

Guide for objecting to applications [25/P/01725](#) and [25/P/01726](#)

To submit your objection(s), please click on the link(s) above; the first is to the main application, and the second to the SANG proposal (see below). If you would prefer to submit a document (into which you can also embed images), you can email it to planningenquiries@guildford.gov.uk A full guide on 'How to Object' is available [here](#) on our website.

Please note that any objections need to be expressed in your own words, not ours, and that they will be most effective if they are illustrated with examples from your own experience, particularly where these challenge the evidence submitted by the developer. The application reveals that the latter knows very little about the site, and as a community, **OUR KNOWLEDGE IS OUR MOST POWERFUL WEAPON!**

The following are examples of how you might start sentences in which you can introduce your personal experience:

- The proposal completely ignores...
- The proposal underestimates the current situation because...
- The proposal will make the situation worse because...

It is also helpful to refer, where you can, to national and local planning rules. You don't have to be an expert on these; just make it clear what your objection relates to. In the notes below, 'NPPF' refers to the [National Planning Policy Framework](#), 'Local Plan' to the Guildford Local Plan Strategy and Sites, and 'Local Plan DMP' to the Local Plan Development Management Policies (both are available to download [here](#)). This is only a rough guide and is not comprehensive; feel free to dig deeper! And don't be put off by the very technical nature of the planning rules: all that matters is that you can show your objection is relevant.

10 Key Reasons to Object to the main application [25/P/01725](#)

1. The site is not "Grey Belt" land under national planning rules (NPPF Glossary and paras 143 and 155; NPPF para 11, footnote 7; Local Plan Policy P3)

The land is largely undeveloped countryside and plays a vital role in keeping nearby towns separate. It is right in the middle of an important green buffer between Guildford and the Ash/Tongham urban areas. There are no hills, rivers, railway lines or A/B roads to limit building between Ash/Tongham or Guildford and the site. There are already other proposed developments looking to close this gap. Losing this site would increase urban sprawl and undermine long-standing planning protections. National policy specifically excludes land like this from being classed as Grey Belt.

2. The development would seriously damage the Green Belt (NPPF Chapter 13; Local Plan Policy P2; Local Plan Policy D3; Local Plan DMP D12; Local Plan Policy P1)

Building up to 950 homes on this site would cause major harm to the openness of the Green Belt, with no "very special circumstances" to justify that harm. At night it would cease to be a 'dark zone' and the light pollution would also impact on the National Landscape.

3. The development would be totally out of character. (NPPF para 84; Local Plan Policy D1; Local Plan DMP Policies D4 and D5; Local Plan Policy P1)

The developer admits this development would have urban characteristics in a rural setting. The proposed 14m high, 4 storey apartment blocks are currently only seen in the town centres of Guildford, Aldershot and Woking. This is in clear contradiction of Guildford Borough Council ('GBC') planning policy. It is also in contradiction of GBC responsibility to enhance the Surrey Hills National Landscape from where the development would be clearly visible.

The developer also fails to acknowledge adequately the potential risk to heritage assets and the historic environment, with the site occupying the historic parkland between Westwood Place and Glaziers, and the possibility that a Roman Road runs across it.

4. The location is not genuinely sustainable (NPPF paras 11 and 155; Local Plan DMP Policy ID1)

Despite the site's being near a small rural station, most journeys in the area are, and will continue to be, made by car. Public transport is limited, unreliable, and poorly connected to jobs, shops, and services. The main current bus service will not be diverted into the proposed development and there is no commitment to provide the necessary upgrades to the station, for example lifts to improve accessibility and a new entrance to avoid a lengthy detour around existing houses to and from the new development.

5. Local roads cannot cope with the extra traffic (NPPF Paras 110 and 115; Local Plan Policy ID3)

Narrow rural roads, existing congestion points, and safety concerns mean the road network is already stretched and unable to take much more traffic. The development would add thousands of extra car journeys every day. Exit routes from the site onto roads which have historic accident risk because of poor visibility.

The developer agrees that there will be many more delays at key junctions in the local area, but it has no solutions for these problems. There are no commitments to address the pedestrian and cyclist safety concerns that would come with an extra 2000+ cars in the local area.

6. Sewerage and other infrastructure is already overloaded (NPPF para 155; Local Plan para 52)

The local sewerage system struggles even now, with sewage backing up into some homes. Thames Water has previously said the network cannot cope even with much smaller developments. There is no commitment to upgrade local water treatment facilities, therefore the situation will become worse.

7. The site has a well-documented and serious flood risk (NPPF para 11, footnote 7; NPPF, Chapter 14; Local Plan Policy P4)

The area already floods regularly, and official flood maps show the risk increasing in future. The developer has been unable to demonstrate that building on this site would not increase flood risk to existing properties or surrounding infrastructure. National policy says development should be avoided in such locations when safer alternatives exist.

8. Drainage proposals are inadequate and unsafe (NPPF para 181; Local Plan Policy P4)

The developer has failed to show that surface water can be properly managed. The County Council's own drainage officer has raised concerns that the plans do not prevent increased flood risk for the surrounding area. There is a very high likelihood that more flooding and more sewerage overflows will occur.

9. The development threatens protected wildlife and habitats (NPPF para 11, footnote 7; NPPF paras 192 and 193; Local Plan Policy P5 and Local Plan DMP Policy P6)

The site lies close to the Thames Basin Heaths Special Protection Area (SPA). The proposed 'Suitable Alternative Natural Greenspace' (SANG) is not fit for purpose and is unlikely to reduce the harm to the SPA. The site is closer to other new developments in Ash/Tongham than it is to this development; during the winter access paths will be impassable and the SANG itself will be saturated.

The promise of improved green space will not be met. The site includes Ancient Woodland and Veteran Trees that the development will put at risk. For at least 3 months of the year the open spaces in the development will be saturated with surface water which needs to be stored on site – therefore it will be unusable for recreation. The developer acknowledges it cannot meet the planning requirement to show biodiversity net gain across the two sites as a whole.

10. The application is premature and undermines the Local Plan process (NPPF para 12)

A new GBC Local Plan is currently being prepared. Approving such a large and sensitive development now would pre-empt proper, strategic, decision-making and weaken democratic accountability. Given the size of the site, it should be treated as a strategic site in a Local Plan exercise; its sensitivity would then be assessed against alternative sites and any required improvements to infrastructure would be agreed with service providers up front to make sure that GBC makes the correct site selection decision.

7 Additional reasons to object to the SANG application 25/P/01726

1. Missing Habitat Management Plan:

The proposal lacks a clear plan for monitoring and managing the environment over time, which is crucial for establishing its feasibility.

2. Failure to Meet Biodiversity Gain:

This lack of clarity means it is impossible to know whether the proposal as a whole (main site and SANG together) meet the required 20% biodiversity gain.

3. Traffic and Safety Issues:

Walking distances shown are misleading and inaccurate. The distance from the main site would lead to increased car journeys, especially in winter when the pedestrian access routes are waterlogged. The proposed access from A323 raises safety concerns due to poor visibility and unaddressed traffic hazards.

4. Absence of Management and Monitoring Plans:

There are no plans for managing construction, nor managing and monitoring visitor access over time, which are needed for assessing the impact on the land and how it will be maintained.

5. Unclear Ownership and Responsibility:

It is unclear who owns or will own the land and who will be responsible for it in the long run. This uncertainty makes it hard to trust the proposal.

6. Lack of Financial Clarity:

There is no information on who will pay for creating and maintaining this new area, nor where the money will come from. This leaves the community in the dark.

7. Incompatible Features:

Plans to add urban-style play areas contradict the idea of a natural green space. These should be reconsidered to keep the area truly natural.

Normandy Action Group
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