



## **Normandy Action Group Objection to Planning Application 25/P/01726**

We object to this application on the following grounds:

1. Failure to achieve the objective of protecting the TBHSPA
2. Generation of additional traffic and road safety issues
3. No evidence of sustainable habitat management plan or BNG
4. Lack of CEMP or SAMM in the proposal
5. Failure to assess heritage importance adequately

We develop these themes in more detail, below.

### **1. Failure to achieve the objective of protecting the TBHSPA**

For this SANG to satisfy the requirements of the Guildford Local Plan Policy P5, the developer must demonstrate that it offers a suitable alternative location to the Ash Ranges (part of the TBHSPA) for the anticipated over 2,000 extra people<sup>1</sup> who would occupy the up to 950 new builds for which permission is sought in application 25/P/01725 (to which we have already objected).

However, this site is unsuitable in several ways:

- a. It is too far away from all parts of the main site to be readily accessible on foot: at its closest it is 800 metres away, but it is at least 2 kms to the extremity of the main site. Because of the distance, the SPA is closer and more convenient to get to from Glaziers Lane than the SANG.
- b. In addition, the pedestrian access routes are notoriously user-unfriendly, and frequently waterlogged, especially in winter.
- c. The site has a convoluted shape and lacks coherence and spatial integrity. At the northern end it is located close to a busy main road, the A323 (which would become a lot busier if this application went ahead), and in the middle it is adjacent to the housing estate at Wyke Avenue. It looks like a choice of last resort for the developer, given the limited availability of land in the vicinity. As natural greenspace, it hardly compares with the Ranges, which would therefore attract many if not most of the additional walkers – and their dogs. It certainly does not constitute “*attractive green space for recreation*” as per the Planning Statement.
- e. It is actually closer to the SPA than is the main site. It is also closer to the housing developments in Ash, which would therefore provide competition for its use and make it less attractive to the inhabitants of the new development.

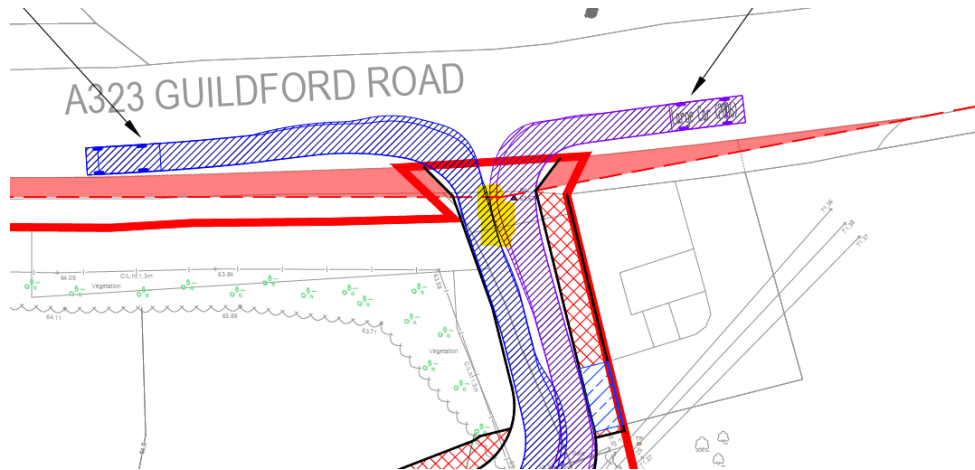
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<sup>1</sup> 950 new builds at an average of 2.5 inhabitants per new build equals 2,375 additional residents. (GBC Planning Contributions Supplementary Planning Document, 2017, refers.)

## 2. Generation of additional traffic and road safety issues

Because of the difficulties of pedestrian access, if people from Normandy did wish to access the site, they would be very likely to travel by car, thus adding to congestion on the already crowded roads. In addition, the proposed access from A323 raises safety concerns due to poor visibility and unaddressed traffic hazards.

The Transport Statement (TS) notes that the vehicle tracking allows for a vehicle to wait in the entrance to the SANG Carpark while another vehicle enters but the swept path diagram (see below) clearly shows the front of the entering vehicle sliding down the side of the outgoing waiting vehicle. This is compounded by the fact that the A323 is a busy road with high volumes of traffic (see below about the lack of a Road Safety Audit or speed survey).



It is surprising that the Transport Consultant has not carried out swept paths for other vehicles such as those accessing the Pump Station as they are proposing to intensify the use of the access and have not shown how other vehicles will interact.

The Consultant has also not shown any other access areas or proposals although surely these are relevant to the TS. The developer appears not to have considered that the residents of Elm Hill will also wish to access the SANG, as no sustainable access is provided across the A323 to service them.

The footpath provision appears to be inadequate at the site access as it does not tie in with the main carriageway of the A323, but instead stops at the back of the highway verge.

The Access plans in the TS contradict what has been proposed by the Landscape Architect with the TS plans showing a splayed access and the Landscape Plans showing a kerbed access. Noting that access is supposed to be in detail, this casts doubt on what the Developer is actually planning to install.

It is surprising that the Transport Consultant has not carried out an independent Road Safety Audit to accompany the proposals, instead stating that there is no impact on Road Safety, whereas as stated above, there clearly is. It is concerning that the Developer does not appear to be taking Road Safety seriously enough.

Very limited information is provided on traffic flows in the TS, and no speed survey information is provided at all, making it unclear whether the speed limit is currently observed on the main road (we doubt it very much) and whether the visibility splays provided are adequate.

### **3. No evidence of sustainable Habitat Management Plan or BNG**

The proposal fails to demonstrate that there is a clear plan for monitoring and managing the environment over time. This is crucial for establishing its feasibility, as well as delivering the 20% BNG required across the main site and the SANG combined (Local Plan Policy P7). No Habitat Monitoring and Management Plan (HMMP) has been submitted, which makes it impossible to judge whether the BNG contribution from the SANG will ever be funded or delivered. The BNG Assessment in the main application makes clear that the means of achieving BNG in the site overall is "not secured."<sup>2</sup> There is no clear indication within the main planning application (25/P/01725) documentation (Planning Statement 5.13) whether there will be adequate funding to buy off-site Biodiversity Units suitable to make up the reported BNG shortfall.

If the SANG is to function as a site, and especially if it is to achieve adequate BNG to 'subsidise' the BNG loss on the main site, it is essential that any new planting such as trees and hedgerows is effectively managed and monitored. Such new planting will typically take 10-20 years to establish itself sufficiently to deliver ecological improvement and therefore there needs to be a visible commitment to do this over a similar period of time, with secure funding and management arrangements identified.

One also has to question whether the proposed tree and hedge planting is really necessary for the benefit of the site, or whether it is simply a device to try to compensate for the significant biodiversity loss on the main site.

### **4. Lack of CEMP or SAMM in the proposal**

In addition to the lack of a plan for managing the habitat over time, there are no plans for managing construction while the SANG is being created, nor for managing and monitoring visitor access over time, both of which are needed for assessing the impact on the land and how it will be maintained. A Construction Environmental Management Plan (CEMP), as required by Surrey County Council, and a Strategic Access Management and Monitoring (SAMM) plan, as required by Local Plan Policy P5, are both required, but neither has been made available by the developer. The result of the latter in particular is a lack of clarity about long-term responsibility for the site, and therefore its sustainability as a genuine community asset.

### **5. Failure to assess heritage importance adequately**

The developer acknowledges (Planning Statement 5.33) that site contains an Area of High Archaeological Potential (AHAP). The Historic Environment Record for Follyhatch (West Wyke) states as follows:

*A scatter of 200+ sherds of 13/14th century pottery on the surface of a ploughed field east of Follyhatch Lane, and north-east of the spring of a stream that flows east. They are evidence of either a settlement or pottery production.*

Follyhatch Farm is on GBC's Local List of Buildings of Special Architectural or Historic Interest, and is therefore covered by Local Plan Policy D23: Non-designated Heritage Assets. This states that for such sites: *An archaeological desk-based assessment, and where appropriate a field evaluation, will be required to inform the determination of development proposals.*

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<sup>2</sup> 25/P/01725 9.6 Biodiversity Net Gain Assessment SANG-2178446" as stated in para 5.3 page 13.

The Surrey County Council Archaeological Officer has already commented that it would be appropriate to require a geophysical survey of the area of the AHAP. It is disappointing that the developer did not offer this as part of the application.

The Normandy Action Group  
12 March 2026