Borough Topic Paper: Green Belt and Countryside that "...it is important that we seek to maximise development opportunities on non-Green Belt areas...", a position that GBC maintains within its approach to the Submission Local Plan (paragraph 4.113)

2.20 The decision to increase the area of Green Belt around Tongham is based on flawed justifications set out within the GBCS. The decision to add land around Tongham (specifically part of Parcel K5) does not appear to be properly informed by the GBCS's own scoring system, given that land with the same scoring is both proposed for release from the Green Belt and to be designated as New Green Belt (refer to Parcels K2, K8 and K9, and part of K3 are all identified as PDAs, yet they share the same scoring as parcel K5).

Landscape Impact

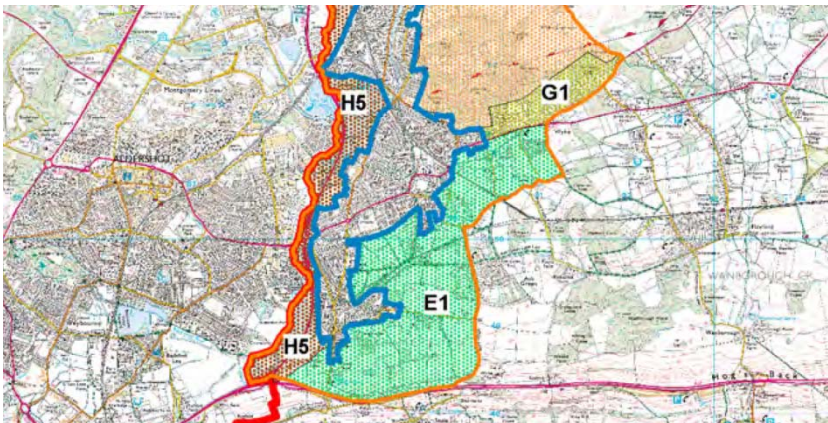
2.21 Crownhall Estates considers that part of the land to the east of the Tongham (the Ash and Tongham urban area) can accommodate residential development, which is outside of the Green Belt with limited landscape impact. Land to the east of the Ash and

Tongham Urban Area is located outside of any local or national designated landscape areas and is not within the Green Belt. The Site is not considered to be a valued landscape.

Landscape Character of land to the east of Tongham:

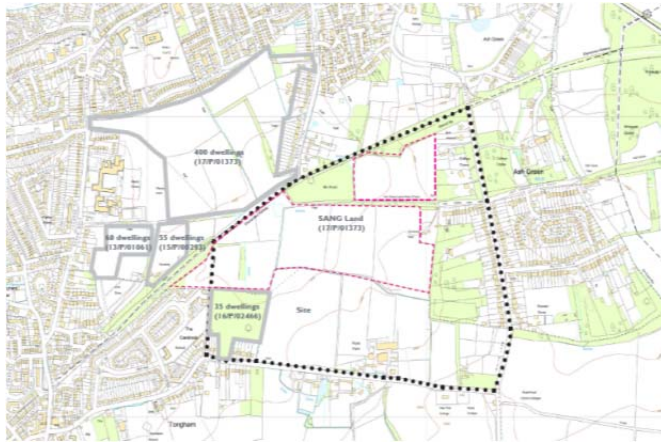
2.22 The Site falls within the Tongham Rural-Urban Fringe Character Area (E1) of the Wooded Rolling Claylands Landscape Type (E1), as defined within the Guildford Landscape Character Assessment and Guidance produced by LUC for GBC, 2007. The description for Character Area E1: Tongham Rural-Urban Fringe states that:

- the rural urban fringe comprises a large area of rolling clayland to the east of Tongham,
- dominated by farmland, including pastures and arable land, and fields subdivided as horse paddocks are also characteristic at the urban edge along with areas of scrub vegetation.
- The Study states that the area includes hedgerows, hedgerow trees, and woodland belts, particularly along the edges of roads, and that these have an important screening function in relation to the urban boundaries and the edge of residential estates.
- The Study also states that the rural urban fringe is heavily influenced by the presence of road and railway networks, and that unmanaged fringe land and horse paddocks have created a landscape which have diluted the more typical character.



The image illustrates that the land to the east of the Ash and Tongham urban area is located within the Tongham Rural-Urban Fringe Character Area (E1)

2.23 Due to the relatively large scale of the published character assessments in relation to land to the east of the Ash and Tongham urban area, a more localised appraisal of the site and its surrounds is set out below, based on desktop studies and field work.



(Image illustrating the extents of identified LLCA (black dotted line))

- 2.24 The local landscape is gently undulating, and land use comprises paddocks, arable land and woodland parcels, a SANG and agricultural buildings at Poyle Farm, and is adjoined and influenced by residential properties and associated boundary features within Tongham, Ash Green and along Poyle Road, as well as development under construction to the north of the dismantled railway line (footpath).
- 2.25 Fields are typically delineated by fencelines and/or hedgerows and trees. The landscape is not particularly open, given the presence of landscape structure, namely trees, woodland blocks and hedgerows. In addition, the existing built form, construction in progress and sites with planning permission have (and will continue to have) an urbanising influence on the landscape and demonstrate that the landscape in this location can accommodate residential development.

9.3 Are the proposed new business land and floorspace allocations in the right strategic locations.

- 2.26 We have no comments with respect to the above.

9.4 Having regard to the extent to which it is proposed to release Green Belt land and develop greenbelt sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been adequately explored?

- 2.27 The Council has established that they cannot meet their housing needs from previously developed land. Therefore, the Council has been required to consider alternative options in order to meet their housing needs. Due to the constrained nature of the Borough, Green Belt release was an inevitable solution which we deem necessary.

- 2.28 We do, however, consider that the Council should have examined fully all other reasonable options by assessing Countryside beyond the Green Belt sites such as our client's; these sites are currently not constrained by Green Belt designations.
- 2.29 Whilst we disagree with the allocation of new Green Belt land, we broadly consider the balance of delivery between previously developed land and greenfield development to be reasonable.

9.5 Having regard to 9.2 and 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?

- 2.30 We have no comments in relation to the above.

9.6 Does the plan take a sound approach towards the inseting of various villages from the Green Belt?

- 2.31 We have no comments in relation to the above.

9.7 Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV and the countryside generally?

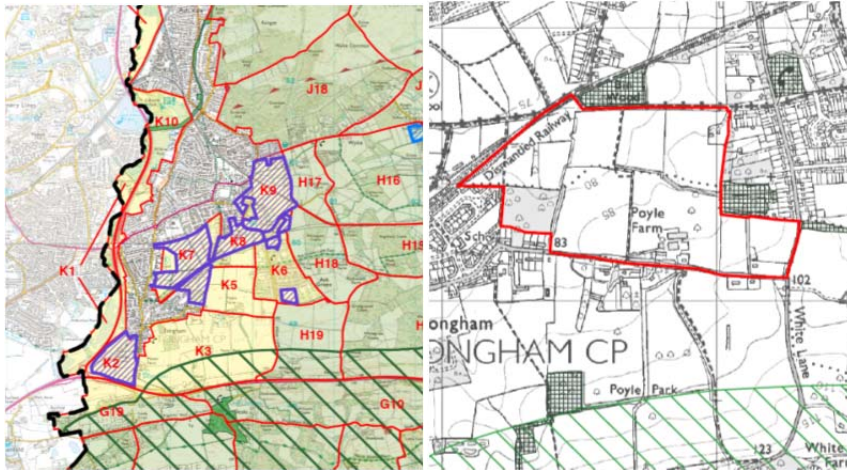
- 2.32 We have no objection to the Council's approach to the protection of the landscape, including the AONB and AGLV and the countryside generally.

9.8 If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?

- 2.33 We consider that the Council would have no difficulties in accommodating a greater housing requirement as we have demonstrated that sites in the Countryside beyond Green Belt have been discounted on suitability grounds prematurely and have not been appropriately assessed as they currently are not designated as Green Belt.
- 2.34 Therefore, these sites within the Countryside beyond Green Belt, which have not been properly assessed, represent an opportunity to accommodate a greater housing requirement.
- 2.35 These opportunities can be accommodated with the parameters established by the Council's spatial strategy and through focusing development at sustainable settlements.

9.9 What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this urban area?

- 2.36 The Council propose to amend Green Belt boundaries and create new areas of Green Belt (including Crownhall Estate's site) through the new Local Plan. In line with the Paragraph 83 of the National Planning Policy Framework (NPPF), the Council is required to demonstrate that exceptional circumstances exist in order to make said alterations.
- 2.37 We have various concerns with this study undertaken which we raised in our representation to the Guildford Borough Council's Regulation 19 Consultation.
- 2.38 The Council has proposed a new area of Green Belt to the east of Tongham, based on the findings of the Pegasus GBCS, which includes an Addendum to Volume II.
- 2.39 Purpose 2 of Green Belt as defined within the NPPF as preventing neighbouring towns merging into one another. Ash Green is not a 'town', however Pegasus has assessed the purpose of the land parcel to the east of Tongham with regards to preventing the merging of Tongham with Ash Green.
- 2.40 With regard to the concept of including additional land within the Green Belt, para 3.6, page 5 of the Summary Document of the GBCS states that:
- 2.41 *"Volume II of the Study does propose the alteration of the existing Green Belt boundary to the south of Ash and Tongham, to include some additional Green Belt land, thereby strengthening the Council's control over future development within it. **This would however be dependent upon the eventual housing requirements for the Borough, and the possible need for such land to help accommodate the growth of the Borough in the longer term.**" (our emphasis)*
- 2.42 The above caveat demonstrates that land at Tongham is not so fundamental to performing the functions of Green Belt, given that it is acknowledged that it may serve to accommodate growth in the longer term depending on housing requirements.
- 2.43 The GBCS divides the borough into land parcels, an extract of which is included below relevant to Tongham and Ash:



The images above illustrate the land parcels identified within the GBCS. The Potential Development areas (PDAs are identified with a blue hatch). The image on the right illustrates the extent of parcel K5.

- 2.44 Parcel K3 and part of K5 were identified to be included within an amended Green Belt boundary around Tongham. The GBCS states the following within the Summary Findings, Volume I, table 1.19:

“Additional Green Belt could be extended northward over land parcel K3 and part of K5 to prevent any south eastward encroachment into the rural landscape and the coalescence of Tongham and Ash Green, within the visual context of the Surrey Hills AONB...”

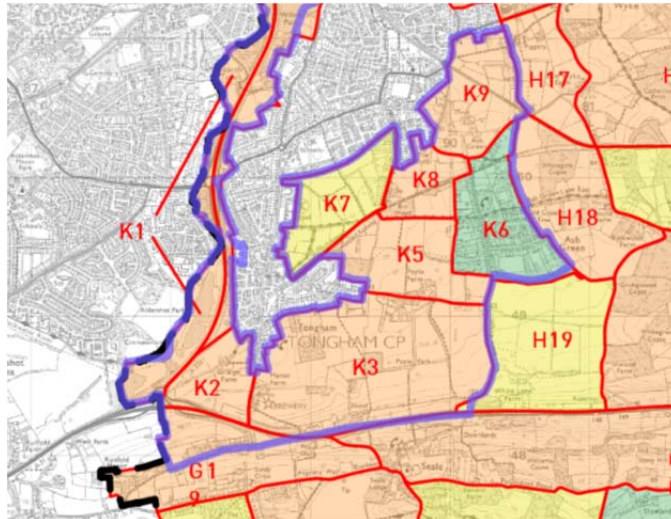
- 2.45 Para 9.25 of Volume II states:

*“It is proposed that additional Green Belt be extended northward over land parcel K3 and part of K5 to prevent any south eastward encroachment into the rural landscape and the coalescence of Tongham and Ash Green, within the visual context of the Surrey Hills AONB.... Whilst land parcel K5 **only scored 2 points** when assessed against the Green Belt purposes, it would appear a sensible contribution to the Green Belt beyond land parcel K3 ...” (our emphasis)*

- 2.46 Para 9.25 acknowledges the poor score of parcel K5, nonetheless the GBCS proposes its inclusion within the Green Belt.

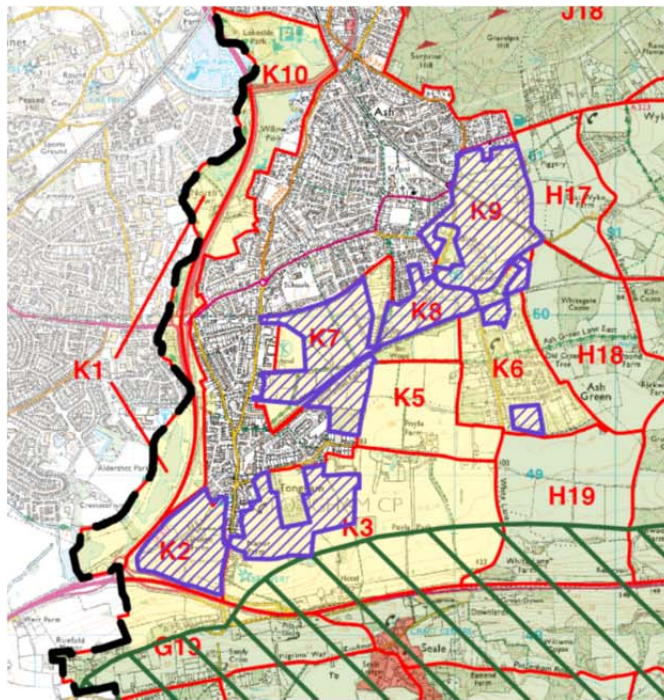
Volume II Addendum

- 2.47 Additional work was undertaken by Pegasus to address concerns raised by the public and interest groups in 2014. The Volume II Addendum was produced as an addition to Volume II rather than the replacement of it, however, as set out in paragraph 1.4 of the Introduction, some of its content supersedes some elements of Volume II.
- 2.48 The Volume II addendum includes an amended methodology for assessment of the Green Belt purpose for safeguarding the countryside from encroachment (Purpose 3) and preserving the setting and character of historic towns (Purpose 4). The land parcels were then reassessed against the new methodology.











Extract from map in Appendix 2, Vol II Addendum, Green Belt Purposes Sensitivity Assessment

2.49 The Addendum proposes some additional potential development areas (PDAs), including part of land parcel K3 (Land south of Poyle Road, Tongham).



KEY

-  Guildford Borough Boundary
-  Settlement Boundary
-  Land Parcel Boundary
- A1** Land Parcel Reference Number
-  Green Belt
-  Countryside Beyond the Green Belt (CBGB)
-  Surrey Hills Area of Outstanding Natural Beauty (AONB)
-  Conservation Area
-  Potential Development Areas (PDA) surrounding Urban Areas

Extract from map in Appendix 8, Vol II Addendum, Potential Development Areas (PDA's) surrounding Urban Areas

2.50 The Addendum sets out a revised Green Belt Purposes Assessment, which reflects the updated methodology. Amongst others, land parcels K5 and K2 are revised to score 3 (high sensitivity) from their previous score of 2, and therefore are updated to have the same score as land parcels K8 and K9 (scoring 3). Whilst they all share the same scoring, Parcels K2, K8 and K9, and part of K3 are all identified as PDAs, yet the majority of parcel K5 is identified as a new area of Green Belt. The Addendum includes no justifiable rationale to include part of parcel K5 within the Green Belt, which scores

consistently with parcels K2, K8 and K9 in terms of its contribution to the purposes of the Green Belt, all of which have been identified as PDAs.

- 2.51 Furthermore, part of land parcel K3 is proposed to be allocated as PDA in the Addendum, however, this further undermines the argument put forward within the original Volume II that additional Green Belt be extended (across K3 and K5) to prevent any south eastward encroachment into the rural landscape within the visual context of the Surrey Hills AONB. Incorporating part of land parcel K3 as PDA would result in development on the edge of the AONB, and therefore undermine their argument with regard to the visual context of the AONB.
- 2.52 The NPPF states that exceptional circumstances are required when altering the Green Belt boundary. The Study provides no clear rationale (in the main report or the addendum) to justify the exceptional circumstances that require additional land to be **added** to the Green Belt around Tongham that cannot sufficiently be addressed through general Local Plan policies relating to development within the countryside.

Guildford Borough Topic Paper: Green Belt and Countryside

- 2.53 Paragraph 4.122 of the Topic Paper states, with regard to Draft Allocation 29:

*“In defining the spatial strategy for the Regulation 19 Local Plan (2016), we reassessed all sites. In doing so, we also reconsidered how we could achieve sustainable development within Ash and Tongham whilst maintaining the separate identity of Ash Green village. We still consider that Ash Green Road will functionally and visually look towards the expanded Ash and Tongham urban area once it is built, and therefore propose that **this land, up to the dismantled railway, be included in the Ash and Tongham urban area instead of identified as an area of separation. We nevertheless wish to acknowledge that this area does form part of Ash Green village.** For this reason, whilst it is proposed to be included within Ash and Tongham urban area, **site allocation A29 requires that proposals for the land west of Ash Green Road should respect the historical context of this area. It also requires the provision of an appropriate green buffer to maintain a sense of separation between any new development and the properties along Ash Green Road.**” (our emphasis)*

- 2.54 This acknowledges that the draft allocation would be within an area that forms part of Ash Green (to the north) and therefore would no longer be an area of separation between the Ash and Tongham urban area and Ash Green. GBC consider adequate mitigation to include an appropriate green buffer in this instance. A similar approach could therefore be considered appropriate for land to the west of Ash Green, but instead, GBC have proposed land to the west of Ash Green to be designated as Green Belt. There is no justification provided for these varying approaches.
- 2.55 Crownhall Estates considers that a sufficient area of separation between the Ash and Tongham urban area and Ash Green (to the west of Ash Green) could be successfully implemented by maintaining the eastern part of parcel K5 as a landscape buffer to maintain a sense of separation, whilst developing the western part of parcel K5 to include the site being promoted by Crownhall Estates. This approach would retain separation between settlements to the west, however would not require land to be designated as Green Belt.

Permanence of the Green Belt

- 2.56 Furthermore, we wish to draw attention to the requirement in Paragraph 85 of the NPPF which stresses the importance of permanence with respect to Green Belt boundaries.
- 2.57 We consider in order to meet any future development needs, the Council will have to review the amended Green Belt boundaries and as such, they will not endure beyond the current plan period. Within the context of the NPPF, we consider this unacceptable and consider that the designation of Green Belt is proposed as a mechanism to safeguard such sites from the presumption in favour of sustainable development. Against a backdrop of under delivery of housing, this is unacceptable, counter-productive and we consider that the Council has not prepared its Local Plan positively.

3. Matter 11: Site Allocations

A29: Land South and East of Ash and Tongham

11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?

2.58 This is a matter for the Council.

11.21 Are the site allocations too large or is there scope for a greater number of new homes in this location, being land beyond the Green Belt?

2.59 Land South and East of Ash and Tongham represents a strategic location site for development, having been proposed to be allocated for approximately 1,750 homes.

2.60 It is, however, considered that the emerging design of the Ash Road Bridge is likely to have an adverse effect on the capacity of the Site A29 allocation¹. It would therefore seem sensible for part of this shortfall to be accommodated on the Poyle Road site. The fact that the detailed capacity assessments undertaken by Motion in relation to application 17/P/01315 have taken into account dwellings that may not be deliverable with the proposed Ash Road Bridge in place is a material consideration in this regard.

2.61 Furthermore, Ash Manor and Old Manor Cottage was amended from a Grade II Listed Building to a Grade II* Listed Building in October last year. It is considered that a bigger buffer will be required in order to safeguard the amenity of this complex which will also reduce the capacity of the area.

2.62 It is, therefore, our view that our client's site will be able to deliver the deficit which will be accrued from the reduced capacity on the allocation site; it is considered it represents an opportunity to accommodate additional land for development to the east of Tongham, whilst still maintaining separation between Ash Green and the Ash and Tongham urban area to the west.

2.63 The landscape surrounding Tongham is urban fringe in character and the localised landscape appraisal (see section 2 of this statement) demonstrates that the landscape has capacity to accommodate residential development, as evidenced by the existing development, construction in progress, sites with planning permission and those with draft allocations.

2.64 Since application 17/P/01315 was refused, Motion has been working with Surrey County Council Highways (SCCH) to address the highways matters that were referred to by GBC in its decision notice dated 10th November 2017. As is outlined in the draft Highways Statement of Common Ground that has been issued to GBC and SCCH, it has been agreed that:

¹ An extract from the Ash Road Bridge Presentation to the Ash Forum is provided at Appendix 2. This plan was downloaded from the Ash Parish Council website on the 8th May 2018.

- The Poyle Road site is in a sustainable location, and as such there will be a range of viable modes of transport that future residents could use.
- The bus services that serve the local area represent an appropriate level of public transport accessibility.
- The junctions that will experience the greatest increase in traffic as a result of this development all currently operate within acceptable thresholds.
- The local highway network in the vicinity of the site is not subject to any defects that result in an abnormally high accident rate.
- It is possible to deliver a safe and suitable access for all.
- The detailed highway capacity modelling undertaken by Motion has established that the cumulative residual impact of the Poyle Road site will not be severe.
- The 2nd reason for refusal associated with application 17/P/01315 has been addressed.

2.65 It is therefore clear that this site will provide a sustainable development in accordance with the overarching transportation principles of the NPPF. This is noteworthy in the context of the Local Plan as the analyses undertaken by Motion have been predicated on the majority of the development sites referenced with the wider ‘Land to the south and east of Ash and Tongham’ allocation (“Site A29”) being in place in 2022 .

2.66 In this regard, it is evident that traffic associated with this site and the Site A29 allocation will not have an adverse effect upon the local highway network. On the contrary, it should be noted that Motion had worked with SCCH to identify mitigation schemes along the southern section of White Lane that are designed to enhance the safety of this link. Alongside this, SCCH has requested a financial contribution towards a road safety scheme that it has identified as being necessary to offset the cumulative increases in traffic using White Lane.

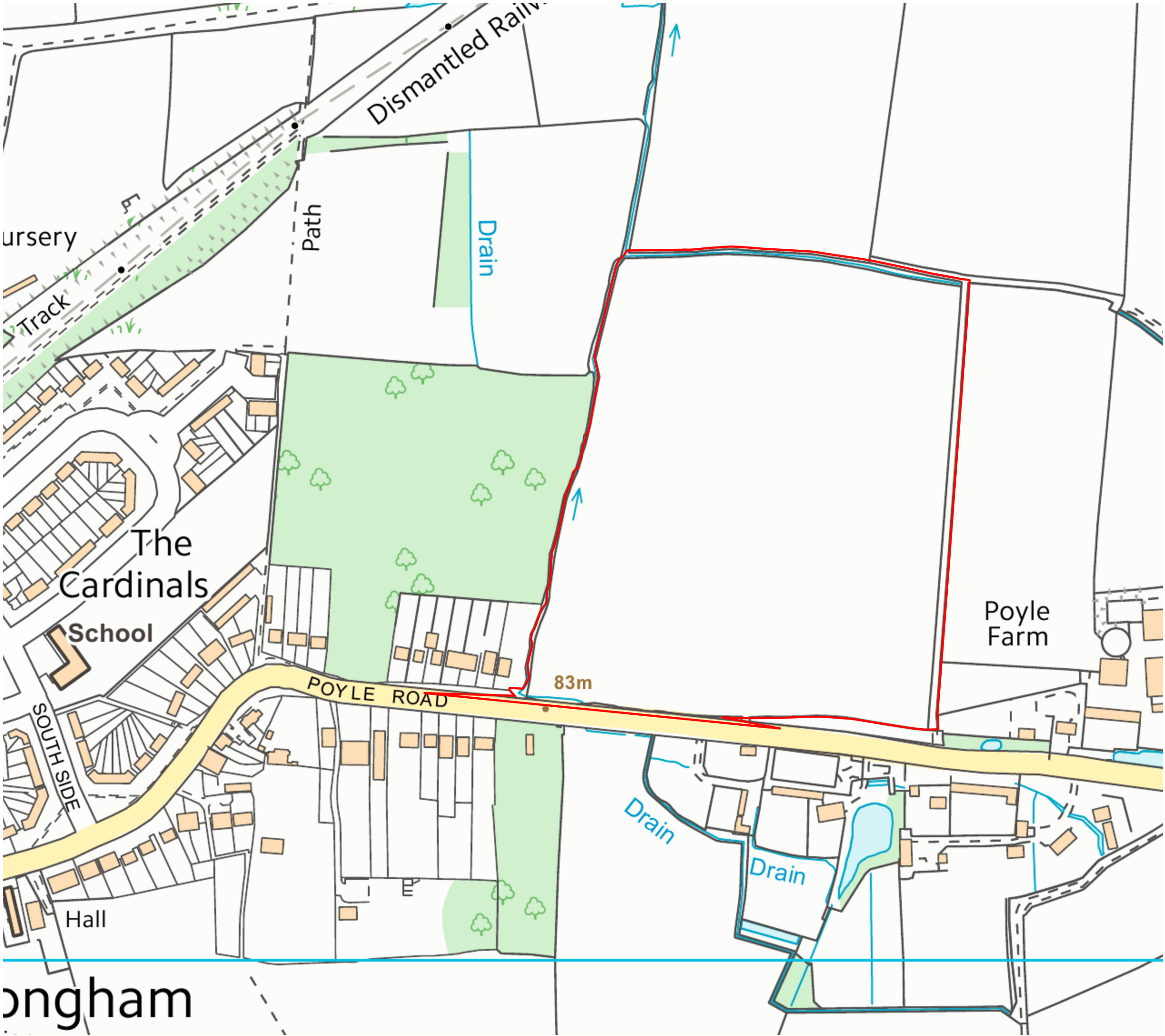
2.67 Whilst GBC contends that the shortfall in funding associated with the Ash Road Bridge should be met by the Site A29 allocation², it is important to recognise that GBC has confirmed through the course of the determination period for application 17/P/01315 that the Poyle Road site would be exempt from this. On the basis that the Poyle Road site is therefore not predicated on its delivery, as determined through Motion’s dialogue with SCCH since application 17/P/01315 was refused, Crownhall Estates has no comments to make with respect to the principle of this piece of strategic infrastructure.

² GBC has been awarded a £10 million grant from Homes England to deliver the Ash Road Bridge.

11.22 Having regard to the different areas and land parcels involved in this allocation, should the plan say more about protecting and enhancing the character of the existing Ash and Tongham urban area and Ash Green villages and creating attractive and cohesive settlement(s)

- 2.68 The character of the land surrounding the Ash and Tongham urban area is already influenced by its urban fringe location and is semi-rural in character.
- 2.69 The maintaining of separation between the Ash and Tongham urban area and Ash Green (to the west of Ash Green, parcel K5) could be addressed in the same way as is set out within paragraph 4.112 of the Guildford Borough Topic Paper: Green Belt and Countryside with regards to draft site allocation A29, namely the introduction of an appropriate green buffer to maintain separation rather than the designation of the land as Green Belt.
- 2.70 Crownhall Estates considers that this approach would sufficiently maintain the separation of settlements, and policies can be appropriately worded to protect and enhance the character of the settlements without designation of new Green Belt.

**Appendix 1: Site Location Plan – Land north of
Poyle Road, Tongham**



— Site boundary 8.69ha

Project
Land North of Poyle Road, Tongham

Drawing Title
Site Location Plan

Date 08/06/2017	Scale 1:2,500 at A3	Drawn by SR	Check by SR
Project No 1021	Drawing No 002	Revision A	

Mosaic

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