

28 February 2026

Mohammed Saleem  
Case Officer  
Planning Department  
Guildford Borough Council

**Planning Application 25/P/01725: Objection from the Normandy Action Group**

Dear Mr Saleem,

Please find below an objection to the above-mentioned planning application. I am submitting it on behalf of the Normandy Action Group, a local village association run by residents who care about our community and who wish to protect its special character and its amenities. We have over 650 people on our mailing list, and in this submission we have done our best to represent the views that they expressed unequivocally, first in our own poll in September 2025, and then in a survey conducted by Normandy Parish Council in November. These revealed that around 95% of respondents were against the Taylor Wimpey proposals.

Since Taylor Wimpey's plans first emerged last year, we have invested a great deal of time and effort in helping local residents to understand the planning issues involved, and to equip them to make their own submissions. This has involved a series of newsletters, articles on our website, three planning seminars in the autumn, and finally a briefing meeting on 18 February attended by over 200 people. We hope that this effort is reflected in the quality of the many submissions we know you have received from our residents.

Our own submission consists of a covering note summarising the main grounds for objection as we see it, supplemented by five technical appendices, produced with input from members of our group who have the relevant professional expertise. These appendices are:

A – NPPF: Grey Belt, Footnote 7, Inappropriate Development, and Very Special Circumstances

B - Infrastructure and Sustainability

C - Surface Water, Flood, Drainage, and Sewerage

D - Habitat and Biodiversity

E – Heritage and Design

For ease of uploading, I have consolidated all of these into one pdf, which follows below.

Yours sincerely,

[signed]

Sir Michael Aaronson CBE

Chair, and on behalf of, the Normandy Action Group

To: Guildford Borough Council Planning Department

From: Normandy Action Group (NAG)

Date: 28 February 2026

**Subject: Formal Objection to Planning Application 25/P/01725 (Land off Glaziers Lane, Normandy)**

### **Executive Summary**

The Normandy Action Group (NAG) strongly **objects** to Taylor Wimpey's application for up to 950 dwellings on a Green Belt site at the heart of Normandy. This proposal represents an inappropriate and disproportionate development that threatens the integrity of the Green Belt and fails to meet critical sustainability and infrastructure requirements. Our main areas of objection are:

- 1. The site that is the subject of application 25/P/01725 fails to pass the tests to be considered as 'Grey Belt'.**
- 2. Even if the site were to be considered 'Grey Belt', the application fails to pass the further tests for it to be considered 'not inappropriate' development in the Green Belt.**

**In particular, the location is not a sustainable one.** The developer has not shown how sufficient improvements could be made to, respectively, public transport, the existing road system, and the sewerage system to meet the increased needs the development would create. The NPPF requires proposals to be refused where safe and suitable access for all users cannot be achieved, and/or where there are unacceptable impacts on highway safety.

**3. Nor does the application comply with the 'Golden Rules'** requiring truly affordable housing, necessary improvements to local or national infrastructure, and access for residents to good quality green spaces within a short walk of their home.

**4. Given the above considerations, the proposal fails to qualify as 'not inappropriate in the Green Belt',** and the developer would therefore have to demonstrate **'very special circumstances'** to be allowed to build on this site. **These have not been demonstrated,** and as there would be substantial harm to the openness of the Green Belt, both spatially and visually, particularly from the proposed four storey buildings, the application should be refused.

**5. [Green Belt Guidance](#) states that "Where a development is not inappropriate in the Green Belt, this does not itself remove the land from the Green Belt nor require development proposals to be approved. In accordance with section 38(6) of the Planning and Compulsory Purchase Act 2004 wider policies and considerations apply, including those in the area's adopted Plan, and in the NPPF read as a whole."**

In line with this guidance, the application falls foul of a number of Policies in the Local Plan, as listed below:

- Policy P1: Surrey Hills.
- Policy P2: Green Belt.
- Policy P3: Countryside
- P4 Flooding, Flood Risk, and Groundwater Protection Zones
- P5 Thames Basin Heaths SPA
- P6: Protecting Important Habitats and Species
- P7: Biodiversity in New Developments
- P9: Air Quality and Air Quality Management Areas
- P10: Water Quality, Waterbodies, and Riparian Corridors
- P11: Sustainable Surface Water Management

D1: Place Shaping  
D3: Historic Environment  
D4: Achieving High Quality Design and Respecting Local Distinctiveness  
D5: Protection of Amenity and Provision of Amenity Space  
D7: Public Realm  
D11: Noise Impacts  
D12: Light Impact and Dark Skies  
D15: Climate Change Adaptation  
D18: Designated Heritage Assets  
D19: Listed Buildings  
ID1: Infrastructure and Delivery  
ID3: Sustainable Transport for New Developments  
ID4: Green and Blue Infrastructure  
ID9: Achieving a Comprehensive Guildford Borough Cycle Network  
ID10: Parking Standards for New Developments

6. Finally, the application is **premature**. It should be considered as part of the ongoing process to update the Local Plan, where issues of environmental sensitivity and sustainability can be considered strategically and in the round. It is worth noting that the site has already been excluded once before from the Local Plan process on grounds of extreme Green Belt sensitivity - not, as the developer has claimed, because it was found houses could be built elsewhere (Briefing note to GBC's Borough, Economy and Infrastructure Executive Advisory Board 20/04/2017 – paras 6.12 and 6.13).

These areas of objection are developed in greater detail below and in the appendices, attached.

## **1. Failure to Pass the 'Grey Belt' Threshold**

The site does not meet the criteria for 'Grey Belt' designation as defined in the NPPF and Government Planning Guidance. As per **para 143 of the NPPF**, it contributes strongly to Green Belt Purpose b): 'to prevent neighbouring towns merging into one another', by serving as an important buffer between the growing Ash/Tongham urban area and Guildford, which is already scheduled to expand to the west (**Local Plan Policy P3**). It is also worth noting that only a small fraction of the site is 'previously developed land' (which case law has established should be ignored for planning purposes), contrary to the impression given by the developer in the way they have framed the application.

These arguments are developed further in **Appendix A, Section A**, attached. In addition, the NPPF explicitly excludes from Grey Belt status land where the application of policies relating to assets in **para 11, Footnote 7**, provides a strong reason for restricting development. As the site is subject to significant restrictions regarding sensitive environmental habitats and flood risk, Footnote 7 is engaged.

### **(a) Environmental and Habitat Exclusions**

These are both on site, with the presence of parcels of Ancient Woodland, also individual Ancient and Veteran Trees, that are threatened by the development, and also because the site falls within the 'Zone of Influence' for the Thames Basin Heaths Special Protection Area (SPA), triggering mandatory mitigation measures. Furthermore, the southern half of the site is a designated Biodiversity Opportunity Area (TBL01). Constructing 950 homes in this area would destroy the very biodiversity opportunities the designation seeks to protect (Policy P6).

(b) Flood Risk Exclusions (**NPPF paras 170 and 174; Local Plan Policy P4**)

The application fails the 'Grey Belt' test due to substantial flood risks that have been inadequately addressed:

- Surface Water Flooding: Local residents can attest that the site and surrounding highways are frequently underwater during wet weather.
- Development within the High-Risk Flood Zone 3: Portions of the development are within the 1-in-100-year plus climate change fluvial flood extent, triggering the need for a Sequential Test, which has not been undertaken.
- Non-Compliant Drainage Strategy: The Sustainable Drainage Strategy (SuDS) is vague, non-compliant and does not demonstrate that the development will be safe for its lifetime without increasing the risk of flooding downstream.
- Downstream Impact: The calculated increase in water volume leaving the site is up to 67% higher than the existing rate, posing a severe threat to downstream properties.
- An already overloaded foul drainage infrastructure: The existing Thames Water foul network is already under immense pressure, regularly surcharging into people's homes and the local watercourse - which is considered of high sensitivity to pollution by the Water Framework Directive.

(c) National Landscape Setting (NPPF para 189; Local Plan Policy XX)

The NPPF requires development within the setting of a National Landscape to be sensitively located and designed.

- The Surrey Hill National Landscape Planning Adviser has effectively confirmed the Proposed Development is not sensitively designed given its mass, scale and urban characteristics in the setting of the Surrey Hills.
- GBC recently relied on this exact principle to justify its refusal of development on nearby land at Wanborough Fields (25/EC/00204/APL).

Because these Footnote 7 issues (Sensitive Habitat, Flood Risk and National Landscape Setting) provide strong reasons for restricting development, the land is excluded from the 'Grey Belt' definition.

These arguments are developed further in **Appendix A, Section B**, attached.

**2. Failure to Meet 'Not Inappropriate' Criteria: Sustainability & Infrastructure**

Even if the site were deemed Grey Belt, it fails the further tests required to be considered 'not inappropriate' in the Green Belt (**NPPF para 155**). The developer has failed to prove the location is sustainable.

(a) The Railway Fallacy

The proximity to Wanborough Station is used as a superficial justification for sustainability. However:

- Limited Service: The station offers no direct trains to London and only two trains per hour in each direction, which does not constitute a "well-connected" hub for 950 households.
- No Capacity Improvements: Network Rail (NWR) have explicitly stated they have no plans for station improvements for at least 20 years. The station is one of the least-used in Surrey, indeed in Britain, and the development would not change this.
- (b) Critical Infrastructure Failures

- Sewerage Crisis: Sewer flooding is a major issue in Normandy, with foul manholes surcharging and effluent backing up into properties. Thames Water has confirmed there is currently no capacity to accommodate this development.

#### (c) Highway and Active Travel Failures

The developer's Active Travel Infrastructure Audit is riddled with inaccuracies:

- Incorrect Data: For example, the consultant has incorrectly stated speed limits on Westwood Lane (north end) and Guildford Road (west of School Lane) as 30mph when they are actually 40mph.
- Route Inadequacy: Many suggested walking routes to the SANG (Suitable Alternative Natural Greenspace) are impassable in winter due to significant surface water flooding and a lack of lighting. The developer has also measured some of the routes incorrectly, stating that they are 100m to 150m shorter than in reality.
- Station Distance: The station is 800m from the nearest parcel and significantly further from others, exceeding comfortable walking distances for many.
- The developer's traffic modelling recognises the severe impact the development would have on the road network, adding over 4000 two-way vehicle trips to the local roads per day.
- No Road Safety Audit (RSA) has been carried out to assess the developer's proposals and the impact that they will have on Active Travel Routes and access for all.
- Construction Impact: The removal of 151,349m<sup>3</sup> of soil will require 12,612 HGV trips over seven years - roughly 30 to 40 trips per day during the ground works season - which is fundamentally unsustainable for local rural roads. In addition, experience shows that most of the construction workforce would not come from the immediate area, adding to local traffic congestion.

Other Policy references: **NPPF paras 110, 111, and 115.**

The above arguments relating to the non-sustainability of the site are developed further in **Appendix B, Infrastructure and Sustainability**, attached.

#### (d) Flood Risk

- The application also fails to address the real issues of flooding in Normandy, focusing on fluvial risk while ignoring the primary concern: surface water. This is addressed in greater detail in **Appendix C, Flood Risk, Surface Water, and Foul Drainage**, attached.

These arguments are assessed against the specific NPPF requirements developed in Appendix A, Section C attached.

### **3. Non-Compliance with 'Golden Rules' on Affordable Housing, Infrastructure Improvements, and easy access to quality green spaces. (NPPF paras 67, 68, 156, and 157)**

The proposal fails the 'Golden Rules' regarding the provision of affordable housing, improvements to local and national infrastructure, and access for residents to good quality green spaces within a short walk of their home.

#### (a) Affordable Housing

- While the developer claims 50% affordable housing, the Footnote 7 restrictions on the site (see above) lead the developer to propose high-density blocks of flats up to four

storeys high. This creates a direct conflict with Local Plan policies regarding village character and the Surrey Hills National Landscape.

(b) No improvements to local and national infrastructure

Local infrastructure is already at or over capacity:

- Sewerage Crisis: Sewer flooding is a major issue in Normandy, with foul manholes surcharging and effluent backing up into properties. Thames Water has confirmed there is currently no capacity to accommodate this development.
- Utility Strategy: The developer has failed to provide a Utilities Strategy as required by **GBC Policy ID1**.
- Road Safety: No independent Road Safety Audit has been conducted for the proposed junction changes, despite the developer admitting the project will add significant traffic volumes to an already congested network, and providing plans showing amendments to junctions around the site.

(c) Inadequate Improvements to Green Space

- Much of the onsite green space is undevelopable due to flood risk and ancient woodland; it will be underwater and inaccessible during the wettest months.
- The proposed SANG (Application 25/P/01726 – see separate objection) lacks a proper SAMM, is inadequately accessible from the site, and will therefore result in increased road traffic. It would be neither a suitable nor a realistic alternative to the SPA for the incoming residents.

These arguments are also developed in **Appendix B, Infrastructure and Sustainability, and Appendix C, Surface Water, Flood Drainage, and Sewerage**, attached.

Non-conformance with the 'Golden Rules' is assessed in **Appendix A, Section C** attached.

**4. No 'Very Special Circumstances' (NPPF para 153; Local Plan Policies D1 and D4)**

As the development fails the sustainability and infrastructure tests, it must be viewed as 'inappropriate'. Consequently, the developer must demonstrate 'very special circumstances' in order to be allowed to build on it which they have not done. On the contrary, the development would cause considerable harm to a sensitive Green Belt site.

(a) Spatial and Visual Harm

The development would cause terminal damage to the openness of Normandy:

- Disproportionate Scale: The proposal for 3 to 4-storey buildings is entirely alien to Normandy's character, which consists mainly of single-storey bungalows and two-storey houses.
- Visual Dominance: These heights would be visible from the Surrey Hills Area of Outstanding Natural Beauty (AONB), negatively impacting its setting.

b) Green Belt Sensitivity

- The site (formerly A46) was removed from the Guildford Local Plan precisely because it was judged a "high sensitivity Green Belt site" where development would result in "significant harm". This has not changed.

c) Lack of Compensating benefits

- Although the developer has flagged several supposed benefits to the community arising from the development, these are either not benefits at all, or there is no assurance that they would be delivered. Community facilities such as the proposed *community hub/facilities including café facilities* would duplicate existing services provided by the community itself. The promise of a medical facility, a primary school, and a SEND school are not within the developer's gift to deliver, and there are serious doubts both on grounds of affordability and shifting Government policy (especially on SEND provision) whether they would ever materialise. The residents of neighbouring Ash have similarly seen promised improvements in health facilities attached to major housing developments come to nothing.
- The developer has included in their application vague commitments to make space available for, among other things, *"up to 2,500 sqm two form entry primary school (Class F1) and up to 5,000 sqm Special Educational Needs school (Class F1) and in addition associated playing fields"*. Enquiries made of Surrey County Council suggest that a new primary school would only be needed were the new homes to be built, so the argument is circular. Equally, with Government policy on SEND provision evolving away from stand-alone schools to integration into mainstream ones, the likelihood that such a school will be needed is shrinking. This is even without considering the extreme financial constraints that the new West Surrey Unitary Council will face from Day 1 of operation, not least because of inherited debt.

We submit, therefore, that the provision of these facilities cannot be regarded as constituting the 'very special circumstances' that would be required to justify building on this site.

The assessment of benefits versus harms of the application is summarised in **Appendix A, Section D** attached.

## 5. Conflict With Wider National and Local Policies

In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application must be judged against the Adopted Plan as a whole. Objections are logged against the various Policies in the appendix, but we would highlight here:

### (a) Biodiversity and Habitats (Policies P6, P7, ID4)

- Ancient Woodland: The developer proposes a 20m buffer but plans to remove Category A and B trees, stating this is "unavoidable" to facilitate access. The Forestry Commission has advised that a 30m buffer to the Ancient Woodland should be in place, and should be kept clear of any and all infrastructure.
- Net Loss: BNG calculations show a net loss of -14.88% Habitat Units and -1.56% Watercourse Units against the 20% requirement, and the developer is only providing a +14.22% gain in Hedgerow units across the site. Even including the BNG calculation for the SANG the developer does not come anywhere near achieving the requirement of a 20% uplift, a direct violation of Policy P7 and ID4.
- Ecological Corridors: The site design creates barriers between areas of ancient woodland (Walden's Copse and Pussey's Copse), disrupting wildlife movement in these highly sensitive areas.

These arguments are developed further in **Appendix D, Biodiversity and Habitat**, attached.

### (b) Character and Heritage (Policies D1, D3, D4, D5, and D19)

- Policy D1 & D4: The "excessive height, scale and bulk" of the proposed buildings fails to respond to local distinctiveness and demonstrates a clear lack of "understanding of the place."
- Policy D3: The development would fail to "enhance the special interest, character, and significance of the borough's heritage assets and their settings". The Heritage Statement underestimates the potential for Roman remains; a post-planning investigation is insufficient to protect archaeology that may be lost under the high-density footprint.
- Policy D5: The proximity of multi-storey buildings to the boundary will cause unacceptable overlooking and loss of privacy for existing residents.
- Policy D19: The application fails to give due consideration to the communal significance of designated heritage buildings surrounding the proposed site, including the individual value of Grade II listed assets.

These arguments are developed further in **Appendix E, Heritage and Design**, attached.

(c) Climate Change Adaptation (Policy D15 and Climate Change, Sustainable Development, Construction and Energy Supplementary Planning Document 2020)

- There is only token acknowledgement in The Environmental Statement of the requirement in Policy D15 for development proposals "*to demonstrate adaptation for more frequent and severe rainfall events*". Instead, we have a proposal for a major development in an area prone to flooding, with major shortcomings of design and risk mitigation, as set out in **Appendix C**.

## **6. The Application is of a scale such that it should only be considered as part of the Local Plan process.**

Government Ministers have been very clear, both publicly and in correspondence with some of our members, that they attach great importance to Local Plans. They have also said specifically on 'Grey Belt' that they wish the release of Green Belt land to be more strategic, rather than 'haphazard' as in the past.

We appreciate that our planning system allows for applications to come forward outside of the Local Plan process; clearly it could not function otherwise. But we submit that it makes no sense for an application on this scale, with the very considerable loss of open Green Belt land that it would represent, to be considered other than as part of the ongoing Local Plan review. Only in this way can the relative merits of different potential sites across the Borough be assessed in terms of sensitivity and sustainability and appropriately strategic decisions be taken. If this application is approved on an outline basis without clarity about what will actually be built, and what infrastructure improvements will make it sustainable, a very important principle will have been conceded, and a very precious piece of countryside will have been lost.

## **Conclusion**

**This application is for an unsustainable, inappropriate, development that fails nearly every relevant Local Plan Policy and National Planning Policy test. The Normandy Action Group urges Guildford Borough Council to refuse permission.**

## Planning Application 25/P/01725: Normandy Action Group Objection

### Appendix A – NPPF: Grey Belt, Footnote 7, Inappropriate Development, and Very Special Circumstances Technical Assessment

#### Section A – The Land cannot be identified as Grey Belt

1. The land off Glaziers Lane, Normandy, GU3 (the “**Land**”) cannot be identified as Grey Belt because it makes a strong contribution to Purpose b of the Green Belt as defined in Para 143 of the National Planning Policy Framework (“**NPPF**”). Purpose b states that such land “*strongly prevents neighbouring towns from merging into one another.*”
2. The NPPF does not provide a specific definition of “town”, but the *Planning Practice Guidance (Revision date 27 February 2025)* (the “**PPG**”) clarifies that “*this purpose [b)] relates to the merging of towns, not villages*”, implying that built up areas larger than villages should be treated as towns for this purpose. This treatment is consistent with the classification of a small town as “*settlements with a population between 7,500 and 24,999*”<sup>1</sup>.
3. Guildford Borough Council (“**GBC**”) classifies both Guildford and Ash/Tongham as urban areas in the Guildford Local Plan<sup>2</sup> (“the **GLP**”). A town is the smallest type of urban settlement in the national Rural Urban Classification<sup>3</sup>, and areas with 10,000+ residents are defined as Amalgamated Built-Up Areas<sup>4</sup>. Based on the 2021 Census, Ash/Tongham has 20,421 residents, so it meets the definition of a town-level urban area.
4. The Guildford and Ash/Tongham urban areas should therefore be categorised as Towns for Green Belt Purpose b assessment.
5. The Land sits between Ash/Tongham and Guildford urban areas; it is 1.9km from the easternmost urban edge of Ash/Tongham and 2.4km from the proposed westernmost urban edge of Guildford after the Blackwell Farm site is developed (note it is 3.4km from the current urban edge of Guildford). The Land is 59ha in area and approximately 0.75km at its widest point, representing 14% of the straight-line distance between the easternmost urban edge of the Ash/Tongham and the proposed westernmost urban edge of Guildford areas.
6. Thus, the Land is assessed to have features such that it can be considered to make a strong contribution to Green Belt purpose b. This assessment is made against the illustrative features of land which makes a strong contribution to Green Belt Purpose b<sup>5</sup>, summarised as follows (**our emphasis**):

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<sup>1</sup> UK Parliament Research Briefing ‘City and Town Classification of Constituencies and Local Authorities’

<sup>2</sup> Guildford borough Local Plan: strategy and sites 2015 – 2034, Adopted 25 April 2019; Policy P3: Countryside 4.3.26

<sup>3</sup> UK Government Collection ‘Rural Urban Classification’ updated 14 March 2025

<sup>4</sup> ONS 2021 Rural Urban Classification

<sup>5</sup> PPG Section ID: 005 Reference ID: 64-005-20250225

| PPG illustrative features                                                                             | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| - are likely to be <b>free of existing development</b>                                                | <ul style="list-style-type: none"> <li>The Land is free of existing development; the stable buildings which occupy an insignificant proportion of the site are disregarded for the purpose of this assessment<sup>6</sup></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| - forming a <b>substantial part of a gap</b> between towns                                            | <ul style="list-style-type: none"> <li>Per Para 5 above, 14% of the straight-line distance between Ash/Tongham and Guildford is considered a substantial proportion.</li> <li>At 59ha and 950 dwellings, planning application 25/P/01725 (the “<b>Proposed Development</b>”) is comparable in size to the strategic sites in the GLP; it is therefore a substantial rather than a windfall site in planning terms.</li> <li>Together with Flexford and Normandy, the Proposed Development would have a combined population of c5,000-6,000 residents<sup>7</sup>; this would fill a substantial part of the gap between Ash/Tongham and Guildford urban areas.</li> <li>The Land is substantial in creating, or mitigating, a meaningful risk of physical coalescence. GBC’s 2025 Land Availability Assessment identifies many other potential development sites in the A323 corridor which are now coming to planning application stage under the ‘tilted balance’. Approving this Proposed Development would set a strong precedent for further development between Ash/Tongham and Guildford.</li> </ul>                                    |
| - the development of which would <b>be likely to result in the loss of visual separation</b> of towns | <ul style="list-style-type: none"> <li>The Proposed Development includes multiple, 4-storey, residential blocks, at least 16.5m in height<sup>8</sup> - a typology otherwise restricted to Aldershot, Guildford, and Woking, as well as other urban characteristics. This massing will likely undermine the visual separation between the adjacent urban areas.</li> <li>This will be experienced by the public in a number of ways, all of which accumulate to cement a visual relationship between neighbouring urban areas. Specifically:</li> <li>During car journeys along the A323, where traffic-light junctions and peak urban-level traffic flows will create the perception of a single continuous urban area.</li> <li>During the 11-minute rail journey between Ash and Guildford, where 4-storey blocks adjacent to Wanborough station will visually dominate the landscape.</li> <li>From the elevated vantage points of the Surrey Hills National Landscape, these at least 16.5m blocks cannot be obscured by natural topography and will feature prominently in the day, with urban streetlights visible at night.</li> </ul> |

<sup>6</sup> see Ribble Valley Borough Council, R (on the application of) v Secretary of State for Housing, Communities and Local Government & Anor [2025] EWHC 2363 (Admin) and R (on the application of Lee Valley Regional Park Authority) v Broxbourne BC [2015] EWHC 185 (Admin)]

<sup>7</sup> 3,112 in Normandy Parish per the 2021 Census, plus an estimate of 2,000-3,000 from 950 dwellings in the Proposed Development

<sup>8</sup> Per block height parameter plan in the Proposed Development application documents the maximum ridge height of these residential blocks will be 16.5m above ground level. Chimneys, flues and/or solar panels would add up to 1.5m above this ridge height.

## **Section B – There are strong reasons for refusing development on the application of NPPF Footnote 7 Policies**

1. Even if the Land is otherwise identified as Grey Belt, the Proposed Development does not meet multiple NPPF Footnote 7 policy thresholds, so there are strong reasons for refusing development under NPPF Para 11 d) i)<sup>9</sup>. Specifically:

| <b>NPPF Footnote 7 policy thresholds</b>                                             | <b>Evidence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Flood Risk not sufficiently mitigated to avoid the need for a sequential test</b> | <ul style="list-style-type: none"> <li>As set out in Appendix C, the Environment Agency advises that the site-specific flood risk assessment does not demonstrate that the site is safe for its lifetime without increasing flood risk elsewhere and as such the Land should be assessed against alternative sites as part of a sequential test (NPPF Para 175). No such sequential test has been undertaken.</li> <li>The Surrey SUDS Team assesses the site SUDS plan to be insufficient such that it cannot ensure that the flood risk is not increased elsewhere and that any residual risk cannot be safely managed (NPPF Para 181).</li> </ul> |
| <b>Likely harm to the Ancient Woodland habitats</b>                                  | <ul style="list-style-type: none"> <li>As set out in Appendix D, there is a likely risk of deterioration of the irreplaceable ancient woodland habitat sites on the Land.</li> <li>Note that the test here is <i>deterioration</i> of the irreplaceable habitat, not loss (NPPF Para 193 c) and that deterioration is <i>likely</i> (NPPF Para 195), not certain.</li> <li>The Forestry Commission has deemed the developer's proposed mitigation inadequate.</li> <li>Crucially, the developer has failed to assess the risk of changing soil hydrology from concentrated water displacement post-development.</li> </ul>                           |
| <b>Likely harm to the SPA sensitive habitat</b>                                      | <ul style="list-style-type: none"> <li>As set out in Appendix D, there is a likely risk both of deterioration to the Thames Basin Heaths SPA (“<b>TBHSPA</b>”) under NPPF Para 193 b).</li> <li>The cumulative in-combination impact of the Proposed Development, the SANG<sup>10</sup>, and Shortlands Farm<sup>11</sup> applications on the TBHSPA has not been assessed as required under NPPF Para 195.</li> <li>The SANG is unlikely to be utilised to the extent that would be necessary to relieve the pressure on the SPA. There is no SAMM, and it is therefore questionable whether the SANG would be sustainable.</li> </ul>              |
| <b>Insensitive development within the setting of a National Landscape</b>            | <ul style="list-style-type: none"> <li>NPPF Para 189 requires development within the setting of a National Landscape to be sensitively located and designed.</li> <li>The Surrey Hill National Landscape Planning Adviser has effectively confirmed that the Proposed Development is not sensitively designed given its mass, scale, and urban characteristics in the setting of the Surrey Hills.</li> <li>GBC recently relied on this exact principle to justify its refusal of development on nearby land at Wanborough Fields (25/EC/00204/APL), concluding residential development would</li> </ul>                                             |

<sup>9</sup> PPG Paragraph: 006 Reference ID: 64-006-20250225

<sup>10</sup> 25/P/01726

<sup>11</sup> 25/P/01521

|  |                                                      |
|--|------------------------------------------------------|
|  | constitute inappropriate development <sup>12</sup> . |
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### **SECTION C – This development in the Green Belt is inappropriate**

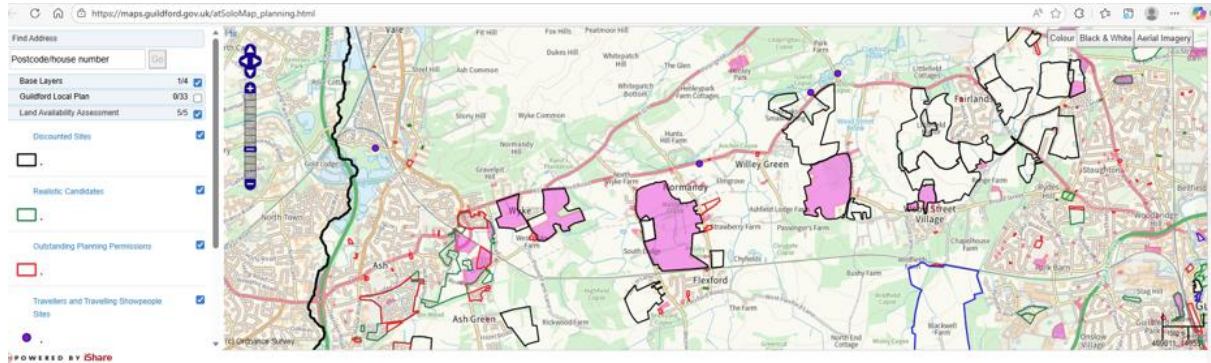
1. Development in the Green Belt is not regarded as inappropriate if it meets the criteria set out in the four limbs of NPPF Para 155. The Proposed Development fails to meet the threshold for three of these four limbs and as such it should be regarded as inappropriate. Specifically:
2. ***Limb a - The Land does not meet the definition of Grey Belt Land as defined in the NPPF:*** As comprehensively detailed in Section A, above, the Land does not meet the NPPF definition of Grey Belt.
3. ***Limb a continued - The Proposed Development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan:*** It is argued in Section A that the Land strongly contributes to Green Belt purpose b. If the planning officer concludes that this threshold is not met, then we argue that the Proposed Development would instead fail the separate test that its approval should not fundamentally undermine the purpose of the remaining Green Belt across the area of the Plan.
4. GBC have previously determined that Site ID 2441 ("Land at Normandy and Flexford, Westwood Lane"), which corresponds to the Proposed Development, is *"not suitable for development due to Green Belt designation"*<sup>13</sup>. This confirms that GBC considers the Land meets the Green Belt purposes set out in NPPF paragraph 143.
5. The developer states that *"[o]f the 20,054ha of Guildford Borough's Green Belt, the Proposed Development would form approximately 0.127%. As such 99.873% would remain unchanged... The Proposed Development is therefore considered to cause limited harm to Purpose C at the Borough level, and the overall function of the Green Belt in preventing encroachment to the countryside is therefore retained"*<sup>14</sup>.
6. This approach completely ignores the situational context for the role land plays in supporting the purposes of the Green Belt.
7. The map below shows the land currently available for development between Ash/Tongham and Guildford, overlaid (pink) with those sites which have a current planning application in process<sup>15</sup>:

<sup>12</sup> See 25/EC/00204/APL, document "Third statement of Joanna Searle 1/9", Para 23 b. [Because Government policy provides for the setting of National Landscapes to be protected] "I am therefore of the view that the Land would not be accepted as Grey Belt should a planning application be submitted for the residential use of the Land and it would be concluded that the Defendant's residential use would be inappropriate development in the Green Belt"

<sup>13</sup> As detailed in the "GBC 2025 Land Availability Assessment 2025, Appendix 3 – Discounted Sites"

<sup>14</sup> Fabrik Green Belt Assessment, para 6.4

<sup>15</sup> Source: GBC Planning Portal: [https://maps.guildford.gov.uk/atSoloMap\\_planning.html](https://maps.guildford.gov.uk/atSoloMap_planning.html), Filter selections: Land Availability Assessment 2025 Discounted Sites, Current Planning Applications



8. The obvious conclusion to be drawn is that the coalescing of Ash/Tongham and Guildford urban areas is a very real risk.
9. The Land acts as a keystone in the Green Belt between Ash/Tongham and Guildford. There are no permanent, durable, boundaries to restrict further east/west sprawl from the Proposed Development. Applying the developer's logic *ad absurdum*, the only land deemed to undermine the Green Belt would be the final parcel of land preventing the adjoining with Ash/Tongham or Guildford. Approval of the proposed development would set a dangerous precedent for the surrounding discounted sites. Rejection maintains the integrity of the Green Belt between Ash/Tongham and Guildford, preventing encroachment into the countryside and eventual coalescence of these urban areas.
10. ***Limb c - The Proposed Development cannot be considered to be in a sustainable location, with particular reference to NPPF Paras 110 to 115:*** A detailed assessment of the Infrastructure and Sustainability shortcomings of the Proposed Development are set out in Appendix B. We identify in the table below the specific shortfalls against the NPPF sustainability requirements (with **our emphasis added** to the NPPF wording):

| NPPF Para | Policy Assessment                                                                                                                                                                                                             | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 110       | <b>This is a significant development</b> in a location which cannot be made sustainable without significant investment because <b>the need to travel will not be sufficiently limited</b> to within the Proposed Development. | <ul style="list-style-type: none"> <li>No genuine choice of transport modes will exist, so <b>the predominant mode of transport will be the car</b></li> <li>It is unlikely that residents will shift to more sustainable transport because no investment has been committed to support it: train and bus services will not be improved if the development proceeds.</li> <li>Travel modes will therefore not be significantly different than those of the existing residents of Normandy and Flexford; as detailed in Appendix B the large majority of journeys will be made by car. (Rail Passenger numbers at Wanborough have averaged 80 passengers per day over the last 3 years out of approx. 3000 local residents (~3%))</li> </ul> |
| 111 a)    | The <b>number and length of journeys</b> needed for employment, shopping, leisure, and education <b>will not be minimised</b> .                                                                                               | <ul style="list-style-type: none"> <li>Almost all of these destinations will remain in their existing locations (i.e. away from the proposed development). There is no commitment to retail on site (it will be for 'top up' shopping at most) and trips to a new primary</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

|        |                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                                                                                                                                                                                                                                                                   | school on site would be shorter for new residents, but likely net longer for all existing residents in the area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 111 b) | There are <b>no agreed improvement plans or financial commitments from other transport infrastructure providers and operators</b> to support sustainable transport patterns.                                                                                                      | <ul style="list-style-type: none"> <li>• Current bus services will not be diverted into the Proposed Development (confirmed by the bus operator Stagecoach).</li> <li>• Network Rail has not committed to the infrastructure improvements at the station to allow direct access to the Northern Platform; considering the low number of passenger journeys to/from the station post development, the investment case for such improvements is very weak.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 111 d) | There are <b>no agreed improvement plans or financial commitments to improve the Local Cycling and Walking Infrastructure</b> to link the Proposed Development with wider employment, shopping, leisure, and education destinations.                                              | <ul style="list-style-type: none"> <li>• There is no commitment in the application to improve the quality of the Christmas Pie trail linking Tongham and Guildford. It is unmade, frequently floods, and is therefore unsuitable for routine journeys by pedestrians and cyclists.</li> <li>• Most pedestrian and Cycle Journeys will take place along Westwood Lane, Glaziers Lane and the A323; again, there is no detailed plan or financial commitment in the application to improve the quality and safety of these routes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 115 a) | <b>Sustainable transport modes are not prioritised.</b> Para 6.2 of the Savills planning statement starts with the statement that the development will be <i>"[c]entered around accessibility to Wanborough Station"</i> . This statement does not hold up under closer scrutiny. | <ul style="list-style-type: none"> <li>• The Northern part of the development is about 1.2km from Wanborough Station (and further without access improvements). Many Normandy commuters already drive to Brookwood for direct London trains rather than use Wanborough, so more homes here would likely increase car travel even for rail users.</li> <li>• There is no compelling evidence that residents of the Northern development will use the train service any more frequently than current residents, so there is no reason to expect a shift to more sustainable transport. The Northern development is being built first, with no commitment to improved station access, showing that sustainable transport is not prioritised in the proposal.</li> <li>• Whilst the Central and Southern developments are closer to the station (and therefore potentially more sustainable), without the train station access improvements the walking distance to all houses will be in excess of the recommended 800m.</li> <li>• There will be no re-routing of the No 20 bus service into the Central and Southern developments, so walking distances to bus stops will be 2-3 times further than the recommended 400m.</li> <li>• Note the comparative price of peak return rail tickets to Guildford (£9.20) compared to daily car parking charges (comparable but more flexible) or bus fares (significantly cheaper - £6 return). The sustainability of the proposed development would be improved if affordable housing was built in the Northern development,</li> </ul> |

|        |                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                          |
|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                                                                                                                                                                                          | not the Southern, to take advantage of cheaper bus fares and more destination options.                                                                                                                                                                                                                                                   |
| 115 d) | The <b>significant impacts</b> from the development on the transport network (in <b>terms of capacity and congestion</b> ), or on <b>highway safety have not been mitigated</b> to an acceptable degree. | <ul style="list-style-type: none"> <li>Apart from traffic light management at 3 locations, there are no agreed improvement plans or financial commitment from local or national highways authorities to alleviate the acknowledged significantly increased congestion in the local area caused by the increased car journeys.</li> </ul> |

**11. Limb d - The Proposed Development does not make sufficient contributions to the 'Golden Rules' set out in NPPF Para 156:**

A detailed assessment of the infrastructure issues and provision of green space is given in Appendix B and the main Objection respectively; we set out below the specific failures to meet the Golden Rules:

| Para 156 Policy Assessment                                                                       | Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>b - Necessary improvements to local and national infrastructure have not been made.</b>       | <ul style="list-style-type: none"> <li>Improvements to the existing foul water infrastructure are required to provide sufficient capacity for the Proposed Development. There is no agreed infrastructure improvement plan or financial commitments from either the developer or Thames Water to deliver this increased capacity.</li> <li>Key road junctions (A331/A323 and A31/B3000) are already at or over theoretical capacity. The developer is aware of these and wider network issues in the Guildford area (A3/A31) and that National Highways and Surrey County Council currently have no plans for improvements. This undermines the developer's proposition that 'necessary improvements' have been made.</li> <li>Infrastructure improvements at Wanborough station are required to allow direct access to the Northern Platform. Network Rail has explicitly stated they have no plans for (and no money for) station improvements for at least the next 20 years.</li> </ul> |
| <b>c - The provision of sufficient new, or improvements to existing, green space is not made</b> | <ul style="list-style-type: none"> <li>The proposed SANG lacks a proper SAMM, is inadequately accessible from the site, and will therefore result in increased road traffic. With the SANG closer to recent housing developments in Ash than it is to the Proposed Development, there is the risk of overuse and therefore deterioration or avoidance of the green space.</li> <li>Much of the green space on the Proposed Development is undevelopable due to flood risk and ancient woodland; it will be underwater and inaccessible during the wettest months.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                |

**SECTION D – No Very Special Circumstances exist to approve this inappropriate development in the Green Belt**

1. This Appendix has set out the sequential arguments why this development in the Green Belt is inappropriate.
2. Per NPPF Para 153, inappropriate development "*should not be approved except in very special circumstances... [where] the potential harm to the Green Belt... is clearly outweighed by other considerations*".

3. As summarised below, the combined benefits of the Proposed Development do not clearly outweigh the cumulative impact of multiple harms and potential harms on the Green Belt detailed in this and many other objections. As such, no Very Special Circumstances exist and so the Proposed Development should be refused.

| <b>Benefit (and weighting)</b>                                                                                                                                             | <b>Harm (and weighting)</b>                                                                                                                                                                                                                                                                   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provision of Housing – Substantial<br><i>Triggers 'tilted balance'; emerging Local Plan has no weight</i>                                                                  | Democratic Deficit – Substantial<br><i>GBC housing delivery should be dealt with strategically as part of a Local Plan process, with the merits of alternative sites in terms of sensitivity and infrastructure properly considered, and meaningful community engagement in that process.</i> |
| Golden Rules compliance – Moderate<br><i>Affordable Housing only</i>                                                                                                       | Increased Flooding risk – Substantial<br><i>Local knowledge disregarded, EA and Surrey SUDS responses should be red flags</i>                                                                                                                                                                 |
| SEND school provision – Moderate<br><i>Government policy increasingly to focus on mainstream schools with intention of reducing number of SEND schools</i>                 | Definitional Green Belt – Substantial<br><i>Land serves Green Belt purposes b and c</i>                                                                                                                                                                                                       |
| Sustainable transport infrastructure – Limited<br><i>No infrastructure improvements committed, no enhancement to current service, no evidence a modal shift will occur</i> | Green Belt Openness – Significant<br><i>Spatial and Visual Harm – disproportionate scale and urban characteristics in a rural setting</i>                                                                                                                                                     |
| Primary school provision – Limited<br><i>Only required if Proposed Development approved</i>                                                                                | Green Belt Sensitivity – Significant<br><i>Status not changed since last GBC classification</i>                                                                                                                                                                                               |
|                                                                                                                                                                            | Golden Rules Non-Compliance – Significant<br><i>No Sewerage Infrastructure Investment<br/>Minimal Traffic Congestion and Safety Improvements</i>                                                                                                                                              |
|                                                                                                                                                                            | Landscape – Significant<br><i>insensitive design in a National Landscape Setting</i>                                                                                                                                                                                                          |
|                                                                                                                                                                            | Risk of Ancient Woodland Deterioration – Significant<br><i>Forestry Commission response, soil hydrology risks should be red flags</i>                                                                                                                                                         |
|                                                                                                                                                                            | Heritage – Moderate<br><i>Risk during build phase not mitigated, setting of 'Glaziers' not sufficiently protected</i>                                                                                                                                                                         |
|                                                                                                                                                                            | Loss of Agricultural land – Moderate<br><i>26% of the Land is ALC 3a; farmer's ability to use the land productively has been constrained by 'planning blight' resulting from this application.</i>                                                                                            |

## Planning Application 25/P/01725: Normandy Action Group Objection

### Appendix B: Infrastructure and Sustainability

#### Failure to Mitigate Significant Infrastructure Risk

##### I. The Sustainable Location Test: A Statistical Analysis

Under paragraph 155 of the NPPF, even development on "Grey Belt" land must be situated in a "sustainable location". Proximity to a railway station is often used as a proxy for sustainability, but in the case of Wanborough Station, the data reveals this to be a "Railway Fallacy".

##### 1.1 The Reality of Wanborough Station Utility

- **Ranking and Use:** According to the [RailwayData](#) website, Wanborough Station is one of the least-utilised in Great Britain, ranking 1,593rd out of 1,772 based on its passenger-to-service ratio.
- **Passenger Data:** The station averages only 2.43 passengers per service, indicating that the majority of current residents do not find it a viable commuting option.
- **Connectivity Limits:** The station offers no direct trains to London and provides a limited service of only two trains per hour in each direction to Guildford (1 stop) and Farnham (3 stops), plus a very limited number of trains to Reading and Gatwick.
- **Network Rail (NWR) Position:** NWR has explicitly stated they have no plans for (and no money for) station improvements for at least the next 20 years. The Developer misrepresents Network Rail's comments as 'support' for the development rather than support for their implementation and payment of upgrades by someone else.
- **Infrastructure Deficiencies:** Pedestrian access to the car park regularly floods after heavy rain, making the station inaccessible without waterproof boots. Furthermore, there is currently no accessible (step-free) means of reaching the "up" platform toward Guildford.



*Images show Wanborough Station after heavy rain on 21 Jan 26. Second image shows passenger climbing across gate to stay dry while exiting car park.*

- **Delayed Accessibility:** Proposed upgrades (which require designing, agreeing and financing), such as lifts and a bridge, are deferred to "Phase 2," meaning the initial hundreds of residents will occupy the site without the station's being fully accessible. Any

lift added to the station would require an annual inspection and certification to continue to remain in legal use. If NWR have no plans to spend money over the next 20 years, there is no indication as to who would fund this.

### *1.2 Local Commuting Realities*

- **Census Discrepancies:** [2021 Census data](#) for Normandy shows that half of all journeys to work are currently made by car or van. Less than 10% of the local population currently uses "other means," including the train, for work travel.
- **Misleading Travel Times:** The developer's Environmental Statement claims a 30-minute journey to London; however, the actual time is approximately 55 minutes, often complicated by unreliable connections at Guildford.
- **Commuting Patterns:** A 2015 RTPI study, "[Building in the Green Belt?](#)", suggests that housing near Metropolitan Green Belt stations can result in millions of additional car journeys per week because residents often do not use the train for work.

## **II. Critical Infrastructure: The Sewerage and Utilities Crisis**

Local Plan Policy ID1 requires that infrastructure must be provided and available *when first needed*. The current state of utilities in Normandy suggests a total inability to absorb 950 new dwellings.

### *2.1 The Foul Water Network*

- **Existing Failure:** The local sewerage system is already at or over capacity, with residents reporting foul manholes surcharging and raw sewage backing up into properties during heavy rain.
- **Thames Water Objection:** In previous nearby applications for only 28 dwellings, Thames Water identified an "inability of the existing foul water network infrastructure" to accommodate the proposal and has unsurprisingly provided the same advice here for 950 houses.
- **Mitigation Absence:** The developer has not provided a Utilities Strategy as required by GBC Policy ID1 to address how 950 homes will connect to this already failing system.

### *2.2 Electricity and Clean Water*

- **Strategic Gaps:** Regular issues are reported with electricity, foul water, and clean water in the area.
- **Requirement for Upgrades:** Significant infrastructure reinforcement is required at the outset, not only for the new development but to protect the service levels of the existing community.

## **III. Active Travel Infrastructure: Technical Audit Errors**

The *Active Travel Infrastructure Audit* submitted by the developer is riddled with inaccuracies and omissions and fails to meet the standards of Policy ID3.

### *3.1 Dangerous Speed and Safety Assumptions*

- **Westwood Lane (Route 8/6c) & Guildford Road (Route 10):** The consultant incorrectly states the speed limit at the start of the Byway towards the SANG as 30mph when it is actually 40mph. This has an impact on pedestrian and cycle safety and the segregation requirements for cycles from vehicular traffic.
- **Safety Audits:** No independent Road Safety Audit has been conducted for any of the proposed works or the impact of thousands of additional vehicle movements. The

developer is proposing significant changes to junctions that will directly impact the safety of users; this has not been taken seriously.

- **Inadequate Lighting:** The audit suggests lighting is good, but it ignores sporadic or non-existent street lighting on Glaziers Lane and other key routes, where pedestrians currently require torches to be seen after dark, and can often feel unsafe.

### *3.2 Physical Barriers to Sustainable Choice*

- **Flooding of Access Routes:** Routes 6a, 6b, and 6c (primary paths to the SANG) are subject to surface water flooding and are unusable during winter, making the SANG unreachable by any means other than by road.
- **Distance Factors:** The station and the SANG are acknowledged to be 800m from the nearest parcel, and significantly further from others, exceeding comfortable walking distances for a significant portion of the site.
- **Bus Service Failure:** Stagecoach (Route 20) has already confirmed they have no intention of running services into the development. The developer has also proposed to move the nearest bus stops to the development as part of the highway proposals but has not proposed any suitable locations. It would not be possible to run a bus service to Wanborough Station given the acute angle of the junction between Station Approach and Glaziers Lane. Additionally, the turning space for a bus in Station Approach is too tight for this to be a safe operation.
- **Not Just Commuting:** It is important to note the sustainability is not just about commuting but also being able to get to and from other destinations by sustainable methods. One of the main barriers to this is the rural nature of the area: the nearest supermarkets are over 5 miles away and not easily accessible by any other method of transport other than a car, especially for the weekly shop.
- **Minimal Improvements:** The Developer mostly only goes so far as proposing dropped kerbs, tactile paving and vegetation trimming but neglects to provide any real improvements to Active Travel Routes around the site to make it easier for residents to get to and from bus stops and local facilities. No improvements have been suggested for Cyclists, completely ignoring the principles of LTN 1/20.
- **No Understanding of the Area:** The nature of the area is that footpaths are sporadic and switch to different sides of the road depending on driveways and highway land availability. Pedestrians travelling along Glaziers Lane frequently have to cross the road multiple times with no facilities and little street lighting to get to and from the Station or Doctor's Surgery, but this is not acknowledged by the Developer and no improvements are proposed.
- The cost of rail travel for regular commuting can be prohibitive compared to driving and parking: a return ticket from Wanborough to Guildford (1 stop) is currently £9.20 for a 7-minute journey. A ticket to London Waterloo via Guildford is £41.00 return (~1hr journey). This level of cost makes commuting via train difficult to justify, especially for low-income families.

## **IV. Highways: Severe Cumulative Impact on Conditions and Safety**

Paragraph 116 of the NPPF allows for refusal where the residual cumulative impact on the road network would be "severe".

### *4.1 Traffic Congestion and Modelling*

- **Junction Overcapacity:** Key junctions (A331/A323 and A31/B3000) are already at or over theoretical capacity for the 2035 development year, with the developer not proposing to make any required improvements, only stating that they will continue to engage. But the conditions for building in the Green Belt require appropriate upgrades to be agreed prior to any planning consent's being granted.

- **Wanborough Hill:** The developer's own *Transport Assessment* admits that queues up Wanborough Hill could extend to 74 vehicles, almost half a kilometre of queuing in the **Surrey Hills National Landscape**.
- **Glaziers Lane junction with A322.** With so little detail shown on their plans, and no highway boundary or land ownership information, it is unclear how the developer intends to make the improvements they have suggested. They propose a 4-way traffic light system to cater for increased traffic flows, but Glaziers Lane is narrow at this point with no potential for widening, and vehicles turning left into Glaziers Lane from the A323 need to wait until those queuing to exit have moved on. Traffic lights would make this worse, causing extensive delays in all directions and significantly impacting safety for vehicle users and pedestrians. This area already causes frustration to local residents with regular near miss collisions.
- **Rat-Runs:** The roads bounding the site are minor rural roads ('C' and 'D' roads) that are already used as rat-runs by speeding vehicles (this appears to be ignored in the *Transport Assessment*).

It is important to note that GBC's Local Plan sets out infrastructure improvements that are required to facilitate the strategic sites set out in the Local Plan and when they are required to be operational. As this application is not in the Local Plan this approach has not been followed. It is also noted that most of the required infrastructure improvements in the Plan have not been implemented by the date they were anticipated to be required. This application does nothing to mitigate existing issues and has not been properly worked through the plan process.

#### 4.2 Road Safety Neglect

- **Parking Hazards:** The developer acknowledges that existing parking on Westwood Lane creates hazards but proposes no mitigation despite the fact the development would add significant traffic to the road, and pedestrians/cyclists to the footpaths.
- **Speeding:** There is no detailed data provided on existing speed surveys, despite local knowledge (from the long-established Community Speed Watch) of a significant speeding problem on Glaziers Lane & the A323 Guildford Road.

## V. Unsustainable Construction: The HGV Burden

5.1 The sustainability of the development is undermined by the sheer scale of the construction logistics required on small rural roads.

- **Massive Earthworks:** The developer's *Preliminary Cut and Fill Strategy* indicates a requirement to remove 41,649m<sup>3</sup> of topsoil and 109,700m<sup>3</sup> of subsoil from the site.
- **Logistical Impact:** Assuming standard 12m<sup>3</sup> HGV tipper trucks, this alone will result in **12,612 HGV trips** over a 7-year construction period, and this does not include the significant number of other vehicles required to service the site throughout its construction duration.
- **Daily Disruption:** This equates to 30 to 40 trips per day over a number of, say, 4-to-6-month periods in the programme aligning with the ground works season. All of this would be on narrow, sensitive village roads and would have a significant detrimental effect on the existing roads which will likely require reconstruction as they will be well beyond their design life.

- **Safety Issues:** Additionally, there would be a large number of delivery vehicles, many of which traditionally are large and possibly articulated, carrying steels, bricks/blocks, roof trusses and such like. Because Glaziers Lane is narrow, and Westwood Lane has the obstacle of a railway underpass, these would all need to access the construction area via the restricted junction of Westwood Lane with the A323, close to where children cross the road on their way to the Village School.

## VI. Flood Risk and Surface Water (NPPF paras 170-182; Policy P4)

6.1 The application fails to address the real issues of flooding in Normandy, focusing on fluvial risk while ignoring the primary concern: surface water.

- **Evidence Gaps:** The Flood Risk Assessment (FRA) relies on desktop data; no site-specific ground investigation or groundwater monitoring has been conducted.
- **Functional Floodplain:** Portions of the development fall within the 1-in-100-year plus climate change flood extent, triggering a Sequential Test that has not been adequately satisfied.
- **Downstream Vulnerability:** The calculated increase in the volume of water leaving the site is up to 67% higher than existing levels, posing a severe threat to downstream properties.

These arguments are developed further in **Appendix C**, attached.

### Summary of Policy Incompatibility

| Technical Area | Policy Ref | Core Failure                                                                                                                                                                                                                                                                                   |
|----------------|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sustainability | NPPF 155   | Site is functionally car-dependent; rail utility is negligible, insufficient upgrades to sustainable transport facilities.                                                                                                                                                                     |
| Infrastructure | GBC ID1    | No capacity in sewerage network; no utilities strategy, insufficient upgrades to the highway network to accommodate the development. (As this development skips the Local Plan making process GBC's Strategic Infrastructure Improvements do not account for this site (GBC LPDMP Appendix 6)) |
| Safety         | NPPF 116   | No Road Safety Audit conducted; inaccurate speed limit data, no mitigation for speeding or safety issues                                                                                                                                                                                       |
| Drainage       | GBC P4     | 67% increase in water runoff; inadequate mitigation for residents.                                                                                                                                                                                                                             |

**Conclusion:** The scale of the proposal is alien to the rural character of Normandy, and the infrastructure is demonstrably incapable of supporting such a massive increase in building quantum.

## Planning Application 25/P/01725: Normandy Action Group Objection

### Appendix C: Failure to Mitigate Flood Risk, Surface Water and Foul Risk

This appendix provides a detailed technical objection demonstrating that the developer, Taylor Wimpey (UK) Ltd, has failed to adequately identify or mitigate risks associated with flooding, surface water management, and foul drainage. The proposal is in direct conflict with the requirements of the NPPF (paras 170-182), and Guildford Borough Local Plan Policies P4 and P11. It also ignores the requirements of Policy D 15 on Climate Change Adaptation, and the provisions of GBC's *Climate Change, Sustainable Development, Construction and Energy Supplementary Planning Document* (2020)

Flooding, surface water, and foul drainage risks are particularly important elements affecting this application, which is why we have devoted a separate Appendix to them. They are significant in three different but interrelated ways:

(a) They restrict the potential for development on this site, and therefore engage Footnote 7 to para 11 of the NPPF regarding the site's putative designation as 'Grey Belt'. We believe the site's high vulnerability to flood risk means it cannot be considered as 'Grey Belt'. (See Appendix A for further details.)

(b) The developer needs to show that existing risk, and the risk from development, have been adequately modelled. We submit that this is not the case, which undermines the credibility of the application.

(c) The developer is required by both national and local planning rules to include adequate flood risk management and mitigation remedies in their proposal. We believe that they have failed to do this.

#### 1. Introduction: The Existing Flood Risk Crisis

The proposed development of 950 dwellings and two schools represents a strategic-scale urban extension that fundamentally ignores the reality of flood risk in Normandy and Flexford. For over a decade, the Normandy Flood Forum - chaired by the local MP - has documented the chronic flooding issues that underline that the village infrastructure is fragile and show the extent of the existing flood risk faced by the residents.

The site is not merely a "greenfield" location; it is a vital part of the local flood management system, acting as informal storage for surface water. By proposing to replace permeable agricultural land with **19.2 hectares of impermeable surfaces**, the developer risks a catastrophic failure of local drainage systems. The following sections detail why the applicant's mitigation strategy is technically flawed and in direct conflict with the **NPPF, paras 170-182, and GBC Local Plan Policies P4 and P11**.

#### 2. Flood Risk: Mischaracterised Baselines and Policy Non-Compliance

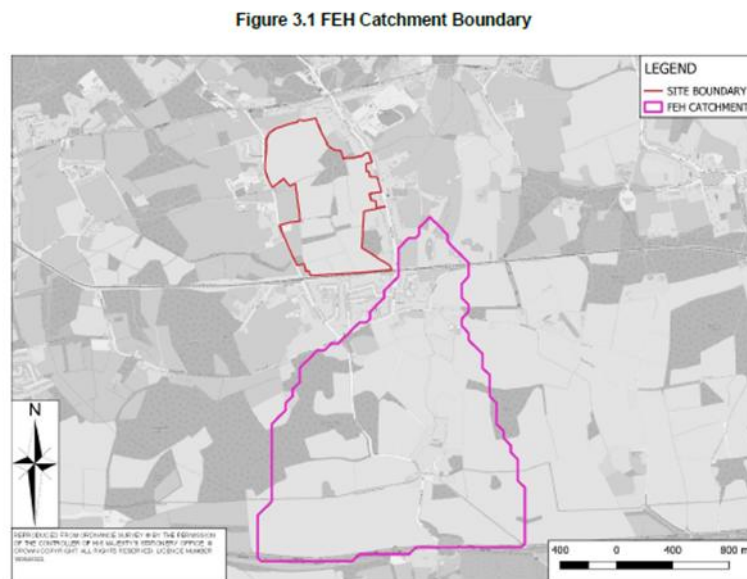
##### (a) Development Constraints

The extensive history of flooding in Normandy is a primary constraint that the developer's desktop-only approach fails to address. During typical winters, roads become impassable, and residents are forced to wade through flooded public spaces. The National Planning

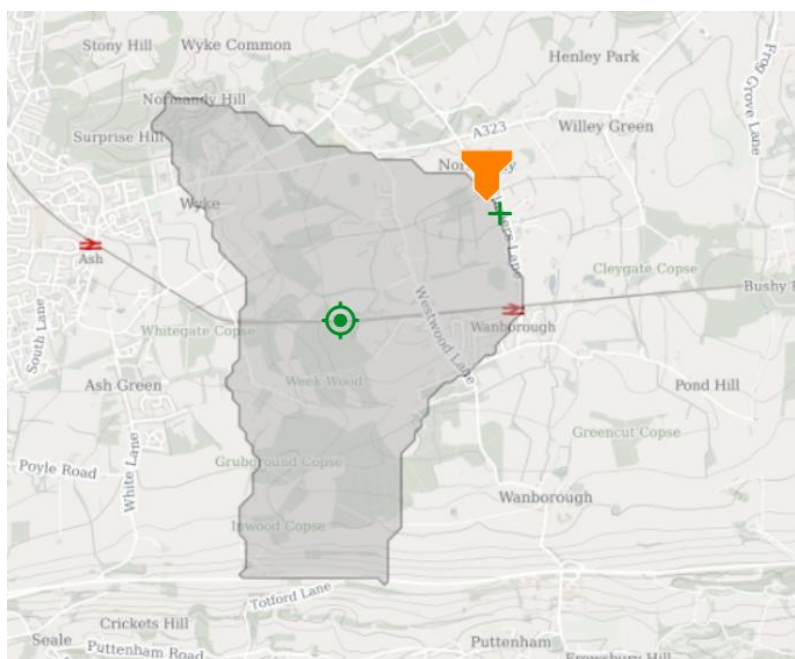
Policy Framework (NPPF) and GBC Policy P4 require development to be safe for its lifetime without increasing risk elsewhere— something that this application does not meet.

*(b) Inaccurate and Insufficient Modelling*

A review of the surface water flood modelling report suggests that the assumptions made about the amount of surface water that could enter the site from offsite should be seriously questioned. The catchment that has been used to model incoming flows is very small with some areas bypassing the site completely, and two key flow paths have been missed. This suggests that the incoming flows have been under-represented and that the flood risk at the site is even greater than currently shown. Below (Figure 3.1 in the FRA) is the catchment used by the Applicant.



Whereas this, below, is the catchment we feel is more appropriate to use. It is worth noting that this is the catchment used in the fluvial flood modelling study, so it is not unreasonable to ask why it has not been used to model surface water risk as well.



- The applicant's modelling is also critically flawed regarding fluvial flood risk. While the report claims the development is all located in low-risk Flood Zone 1, the fluvial modelling study undertaken by the developer shows that portions of the development fall within the **1-in-100-year + climate change fluvial flood extent (Zone 3)**.
- In addition, setting the floor level of buildings 300mm above the modelled flood level will potentially raise the datum height of all buildings including the four storey ones. There is no indication of the likely maximum height, nor by how much the buildings would need to be raised above the existing ground level.

*(c) Lack of Adequate Mitigation*

- **Sequential Test Failure:** Any development in Flood Zone 3 triggers a mandatory Sequential Test to prove no lower-risk sites exist, but the developer has bypassed this critical planning hurdle.
- **Flawed Compensation:** Flood compensation is not proposed for the development within the Flood Zone 3 area but the proposal does locate flood compensation storage for minor flooding on Glaziers Lane in an area that is at risk of surface water flooding. If saturated with rain, it cannot store displaced river water, inevitably pushing floods into existing properties to the south.
- **Groundwater Neglect:** Despite admitting a "potential for groundwater flooding to occur at surface", the developer offers zero monitoring or mitigation.

### **3. Surface Water Drainage: Insufficient and Non-Compliant**

*(a) Inaccurate and Insufficient Modelling*

- **Under-designed Basins:** The storage basin calculations are based on very low impermeable area assumptions given that this is supposed to incorporate 10% urban creep. The basins should also take account of soft landscaping areas that could discharge into them considering the impermeability of the underlying soils..
- **Discharge Rates Discrepancies:** The proposed discharge rates on the drainage drawing do not match those in the table provided. Is the developer discharging back to the Qmed rate or the QBar rate? It is not clear or consistent.
- **Ignoring LLFA Requests:** The developer has not conducted the "intrusive ground investigations" explicitly requested by Surrey County Council (SCC) during a pre-app meeting, relying instead on desktop information.
- **Significant increase in discharge volumes:** The calculated increase in the volume of water leaving the site is considerably higher than the existing volume: a 67% increase for the 1in100yr plus climate change event

*(c) Breach of National SuDS Standards*

- **SuDS Hierarchy Violation:** The strategy dismisses infiltration in the northern section despite identifying permeable Bagshot Sand Formation in that area, a direct breach of Policy P11 and Standard 2 of the National SuDS Standards.
- **Standard 2 Non-Compliance:** There is no evidence demonstrating how the first 5mm of rainfall will be captured and stored.
- **Maintenance of Ditch network.** Surface water drainage would be dependent on the capacity of the ditches network. This would need to be maintained for the life of the development, but there is no mention of who would be responsible in financial and practical terms.

- **Connectivity Failure:** Downstream connectivity of the local ditch network remains unproven, raising the risk of increased flood depth for the wider village.

#### 4. Foul Drainage: Infrastructure Strain

##### *(a) Development Constraints*

The village of Normandy already suffers from a severe capacity deficit. Thames Water has formally concluded in its comments both on this application and on previous ones, that there is **insufficient capacity** in the current network to accept flows from 950 additional dwellings.

##### *(b) Insufficient Modelling*

Modelling for infrastructure upgrades is typically based on "dry weather flows". This is an inaccurate baseline for Normandy, where existing properties already discharge surface water into the foul network, causing it to surcharge and overflow during every significant rainfall event.

##### *(c) Lack of Adequate Mitigation*

- **Pollution of High-Sensitivity Watercourses:** The site's watercourse has a Water Framework Directive (WFD) rating of 'high'. Any surcharging from the development will discharge raw sewage into a sensitive ecological environment.
- **Absence of Binding Upgrades:** The proposal offers no guarantee that the necessary sewer upgrades will be completed before the houses are occupied, threatening to exacerbate the raw sewage overflows already experienced by existing residents.

#### 5. Conclusion: Summary of Incompatibility

The following table summarises the developer's failure to meet the required flood risk and drainage requirements and standards:

| Policy / Feature              | Requirement / Existing Condition                          | Developer Failure                                                                                                                            |
|-------------------------------|-----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Modelling Inaccuracies</b> | The flood risk at the site should be accurately modelled. | <b>Inaccuracies in the surface water flood modelling, omitting existing flow paths and catchments that impact the site.</b>                  |
| <b>Sequential Test</b>        | Mandatory for development in Flood Zone 3.                | <b>Omitted</b> ; developer claims it is not required despite their flood modelling and mapping showing development in the Flood Zone 3 area. |
| <b>Groundwater</b>            | Intrusive monitoring and mitigation required.             | <b>No intrusive testing</b> ; provided zero mitigation for admitted "at surface" flooding risk.                                              |
| <b>SuDS Priority</b>          | Must follow drainage hierarchy (Infiltration first).      | <b>Dismissed infiltration</b> in permeable northern zones without site-specific testing.                                                     |
| <b>Drainage Connectivity</b>  | Prove downstream ditch capacity.                          | <b>No evidence provided</b> despite formal requests from Surrey County Council.                                                              |

|                           |                                              |                                                                                      |
|---------------------------|----------------------------------------------|--------------------------------------------------------------------------------------|
| <b>Foul Sewer Network</b> | Insufficient capacity for 950+ new homes.    | Network is <b>already surcharging</b> ; Thames Water confirms zero current capacity. |
| <b>SuDS Standard 2</b>    | Capture and store the first 5mm of rainfall. | <b>No drawing or technical proof</b> provided to demonstrate compliance.             |

**Final Determination:** By failing to provide a strategy based on physical site testing and comprehensive modelling, Taylor Wimpey has not demonstrated that the site is safe or sustainable. The development poses an unacceptable risk to both future occupants and the existing community of Normandy and Flexford. **The application should be refused on the grounds of non-compliance with the NPPF paras 170-182, GBC Policies P4 and P11 and the National SuDS Standards.**

## Planning Application 25/P/01725: Normandy Action Group Objection

### Appendix D: Ecological Impact of Proposed Development

#### 1. Executive Summary

The proposed development of up to 950 dwellings on land at Normandy and Flexford represents a significant threat to the ecological integrity of the local landscape. While the developer claims compliance with nature conservation policies, a critical analysis reveals substantial underestimations of habitat value, realistic threats to Ancient Woodland and Ancient and Veteran Trees, and a failure to meet the required 20% Biodiversity Net Gain (BNG) on-site. The proposal risks fragmenting critical wildlife corridors and placing unsustainable pressure on designated sites.

#### 2. Irreplaceable Habitats: Ancient Woodland and Veteran Trees

The site contains and is bordered **Irreplaceable Habitats: Ancient Woodland and Veteran Trees** by four parcels of Ancient and Semi-Natural Woodland (ASNW), including Walden's Copse, Shard Copse, and Pussey's Copse. Ancient woodland is an **irreplaceable habitat**, and paragraph 193(c) of the NPPF states that development resulting in its loss or deterioration should be refused unless wholly exceptional reasons exist. No such exceptional justification has been demonstrated.

- **Direct Removal of High-Value Trees:** The Arboricultural Impact Assessment confirms the removal of 23 trees of individual distinction to facilitate the Glaziers Lane access, including one Category A English Oak and eight Category B Oaks. Category A trees are defined under BS5837 as high-quality trees with a life expectancy of 40+ years. Their removal represents a significant adverse impact.

There is little evidence within the submitted BS5837 schedule to demonstrate why the eight Category B boundary Oaks do not in fact meet Category A criteria, particularly given their maturity, prominence and collective landscape value. The grading distinction appears insufficiently justified. The assertion that their loss is "unavoidable" reflects a chosen access alignment rather than environmental necessity, contrary to the avoidance-led principles of BS5837.

- **Buffer Zone Encroachment:** Although a 20m buffer is proposed (+/-10), Forestry Commission guidance makes clear that 15m is only a minimum starting point and that developments of this scale should provide **at least 30m of high-quality buffer**. The scheme places housing, link roads, drainage infrastructure and 3–4 storey buildings immediately adjacent to woodland edges. The building of 4 story buildings on clay will need to use significant piling which could damage roots directly and through vibrations. This proximity also creates recognised "edge effects", including hydrological alteration, light spill, shading conflict, soil compaction and recreational pressure. Under NPPF 193(c), deterioration alone is sufficient grounds for refusal.
- **Survey Deficiencies:** Local Plan Policy P6 requires proper survey and identification of ancient woodland and associated features. The documentation identifies woodland parcels but does not demonstrate a comprehensive survey of internal woodland characteristics, including Veteran Trees and Ancient Woodland indicators. Concerns regarding the topography of the land and the hydrological impacts of upslope development on Walden's Copse are significant and have not been adequately surveyed or modelled at woodland-edge level. Given the site's valleys, drainage corridors and

engineered attenuation strategy, the probable alteration of moisture regimes presents a foreseeable risk of deterioration to this irreplaceable habitat. Without woodland-specific hydrological assessment, the planning authority cannot lawfully conclude that deterioration will be avoided.

- **Long-term Integrity:** Ancient Woodland ecosystems depend on stable microclimatic conditions. A 20m buffer does not provide sufficient resilience against incremental degradation over time. Housing directly backing onto woodland buffers introduces predictable long-term pressures: garden encroachment, informal access, pruning requests and artificial lighting. Encircling these irreplaceable habitats with housing and substantially increasing human activity is likely to result in dog fouling, littering, and other forms of human disturbance encroaching into the woodlands, placing wildlife and biodiversity at risk. These areas also require continuing protection from fireworks and bonfires.
- **Conclusion:** The proposal removes high-value trees, provides substandard buffers for a development of this scale, fails to justify the downgrading of boundary Oaks, and introduces foreseeable hydrological and edge-effect deterioration risks to irreplaceable habitats. In the absence of wholly exceptional reasons, this conflicts directly with NPPF paragraph 193(c) and weighs strongly in favour of refusal.

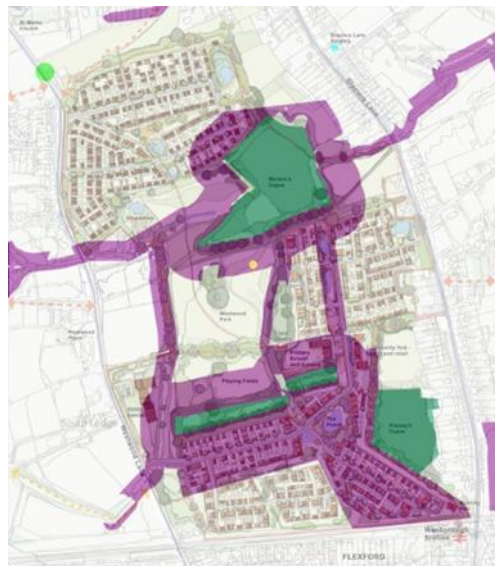
### 3. Failure to Achieve Mandatory Biodiversity Net Gain

The developer's own assessment acknowledges a significant failure to meet on-site biodiversity targets as required by Policy 7 of the Guildford Borough Local Plan. These require a gain of 20%.

- **On-site Deficit:** The proposal results in an on-site net loss of -14.88% Habitat Units and -1.56% Watercourse Units with only a net gain of +14.22% Hedgerow units which is all significantly under the 20% BNG requirement.
- **Reliance on Off-site Offsets:** The developer intends to use "surplus units" from the Follyhatch SANG to reduce this loss, yet even with these off-site BNG calculation, a net Habitat Unit loss of -4.03% against the 20% target remains, as does the -1.56% loss of Watercourse units.
- **Methodological Weaknesses:** Independent critiques suggest the BNG assessment is "methodologically weak" and "overly optimistic". It is argued that the baseline value of the site is underestimated—for instance, by excluding watercourse modules for ditches—thereby inflating the potential for "gain".
- **Surrey Nature Recovery Strategy:** The Surrey Nature Partnership (SNP) has designated large areas of the site as significantly important to Biodiversity, with the southern two thirds of the site included in the Thames Basin Lowlands Biodiversity Opportunity Area (TBL01 indicated in brown in the image below, mapped onto the proposed development) which is barely referenced by the Developer. This calls into question why the developer has not tried to meet the BNG requirements on-site.



- The SNP have also suggested that the areas around and between the Ancient Woodlands and watercourses could become significantly important to biodiversity (shown in purple in the image below). This further highlights the inappropriate nature and scale of the development.



#### 4. Impact on Protected and Notable Species

The development site supports a number of high-value species that will be disrupted by habitat loss and fragmentation.

- **Rare Bat Assemblage:** The site supports the nationally rare Barbastelle bat, recorded with "high regularity" (28 out of 35 nights). Critics argue this indicates Regional rather than just "County" level importance and that the developer has not quantified the severe impacts of street lighting on these light-sensitive species.

- **Bird Populations:** The site hosts confirmed breeding of 18 species and recorded presence of others including Barn Owl, Skylark, and Woodcock. Labelling these as being of only "Local importance" is seen as a significant understatement of the site's ecological value.
- **Species "Scoped Out":** Various experts suggest the developer prematurely scoped out species such as Dormouse and certain invertebrates (e.g., Stag Beetle) despite the presence of suitable habitat such as ancient woodland and deadwood.
- **Closing Wildlife Corridors:** The provision of the neighbourhood centre, primary school and spine road in a narrow gap between two areas of Ancient Woodland will add significant human activity to an area which must be protected for wildlife activity, as shown in the image below:



## 5. Inadequacy of SANG as Mitigation

The Follyhatch Suitable Alternative Natural Greenspace (SANG) is intended to draw recreational pressure away from the Thames Basin Heaths Special Protection Area (SPA) but presents its own ecological risks.

- **Pressure on Adjacent Areas:** The SANG may inadvertently create ecological pressure on the adjoining Wyke Wood and Catherine Frith SNCIs through high footfall, dog walking, and nutrient enrichment.
- **Connectivity Loss:** Culverting of streams and ditches for internal site access is inherently damaging to ecological connectivity, a loss not fully quantified in the developer's assessment.

## Conclusion: Summary of Policy Incompatibility

The following table summarizes the primary areas where the development proposal conflicts with the Guildford Borough Local Plan (GBLP) and national guidelines.

| <b>Policy / Requirement</b>                         | <b>Proposal Status</b> | <b>Primary Incompatibility [Citations]</b>                                                                                           |
|-----------------------------------------------------|------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| <b>GBLP Policy P6</b><br>(Protecting Habitats)      | <b>Non-Compliant</b>   | Proposes removal of irreplaceable Category A/B trees and fails to provide adequate functional connectivity between woodland parcels. |
| <b>GBLP Policy P7</b><br>(Biodiversity Net Gain)    | <b>Non-Compliant</b>   | Fails to achieve the mandated 20% on-site gain; acknowledges a -14.88% on-site habitat unit loss.                                    |
| <b>NPPF Para 193(c)</b><br>(Irreplaceable Habitats) | <b>Challenged</b>      | Direct tree loss and buffer encroachment on Ancient Woodland; "wholly exceptional reasons" for such losses have not been proven.     |
| <b>Watercourse Integrity</b>                        | <b>Non-Compliant</b>   | Proposes culverting of streams and ditches, causing inherent damage to ecological connectivity.                                      |
| <b>Species Protection</b><br>(Bats/Birds)           | <b>Understated</b>     | Potential for significant harm to rare Barbastelle bats and Barn Owl roosts through fragmentation and unquantified lighting impacts. |

The cumulative evidence suggests that the proposed development prioritizes housing density over the long-term survival of the local ecosystem. The irreversible damage to ancient woodland, the failure to meet BNG targets, and the potential displacement of rare species constitute strong grounds for refusal.

## Objection to Planning Application 25/P/01725: Land at Normandy and Flexford

### Appendix E: Detailed Objections on Heritage, Design, and Structural Integrity

#### 1. Introduction and Core Policy Conflict

This formal objection is submitted regarding the proposed residential-led development at Normandy and Flexford. From a review of the applicant's Built Heritage Statement, Archaeological Desk-Based Assessment, and Design and Access Statement, it is evident that the proposal represents a significant and demonstrable conflict with the **Guildford Borough Local Plan (GBLP)** and the **National Planning Policy Framework (NPPF) 2024**.

Specifically, the development fails to meet the requirements of **Policy D3 (Historic Environment)**, which mandates that development must sustain and enhance the significance of heritage assets, and **Policy D4 (Local Distinctiveness)**, which requires a positive response to the history and character of a place. The scale of the proposal - introducing up to 950 homes into a sensitive rural fringe—threatens to erode permanently the communal and historic identity of Normandy.

#### 2. Harm to Built Heritage: The Underestimation of Significance

The applicant's heritage assessment acknowledges that the development will cause "less than substantial harm" to several Grade II listed assets, including **Glaziers, Halsey Cottage, Great Westwood, and the Westwood Place group**. However, this objection contends that the degree of harm has been systematically understated and that there is no appropriate mitigation.

- **Failure of the "Already Compromised" Argument:** The applicant argues that **Glaziers** is less sensitive to change because its setting is already "suburbanised" to the north, east, and south. This is a flawed application of policy. The NPPF does not permit cumulative erosion simply because past harm has occurred. In fact, the remaining open western rural setting of **Glaziers** is its *most* significant attribute, as these adjoining fields historically provided the backdrop for this 16th-century farm cottage. This is important to understanding its agricultural origins and subsequent development. The open land also preserves the historic spatial relationship between **Glaziers** and **Westwood Place**, maintaining the legibility of the former estate landscape. This setting is therefore integral to the asset's significance in NPPF terms.
- **Harm to Grade II Listed Asset: Glaziers** is prominently experienced from the public footpath known as The Avenue, where it has long been viewed within an open rural context. The introduction of substantial built form into this setting would reduce openness, alter key views, and result in harm to the listed building's significance through change to its setting. Paragraph 205 of the NPPF requires that great weight be given to the conservation of designated heritage assets. Where harm is assessed as less than substantial, paragraph 208 requires that harm to be weighed against the public benefits of the proposal. In applying that balance, Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires special regard to be had to the desirability of preserving the listed building and its setting. As established in *Barnwell Manor Wind Energy Ltd v East Northamptonshire DC* [2014], this means that considerable importance and weight must be given to the preservation of a listed building and its setting in the decision-making process.
- **Loss of Historic Isolation: Glaziers** is recognized as an "historically isolated farmhouse". The introduction of 4-storey buildings in the field immediately adjacent (approximately 100m away) would permanently destroy this isolation and the building's historic legibility as an agricultural asset.

- **Impact on the Westwood Estate Parkland:** The central part of the site formed the 19th-century parkland for Westwood Place. While the applicant proposes a "Central Community Meadow" to reflect this, the surrounding high-density housing will transform this historic landscape into an urbanized park, stripping away its character and significance as a private, distinctive, estate setting.

### 3. Inappropriate Design and Scale

The proposed design parameters are fundamentally incompatible with the prevailing character of Normandy, a village primarily composed of single-storey bungalows and two-storey houses with substantial outdoor space.

- **Impact on 'Place':** We understand that to an extent 'good' design is subjective, but our objection is strictly limited to the impact of the proposed masterplan and buildings designs on the preservation of long-standing character of place and heritage maintained by respecting local plan-led policies and design frameworks.
- **Urbanization of Rural Corridors:** The transformation of "The Avenue"—an historic footpath and the only surviving landscape feature of Westwood Place's park, lined with Ancient and Veteran oaks connecting Glaziers to Westwood Place—into an urban corridor between housing blocks is a direct violation of Policy D4. The experiential setting of this historic movement through the landscape will be lost to engineered roads and residential clusters.
- **Excessive Height and Density:** The proposal includes building heights of up to 4 storeys (at least 16m to the ridge line). There are no buildings of this scale in Normandy or Flexford; the nearest equivalents are located miles away at the Royal Surrey Research Park or Aldershot. Such "excessive height, scale and bulk" was recently cited by Guildford Borough Council in the refusal of application 25/P/00635 at Slyfield, a precedent that should be applied here.
- **Disproportionate Scale:** The proposed development is fundamentally out of scale with the established rural character of Normandy and Flexford. The height, density and massing — including multi-storey elements without local precedent — would introduce a suburban form of development into what is a low-rise village settlement with limited services and infrastructure. The scheme's reliance on **Westwood Place** as a precedent misrepresents the prevailing character of the area. This conflicts with NPPF paragraph 135 (design and local character) and paragraph 205 (Green Belt openness and purposes) of the December 2024 Framework. At a local level, it is contrary to Guildford Local Plan Policy D1 (Place Shaping), which requires development to respond to local character and landscape setting, and Policy P2 (Green Belt), which seeks to protect openness and prevent urban sprawl.
- **Environmental Harm:** The application also fails to demonstrate that it can be delivered without unacceptable environmental and amenity harm. There is insufficient clarity regarding construction phasing and the extent of temporary works areas, particularly in relation to the Ancient Woodland buffer. The proposed cut-and-fill strategy lacks robust technical justification, with missing sections and limited evidence that the built form would follow natural land contours or avoid flood risk implications. In addition, there is inadequate visual assessment to demonstrate that overlooking and loss of privacy from taller buildings would not occur. These shortcomings conflict with NPPF paragraphs 135 and 140 (design quality and amenity) and paragraphs 165–175 (flood risk and environmental protection), as well as Guildford Local Plan Policies D1 (design), D2 (sustainable design and construction), and P5 (flood risk).

- **Safety Concerns:** Finally, the siting of the proposed 5,000 sqm SEND school adjacent to Westwood Lane raises significant highway safety concerns, with likely congestion and unsafe traffic conditions at the site access. The scheme does not demonstrate safe or suitable access for all users, contrary to NPPF paragraph 115 (highway safety) and Guildford Local Plan Policy ID3 (Sustainable Transport). Taken together, the proposal would result in the urbanisation of a rural village location within the Green Belt, causing harm to openness, local character, residential amenity, environmental quality and highway safety, in conflict with both national and local planning policy.

#### 4. Technical Risks to the Fabric of Listed Buildings

Beyond visual "setting" impacts, the development poses direct, unassessed, risks to the physical fabric of 16th-century structures, particularly **Glaziers**, not considered in the application.

- **Hydrological and Flooding Risks:** Lived experience and topographic surveys confirm the fields behind **Glaziers** experience seasonal surface water flooding for 3–4 months annually. The applicant's flood modelling is uncalibrated to these real-world events. Replacing permeable agricultural land with roughly 19.2ha of impermeable surface will likely surcharge existing ditch systems, leading to direct moisture damage and flooding of listed assets with shallow historic foundations.
- **Vibration and Piling Damage:** The London Clay geology of the site will almost certainly necessitate piling for 4-storey structures. For a 16th-century timber-framed building like **Glaziers**—which lacks modern reinforced foundations and sits only 5m from the road—piling vibrations and the resulting redistribution of moisture regimes represent a severe structural threat. No heritage-specific vibration or structural assessment has been provided to mitigate these risks.

#### 5. Archaeological Inadequacy

The Archaeological Desk-Based Assessment concludes a "low potential" for the presence of as yet unknown Roman archaeology. With the Roman road between Winchester and London postulated to run east-west across the southern third of the site, this conclusion is premature and risks loss or damage to potentially important heritage assets.

- **Risks to an unlocated Roman road of regional and national significance:** The Environmental Statement says that drone and magnetometry surveys of the Site identified no significant archaeology, with no evidence of a linear feature of metalling and flanking ditching suggesting the presence of a Roman road. Yet, the findings of the geophysical survey undertaken for the applicant by SUMO, conclude that several linear anomalies and trends have an uncertain origin and that, in particular, one linear trend shares an approximate location and alignment with the possible Roman road. The section of the road found at Cleygate Farm had deteriorated and only became clear on excavation, and archaeological features on London Clay are notoriously difficult to detect via magnetometry.
- **Likelihood of missing important material:** The applicant considers that the potential impact of construction on the possible Roman road is negligible as the route is in the open, central section of the site, unaffected by development. The condition they suggest is a focussed programme of post-planning archaeological excavation of the area of effect (the would-be crossing point of the possible Roman road with the north-south road). Archaeologists from the Surrey Archaeological Society who excavated the nearby stretch of road at Cleygate Farm have identified two possible routes, covering a broader part of the Site as shown on the map below. Restricting excavation to the suggested area of effect creates a high likelihood of missing important archaeological material.



## Summary Table of Objections

| <b>Objection Category</b>     | <b>Key Issue</b>                                                                                        | <b>Policy/Statutory Conflict</b>                              |
|-------------------------------|---------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| <b>Built Heritage Setting</b> | Underestimated harm to Glaziers and Westwood groups; loss of historic isolation and parkland context.   | NPPF Para 213-215; GBLP Policy D19; Section 66(1) of 1990 Act |
| <b>Design &amp; Character</b> | Introduction of 4-story buildings (14m) and high density into a village of bungalows and 2-story homes. | GBLP Policy D4; National Design Guide; GBLP Policy D1         |
| <b>Structural Integrity</b>   | Piling vibrations on London Clay and unassessed flooding risks to 16th-century shallow foundations.     | NPPF Para 207; GBLP Policy D18 (Adequate information)         |
| <b>Hydrology</b>              | Loss of 19.2ha of permeable land; uncalibrated flood models ignoring documented seasonal ponding.       | NPPF Para 193; GBLP Policy D5                                 |
| <b>Archaeology</b>            | Risk of destroying unrecorded Roman remains and the postulated Winchester-London Roman road.            | Ancient Monuments Act 1979; GBLP Policy D21                   |
| <b>Communal Value</b>         | Loss of local landmarks and the shared identity of Normandy as a dispersed rural community.             | Historic England GPA Note 2; GBLP Policy D3                   |