

Summary of key changes to the Proposed Submission Local Plan: strategy and sites (2017)

Introduction

This note provides a brief summary of the changes to the policies, maps and Appendix C: Infrastructure Schedule. Some of the policy changes have been significant and include:

- additional requirements to the policy (e.g. requiring a proportion of accessible, adaptable and wheelchair accessible homes in Policy H1)
- Clarification on how the policy will be applied (e.g. replacement of 'we will expect' with 'will be required' in Policy ID3)

However, most are relatively minor changes that do not alter the intention of the policy but:

- improve readability or clarity
- ensures greater consistency between the policies
- responds to specific comments made during the last consultation

Summary of key changes to the policies

Policy S1: Presumption in favour of sustainable development

- Added wording to introduction to reflect para 14 of NPPF
- Added definition of sustainable development
- Added in reference to the specific policies referred to in the NPPF that indicate development should be restricted

Policy S2: Planning for the borough - our spatial development strategy

- Correction to include urban extension at Ash and Tongham in Countryside Beyond the Green Belt bullet
- Defined the strategic development sites to aid clarity
- Amended plan period and quantities of the new requirements for homes, employment, retail and travellers
- Will be amending the annual housing target/phasing of development (**note:** this will only be done for Executive but does not impact on the quantum of development contained within the plan)
- Additional wording to provide greater clarity regarding the overall housing requirement, the purpose of the annual housing target table, the rolling five year housing supply and the specific site allocations
- Additional justification for the phasing strategy
- Reference to the 'latest' LAA for information on supply over the plan period
- Deletion of Table 1 – this information will be contained in the latest LAA. Not necessary to be contained in the Local Plan
- Table 2 (hierarchy of centres) – this has been moved to Appendix B to sit alongside the primary and secondary shopping frontages table
- Monitoring indicators amended to reflect that relevant floorspace will be monitored by policies E1 and E7

Policy H1: Homes for all

- Clarification that the net loss of all housing will not be permitted and the net loss of C2 use class (residential care/nursing homes), C3 dwellings and traveller sites (including sites allocated as such in Local Plan) will not be permitted
- Moved density wording to policy D4 'Character and design of new dwellings'
- New policy wording requiring 15% of new homes on schemes of 25 homes or more to be accessible, adaptable and wheelchair accessible homes. Clarification in reasoned justification
- The 'encouragement' of specialist accommodation
- Rewording to encourage new purpose built student accommodation on campus for all higher education Guildford based students, where appropriate. About 60% of full time Guildford based University of Surrey students expected to be provided with accommodation on campus. Clarification in reasoned justification
- Reworded policy to state that sufficient traveller sites are identified in Local Plan to meet needs. Deleted some wording in traveller policy to make it compatible with our approach to all housing. Clarification in reasoned justification

- New wording in response to recent legislation to require self-build or custom housebuilding plots on development sites of 100 or more homes, to be delivered at the earliest stages. Plots to respond to the sizes identified on the register and to be appropriately priced and marketed for 18 months. Clarification in reasoned justification

Policy H2: Affordable Homes

- Softening of introductory text in relation to reasons for affordability issues in the borough
- First para of policy replaces text previously below in a bullet point to aid clarity
- Text of policy tone changed from 'will be provided' to 'seeking'. More in line with the consideration of viability and the process of negotiation
- Tone of text changed in relation to must be to 'seeking'. As reason above. Development would not be unacceptable if it delivered less than 40% for genuine reasons of viability
- Size of homes clarified to relate to the number of bedrooms
- By providing affordable housing on site developers will not be providing land at nil cost or any other cost
- Incorporate paragraph addressing off site contributions in policy. Was previously only in the accompanying text
- Para 4.2.40 tidied up – removed reference to cascade as superfluous

Policy H3: Rural Exception Homes

- Clarified wording in policy
- Removed detail about the allocation policy – this is determined through the Council's allocation policy

Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

- Policy title changed to refer to the Area of Great Landscape Value
- Removal of "we" where appropriate
- Addition of reference to scenic beauty and deletion of bulleted considerations to ensure consistency with NPPF/NPPG requirements
- Rewording of reference to exceptional circumstances test to make clearer and refer to national policy rather than NPPF to future proof it
- Addition of reference to natural beauty to reflect Natural England's guidance for AONB
- Addition of reference to protection of its setting to reflect NPPG
- Removed repetition in Reasoned Justification
- Removal of reference to the date at which we expect Natural England to undertake boundary review as this may be subject to change. Now says its within their current work programme

Policy P2: Green Belt

- Send Business Park is now inset from the Green Belt
- Removal of “we” where appropriate
- Correction of term ‘proposals map’ to ‘policies map’
- Addition of Ripley as a village which, whilst the majority continues to be inset from the Green Belt, now also has an identified settlement boundary for limited infilling purposes
- Monitoring changed to percentage to measure success of policy

Policy P3: Countryside

- Restructure of wording and repetition removed
- Reference added to the policies map to make clear it only applies to designate countryside rather than all countryside which includes Green Belt land
- Monitoring changed to percentage to measure success of policy

Policy P4: Flood Risk

- Title of Policy amended as suggested by the EA
- Introductory text making connection with the NPPF
- Clarification of 3b undeveloped land contribution to flow routes
- Greater recognition of climate change over the lifetime of new development throughout policy and reasoned justification
- Further reference to surface water land drainage
- Updating of evidence documents

Policy P5: Thames Basin Heaths Special Protection Area

- New text added to the introduction to reference relevant international legislation and treaties other than EU directives to provide a more complete picture of the legal background to SPA protection, as suggested by SWT
- First sentence of policy reworded to be positive to meet NPPF requirements with no consequential negative impact on the strength of the policy
- Clarified the relationship between avoidance and mitigation throughout the policy, as suggested during the consultation
- Corrected the threshold for impact in the 5-7 km zone is development of “over” 50 net new dwellings (not “at least” 50). This reflects the situation
- Clarified that new SANG proposals must be “agreed” by NE, not “approved”, which was misleading
- Added a definition of “adverse impacts” after the policy and how this interacts with the SPA approach introduced in 2010. This aids clarity following consultation comments
- Replaced the list of types of residential development and permanent accommodation. This represents further work undertaken on the emerging SPA Strategy since the policy was written
- Removed requirement in the supporting text for all development in 400m zone to undergo an Appropriate Assessment as Natural England disagreed with this

- Added a short paragraph explaining that the policy must be consistent with policy NRM6 of the South East Plan, following solicitor's advice.

Policy E1: Meeting employment needs

- Introductory text – new paragraph on role of LEP.
- Amount of floorspace amended in light of new ELNA.
- Reference to the number of strategic sites has been removed as considered unnecessary
- Three Office and R&D strategic sites added to list:
 - 1000, 2000 and 3000 Cathedral Hill previously included within another site
 - The Guildway previously incorrectly listed as industrial
 - Send Business Centre has been added to the plan
- Clarity added to Gosden Hill Farm designation
- New designation of Strategic Industrial site at Burnt Common added
- Site at Garlick's Arch deleted .
- Locally significant sites
 - Words "employment based" added to regeneration for clarity
 - Broadford Business Park added now it is not being lost for residential
 - Abbey Business Park and Home farm following feedback from Rural Business Officer
 - New future employment land at Wisley added

Policy E2: Locations of new employment floorspace

- Amended wording on Guildford town centre to clarify sequential approach.
- Deleted wording on Surrey Research Park and amended to apply to all site allocations to simplify and clarify text.
- Added "Locally Significant Employment Sites" as a location where development is acceptable in order to ensure policy in conformity with policy E3.
- Industrial – text added to ensure policy in conformity with site allocations.
- Definitions – Transport interchanges – Wanborough removed and Normandy/Flexford site removed from Plan.
- Text on Waste Management Facilities added at the request of SCC.

Policy E3: Maintaining employment capacity and improving employment floorspace

- Text added on Strategic Employment Sites will be protected for their current specific use. To ensure the balance is maintained of both office/R&D and Industrial in order to meet needs.
- Text added to clarify that marketing must take place prior to submission of a planning application.
- Additional information added to ensure marketing information is fully clarified and easy to understand.

Policy E4: Surrey Research Park

- Text amended on vacant plot at Faraday Court to ensure information is up-to-date.

- Added reference to proposals map and site allocation to ensure Plan is consistent throughout.
- Moved bullet on design and landscaping to clarify that this applies to all proposals not just exceptions to the first paragraph
- Added text on total capacity vs plan period

Policy E5: Rural Economy

- Added text on small incubator units as a result of consultation responses and discussions with Economic Development team
- Added text on agricultural land as a result of consultation responses
- Added text on loss of shops and services to ensure policy is consistent with E8 and to ensure this key requirement is not lost if applicants only look at policy E5
- RJ – added text from previous draft on broadband as a result of consultation responses
- Added text on small incubator units as a result of consultation responses, councillor comments and discussions with Economic Development team

Policy E6: The leisure and visitor experience

- Updated statistics
- Introduction now makes reference to the historic built environment, centres, natural environment, biodiversity and water quality
- Policy wording changed from 'should' to 'require'
- Increased flexibility in terms of locational requirements for self-contained hotels

Policy E7: Guildford Town Centre

- Added references to historic assets and character
- Enhanced reference in text to high quality design and environmental standards. Also reconnecting the town to the river
- Moved policy heading to add para to introduction
- Deletion of the vision, which came from the Town Centre Masterplan
- Removal of text from first part of policy that were none specific and added them as text
- Corrected error of leaving out reference to A5 use in policy
- Update quantum of development proposed in response to changes to the evidence base
- Deletion of text relating to flooding as it unnecessary text within a Local Plan. Does not aid understanding of the policy or help the decision maker
- Updating of the Key evidence removing the Town Centre Masterplan
- Amended Monitoring indicators to read floorspace permitted and completed within the town centre

Policy E8: District Centres

- Removal of 'we' as inappropriate

- Clarify the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
- Expand those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
- Correct an error re reference to local centres in a policy on District centres
- Simplify wording in relation to the A uses
- Ensure consistency in the 4 bullet points with policies E7 and E9
- Add two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
- Add definition of 'main town centre uses' to Reasoned Justification

Policy E9: Local Centres

- Remove the 'we' as inappropriate
- Clarify the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
- Expand those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
- Simplify wording in relation to the A uses
- Add two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
- Last sentence of policy moved to more appropriate policy E5
- Definition section enhanced with definition of main town centre uses, reference to defining the primary shopping area(moved from Reasoned Justification) and defining small scale

Policy D1: Place shaping

- Policy title changed to better reflect aims of the policy
- Added reference to landscape considerations
- Use of "should" rather than "must" as not all bullets will be relevant in all cases
- Additional bullet seeking high quality communications infrastructure to support broadband
- The section of the policy and text in the reasoned justification that related to **all** developments has been moved to Policy D4: Character and design of new development
- Addition of Landscape Character Assessment to Key Evidence

Policy D2: Sustainable design, construction and energy

- Changed "must" to "are/is required to" to be consistent with other policies
- Removed "that are achievable" when referring to the highest standards as this is inherent in the policy (applicants cannot exceed achievable standards)

- Removed “wherever opportunities to do so are identified” from the requirement to “deliver measures that enable sustainable lifestyles for the occupants of buildings” in order to reduce uncertainty for applicants and deliver a plan-led system.
- Increased carbon reduction requirement from 15 per cent to 20 per cent subject to the outcome of the viability study currently underway
- Added a sentence to allow for offsite carbon offsetting measures as a last resort in meeting the carbon reduction requirement as GBC may wish to set up an offset fund in the future. This reflects the energy hierarchy
- Added clarifications on sustainability and energy statements, “direct carbon emissions” and “the lowest level of carbon emissions” to the supporting text for clarity
- Clarified that the “highest level of water efficiency” means the current optional building regulation standard of 110 litres per person per day, or a future higher national standard. This is to allow for changes in national policy and to ensure the current standard (110 litres per person per day) is formally adopted through this policy. Further explanation added to the supporting text
- Added clarification to the meaning of the requirements for CCHP systems to be of a scale and operation that delivers the lowest carbon emissions to provide greater clarity for the policy

Policy D3: Historic environment

- Replace word ‘conserve’ with ‘sustain’ on advice of Historic England
- Additional wording to reasoned justification on historic landscapes, County sites of archaeological importance and consulting the County Archaeologist on sites of archaeological importance
- Addition of Landscape Character Assessments and Historic Landscape Character Assessments to Key Evidence

Policy D4: Character and design of new development

- Policy title changed to better reflect aims of policy - no longer restricted to only urban areas and inset villages – applicable to **all** new development
- Text previously in Reasoned Justification added to introduction
- Section of policy and Reasoned Justification previously in D1 incorporated into D4
- Additional bullet regarding density and efficient use of land (previously addressed in Policy H1)
- Additional requirements from LP 2003 General Policies added eg designing out crime, inclusion of natural features such as watercourses and ponds, visual interest at pedestrian level, visual impact of traffic
- Additional requirement for the DCLG nationally described space standards
- Section of policy that related to inset villages now relates to **all** villages
- Reasoned Justification includes additional information in relation to art and the emerging GBC Public Art Strategy
- A number of additional documents added to the Key Evidence

Policy ID1: Infrastructure and delivery

- Name of policy changed to ID1. Responds to consultation comment that I4 looks like fourteen. Other “I” policies have been renamed accordingly.
- Policy tightened and expanded to aid clarity with regard to phasing and application of planning conditions and planning obligations
- The policy test included in the site allocation policies for the strategic sites starting ‘When determining planning applications...’ added to the policy
- Clarified the definition of infrastructure

Policy ID2: Supporting the Department for Transport’s “Road Investment Strategy”

- Name of policy changed to ID2. Responds to consultation comment that I4 looks like fourteen. Other “I” policies have been renamed accordingly.
- Clarified and modified application of the policy to ‘promoters of sites close to the A3 and M25 and strategic sites...’
- Removed the square bracketed paragraph on the potential Statement of Common Ground as felt that this likely to be agreed closer to Examination
- Date source of ‘Planning consents’ removed from Monitoring

Policy ID3: Sustainable transport for new developments

- Name of policy changed to ID3. Responds to consultation comment that I4 looks like fourteen. Other “I” policies have been renamed accordingly.
- Policy tightened with replacement of ‘we will expect’ with ‘will be required’
- Use of additional language mirroring NPPF
- Requirement for planning obligation preventing future occupants obtaining on-street residents parking permits now specified as applying to CPZs, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, ‘pay and display’ visitor parking exceeds the supply of designated on-street parking spaces
- Tightened requirement in other areas such that any development-related parking on the public highway does not adversely impact road safety or the movement of other road users
- New provision that the provision and/or improvement of a car club by a new development will be supported if appropriate
- Cumulative impacts test now specifically includes the context provided by site allocations as well as approved developments
- Infrastructure Schedule referenced in policy itself
- Policy added that the provision of additional public off-street car parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise drive through the Guildford gyratory
- Definitions added
- Reasoned Justification has undergone major update to reflect numerous policy changes

Policy ID4: Green and blue infrastructure

- Name of policy changed to ID4. Responds to consultation comment that I4 looks like fourteen. Other “I” policies have been renamed accordingly.
- Added allotments to list of types of green infrastructure as suggested in consultation.
- Added flood risk management to the list of benefits of Green Infrastructure as suggested in consultation.
- Numerous amendments to supporting text for clarity and accuracy
- Added “as defined in the NPPF” to definition of open space for clarity.
- Added “where possible” to requirement for proposals to demonstrate how they will achieve net gains in biodiversity to reflect language in the NPPF
- Added “Where this test is met, every effort must be made to reduce the harm to the site through avoidance and mitigation measures” to aid clarity
- Minor amendments to Blue Infrastructure section of the policy for clarity and accuracy
- Added “as identified in the most recent Open Space, Sports and Recreation Assessment” to final paragraph of policy
- Added text to definitions to allow for biodiversity enhancements other than those indicated in the BOA policy statements where they are more appropriate
- Changed references to “NPPF” to “national planning policy” for future proofing, where the text does not refer to a specific NPPF paragraph

Summary of key changes to the maps

Albury

No change

Ash and Tongham

Amendment	Change	Reason
1 – 10	Additional land parcels within allocation A29	Now includes all unimplemented planning permissions
11	Site boundary amendment to allocation A28	The site has been extended westwards to include land up to White Lane to ensure it can be accessed. It has been extended southwards to follow the access road to ensure a defensible Green Belt boundary
12	Urban area boundary amendment	Amended to follow amended Green Belt boundary

Ash Green

Amendment	Change	Reason
1	Site boundary amendment to allocation A28	The site has been extended westwards to include land up to White Lane to ensure it can be accessed. It has been extended southwards to follow the access road to ensure a defensible Green Belt boundary
2	Urban area boundary amendment	Amended to follow amended Green Belt boundary

Chilworth

No change

Compton

No change

East Clandon

No change

Effingham

Amendment	Change	Reason
1	Green Belt boundary amendment	Amended to ensure the Green Belt follows a defensible boundary

Fairlands

No change

Former Wisley Airfield

Amendment	Change	Reason
1	Site boundary amendment to allocation A35	Includes additional land that is now available
2	Green Belt boundary amendment	Amended to ensure the Green Belt follows a defensible boundary

Gomshall

No change

Guildford Town Centre

Amendment	Change	Reason
1	Removal of site allocation A4	Site no longer available
2	Site boundary amendment to allocation A5	The site now includes the section of the Sustainable Movement Corridor previously allocated by A10, with a requirement to deliver it
3	Site boundary amendment to allocation A10	The site has been changed to only include the section of the Sustainable Movement Corridor that remains to be delivered

Guildford Urban Area

Amendment	Change	Reason
1	Removal of site allocation A4	Site no longer available
2	Site boundary amendment to allocation A5	The site now includes the section of the Sustainable Movement Corridor previously allocated by A10, with a requirement to deliver it
3	Site boundary amendment to allocation A10	The site has been changed to only include the section of the Sustainable Movement Corridor that remains to be delivered
4	Additional site allocation A59	To provide greater certainty and clarity the proposed new rail station at Guildford West (Park Barn) is now allocated
5	Incorrect AONB boundary	Corrected the error in the Local Plan 2003 to show the AONB boundary as originally designated in 1958
6	Designation change for the type of Strategic Employment Site	Now correctly shows the site as being an Office and Research and Development Strategic Employment Site rather than an Industrial Strategic Employment Site
7	Green Belt boundary amendment	Amended to exclude land that falls within the Urban Area boundary and to follow defensible lines

Henley Business Park, Pirbright Road, Normandy

No change

HM Prison, Ripley Road, Ripley

No change

Holmbury St Mary

No change

Home Farm, Effingham

Map deleted

Horsleys – West Horsley (north)

Amendment	Change	Reason
1	Removal of site allocation A41	Site now being made available for a relocated primary school – deliverability of the site for this use is not certain
2	Green Belt boundary amendment	Amended to exclude A41

Horsleys – East Horsley (south)

Amendment	Change	Reason
1	Removal of site allocation A36	Insufficient evidence to demonstrate the loss of the hotel
2	Identified Settlement boundary amendment	Amended to include the whole village settlement area

Horsleys – East Horsley

Amendment	Change	Reason
1	Removal of site allocation A36	Insufficient evidence to demonstrate the loss of the hotel
2	Removal of site allocation A41	Site now being made available for a relocated primary school – deliverability of the site for this use is not certain
3	Green Belt boundary amendment	Amended to exclude A41
4	Identified Settlement boundary amendment	Amended to include the whole village settlement area

Horsleys – West Horsley (south)

No change

Jacobs Well

Amendment	Change	Reason
1	Designation of Local Shopping Centre/Primary Shopping Area	A further review of the parade indicates it meets the criteria for the designation.

Keogh Barracks, Ash Vale

No change

Mount Browne and University of Law, Guildford

No change

Normandy and Flexford

Amendment	Change	Reason
1	Removal of site allocation A46	An alternative and preferable location for the new secondary school has been found which removes the exceptional circumstances to justify this site
2	Removal of site allocation A47	The site continues to meet the criteria for a Site of Nature Conservation Interest (SNCI), which is incompatible with development
3 – 8	Green Belt boundary amendment	Amended to exclude A46 and A47. Amended to include a plot south-west of Flexford

Peaslake

No change

Peasmarsh

No change

Pirbright

No change

Pirbright Barracks

No change

Pirbright Institute

No change

Puttenham

No change

Ripley

Amendment	Change	Reason
1	Green Belt boundary amendment	Amended to ensure the Green Belt follows a defensible boundary
2	Inclusion of Identified Settlement boundary	Added to show that the part of the village removed from the Green Belt still forms part of the village

Send

Amendment	Change	Reason
1	Designation change from 'Locally Important Employment site' to 'Strategic Employment site'	The site fulfils the criteria to be designated a Strategic Employment Site
2	Green Belt boundary amendment	Amended included Send Business Park

Send Marsh/ Burnt Common

Amendment	Change	Reason
1	Additional site allocation A58	New site allocated for industrial uses (previously on A43)
2	Green Belt boundary amendment	Amended to include A58
3	Designation of site as a 'Strategic Employment site'	The site fulfils the criteria to be designated a Strategic Employment Site
4	Boundary amendment to site A43a	Amended to include the land likely to be required to deliver the new slip roads.
5	Boundary amendment to site A43	Amended to include all the land that forms part of the site
6	Green Belt boundary amendment	Amended to ensure the Green Belt follows a defensible boundary

Shalford North

Amendment	Change	Reason
1	Incorrect AGLV boundary	The AGLV designation does not cover the built up area of the village

Shalford South

Amendment	Change	Reason
1	Incorrect AGLV boundary	The AGLV designation does not cover the built up area of the village
2	Removal of site allocation A34	Insufficient evidence to demonstrate the loss of employment land
3	Designation of site as a 'Locally Important Employment site'	The site fulfils the criteria to be designated a Locally Important Employment Site

Shere

No change

The Orchard, Puttenham

No change

West Clandon

No change

Whittles Drive, Cobbetts Close and Four Acre Stables, Aldershot Road (Normandy and Worplesdon wards)

No change

Wood Street Village

No change

Worplesdon

No change

Summary of changes to Appendix C: Infrastructure Schedule

- Options kept open through identifying 'Developer funded' as the funding source so that specific infrastructure schemes can be funded by S106 or CIL, and by one or many developers
- SRN1 and SRN6 highway schemes removed as requested by Highways England
- SRN7 and SRN8 highway schemes now shown as benefitting from committed funding from the Department for Transport
- LRN7 highway scheme now additionally specifies that developer of former Wisley Airfield site will provide a mitigation scheme to address junctions of Old Lane, Forest Road and Howard Road
- LRN17 highway scheme retained, but mention of this being principally to serve the Normandy and Flexford site removed as site has been removed from Draft Local Plan
- LRN19, AM4, EG6, WS4, WCT5, FRR4, FRR5, SANG13, OS4, PED1 infrastructure schemes removed as Normandy and Flexford site removed from Draft Local Plan
- LRN23 highway scheme added for new and modified signalised junctions of A322 Onslow Street, Laundry Road, A322 Woodbridge Road and A246 York Road in Guildford town centre
- BT5 and BT6 bus schemes added for significant bus networks serving Gosden Hill Farm and Blackwell Farm sites respectively to match additional requirements for their site allocation policies
- 'SCC' removed from the 'Delivered by' cell for various transport schemes as requested by SCC where it is considered that a specific developer will be responsible
- EYED1 early years education scheme removed – this site (site allocation A18 is now being allocated for student accommodation and an element of D1. Nursery no longer considered appropriate here)
- PED5 primary school scheme modified following discussion with SCC as Local Education Authority
- SED1 secondary school requirements at Gosden Hill Farm site modified – reference to up to 6FE removed as this is not necessary with 4FE at Wisley airfield
- SED2 secondary school requirements at former Wisley airfield site modified to remove reference to "age 16" at request of SCC
- SED3 secondary school requirements modified to such that school provided at Blackwell Farm site rather than the Normandy and Flexford site removed from the Draft Local Plan
- SED4 deleted – UTC project no longer being progressed
- SED5 secondary school requirement added for expansion of Ash Manor Secondary School
- Addition of HSC6 - GP provision at Ash and Tongham