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Report on Ash Parish Neighbourhood Plan 2025 - 2045

An Examination undertaken for Guildford Borough Council with the support of the Ash Parish Council on the November 2025 submission version of the Plan.

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Date of Report: 27 August 2026

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Main Findings - Executive Summary

From my examination of the Ash Parish Neighbourhood Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Ash Parish Council;
- The Plan has been prepared for an area properly designated – Ash Parish, as illustrated in Figure 1 of the Plan;
- The Plan specifies the period to which it is to take effect – 2025 - 2045; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Ash Parish Neighbourhood Plan 2025 - 2045

- 1.1 Ash Parish is located immediately east of Aldershot and to the west of Guildford. Between Aldershot and Ash is the Blackwater River Valley. The Basingstoke canal, another prominent waterway, runs parallel to Blackwater Valley across the northern part of Ash Parish. The built-up area of the Parish has grown up from three villages, namely Ash Vale in the north, Ash in the centre, and Ash Green in the south. St Peter's church in Ash, which is a Grade II* listed building is a landmark in the Parish, and sits amidst 16 listed buildings, as shown in Figure 3 of the Plan, depicting Ash's historic past. Ash railway station, also shown on Figure 3, provides services across Guildford Borough and beyond. Ash Vale and Ash Green also have railway stations. Introduction of the railway in the nineteenth century led to substantial growth in Ash. The Army established a camp nearby in Aldershot in 1853, enclosing much of Ash Common for training and rifle ranges. Keogh Barracks, in Ash Parish, houses military personnel, and Ash Ranges is an area of heathland owned by the Ministry of Defence (MOD) in the north-east of the Plan area.
- 1.2 The road system was expanded in the twentieth century, and the A331 extends from north to south on the western edge of Ash, linking to the M3, A3 and A31. The Parish population contains a relatively high

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proportion of people in the working age group 30-60 years, reflecting Ash's good accessibility by car or train to key workplaces in South-East England. Good transport access developed after World War II led to significant housing development in Ash. It is described as "swathes of 20th century suburban housing estates" in the Plan (paragraph 3.13). The District Centre at Wharf Road, the Local Centre at Ash Vale and designated new Local Centre in Ash Street, as shown on the Policies Map in the Plan, offer a variety of retail outlets, and there is a range of community facilities across the Parish. Strategic Employment Locations at Lysons Avenue, Ash Vale, and adjacent to Ash rail station, provide opportunities for businesses and the local workforce. The Plan area also includes extensive areas of Green and Blue Infrastructure, as shown on the Policies Map.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Ash Parish Neighbourhood Plan by Guildford Borough Council, with the agreement of the Ash Parish Council.
- 1.4 I am a chartered town planner and former government Planning Inspector, with prior experience examining Neighbourhood Plans in South-East England and more widely. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
 - (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
 - Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;

- it sets out policies in relation to the development and use of land and does not go beyond the scope of what may be included in a draft plan¹;
 - it specifies the period during which it has effect;
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - it does not include provisions and policies for 'excluded development';
 - so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, it is designed to secure that the development and use of land in the neighbourhood area will contribute to the mitigation of, and adaptation to, climate change²; and
 - so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, it takes account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area.³
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').

1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
- Contribute to the achievement of sustainable development;

¹ See s.38B(A1) and s.38B(2C)(a) of the 2004 Act.

² This additional requirement was commenced on 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force section 98 of the Levelling-up and Regeneration Act 2023.

³ See footnote above.

- not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made⁴;
 - be compatible with, and not breach, assimilated obligations⁵; and
 - Meet prescribed conditions and comply with prescribed matters.
- 1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.⁶

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Guildford Borough Council, not including documents relating to excluded minerals and waste development, is the Guildford Local Plan Parts 1 and 2. Part 1: Strategy and Sites, was adopted in 2019, and updated in 2023. Part 2: The Local Plan Development Management Policies, was adopted in 2023. The Regional Spatial Strategy for the South East of England has largely been withdrawn, but Policy NRM6 concerning protection of the Thames Basin Heaths Special Protection Area (SPA), remains in place. The Council is preparing a new Guildford Local Plan in line with Government's new plan-making system and is, therefore, at a very early stage.
- 2.2 This Plan has been prepared in the context of the version of the National Planning Policy Framework (NPPF) published in December 2024. A revised NPPF was published during the examination on 17 August 2026. However, the revised version does not apply for the purposes of this examination.⁷

⁴ This Basic Condition applies from 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force section 99 of the Levelling-up and Regeneration Act 2023. This replaces the former Basic Condition which required a neighbourhood plan to be in general conformity with the strategic policies of the development plan for the area.

⁵ See: The Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023, which replaced the previous reference to 'EU' obligations.

⁶ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

⁷ See the transitional arrangements provided by Annex A, Paragraph 6 of the August 2026 NPPF: [National Planning Policy Framework - GOV.UK](#)

Unless otherwise stated, all references in the report are to the December 2024 NPPF and the accompanying Planning Practice Guidance (PPG).

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
- the draft Ash Neighbourhood Plan 2025 -2045, [April 2026];
 - Map [Figure 1] of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - Guildford Borough Council's Statement to the Examiner [March 2026]
 - the Consultation Statement [November 2025];
 - the Basic Conditions Statement [November 2025];
 - the Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report and Determinations, prepared by Guildford Borough Council [January 2026];
 - all the representations that have been made in accordance with the Regulation 16 consultation; and
 - the responses to my questions (Examiner letter of 1 April 2026), provided by Ash Parish Council (20 April 2026) and Guildford Borough Council (12 May 2026), the subsequent representation submitted on behalf of the Muller Property Group (15 April 2026), and the 3 consultee responses received related to the legislative changes that came into force on 25 March 2026.
 - The responses to my further questions (Examiner letter of 8 June 2026) provided by Ash Parish Council (19 June 2026) and Guildford Borough Council (also 19 June 2026), and the response received from Ash Green Residents' Association (22 June 2026).⁸

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 2 June 2026, to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and did not seek a hearing session. In addition, further written clarification was provided by the Parish Council and Guildford Borough Council in response to my Examiner questions of 1 April 2026.

⁸ View all the submitted and examination documents at:

<https://www.guildford.gov.uk/article/27109/Neighbourhood-planning-in-Ash>

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Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Ash Parish Neighbourhood Plan has been prepared and submitted for examination by Ash Parish Council, which is a qualifying body for an area that was designated by Guildford Borough Council on 26 April 2024.
- 3.2 It is the only Neighbourhood Plan for Ash Parish and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2025 to 2045.

Neighbourhood Plan Preparation and Consultation

- 3.4 Ash Parish Council decided, in February 2024, to produce a neighbourhood plan. A Neighbourhood Planning Committee was formed in May 2024, comprising Parish Council representatives, and the Committee was given authority by the Parish Council to prepare the Neighbourhood Plan. Residents and members of the local community were encouraged to attend all meetings. Following work to progress the Neighbourhood Plan between October 2024 and March 2025, the Parish Council held a resident engagement event with drop-in sessions at The Ash Centre in April 2025. An online survey was also undertaken in April 2025.
- 3.5 The Regulation 14 consultation exercise was conducted from 16 June 2025 to 31 July 2025, both online and offline, with adverts on noticeboards around the Parish. The Consultation Statement accompanying the Plan states that 8 representations were received, including 3 from the statutory consultees. The responses were analysed as described in the Consultation Statement and were used to modify the Neighbourhood Plan and produce a final draft for submission to Guildford Borough Council in December 2025. Consultation under Regulation 16 took place from 20 January to 9 March 2026 and 16 responses were received. I am satisfied that the consultation process has met the legal requirements and has had regard for advice in the PPG on plan preparation and engagement.

- 3.6 Following the regulation 16 consultation, changes to the legal compliance requirements and Basic Conditions for neighbourhood planning came into Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

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effect on 25 March 2026.⁹ In order to provide an opportunity for the Qualifying Body (QB), Local Planning Authority (LPA) and any other interested parties to comment, the LPA contacted those who had made representations at Regulation 16, and a 2 week period from 11 May to 26 May 2026 was provided on Guildford Borough Council's website inviting further comments, focused only on the legislative changes. In addition to the responses from the Borough and Parish Councils, 3 further responses were received. I have taken these into account in my assessment.

Development and Use of Land and Excluded Development

- 3.7 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act and does not exceed the appropriate scope of a neighbourhood plan.¹⁰ The Plan does not include provisions and policies for 'excluded development'.¹¹

Local Nature Recovery Strategy

- 3.8 Guildford Borough Council has confirmed that a local nature recovery strategy (under section 104 of the Environment Act 2021) for the whole of Surrey has been put in place, and it relates to all of the Neighbourhood Plan Area. Policy ASH11 of the Neighbourhood Plan covers Green and Blue Infrastructure and requires new development to align with and contribute to delivery of the Surrey Local Nature Recovery Strategy. I note there are two Local Nature Reserve (LNR) sites in the Plan area, namely Lakeside Nature Reserve in Ash Vale, and Snaky Lake, also in Ash Vale, which should be protected. In my assessment, none of the Plan's policies are in direct conflict with the local nature recovery strategy.

Climate Change

- 3.9 Having regard to the responses received to my letter of 1 April 2026, I am satisfied that overall the Plan policies do not conflict with the aims of securing development which contributes to the mitigation of, and adaptation to, climate change.

Human Rights

- 3.10 Guildford Borough Council has not raised concern that the Plan breaches Human Rights (within the meaning of the Human Rights Act 1998), and from my independent assessment I see no reason to disagree.

⁹ See paragraphs 1.6 – 1.8 above and the associated footnotes.

¹⁰ See s.38B(A1) and s.38B(2C)(a) of the 2004 Act.

¹¹ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.

4. Compliance with the Basic Conditions

Assimilated Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Guildford Borough Council, which found that it was necessary to undertake SEA. The Environmental Report of June 2025 concluded that there would be no significant harmful effects from policies in the Ash Neighbourhood Plan. Having read the SEA Screening Opinion, November 2024, the Environmental Report to accompany the Regulation 14 version of the Plan, June 2025, and the SEA and HRA Screening Report and Determinations January 2026, I support this conclusion.
- 4.2 In relation to Habitats Regulations Assessment (HRA), Ash Parish is in close proximity to designated sites of international importance, notably the Thames Basin SPA and the Thursley, Ash, Pirbright and Chobham SAC. Guildford Borough Council screened the Plan proposals at an early stage, initially determining they should be “screened in” for Habitats Regulations Assessment (HRA), based on the proposed scope of the Plan and the presence of European protected sites within the Neighbourhood Plan Area. However, in its “Statement for the examiner” dated March 2026, Guildford Borough Council has subsequently advised that it has determined that the submission version of the Plan does not require a HRA “appropriate assessment”. Natural England did not raise objections to the draft Plan. From my independent assessment of this matter, I have no reason to disagree.

Main Issues

- 4.3 I have approached the assessment of compliance with the Basic Conditions of the Ash Neighbourhood Plan as two main matters:
- General issues of compliance of the Plan, as a whole; and
 - Specific issues of compliance of the Plan policies.

Where I comment on the relationship of the Plan’s policies to those of the Guildford Local Plan (Parts 1 and 2), this is simply to provide context for the potential application of the draft Plan’s policies. I am not testing the Plan against the former Basic Condition requirement that a neighbourhood plan’s policies be in general conformity with the strategic policies of the Development Plan.

General Issues of Compliance

- 4.4 The Introduction to the Plan includes Figure 1, which helpfully illustrates the extent of Ash Neighbourhood Plan Area. The text and Figure 2 then explain that the Plan must meet the Basic Conditions for neighbourhood planning, as set out by Government. As the applicable Basic Conditions’ framework has recently changed (referenced in paragraph 1.8 above and its accompanying footnotes), I recommend that Figure 2 is modified so

that it reflects the current statutory position, which has been applied for the purposes of this examination (**PM1**).

- 4.5 A brief history of Ash Parish in Chapter 2 provides the reader with useful information as to how the area has developed over time, and Figure 3 shows the location of the Listed Buildings which have special historic interest. Demographic data from the 2021 Census in Figure 4 provides a profile of the Area's population, its age distribution and household size, work and travel characteristics, and the energy efficiency of its housing. Strategic planning policy, in the Guildford Borough Council's adopted and emerging Local Plans and transport plans, is then briefly summarised, followed by national planning policy, with extracts from the NPPF which have significance for the Ash Neighbourhood Plan. Paragraph 2.13 describes the Local Plan and updates to it. Progress on the Neighbourhood Plan's production is summarised briefly at the end of Chapter 2. I consider that Chapters 1 and 2, with **PM1** in place, will provide a helpful starting-point for readers of the Plan.
- 4.6 Chapter 3 outlines the Vision, Objectives and Policies for the Plan over the next 20 years, emphasising that the Parish's three areas – Ash Vale, Ash and Ash Green – will retain their individual identities. Additional objectives are described: to protect and enhance the natural environment; to increase commuting by rail, bus, cycling and walking; to increase the capacity of social infrastructure; and to increase health and wellbeing through more recreational activities and access to green areas. I consider these objectives to be consistent with the promotion of sustainable development and the other Basic Conditions for neighbourhood planning.
- 4.7 Paragraph 3.4 of the Plan states that, subsequent to its objectives, the Plan includes 14 policies, on which I comment individually in the next section of this report. Paragraph 3.4 also refers to the Policies Map, showing the locations of specific land or sites in Ash which are mentioned in policies. In my letter to Ash Parish Council of 1 April 2026, I queried the ability of readers of the Plan to identify key sites and geographical features, noting the limits of Figure 1. The Parish Council responded on 20 April 2026, advising that the Policies Map is a PDF version of the digital GIS-based map, which will allow readers to zoom in and out, to show the precise site boundaries of all key features. Once the Neighbourhood Plan is made, the mapping layers will be uploaded to the Borough Council to enable interactive mapping and digital access for readers. **PM2** should be made to ensure that that an A3 sized version of the Policies Map accompanies the Plan when it goes to a referendum and to ensure that the Policies Map layers will be hosted on the Guildford Borough Council (or successor authority's) interactive planning policies map.
- 4.8 Chapter 4 of the Plan provides information as to how the Neighbourhood Plan will be implemented. Overall, this chapter should help readers to understand how the Plan, once adopted, will assist decision-making on planning applications. However, paragraph 4.2 incorrectly implies that the Parish Council will determine planning applications. In response to

question 10 of my letter of 1 April 2026, Guildford Borough Council agreed that the text should be modified, to clarify that the Parish Council will “inform and comment on” planning applications, rather than determine them. **PM3** should therefore be made having regard for national planning policy. With proposed modifications PM1-PM3 in place, I conclude that Chapters 1 and 2, paragraphs 3.1-3.4, and Chapter 4 will achieve compliance with the requirements for neighbourhood planning.

Specific issues of compliance of the Plan’s policies

Policy ASH1: Spatial Strategy

- 4.9 Policy ASH1: Spatial Strategy seeks to direct all significant new development to the defined built-up areas, with a focus on reusing brownfield land. Guildford Borough Council expressed concern that Policy ASH1 could result in a reduction of the amount of new housing on the site allocated in the Local Plan Strategy and Sites, in Policy A31. The Parish Council acknowledged that the policy should be rewritten, and the submission version of Policy ASH1 contains amendments which have led the Borough Council to remove its earlier objection. The Borough Council is now satisfied that Policy ASH1 will not prevent development which is proposed in the Local Plan from taking place and agrees that Policy ASH1 meets the new revised Basic Conditions for neighbourhood planning. Bewley Homes PLC pointed out that the built-up area boundaries for Ash and Tongham have not been updated since 2015, arguing that this constrains development and risks limiting the area’s ability to respond to changing housing needs. I consider that this is a matter for Guildford Borough Council to investigate in its Local Plan Review but am satisfied that Policy ASH1 aligns with the current Local Plan strategy. It should not result in less housing provision than proposed in the current Local Plan.
- 4.10 Regarding the supporting text, I consider that the reference to Local Plan Policy A31, in paragraph 3.6 of the Neighbourhood Plan, is helpful. As I indicated in my Procedural Matters and Questions, it would also assist readers if references to Policies A29 & A30 of the Local Plan were added, so that Policy ASH1 is not perceived to be supportive of less housing than the adopted Local Plan. Ash Parish Council expressed its agreement for such amendment to the text. Paragraph 3.7 should be modified, as proposed in **PM4**, to align with Guildford’s Local Plan housing policy. **PM4** should also include amended text to the first sentence in paragraph 3.9, to clarify the aim for readers of the Plan. The amended text was proposed by Ash Parish Council in its letter to me of 20 April 2026. I have included another amendment to paragraph 3.9, to refer to Policy P5 of the Local Plan, and provide information for readers about “the 400m SPA buffer zone”, which is referred to in Policy ASH1. This is also provided in **PM4**.

Policy ASH2: Design Principles in Ash; Policy ASH3 Design Principles in Ash Vale;
and Policy ASH4 Design Principles in Ash Green Village

- 4.11 Policy ASH2: Design Principles in Ash; Policy ASH3 Design Principles in Ash Vale; and Policy ASH4 Design Principles in Ash Green Village seek high quality design, and state that regard should be had for the Ash Design Guidance and Codes, which is attached to the Plan as Appendix A. I propose a focused change in wording to clause A of Policies ASH2, ASH3 and ASH4, as in **PM5**, to avoid any misunderstanding as to the role of the Ash Design Guidance and Codes document. Chapter 1 of Appendix A explains the document's purpose, area covered, and planning policy context succinctly. It confirms that a site visit and community engagement were carried out prior to producing the document. It then explains how potential users – including developers, the Parish Council and local planning authority – should apply the design guidance and codes. Chapter 2 gives a Parish-wide analysis of key subjects, beginning with settlement pattern and evolution, heritage context, green and blue infrastructure, access and movement, and describes the three built-up areas. All these features are illustrated with photographs from the Parish. Chapter 3 explains that Design Codes are mandatory for development, and Design Guidelines should, or could, be delivered to secure good quality development. Expectations for each of the key subjects, with examples of good design and application are described in Chapter 3. Chapter 4 includes Area Types Appraisal, focusing on the specific identities and characteristics of Ash, Ash Vale and Ash Green. Guildford Borough Council contended that the photograph in Figure 39, criticising recent developments with relatively monotonous styles, centres on just one house and could understandably, and unnecessarily, offend residents. I agree that, for the reasons given, Figure 39 should be removed from the Design Guidance and Codes document, as in **PM6**. The age of built development of different parts of the Plan area are described in 4.3 of the document. The distinct qualities and features of areas developed in different eras are described, which should be helpful for developers and decision-makers.
- 4.12 Bewley Homes PLC, with interests at Ash Manor, Ash Green Road, made a number of objections to Policy ASH4, arguing that it attempts to achieve too many objectives within a single policy. In my view, large development proposals will be complex and will need to address all the issues covered by Policy ASH4, as set out in clauses A to E, as well as have regard for those in Appendix A, Ash Design Guidance and Codes, to which Policy ASH4 makes a cross-reference. I consider that Figure 3 and the Policies Map provide appropriate information as to the location and setting of Ash Manor and other listed buildings in the vicinity. Reference to Ash Manor in Policy ASH4 is appropriate, in my view, because of its proximity to the new housing development site allocated in Policy A31 of the Local Plan.
- 4.13 I note the consultation response from David Barton who is promoting the existing Built Historic Environment and Traditional Vernacular Architecture (TVA) across UK. Overall, I am satisfied that the Ash Neighbourhood Plan

addresses the principle for preserving the built historic environment and promoting good quality design. However, I agree with Guildford Borough Council's comments, contained in its "Statement for the examiner" (March 2026), that there is some inconsistency in clause B of Policy ASH4 with use of the terms preserve, conserve and enhance. Notably, the first paragraph of clause B requires development to "conserve and where appropriate enhance" heritage, whereas the last paragraph states that development should "preserve or enhance the historic and heritage qualities ...". I agree that this wording is open to subjective interpretation and risks inconsistent decision-making. I recommend that clause B is modified, as in **PM5**, with regard to the NPPF on conserving and enhancing the historic environment. Also, in the NPPF, paragraph 132 states that Plans should set out a clear design vision and expectations, giving as much certainty as possible as to what is likely to be acceptable. I consider that Policies ASH2, ASH3 and ASH4, and the Design Guidance and Codes in Appendix A, which includes comprehensive and detailed information, with words and illustrations demonstrating what is expected from new buildings and spaces, align with paragraph 132. Application of the Guidance and Codes should, in my opinion, contribute to well-designed new housing and well-functioning and connected places, which will offer good health and well-being, reduced pollution and access to green areas for future occupants.

- 4.14 Clause D of Policy ASH4 refers to a Local Gap between Ash and Ash Green, defined to prevent coalescence of the two settlements. Bewley Homes PLC argued that its designation was not supported by a robust or proportionate evidence base. However, supporting text in paragraph 3.23 explains that Policy A31 of the Local Plan seeks a green buffer to prevent the coalescence of Ash, Tongham and Ash Green. Paragraphs 3.24 and 3.25 of the Neighbourhood Plan refer to Figure 6, which shows the proposed Local Gap, alongside an illustrative map of the A31 site taken from the Guildford Borough Council's Strategic Development Framework Supplementary Planning Development (SPD). The Parish Council's evidence for designating the Local Gap is summarised in Appendix E. I am satisfied that the Plan provides ample justification for the Local Gap, which should not prevent sustainable development, or result in less housing development than is proposed in the Local Plan. In contrast to Bewley Homes PLC, a number of respondents to the Regulation 16 consultation exercise expressed support for a larger green gap between Ash Green and Ash and Tongham. As land bordering the proposed Local Gap site has been allocated for new development in Policy A31 in the Local Plan, I shall not propose its enlargement.
- 4.15 In my letter of 1 April to the Parish Council, I questioned the correlation of the 2 maps in Figure 6 and requested a revised map to provide the necessary clarity for readers. A revised map, showing the Ash Green Local Gap and the Policy A31 site was submitted, which I consider to be clear for readers, and consistent with Local Plan policy. I recommend that it is included as a replacement for Figure 6, as in **PM7**. **PM7** should also include (i) removal of the "illustrative concept plan of site A31", as this

can be viewed in Appendix E of the Plan as Figure 4, and (ii) modification of the text in paragraphs 3.25 and 3.26, to describe the new replacement map accurately. I conclude that, with **PM7** in place, the Plan's proposed Local Gap, preventing the coalescence of the urban areas and protecting the rural landscape, as described in Policy ASH4 and Appendix E, will meet the Basic Conditions for neighbourhood planning. It will not lead to less development than is proposed in the Local Plan.

Policy ASH5: District and Local Centres and Dispersed Local Centres

- 4.16 Policy ASH5: District and Local Centres and Dispersed Local Centres relates to the existing District Centre at Wharf Road, and existing Local Centre at Ash Vale Parade. These centres are named in the Local Plan Policies E8: District Centres and E9: Local Centres. I saw both centres at my site visit, as well as Ash Street/Star Lane, named in Policy ASH5 as a new Local Centre. Guildford Borough Council queried whether the Ash Library should be included in the boundary of the proposed new Local Centre, as it is a community rather than main town centre use. The Council observed that its inclusion is "unlikely to have any repercussions" and, in my experience designated Local Centres commonly include a variety of land uses. I do not recommend a change to the boundary and support the proposed new Local Centre, for the reasons given in paragraph 3.34 of the Plan.
- 4.17 However, I agree with Guildford Borough Council that dispersed local shops do not have the same status as District and Local Centres. Policy ASH5 should be modified so that it has sufficient regard to national planning policy. I propose re-wording of clause A of the policy and supporting text in paragraph 3.38 to address this inconsistency, as in **PM8**. The reference to the dispersed shops at Longfield Road, Aldershot Road, Guildford Road and Oxenden Road should be retained in recognition of their local value. With the addition of a sentence proposed in **PM8**, I am satisfied that Clause C outlines appropriately the actions needed if centres or shops are to be lost. With **PM8** in place, I also consider that Policy ASH5 and its supporting text will align with Chapter 2 of the NPPF - Ensuring the vitality of town centres. Paragraph 90 of the NPPF states that planning policies should support the role that town centres play at the heart of local communities by taking a positive approach to their growth. Paragraph 97, as referenced in paragraph 3.37 of the Plan, explains which uses are permissible in the designated areas. In my early questions to the Parish Council, I asked whether the retail centres were shown appropriately on the Policies Map. The Parish Council referred me to the interactive map, and I am satisfied that this will show their locations clearly.

Policy ASH6: Employment Locations

- 4.18 Policy ASH6: Employment Locations identifies the Strategic Employment Location at North and South of Lysons Avenue and designates a locally important employment location on land at Ash Station. As supporting text

in paragraph 3.40 states, the Parish needs to maintain its economic base to prevent it becoming a “dormitory community”. I saw both named employment sites at my site visit and support the thrust of the policy which has regard for the NPPF’s aim for building a strong, competitive economy (paragraphs 85-89), is consistent with Policy E3 of the Guildford Local Plan and should contribute to the achievement of sustainable development. I accept that the interactive Policies Map will enable readers of the Plan to identify the locations of the named employment sites. However, Guildford Borough Council argued that there is a lack of clarity in clause A of Policy ASH6 regarding the intensification of class E(g) and B2 uses on land at Ash Station and compliance with Policy E2 of the Local Plan. Policy E2 restricts expansion of existing offices outside town centres and strategic employment sites to 25% of existing office and research and development (R&D) floorspace. I accept that the supporting text to Policy ASH6 should inform readers of this requirement. Also, I agree with the Council that clause A should refer to “existing” adjoining residential areas, to take account of paragraph 200 of the NPPF. The Council also questioned the content of paragraph 3.44 which comments on Local Plan Policy E3, and its relevance to the “repurposing” of employment floorspace to provide a wider range of unit sizes etc. I consider that this commentary could be viewed as speculative and recommend that the text is amended. These modifications should be made to meet the Basic Conditions, as in **PM9**.

Policy ASH7: Replacement Dwellings

- 4.19 The Parish of Ash has recently experienced (and is experiencing) significant new housing development, as I observed at my site visit. Given the attractiveness of the area to households seeking a new (or larger) home and to house-builders, I appreciate the reasons for introducing Policy ASH7. The policy directs those proposing dwelling replacement to the Ash Design Guidance and Codes, which should help achieve positive outcomes in respect of the four criteria in clause A of the policy. Supporting text in paragraph 3.46 refers to the positive effects redevelopment schemes can achieve. They can maximise the efficient use of land, and result in social sustainability benefits. Paragraph 3.48 confirms that the proposed policy would not set an overly restrictive target for biodiversity net gain. I am satisfied that Policy ASH7 meets the Basic Conditions, notably it should contribute to the achievement of sustainable development.

Policy ASH8: Energy Efficiency

- 4.20 Policy ASH8: Energy Efficiency aims for new and replacement dwellings to be “zero carbon ready” by design. The overall aim of the policy, to achieve a “step-change in the energy performance of all new developments in Ash”, is, in my opinion, consistent with the achievement of sustainable development and takes account of climate change. In response to my earlier questions, the Parish Council advised that the policy was intended to apply to replacement as well as new buildings. It

proposed amended wording to clause C which I recommend in **PM10**. I also asked the Parish Council whether Clause C should clarify where responsibility post-occupancy would lie. I was informed that the Greater London Authority, when granting permission for new housing, requires qualifying units to be installed with monitors for use by future occupiers. However, Ash Parish is outside Greater London, and I have seen no policies in the Guildford Local Plan that would support control over occupancy. The Borough Council expressed concern over the use of a condition to achieve post-occupancy evaluation, as future occupiers of the housing might be unaware of/or not minded to comply; those who had secured planning permission originally would no longer be responsible for use on site. Planning conditions are required by national Government to be reasonable and enforceable. I propose modification of clause C, and new text in paragraph 3.55, to remove the post-occupancy requirements, so that the Plan has suitable regard to national planning policy. I also propose amendment to the wording of clause B to avoid ambiguity, and the removal of Appendix D: Post-Occupancy Evaluation. **PM10** includes these modifications to meet national planning regulations for development management, to achieve sustainable development and help mitigate climate change. I have read the representations made by Ash Green Residents Association (AGRA) with proposed modifications to Policy ASH8, to strengthen the Plan's objectives for protection of the climate and heritage. Many of the proposed new measures relate to the application of Building Regulations, rather than planning. AGRA refers to the Borough Council's upcoming review of the Local Plan. I consider that AGRA's proposals for future energy efficiency policy should be pursued first at Local Plan level, and that public consultation including the views of statutory bodies and developers should be fully investigated. I support the aim for an effective policy which will minimise energy use and mitigate climate change but recommend no further changes to ASH8 at this stage.

Policy ASH9: Housing Mix, Type and Tenure

- 4.21 Policy ASH9: Housing Mix, Type and Tenure is followed by paragraph 3.63, which acknowledges that the policy duplicates Local Plan Policy H2. Bewley Homes PLC contended that it should be deleted because the policy contains no locally specific references. I note that paragraph 16 of the NPPF, concerning plan-making, states that plan-makers should avoid unnecessary duplication of policies. Policies H1: Homes for All and H2: Affordable Homes in the Guildford Local Plan, are detailed policies, and their overlap with Policy ASH9 is substantial, in my view. Both seek 40% affordable housing on sites for 11 or more dwellings. Both seek a mix of dwelling types and sizes, and development proposals that will provide accessible and adaptable dwellings in accordance with Building Regulations M4(2). I therefore recommend that Policy ASH9 be removed from the Plan, but the information contained in the policy and paragraphs 3.63 to 3.66 should be moved to a new Appendix, as I appreciate the importance of the topic to the local community. A reminder in the Neighbourhood Plan as to the mix, type and tenure of new housing which is expected from new development in Ash should be given, as supporting

text. **PM11**, to secure the above changes, should be made to have regard to paragraph 16 of the NPPF, and acknowledge Policies H1 and H2 of the Guildford Local Plan.

Policy ASH10: Existing and New Community Assets

- 4.22 Policy ASH10: Existing and New Community Assets is supported by Appendix B, which lists the pubs, schools, community buildings and other assets which are located in the Ash Neighbourhood Plan Area. NHS Property Services and NHS Surrey Heartlands Integrated Care Boards (ICB) commented that the NHS requires flexibility with the use of its estate to deliver excellent patient care and support key healthcare strategies. It is argued that the disposal of sites and properties which are no longer suitable for healthcare, at open market value, can help fund new or improved services. A requirement to explore potential alternative community uses, and/or retain a proportion of community facility provision may delay vital reinvestment in facilities and services for the community. The NHS providers put forward amended wording to Policy ASH10 and the supporting text to address their concern. I consider that these amendments should be made as in **PM12** to promote health and well-being in the area and secure sustainable development. Guildford Borough Council proposed additional wording in clause A(ii) of Policy ASH10, to inform readers that development should meet the sequential test outlined in the NPPF for town centre uses. I support this, to have regard to national planning policy (noting the presence also of Policy ID7 of the Local Plan), and I recommend its inclusion as in **PM12**.
- 4.23 Third Revolution Projects argued that clause C of Policy ASH10 should be modified, so that provision of a care-home (use class C2) on land at Ash Lodge Drive would not be required to provide ancillary class F2 local community uses. The supporting text puts forward a good case for provision of facilities such as a café, garden or other social space, accessible to the wider community and enabling a good link between those in the care home and those living and working nearby. However, Third Revolution Projects stated that the site would be unable to provide its target number of bedrooms if required to provide F2 facilities, and development would not be financially viable. I propose that clause C should be amended to state that land at Ash Lodge Drive should include F2 uses, where possible. The supporting text should state that a financial viability assessment should be undertaken to justify a departure from this approach. These amendments should be made in **PM12**, to secure sustainable development.

Policy ASH11: Green and Blue Infrastructure

- 4.24 Policy ASH11: Green and Blue Infrastructure relates to the extensive and diverse network within Ash Parish, which is illustrated on the Policies Map. I consider that the policy and supporting text are consistent with chapter 15, paragraphs 187 onwards of the NPPF. This advises that planning policies should contribute to, and enhance, the natural and local

environment. Policy ASH11 also, in my opinion, aligns with Policy ID4: Green and Blue Infrastructure, in the Guildford Local Plan, and is helpful in offering a more detailed analysis of landscape and waterways in Ash Parish. AGRA argued that Policy ASH11 should be strengthened, as recent planning history in the Parish had resulted in developments bypassing the regulations for visual, environmental and hydrological protection. My attention was drawn to the appeal decision Ref: APP/Y3615/W/21/3273305, erection of 69 houses on Land at Ash Manor. The Inspector dismissed the appeal and highlighted the harmful effects on rural character and landscape from proposed water engineering measures, to reconfigure a pond. AGRA put forward suggested wording to modify Policy ASH11, to address the vulnerabilities of the environment to new development. As with Policy ASH8, I consider that the complex and detailed policy modifications put forward by AGRA for the Ash Neighbourhood Plan would more appropriately be considered by the Borough Council for the revised Local Plan, and do not recommend their addition to this Plan.

- 4.25 However, I propose one amendment to Policy ASH11, to ensure that clause D is not unduly restrictive. Whilst provision of 2 trees to replace every tree that is lost would be beneficial, there may be circumstances where this is not feasible. To achieve some flexibility, I propose that clause D seeks 2 trees in place of 1 only "where possible", as in **PM13**. Also, the consultation response from Thames Water Utilities Ltd (Thames Water) highlights that a key sustainability objective for neighbourhood plans should be for new development to be co-ordinated with the infrastructure it demands, including water supply, wastewater and water quality. As this Plan is not proposing major new development, I shall not propose an additional policy on water infrastructure. However, the Environment Agency has designated the Thames Water region as "seriously water stressed", so I agree that a reference to the role of Thames Water when new development is proposed should be added to the Plan. This should refer to the agency's pre-planning service and encourage at the earliest opportunity to establish the likely demand for water supply infrastructure, sewage/wastewater treatment, surface water drainage and flood risk. The text following Policy ASH11 should include this information, for the achievement of sustainable development, as in **PM13**.

Policy ASH12: Local Green Spaces

- 4.26 Policy ASH12 proposes the designation of 35 Local Green Spaces (LGSs), providing a high level of protection from future development. Details of all 35 sites are set out in Appendix C, and paragraphs 3.84 & 3.85 give supporting text. This explains that LGS should only be made when the three criteria specified in the NPPF (paragraph 106) are met. At my site visit, I viewed the sites. I consider that, overall, the policy reflects the general principles of Local Plan Policy ID5: Protecting open space, and Policy D4: Design and Local Distinctiveness, and offers protection of the natural environment. However, I wrote to the Parish Council (letter of 1

April 2026) stating that I was surprised to see that as many as 35 areas in Ash Parish were put forward as LGSs. In total, they amount to an extensive portion of the land in Ash Parish. Appendix C indicates that 10 of the sites are owned by Ash Parish Council, 11 by Guildford Borough Council, 1 by the Ministry of Defence (MOD), and the remaining 13 are privately owned or operated by management companies.

- 4.27 From my site visit, I am satisfied that the majority of the proposed LGS sites provide attractive and green spaces within walking distance of residential areas, often with play areas, quiet walkways and good views over wooded areas, grassland or waterways. Sites nos. 1-5; 7-20; and 22-34 all satisfy the criteria for designation and are capable of enduring beyond the end of the Plan period.¹² I raised concern over three of the proposed LGSs with the Parish Council, site nos. 6, 21 and 35, and have considered their responses. Regarding No 6. Keogh Barracks Playing Fields, I appreciate that this site will have considerable value for stationed military personnel and their families. However, as far as I could ascertain from my site visit, the site is scarcely visible from any vantage point outside the Barracks and not accessible to the wider community. Its current and future use will depend on the aims and objectives of the MOD, and I am doubtful whether local authority planning policies should seek to influence or restrict future usage through this particular national policy mechanism. I therefore recommend that site No 6 Keogh Barracks Playing Field is removed from Policy ASH12 and Appendix C. **PM14** should be made to ensure regard is had to national planning policy.
- 4.28 Regarding site 21 Ash Green Meadows, I recognise the strong case made by AGRA for its contribution to biodiversity, visual amenity, landscape, the landscape character, health, well-being and quality. I note the site already has protection as a Suitable Alternative Natural Greenspace (SANG). Part of the site is further protected as a Site of Nature Conservation Importance (SNCI). I consider that adding LGS designation is unnecessary in these circumstances and propose deletion of the site from Policy ASH12 and Appendix C, as in **PM14**. Site 35, West of White Lane, is a private green space at the rear of properties, but AGRA contended that this should not prevent it from being designated a LGS. It drew my attention to Appeal Ref APP/Y3615/W/23/ 3333200 and the Inspector's observation that the land contributes cumulatively towards a wider character of broadly open space behind the dwellings in this part of White Lane. I accept that, for the small community whose homes back on to this space, the land will be special and conclude that LGS35 should remain in Policy ASH12 and meet the requirements of the NPPF (paragraphs 106 and 107). **PM14** should be made for consistency with national planning policy.

¹² See NPPF, paragraph 106.

Policy ASH13: Thames Basin Heaths SPA

- 4.29 Inclusion of Policy ASH13: Thames Basin Heaths SPA was criticised by Bewley Homes PLC, as it duplicates existing Local Plan policy and Guildford Borough Council's SPD. I note that Policy P5 of the Local Plan sets out, in some detail, the principles for determining development proposals in or near to the SPA. However, in my opinion, Policy ASH13 provide additional guidance on acceptable mitigation measures. Regarding paragraph 3.89 of the supporting text, Guildford Borough Council observed that nowhere in Ash is more than 5kms from the SPA boundary and suggested that the paragraph should be taken out of the Plan. I agree and recommend its removal in **PM15**. Providing that modification is in place, I consider that Policy ASH13 and the supporting text meet the Basic Conditions.

Policy ASH14: Active Travel

- 4.30 Policy ASH14: Active Travel aligns with the NPPF's aim to promote sustainable transport. The NPPF states that transport issues "should be considered from the earliest stages of plan-making and development proposals".¹³ Policy ID3 of the Guildford Local Plan expects new development to contribute to delivery of an integrated, accessible and safe transport system, maximising use of sustainable modes of walking, cycling and public or community transport. Difficulties with the existing network for cyclists were noted by respondents to the consultation exercise, such as the busy Chester Bridge and "mud bath" in winter along the Christmas Pie trail. The supporting text to ASH14 identifies a number of areas of the Ash transport network which require improvement. I consider that Policy ASH14 fits with the overarching strategic policy framework and reflects local concerns. Clause C refers to travel plans, and I am satisfied that Policy ASH14 is compatible with Surrey County Council's Travel Plans – a good practice guide for developers, May 2024. I put forward amendments to the wording of clause C to give some flexibility, in case other transport and travel issues than those highlighted merit priority in specific cases. Also, modification is needed to clause D and supporting text in 3.93 and 3.96 to correct typing errors which may cause ambiguity.¹⁴ With **PM16** in place, Policy ASH14 will meet the Basic Conditions.
- 4.31 With the modifications described above, I conclude that the policies (ASH1 to ASH14) meet the Basic Conditions for neighbourhood planning and should be made.

¹³ Paragraph 109.

¹⁴ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

Factual and Minor Amendments and Updates

- 4.32 In addition to those identified above (paragraph 4.30), there are a number of minor typographical errors in the Plan, for example in paragraphs 3.41; 3.46; 3.48; and 3.77. Similarly, the paragraph numbering of the Plan goes wrong between Pages 12 and 13 and paragraph 3.4 is repeated, both before and after Policy ASH1. These do not affect compliance with the Basic Conditions and may be remedied through thorough proof reading when updating the Plan for the purposes of any referendum. Minor amendments to the text and numbering (sections, paragraphs etc) can be made consequential to the recommended modifications, alongside any other minor non-material changes or updates, in agreement between Guildford Borough Council and Ash Parish Council.¹⁵

5. Conclusions

Summary

- 5.1 The Ash Parish Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan, the responses to my examination questions, the additional consultation responses, and the evidence documents submitted with the Plan.
- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Ash Parish Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 I appreciate the hard work which has been undertaken to produce this Plan, especially in the light of the significant amount of new development which has taken place, or is currently ongoing, in Ash Parish. I recognise

¹⁵ PPG Reference ID: 41-106-20190509.

that this has led to challenges for the Parish Council and longstanding local residents who have experienced and had to adapt to a changing environment. On the other hand, new development brings many positive benefits notably new homes with additional community facilities in an attractive area which has good access to workplaces in larger towns and cities, as well as to the countryside. The Neighbourhood Plan has achieved a good balance, in my view, accepting that new development as proposed in the adopted Local Plan must be accommodated and will bring benefits, whilst the existing settlements, heritage, blue and green infrastructure of Ash Parish must be safeguarded. The Parish Council has also had to address recent changes by Government in the Basic Conditions for neighbourhood planning, which have required extra analysis and investigation. I hope that the Neighbourhood Plan will help shape the future of Ash Parish in a successful manner.

Jill Kingaby

Examiner

Appendix: Modifications (16)

Note: Additions are provided in ***bold, italicised text*** and deletions are shown with ~~strikethrough~~.

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Page 5	Paragraph 1.4. Amend Fig. 2 by deleting: "Is the Plan in general conformity with strategic planning policy?" Replace with: <i>"Is it the case that the Plan does not prevent development from taking place which – (i) is proposed in the development plan for the area of the authority (or any part of that area), and (ii) if it took place, would provide housing?"</i>
PM2	Page 13 and 34	Policy ASH1 Append an A3 sized version of the Policies Map to the Plan. Add a footnote to Pages 13 and 35: <i>"The Ash Policy Map layers are to be hosted on the Guildford Borough Council or successor authority's planning policies map."</i>
PM3	Page 40	Amend first sentence of para 4.2 to read: "The Parish Council will useto inform and determine its- <i>to inform and comment on planning applications</i> decisions."
PM4	Page 13	In paragraph 3.7, insert an a new (additional) sentence after the first sentence to read: <i>"Local Plan Policies A29 (Warren Farm, White Lane) and A30 (Land to the east of White Lane) propose approximately 58 new homes and 62 new homes respectively."</i>

		Delete text in paragraph 3.9 and replace with: <i>"Outside of the defined built-up areas, the remaining undeveloped land is designated as countryside in the Local Plan. It is therefore only suited to the types of development that are consistent in countryside locations. The eastern boundary of the Parish, comprising mostly Ash Ranges and the Thames Basin Heath SPA, lies in the Green Belt, and is therefore subject to national planning policy constraints."</i> Add a new sentence at the end of paragraph 3.9: <i>"Policy P5 of the Local Plan protects the ecological integrity of Thames Basin Heaths Special Protection Area (SPA). It explains that there is an "exclusion zone" set at 400m linear distance from the SPA boundary where permission for development resulting in a net increase in residential units will not be permitted."</i>
PM5	Pages 14-17	Policy ASH2/ASH3/ASH4 Clauses A Modify the second sentence in each of these three policies as follows: "To achieve this, development proposals are required to have full regard for the Ash Design Guidance and Codes..." Policy ASH4 Delete the first sentence in Clause B, and replace with: <i>"Developments within Ash Green are expected to conserve, and where appropriate, enhance the significance of its heritage assets and their settings."</i> Retain i) to iv) and then delete as follows:

		v) illustrates how viewsWhite Lane, are protected. Development will only be supported with national policy. Replace with: "Any residual harm must be clearly and convincingly justified in accordance with national policy. For designated heritage assets, harm will be weighed against the public benefits of the proposal; for non-designated heritage assets, a balanced judgement will be applied. Views to and from the Ash Manor complex should be safeguarded where they contribute to the significance of the listed buildings, with any important views identified, evidenced and assessed." Amend Clause E as follows: "E. Development proposals impact of traffic and noise, and air quality. Proposals which fail ...".
PM6	Page 49	Appendix A: Ash Design Guidance and Codes Delete Figure 39.
PM7	Page 18	Figure 6 Delete the 2 maps and replace with new map: Policy A31 with ASH4 Local Gap overlay, as attached to Ash Parish Council's letter of 20 April 2026 to the Examiner.¹⁶ Paragraphs 3.25 and 3.26 Delete text and replace with: "Figure 6 shows the location of the Local Gap, south and east of the main built-up area of Ash, and north of Ash Green, and its relationship to the sites allocated for

¹⁶ View at: [https://www.guildford.gov.uk/media/37770/APC-External-Examiner-Additional-Questions-June-2026/doc/APC External Examiner Additional Questions June 2026.docx?m=1782116875977](https://www.guildford.gov.uk/media/37770/APC-External-Examiner-Additional-Questions-June-2026/doc/APC%20External%20Examiner%20Additional%20Questions%20June%202026.docx?m=1782116875977)

		<i>new development in Policy A31 of the Local Plan."</i>
PM8	Pages 19 and 20	Policy ASH5 Modify Clause A to read: "In each identified location <i>In the identified district and local centres</i> , proposals". Modify Clause C to read: "Proposals that will result in the total loss of a local centre or dispersed local shop <i>shops within it</i> will be resisted". Add a new sentence at the end of Clause C to read: <i>"Dispersed local shops at Longfield Road, Aldershot Road, Guildford Road and Oxenden Road seeking closure are also encouraged to follow the above process (beginning with a minimum 12 month marketing period)."</i> Paragraph 3.38 Delete: "or identified dispersed local shops".
PM9	Pages 21 and 22	Policy ASH6 Modify Clause A: "Proposals for the intensification amenity of <i>existing</i> adjoining residential areas." Paragraph 3.42 Inset the following text before the first sentence: <i>"Town centres and strategic employment sites are defined in Policy E2 of the Guildford Local Plan as the focus for new employment. Ash station is not so designated. Policy E2, restricting expansion of existing offices outside town centres and strategic employment sites to 25% of existing office and Research & Development floorspace,</i>

		therefore applies to the station site in Policy ASH6." The first sentence (which now becomes the fourth sentence) should be modified to read: "Policy ASH6 identifies the established employment location This policy therefore identifies these established employment locations in the parish, designating the land at Ash Station as locally important ..." Paragraph 3.44 Delete the second half of the second sentence so that it ends: "...with employment floorspace loss strongly resisted."
PM10	Pages 23 - 25	Policy ASH8 Amend the second sentence of Clause B as follows: "Where sSchemes that maximise their potential..... forms of with plot size, plot coverage.....proposal is located, this will be supported, provided" Amend Clause C as follows: "All planning permissions granted applications for new and replacement buildings should demonstrate that that they will be have been tested to ensure the buildings will perform as predicted, Submission of test results will be secured through appropriate including planning conditions." Delete the remainder of this sentence and the final sentence. Paragraph 3.55 Modify the fourth sentence to read: "Clause C of the policy therefore requires ... new or replacement dwellings enables maximum energy efficiency." Delete the final sentence. Delete paragraphs 3.56 to 3.58.

		Delete Appendix D: Post Occupancy Evaluation (Policy ASH8)
PM11	Page 26	Policy ASH9 Remove the policy and its supporting text to a new Appendix, with modified wording so that it no longer constitutes a policy but is a source of locally relevant information for users of the Plan.
PM12	Page 27	Policy ASH10 Amend Clause A: "A.(i) Proposals that will result clearly demonstrated that <i>either</i> the operation of the facility viable, <i>or adequate alternative provision exists or a replacement facility of an equivalent or better standard is to be provided in a location equally or more accessible to the facility's catchment area.</i>" A.(ii) Proposals to sustain will be supported, <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>" Amend Clause C: "C. The Neighbourhood Plan designates 0.27 ha of landDevelopment proposals in this location must <i>should where possible</i> include the creation" Paragraphs 3.67-3.72 Add new supporting text: <i>"Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS, or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered to meet the requirement under Part A(i) of Policy ASH10.</i> <i>Where provision of a Class 2 use on land at Ash Lodge Drive with ancillary F2 local</i>

		<i>community uses is demonstrated to be financially unviable, the need for care homes could make a Class 2 only development acceptable."</i>
PM13	Pages 28 - 30	Policy ASH11 Amend the 2nd sentence of Clause D: "Where they are unavoidably lost, must be planted (two trees must should be planted for every one lost, where possible)". Paragraphs 3.72-3.83 Add new supporting text: <i>"Developers of large sites are advised to engage with Thames Water at the earliest opportunity to establish :</i> <i>• The development's demand for water supply infrastructure;</i> <i>• The development's demand for sewage/wastewater treatment and network infrastructure; and</i> <i>• The surface water drainage requirements and any flood risk on or off the site.</i> <i>Thames Water provides a pre-planning service at:</i> https://developers.thameswater.co.uk/Developing-a-large-site".
PM14	Page 31	Policy ASH12 Delete 6) Keogh Barracks Playing Fields and 21) Ash Green meadows from the list in the policy and from Appendix C.
PM15	Page 32	Delete paragraph 3.89.
PM16	Page 33	Policy ASH14 Amend Clause C: "Development proposals conditions or obligations, are required to prioritise in their travel interventions should prioritise the making ofLocal Plan (Strategy and Sites".

		Amend Clause D: "Development proposals that will result on in the unnecessary" Paragraph 3.93 Amend last line of paragraph: "mans means of access". Paragraph 3.96 Amend second line: "use the Healthy Streets Indicators Assessment...".
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