



28 August 2026

Ms. Jessica Riches, Case Officer
Planning Department
Guildford Borough Council
Millmead House
Millmead
Guildford
GU2 4BB
By email

Dear Ms Riches,

**Re: Planning Application 25/P/01725 (Land off Glaziers Lane, Normandy):
Supplementary Objection from the Normandy Action Group**

We write further to our detailed objection of 28 February 2026 to the above application, and in response to the Applicant's re-submission and covering letter from Savills dated 13 July 2026 (the Covering Letter). We have carefully reviewed the latter, the accompanying suite of revised technical documents, and the Applicant's Amended Statement of Community Involvement (SCI) dated July 2026. Having done so, we conclude that the substance of our original objection has not been addressed. **We therefore reaffirm our opposition in the strongest possible terms to Taylor Wimpey's proposals.**

We have also now considered the revised National Planning Policy Framework (NPPF) published on 17 August 2026, which replaces the December 2024 version against which our original objection to the application was prepared. This supplementary objection is updated accordingly, using the new policy numbering. As the applicant has reserved the right to comment further in the light of the NPPF changes, we likewise may wish to submit a further objection in response should they do this.

Preliminary Observation: The Applicant's Failure to Engage with Our Objection

We ask the Council to note, as a preliminary and material matter, that the Applicant's response to our submission (Covering Letter section 3.6) does not engage with the substance of our objections. Each of our six summarised grounds is met with a single, cursory, cross-reference to a response given to a different consultee - Normandy Parish Council, the Lead Local Flood Authority, the Environment Agency, or Thames Water - rather than a direct answer to the detailed evidence and analysis set out in our five technical appendices.

None of our appendices is referenced or rebutted anywhere in the Covering Letter. Our original submission comprised five technical appendices totalling over 30 pages, prepared with input from members of our group who possess relevant professional expertise in planning, ecology, hydrology, transport, and heritage. We do not consider the Applicant's generic, cross-referential, response to constitute adequate engagement with a formal objection of this substance. We ask the Council to weigh this failure of engagement in its assessment of whether outstanding technical concerns have genuinely been resolved.

We turn now to our substantive objections to the latest proposals, which are grouped under the following headings:

1. The "Grey Belt" Classification Remains Unsubstantiated
2. The Application Fails the 'Well-Connected Station' Exception Test
3. The Application Contravenes the "Golden Rules" of Grey Belt Development
4. The Section 106 Affordable Housing Provision Is Not Guaranteed
5. The Developer's "Sustainability" Case Rests on Unfunded Assertions Regarding the Transport Infrastructure
6. Specific Factual Errors in the Active Travel Infrastructure Audit Remain Uncorrected
7. Unacceptable Risks to Foul Sewerage Infrastructure Remain
8. Flood Risk: Procedural Reframing, Not a Safety Demonstration
9. The Case for "Very Special Circumstances" Has Not Been Made
10. Biodiversity Net Gain Commitments Suggest that the Development is too Intensive for the Land
11. Deficient Ancient Woodland Buffers - Inadequate Protection for Irreplaceable Habitats
12. Scale and Character Remain Alien to the Village
13. Heritage and Archaeological Harm Substantially Unaddressed
14. Serious Deficiencies of Public Engagement
15. The Application is Premature and Must Be Part of a Local Plan Process

1. The "Grey Belt" Classification Remains Unsubstantiated

Our Original Position (Appendix A, Section A): We argued that the Land should not be identified as Grey Belt because it made a strong contribution to Green Belt Purpose (b), sitting as it did between the Ash/Tongham and Guildford urban areas, occupying approximately 14% of the straight-line distance between them. At 59 hectares and with 950 dwellings proposed, we argued that it was comparable in size to the strategic sites identified in the Guildford Local Plan.

The Applicant's Response: The Covering Letter states, at paragraph 1.46, that the Applicant's "position on the Site's merits as Grey Belt remains unaltered" and that the Fabrik Green Belt Assessment "remains unchanged." No attempt has been made to address our arguments.

Our Supplementary Position: In the meantime, the Council has considered Planning Application 25/P/01521 for the proposed Shortlands Farm development. The Officer's Report for the GBC Planning Committee (24 June 2026) argued that *"The presence of Wyke Avenue and the housing development on the eastern side...and opposite the site on the northern side of Guildford Road, and with the delivery of allocations to the west of the application site, would mean that the site could be considered as an infill of a gap in the built area."* On this basis we revise our position as follows:

The Land sits between Ash/Tongham and Guildford urban areas: 1.2km 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. The Land is 59ha in area and approximately 0.75km at its widest point, representing **16.4%** of the straight-line distance between the easternmost urban edge of the Ash/Tongham and the proposed westernmost urban edge of Guildford area. **This increase is the size of the Ash/Tongham built area strengthens our existing assessment that the Land contributes strongly to Green Belt purpose (b).**

Under the December 2024 NPPF we also relied on footnote 7, where land was excluded from consideration as Grey Belt where the policies protecting habitats, flood risk and National Landscapes provided a strong reason for refusing or restricting development. We note that the published NPPF does not reproduce that exclusion: Grey Belt is now defined in Annex B solely by reference to whether the land strongly contributes to Green Belt purposes (a), (b) or (d), to be assessed in accordance with Annex E.

However, we continue to maintain that the Land is not Grey Belt because of its strong contribution to Green Belt purpose (b). Although GBC's recently concluded Green Belt Assessment has identified most of the areas comprising the site as either Grey Belt or potentially Grey Belt, this does not address the situation where a site of this scale is being considered for development. The decision cannot rest on an aggregation of all the separate elements which have been assessed for their individual contribution; **the site as a whole needs to be assessed in the round.**

In addition, as the Government has made clear in its response to the consultation on the NPPF, the habitat, flood-risk and National Landscape matters on which we relied (now expressed in the NPPF as Policies N4(4), N6(2), and F4-F7) remain decisive as separate decision policies.

We also remind the Council that GBC's own prior determination (2017) found the site **unsuitable for development on Green Belt sensitivity grounds** - not, as the Applicant has previously suggested, because development could be accommodated elsewhere. This status has not changed. The site acts as a "keystone" in the Green Belt between Ash/Tongham and Guildford; its loss would set a dangerous precedent for the surrounding sites identified as "discounted" in GBC's 2025 Land Availability Assessment. Approving this application would allow for future developments built out from an enlarged Normandy/Flexford, and would therefore **fundamentally undermine the purposes of the Green Belt** across the area of the plan, in direct conflict with Policy GB7(1)(g)(i).

2. The Application Fails the ‘Well-Connected Station’ Exception Test

We anticipate that the Applicant may now seek to rely on Policy GB7(1)(h), which treats residential development within walking distance of a "well-connected station" as not inappropriate in the Green Belt. We invite the Council to scrutinise each requirement of that policy, as follows:

- (i) **"reasonable walking distance"** (defined in Annex B as being about 800 metres or 10 minutes' walk) is met by only part of a 950-home site, and then only if an access point to the northern platform is created, for which there are no firm plans.
- (ii) the development must be **"physically well-related"** to the station or its settlement, which, equally, most of it is not: only the southern parcels close to the railway line could reasonably fit that definition;
- (iii) it must be **"of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure"** - which is plainly not demonstrated: see Sections 5 (Transport Infrastructure) and 7 (Sewerage) below.
- (iv) it must **"not prejudice any proposals** for long-term comprehensive development"; see our prematurity objection in Section 15 below.

In other words, even if the narrow definitional test of a "well-connected station" is met, the wider infrastructure and other requirements set out in NPPF Policy GB7(1)(h) are not. We therefore submit that **this remains 'inappropriate development in the Green Belt' and that the application still must pass the test of "very special circumstances"** as per NPPF Policy GB6.

3. The Application Contravenes the "Golden Rules" of Grey Belt Development

The published NPPF's Golden Rules (Policy GB8) are not discretionary - they are conditions that should be satisfied for major housing on Green Belt land to be considered acceptable. The developer's reliance on unsecured infrastructure commitments and future S106 negotiations does not satisfy these rules. As the Minister for Housing has confirmed, the Government's intention is to move away from the *"haphazard and chaotic"* release of Green Belt land seen under the previous Administration. This application represents precisely that approach - speculative, uncoordinated, and infrastructure-deficient.

The Golden Rules stipulate that the following contributions should be made:

a) Affordable housing: The papers submitted by the Applicant cast doubt on the prospect that the full 50% affordable housing will ever be delivered. See section 4, below.

b) Necessary improvements to local and national infrastructure: As we will demonstrate in sections 5, 6, 7, and 8 below, critical infrastructure improvements - foul drainage for 950 dwellings, station access improvements, flood compensation works, highway improvements - remain unsecured. The applicant claims that Thames Water has confirmed capacity for only the first 100 dwellings (but see section 7, below). Network Rail has no funded plans for station improvements for at least 20 years. Bus operators have confirmed they will not extend services into the site. There is no proposed solution for the acknowledged major pinch point of the road

junctions between Wanborough Hill, the B3000, and the A31, with the potential for huge traffic jams leading into and out of the area. This is not evidence of "necessary improvements" - this is a wish-list of promises with no guarantee that they will be fulfilled.

c) The provision of new green space, or improvements to existing green space, which is accessible to the public. Much of the onsite green space is undevelopable due to flood risk and Ancient Woodland. The proposed SANG still lacks a proper SAMM, is inadequately accessible from the site, and will therefore result in increased road traffic. The SANG is closer to recent housing developments in Ash than it is to the proposed development, raising the risk of overuse and deterioration.

We continue to maintain, therefore, that **the Golden Rules have not been satisfied**, and that the Council should refuse the application on these grounds given the negative weight given to this in the planning balance.

4. The Section 106 Affordable Housing Provision is Not Guaranteed

The draft Section 106 Heads of Terms raises the possibility of there being insufficient local demand to fill the required 50% affordable housing, providing the option for Taylor Wimpey to make a financial contribution in lieu of what is not provided. The 50% affordable housing is a fundamental requirement for Grey Belt development under Policy GB8(1) of the published NPPF (the 'Golden Rules'). If the affordable housing is not delivered on-site, the development fails the Golden Rules, which were deliberately included by government to ensure that the benefits of developing in the Green Belt were such as to outweigh the harms.

This is not a minor technical point - it goes to the heart of whether the development can legitimately be considered "not inappropriate" in the Green Belt. Policy GB8(4) now makes clear that contributions significantly below those stipulated by the Golden Rule relating to affordable housing "will only be acceptable in **exceptional cases where fully evidenced and justified**". The Council should require a binding commitment to deliver the full 50% affordable housing on-site, without any fallback financial contribution, before any grant of permission can be contemplated.

If the problem is that 80% of market rate in this area is not actually affordable, then the developer is pricing out those in need of genuinely affordable homes, and the rationale for development on this sensitive Green Belt site falls away.

In addition, if 50% affordable housing can only be achieved through high-density blocks of flats up to three storeys near the station, this creates direct conflict with Local Plan Policies D1 and D4, and NPPF Policy DP3 requiring development to respond to local character: see section 12 below.

5. The Developer's "Sustainability" Case Rests on Unfunded Assertions Regarding the Transport Infrastructure

Our Original Position (Appendix B): We submitted that the developer had failed to prove that the location was sustainable. The proximity to Wanborough Station was used as a superficial justification for sustainability, but we pointed out that the station is one of the least-used stations

in Britain, and that Network Rail had explicitly stated they had no plans for station improvements for at least 20 years. We also identified specific factual errors in the Active Travel Infrastructure Audit (see section 6 below).

The Applicant's Response: The Covering Letter (e.g. sections 1.25, 2.19, 3.3) asserts that the site is in a sustainable location, citing the frequency of trains (two per hour) and the proposed new northern access to Wanborough Station. The Transport Assessment Addendum provides updated modelling, and claims that the Applicant is engaging with Network Rail on station improvements. Active Travel England's recommendations are noted but several are explicitly declined as "disproportionate."

Our Supplementary Position: As noted in section 2, above, the Applicant is likely to characterise Wanborough as a "well-connected station" under the new NPPF definition (a station in a top 80 Travel-to-Work Area served by at least two trains per hour in each direction). Even if that definitional test is met, it does not establish that this is a sustainable location under Policy TR3, nor that the scheme satisfies the other requirements of Policy GB7(1)(h). The definition turns solely on timetable frequency and the size of the travel-to-work area; it says nothing about whether the infrastructure on which a significantly increased population would depend - roads, station accessibility, safe active travel (and sewerage, see section 7 below) - can genuinely accommodate 950 additional homes.

The Railway Fallacy

The Applicant's response does not engage with the specific evidence in our Appendix B: [Wanborough's ranking](#) as **1,593rd of 1,772 stations** nationally by passenger-to-service ratio, an average of only **2.43 passengers per service**: it is an unstaffed halt with short platforms, on a branch line. This is a good indicator of the likely use of the railway by the inhabitants of any new development. Unsurprisingly, discussions with Network Rail and South Western Railway have not resulted in any agreement to create an accessible station: Network Rail's stated position that it has no funded plans for station improvements for at least 20 years. The proposed new northern access is an "ongoing discussion," not a secured commitment. Even if the applicant were to meet the capital cost, there would need to be guarantees that there would be funds for regular maintenance of the lifts and replacement at the end of their useful life.

Even should the access upgrades be agreed, they have not been proposed in the first phase of development, showing that the Applicant is not serious about enabling sustainable travel from day one. The fundamental "Railway Fallacy" we identified remains unanswered.

The Applicant's lack of knowledge and understanding of this station and what it actually represents is illustrated by the fact that the Amended EIA (3) para 3.2.25 still makes the absurd claim that journey time from Wanborough to London Waterloo is 30 minutes, when in actual fact the very quickest journey possible is 50 minutes. This casual approach to the facts does not inspire confidence.

No Bus Improvements

The Mobility Hub and improved bus services are aspirations, not funded deliverables. TW's discussions with the bus company have resulted in **no bus service being extended into the site**, presumably on grounds of non-viability and additional journey times.

Transport Hub a Hollow Promise

Therefore, the proposed Transport Hub will have:

- **No buses** entering the site. In addition, the No 20 bus route between Aldershot and Guildford would only be a realistic travel option for anyone inhabiting the northern part of the proposed development site. We also note that the Applicant's proposals move the bus stop facilities further from the top of Glaziers Lane to accommodate amendments to the junction, thereby making them less attractive to would-be passengers.
- **No means for the less able to reach the 'down' (Farnham direction) platform from the site** other than the absurd suggestion (Covering letter 2.12) that access is available via Glaziers Lane – which involves a major diversion and will hardly encourage people to walk to the station to take the train. Equally, those wishing to access the 'up' platform (Guildford direction) are unlikely to make the detour into the site to do so and will continue to have to cross a footbridge with no lifts).

The Transport Hub is a hollow promise, with a café added to make it look good, not a genuine solution.

Nothing for Cyclists

The Applicant asserts that the site performs "*strongly in connectivity for cycling and public transport*," yet admits that cycling on adjacent highways can only be undertaken by cycling on the roadway - including the busy Guildford Road A323. There are no plans for improvements to Active Travel beyond the site itself. This is not a safe or attractive cycling environment, and it is not "strong connectivity" by any reasonable definition

We also note that several of Active Travel England's recommendations - including a vision-led, multi-modal transport assessment and LTN 1/20-compliant cycle infrastructure on Guildford Road - were explicitly **declined by the Applicant** (Covering Letter section 2.19). We consider it material that the Government's active travel body's advice has been only partially accepted.

The active travel 'improvements' that are proposed by the applicant are half-hearted and inadequate for the scale of the development that is proposed for this rural area. As stated above, **no cycle improvements** are proposed to integrate the development, and pedestrian improvements consist of the odd dropped kerb and tactile paving with no interest in providing appropriate infrastructure to encourage bus and train use from the very first dwelling.

No attention to road safety

The Applicant appears to have paid **very little attention to road safety**, with no Audits having been carried out to date despite the variety of accesses proposed and changes to existing junctions and infrastructure. No attention is given to the speeding issues or previous fatalities on Westwood Lane/Wanborough Hill (two in the last five years) despite the proposed 50% increase in traffic.

It is unclear how a development that adds significant levels of traffic, noise and disruption to narrow rural roads and the existing residents in this quiet rural hamlet can be considered even remotely appropriate or sustainable in the sense of the NPPF.

Unrealistic assumptions about parking

The proposal to provide parking provision at or below maximum standards to discourage multi-car ownership will instead push parking onto surrounding roads. This is not speculation - it is a predictable outcome. Surrey is a rural county where car ownership is high and public transport is limited. Residents will not be "discouraged" from owning cars; they will simply park them on Westwood Lane, Glaziers Lane, and other surrounding roads. Policy TR4 of the published NPPF requires parking provision to be appropriate to the location and its accessibility, **not used to frustrate car use in a location with no genuine alternative.**

We draw the Council's attention to recent experience of a development in Woking, where the lack of parking made selling the units very difficult and the developer, Linden Homes, needed to reapply for planning permission to increase parking provision from 1 space per unit to 2. The same scenario could easily unfold here, requiring a subsequent planning application to increase parking - but only after the damage of overspill parking has already been done to the existing community, and also fundamentally changing the parameters of the development.

Cars, cars, and more cars

The applicant's offer to undertake remedial action via a "prefunded contingency bond...to enable further off-site active travel infrastructure or directly subsidise local bus services" (Transport Assessment Addendum 2.1.3) is not a solution to the problem of increased car use. It does not limit the need for cars to get around in Surrey, nor does it prevent overspill parking on local roads. The fundamental issue is that the site is in a rural location where car use is a necessity, not a lifestyle choice. This development would put an additional ~2,000 cars on already overcrowded local roads.

The proposal therefore fails Policy TR3 (a genuine choice of transport modes) and, on the evidence of cumulative impact, Policy TR6(4): *"Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety)."*

The proposal is for a significant development in a setting where the number and length of journeys needed for employment, shopping, leisure, and education will not be minimised. Almost all of these destinations will remain in their existing locations (i.e. away from the proposed development).

In short, the Applicant has not demonstrated that this is a development in a sustainable location, as required by Policies TR3 and TR6.

6. Specific Factual Errors in the Active Travel Infrastructure Audit Remain Uncorrected

Our Original Position (Appendix B): We identified specific, factual errors in the Applicant's Active Travel Infrastructure Audit, including:

- Incorrect speed limit data: Westwood Lane and Guildford Road were stated as 30mph where the actual limit is **40mph**;
- Route lengths were shown as **100-150m shorter than reality**;

- The absence of any independent **Road Safety Audit** despite the Applicant's acknowledgement of significant additional traffic.

The Applicant's Response: None of these specific points is corrected or even mentioned in the Covering Letter or the Transport Assessment Addendum, which instead focuses on collision data and high-level modal share assumptions.

Our Supplementary Position: As these are matters of fact rather than planning judgement, the Council should require the Applicant to confirm or correct factual errors or misrepresentations before further weight is placed on the Active Travel Infrastructure Audit. A transport strategy built on demonstrably incorrect data cannot be relied upon for the purposes of policies TR3 and TR6.

7. Unacceptable Risks to Foul Sewerage Infrastructure

Our Original Position (Appendices B and C): We pointed to the fact that the existing Thames Water foul network is already under immense pressure, regularly surcharging into people's homes and the local watercourse. Thames Water had formally commented that there was insufficient capacity in the current network to accept flows from 950 additional dwellings.

The Applicant's Response: The Covering Letter (section 2.7) claims that Thames Water has agreed capacity for only the first 100 properties, and that a Grampian Condition would be attached to any permission to restrict occupation until the necessary infrastructure improvements had been made.

Our Supplementary Position: This statement by the Applicant is an admission that the scheme's foul drainage is not presently deliverable, not a demonstration that it can be made so. Given that our community already experiences regular raw sewage surcharging into properties and sensitive watercourses, introducing even 100 additional dwellings to a failing system is **reckless** and contrary to Local Plan Policy ID1. Under the published NPPF, Policies GB7(1)(h)(iii) and GB8(1)(b) require the scale of any development to be accommodated either by existing or proposed infrastructure or by necessary infrastructure improvements.

A Grampian condition deferring 850 dwellings until that capacity has been provided would be **irresponsible**. We also note that here is no mention in Thames Water's supplementary response of 17 August that they have capacity for the first 100 houses; they merely repeat the statement that "the existing foul water network does not have sufficient capacity to support the proposed development."

We ask the Council to require clear evidence of a funded, agreed infrastructure solution **at this stage**, rather than relying on a condition to resolve a matter that affects the deliverability and sustainability of the scheme as a whole.

8. Flood Risk: Procedural Reframing, not a Safety Demonstration

Our Original Position (Appendix C): We demonstrated that the Flood Risk Assessment (FRA) was critically flawed. We argued that the catchment used to model incoming surface water flows was too small, omitting two key flow paths, and consequently understated flood risk at the site. As such, the FRA did not demonstrate that the development was safe for its lifetime from surface water flood risk. The development fell within the '1-in-100-year plus' climate change

flood extent (Flood Zone 3), triggering the need for a Sequential Test, which had not been undertaken. The calculated increase in the volume of water leaving the site was up to 67% higher than existing levels, posing a severe threat to downstream properties.

The Applicant's Response: The Covering Letter (sections 2.5) states that the Applicant's position that a Sequential Test is no longer required rests on a change to national Planning Practice Guidance (PPG - 17 September 2025) which removed the mandatory trigger where a site-specific FRA sufficiently demonstrates surface water flood risk mitigation for the lifetime of the development. Section 2.6 asserts that a Flood Risk Modelling Addendum resolves the Environment Agency's concerns. The Applicant also claims (sections 3.3 and 3.7) to have provided floodplain compensation in the northeast corner of the Site for the "betterment of the local area."

Our Supplementary Position: The Minister for Housing confirmed in [Parliament](#) on 16 July 2026 (Column 466WH) that the Government had **"not weakened the sequential test in any way."** He clarified that the PPG changes were about *"clarify[ing] the triggers for the sequential test as well as its application"* - not about removing the test itself. The Minister also confirmed that *"where the sequential and exception tests have been applied as necessary and are not met, the NPPF is clear that development should not be allowed."* The published NPPF retains the sequential test (Policy F5) and the exception test (Policy F6).

We note that the Environment Agency's (EA's) letter of 29 May 2026 stated that the models used by the Applicant *"do not provide a suitable basis for assessing the flood risk outcomes associated with this application. We therefore maintain our objection dated 16 February 2026."* The letter identified **"red and amber" issues** with the hydrological model that it considered "must be addressed" (referred to in Covering Letter section 2.6). The Covering Letter asserts these have now been resolved; however we note that the EA is yet to comment on the updated fluvial flood modelling and FRA following their comments of 29th May and ask that the Council await their further comments from them before making any decision.

The re-submission also fails to address the specific critique in our Appendix C - namely, that the Flood Estimation Handbook (FEH) catchment used to model incoming surface water flows is too small, omits two flow paths, and consequently understates flood risk at the site.

We therefore maintain that it has not been demonstrated that surface water flood risk to the development is sufficiently mitigated, and as the fluvial flood modelling study shows that development is proposed within Flood Zone 3, **the sequential test is still required**. We also ask the Council to ensure the surface water flood modelling is reviewed to ensure it is fit for purpose, especially the catchment used to inform the surface water flood extents, which we argue are under-represented in the Flood Risk Assessment.

9. The Case for "Very Special Circumstances" Has Not Been Made

Our Original Position (Appendix A, Section D): We submitted that, because the development failed the sustainability and infrastructure tests, it must be viewed as "inappropriate" development in the Green Belt. Consequently, the developer would have to demonstrate "very special circumstances" under paragraph 153 of the then NPPF in order to be allowed to build on this site. We argued that no such circumstances had been demonstrated, and that the claimed

benefits (community facilities, medical facility, primary school, SEND school) were either not benefits at all, or were not within the developer's gift to deliver.

The Applicant's Response: The Applicant's response to the Surrey CPRE's objection directs the Council to a "revised Grey Belt Assessment within the Planning Statement Addendum 1" (Covering Letter section 3.8). However, paragraphs 1.8 and 1.9 of the same Covering Letter confirm that no updated Planning Statement has in fact been submitted as part of this re-submission, and that the Applicant merely "reserve(s) the right" to provide one should a revised NPPF be published. The original Planning Statement and Green Belt Assessment (Fabrik) are stated to remain unaltered (paragraph 1.46).

Our Supplementary Position: The Applicant has not provided any new evidence demonstrating Very Special Circumstances under Policy GB6(2). **The benefits/harms balancing table set out in our original Appendix A, Section D, stands unrebutted.** We note in particular that the promised SEND school - described in the Covering Letter as a "substantial benefit" - is subject to significant uncertainty. Government policy on SEND provision is evolving away from stand-alone schools towards integration into mainstream education, and the new West Surrey Unitary Council will face extreme financial constraints from day one of operation, not least because of inherited debt. The provision of these facilities, even if complemented by the provision of a nursery school in the revised proposals, cannot be regarded as constituting the "very special circumstances" required to justify building on this site. Apart from the SEND school they are only needed to serve the would-be inhabitants of this new development and **do not respond to an existing need within the community.**

We may wish to comment further should the Applicant decide to submit the promised addendum now that the revised NPPF has been published. But as things stand, 'Very Special Circumstances' have not been established.

10. Biodiversity Net Gain Commitments Suggest that the Development is too Intensive for the Land

Our Original Position (Appendix D): We observed that the proposal resulted in a net loss of Habitat and Watercourse Units against the 20% requirement of Local Plan Policy P7, and noted that the southern two-thirds of the site fell within the Thames Basin Lowlands Biodiversity Opportunity Area (TBL01), which was barely referenced by the developer.

The Applicant's Response: The Covering Letter (paragraph 1.34) confirms a post-mitigation biodiversity position (but only by incorporating the SANG) of **+25.19% Hedgerow Units, -2.52% Habitat Units, and -1.56% Watercourse Units**, with the remaining Habitat and Watercourse Unit requirements to be secured "through further offsetting and the Biodiversity Gain Plan process."

Our Supplementary Position: Since our original objection, the updated [Surrey Local Nature Recovery Strategy](#) has been published; it includes a substantial proportion of the site among "Areas that could become of Particular Importance for Biodiversity". The imperative of enhancing biodiversity on the site is thereby confirmed. However, we believe the documents show that there is a fundamental problem with the Applicant's approach to Biodiversity Net Gain (BNG), as shown by the failure to address both local and national policy requirements.

Whilst the statutory BNG regime permits biodiversity gains to be delivered off-site, Local Plan Policy P7 not only requires qualifying developments to achieve at least 20% biodiversity net gain but expressly seeks to secure maximum biodiversity gain **on site**, whilst following the **mitigation hierarchy**. Policy P6 similarly seeks to maximise biodiversity gains through the design of new development. These policies reflect the principle that ecological harm should first be avoided and minimised, with compensation measures relied upon only where necessary.

In this case, the applicant appears to rely heavily upon habitat enhancements within the proposed SANG and other future offsetting measures rather than demonstrating that biodiversity gains have been maximised within the main development site itself. The apparent dependence on land outside the development boundary raises a legitimate question as to whether the proposed quantum and density of development allow sufficient space for meaningful ecological enhancement on site. If the required biodiversity outcome can only be achieved through substantial reliance upon the SANG and other off-site measures, this would appear to indicate that **the development is simply too intensive for the land**.

We also note that national [planning guidance](#) on “*What you can count towards a development’s biodiversity net gain*”) makes clear that BNG as a result of creating a SANG: “*can only count up to no net loss. Your additional 10% net gain above no net loss must come from separate activities other than mitigation and compensation.*” Thus, the applicant will need to show that they have undertaken “*additional habitat enhancement works on the mitigation site*”, rather than just BNG deriving from the creation of the SANG itself.

In addition, section 4.22 of GBC Policy P6 states: “*Compensation measures must not overlap with other biodiversity measures, or measures delivered for biodiversity net gain, which must be truly additional to compensation measures. **This preserves the disincentive for harming irreplaceable habitats** and to reflect the very high value placed on irreplaceable habitats, and preserves the principle embedded in the national approach to biodiversity net gains which is that the measures must be truly additional to other works.*” [emphasis added]

The Council should therefore be satisfied not merely that the headline biodiversity net gain target can be achieved, but that the Applicant has properly followed the mitigation hierarchy and genuinely maximised opportunities for biodiversity enhancement within the site itself in accordance with NPPF Policy N2 and Local Plan Policies P6 and P7. We would argue that the developer's reliance on off-site offsets, rather than meaningful on-site enhancement, demonstrates that under the current proposals **the site would be fundamentally overdeveloped for its ecological sensitivity**.

We also note that the revised NPPF, in policy N1(2), allows local requirements for Biodiversity Net Gain to be in excess of national policy: “*where this is for specific site allocations and is fully justified and deliverable.*” We trust that the 20% requirement will be maintained for this site in the new Local Plan, in view of its sensitivity and in the wider context of addressing biodiversity loss in Surrey. The [BNG PPG](#) states (para 020): “*a policy which required a gain greater than 10% on an area wide basis or for an allocation may still be relevant as the statutory biodiversity gain objective is for **at least a 10% gain***” [emphasis added].

11. Deficient Ancient Woodland Buffers - Inadequate Protection for Irreplaceable Habitats

Our Original Position (Appendix D): We noted that the site contains and is bordered by four parcels of Ancient and Semi-Natural Woodland (ASNW). Ancient woodland is an irreplaceable habitat, and had special protection under the then NPPF. We argued that the developer's proposed 20m buffer was inadequate and pointed out that the Forestry Commission had advised that a 30m buffer should be in place and kept clear of any and all infrastructure. We also identified the risk of hydrological alteration from upslope development and the threat of piling damage to root systems.

The Applicant's Response: The Covering Letter (section 2.20) states that the draft Design Code has been updated to include a section on Ancient Woodland, providing for a 15-20m buffer, footpaths sited outside the 15m buffer, ecotone planting, and linkages between woodland parcels. The Covering Letter also claims that less than 1% of existing canopy cover is proposed to be removed.

Our Supplementary Position: The revised NPPF reaffirms this protection for areas of Ancient Woodland. Policy N6(2) provides that development resulting in its loss **or deterioration** (our emphasis) should be refused unless wholly exceptional reasons exist. **While the risk threshold with regard to 'loss' may be uncertain, with regard to 'deterioration', it is, in this case, highly likely.**

Constructing within the recommended buffer zone for established trees puts their long-term survival in doubt. The Forestry Commission's guidance is clear: 15m is only a minimum starting point, and developments of this scale should ideally provide at least 30m of high-quality buffer. The Applicant's insistence on retaining an inadequate 15-20m buffer, which is **dictated by their excessive level of ambition for the number of houses on the site**, 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, artificial lighting, dog fouling, littering, and other forms of human disturbance. We note that **no hydrology assessment is being carried out**, despite our pointing out the need for one because of the significant changes in soil conditions which will result from the required piling, new run off flows, and the creation of water attenuation areas.

We also note that while the Developer claims to provide linkages between Ancient Woodlands, they are still intersecting these green linkages with roads, footpaths, retail areas and a school.

Furthermore, the Applicant **dismisses the existence of the current green barrier that separates Normandy from Flexford along Glaziers Lane**, claiming all of Glaziers Lane is a linear development and it does "not create any sense of transition between Normandy and Flexford." This is demonstrably false. The tree canopy over Glaziers Lane at the proposed point of entry to the development is a major feature of the area and provides the visual and physical separation between the two settlements.

The proposed access would destroy this precious feature, and would be against the advice of the Landscape Officer, who on 17 June commented "*This woodland belt is important in defining the enclosed character of this section of the lane. This wooded section of Glaziers Lane forms a*

visual and physical break between the hamlets of Normandy and Flexford (as recognised on page 33 of the DAS) which would be compromised if the site access were built as proposed." On the marked-up plan the officer wrote: "**Site access here unacceptable in landscape character terms**". The fact that the Applicant can nevertheless proceed with this proposal in the face of clear professional advice and against the wishes and interests of the community shows how little regard they have for our landscape or for our views.

12. Scale and Character Remain Alien to the Village

Our Original Position (Appendix E): We demonstrated that the proposed development was fundamentally out of scale with the established rural character of Normandy and Flexford. The proposal included building heights of up to four storeys (at least 16m to the ridge line), with no buildings of this scale in the locality. The "excessive height, scale and bulk" failed to respond to local distinctiveness and demonstrated a clear lack of "understanding of the place" in conflict with Local Plan Policies D1 and D4.

The Applicant's Response: The Covering Letter (section 2.8) confirms that, in response to comments from Surrey Hills National Landscape and the Design Review Panel, the maximum building height has been reduced from four storeys to three storeys in the southern parcels. Various masterplan amendments have been made in response to Design Review Panel feedback.

Our Supplementary Position: The reduction in maximum building height is clearly necessary, but it still fails to respond to the single-storey and two-storey vernacular of Normandy and Flexford. A massed three-storey, development in the southern parcels remains fundamentally out of character.

The Applicant's own Design and Access Statement acknowledges the area's existing character of "single-storey bungalows and two-storey houses with substantial outdoor space." The introduction of up to 950 dwellings, three-storey apartment blocks, and dense urban form represents a fundamental change to this character, contrary to the design principles in Local Plan Policy DP3 and the requirement in national Policy N4(4) that development within the setting of a Protected Landscape be sensitively located and designed. The development as resubmitted would still irreversibly urbanise a sensitive rural fringe, causing significant spatial harm to the Green Belt and the setting of Grade II listed heritage assets, including Glaziers (see section 14 below).

We further note that the published NPPF's density standard for the southern parcels of this location in policy L3(2)(c) is "*a minimum of 35 dwellings per hectare within walking distance of a well-connected station*". This is a significant reduction from the 50 dwellings per hectare (dph) in the version on which consultation took place and on which the developer may have based their plans. 35dph is a two-storey density, readily achievable through terraced and semi-detached houses in keeping with the existing character of Normandy and Flexford. The Applicant's three-storey (and formerly four-storey) massing is therefore a design choice rather than a policy necessity, and the additional height causes harm to the area's character and to the setting of the Surrey Hills National Landscape that is not justified by the density requirement (Policies DP3 and N4(4)). The developer should therefore design out the need to go to 3 storeys.

The Applicant admits that the neighbourhood centre "is the multi-functional heart of the development" and is "primarily intended to serve the needs of site residents with negligible attraction from the wider area." This is a candid admission that the development is designed for its own residents, not to benefit the existing community. **It is an enclave, not an integration.**

13. Heritage and Archaeological Harm Substantially Unaddressed

Our Original Position (Appendix E): We demonstrated that the development would cause harm to the setting, character, and significance of nearby heritage assets, including Glaziers, Halsey Cottage, Great Westwood, and the Westwood Place group. We argued that the Applicant's Heritage Statement underestimated the potential for Roman remains, and that a post-planning investigation was insufficient to protect significant archaeology that might be lost under the high-density footprint. We also identified the risk of piling vibration and altered hydrology to the shallow foundations of 16th-century structures.

The Applicant's Response: The Covering Letter (section 2.2) notes that Historic England has raised no objection. A Heritage Impact Assessment is referenced, and the Applicant claims to be engaging with SCC Archaeology. The Covering Letter also notes that a CEMP will be required via a planning condition to control construction impacts.

Our Supplementary Position: Historic England's "no objection" is unchanged from its original position and does not address the specific arguments in our Appendix E regarding:

- The statutory duty under **Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990** and the *Barnwell Manor* line of authority on the weight to be given to preservation of a listed building's setting;
- The loss of Glaziers' historic isolation against its North and West setting of smallholding fields that has survived, almost intact, from at least the early 18th century and probably the medieval period, to the present day. It is particularly disappointing to see nothing about the impact on 'Glaziers', and indeed the updated site plan shows potentially increased harm. The small patch of land that provided a slight buffer between the site and Glaziers' back garden now contains a couple of extra houses, with small back gardens butting up to the boundary. (This area is also notoriously subject to flooding.)
- The risk of piling vibration and altered hydrology to the shallow foundations of 16th-century structures that can result in structural failure in fragile, historic buildings, particularly those with aged masonry, weak, or brittle materials; and
- **The geophysical and existing archaeological evidence of Roman activity**, pointing to the potential for the Roman road, already excavated at Cleygate Farm, to cross the site, and the inadequacy of a post-planning, area-limited, trial trenching condition to protect it given the uncertainty of a specific, defined route. We highlight SCC Archaeology's comment, confirmed by their response of 20 August to the amended application, that "**further archaeological investigation of the main site is required**" and that "*a condition of any Outline planning permission be that any detailed planning application(s) to follow should be accompanied by the results of a **site-wide** trial trench evaluation*" (emphasis added). The known finds of Roman material around Normandy, with questions about the applicant's interpretation of the results of the geophysics, support the case that **the possibility of the**

road crossing the site should be taken seriously, not played down as the Applicant has sought to do.

None of these points is engaged with in the Covering Letter. The published NPPF's heritage Policies (HE4, HE5 and HE6) require conservation of heritage assets and assessment of the effect on their significance, and give substantial weight to the asset's conservation. The arguments in our Appendix E still stand in full and have not been addressed.

In general, the level of engagement with heritage shown by the Applicant is poor. The only point picked up in the Covering Letter is around the setting of 'Great Westwood' and the Barn; the solution being to place large homes with courtyards opposite. This is not an adequate response.

14. Serious Deficiencies of Public Engagement

We draw the Council's attention to significant and material deficiencies in the Applicant's public engagement process as described in the Amended Statement of Community Involvement (SCI) dated July 2026. The SCI paints a picture of consultation, transparency, and willingness on the part of the developer to engage that is completely at odds with the experience of the residents of Normandy throughout this process. We identify the following specific shortcomings:

a) The Claim of "Notable Support" Is Unsubstantiated and Contradicted by Evidence

Paragraph 8.4 of the SCI states: *"However, following the second consultation there has been notable support to the changes made in response to the feedback received."* No evidence is offered for this statement, which runs directly counter to the fact that 789 objections to the proposal were submitted to Guildford Borough Council once the application had been validated and was subject to public consultation. The overwhelming weight of public opinion is against this development - a fact the SCI attempts to obscure with an unsubstantiated claim of "notable support."

b) The Door-to-Door 'Engagement' Was a Disingenuous Attempt to Manufacture Support

Paragraph 9.2 of the SCI states: *"As part of the ongoing engagement programme, Taylor Wimpey commissioned an independent communications consultancy, Thorncliffe, to undertake a targeted programme of door-to-door engagement with a limited number of nearby households. This initiative was designed to provide residents who may have been less aware of the proposals with an additional opportunity to understand the application and, should they wish, submit comments to the Council in support of or in objection to the proposals."*

This was not a good faith effort to inform residents about the nature of the application. It was an attempt to drum up support by knocking on the doors of people in the surrounding area to obtain statements of support that could be uploaded to the GBC planning portal - a clear attempt to manufacture the appearance of community backing for a proposal that is, in reality, overwhelmingly opposed. We have firsthand evidence that if an individual who was thus approached expressed their opposition to the developer's proposals, the canvasser immediately backed off and did not make any attempt to record the nature of their objections.

c) These Deficiencies Undermine the Entire Consultation Process

We submit that these deficiencies are not minor procedural issues. They go to the heart of the legitimacy of the consultation process. The SCI is the document by which the Applicant seeks to demonstrate that it has adequately engaged with the community. Yet it contains unsubstantiated claims, glosses over the developer's failure to honour its commitments, and presents a misleading account of door-to-door engagement.

The importance of good public engagement is a theme running through the revised NPPF. This is spelt out in Policy DM1 where it is made clear that "*Proposals for major development should be informed by early engagement with neighbours and the local community...to identify and **seek to resolve** key planning matters prior to the submission of a planning application.*" (Emphasis added.)

To be effective, engagement must be genuine, transparent, and in good faith. The engagement documented in the SCI falls short of these standards, and the Applicant has made no serious attempt to resolve the issues identified by the community.

d) Link to the Prematurity Argument

These deficiencies in the public engagement process reinforce our argument that a development of this scale should only be considered in the context of a Local Plan process, where it can be subjected to proper democratic scrutiny and public engagement. The Local Plan provides a structured, transparent, and accountable framework for assessing sites and engaging with communities. This speculative application, by contrast, has been accompanied by a consultation process that has been at best superficial and at worst disingenuous.

15. The Application is Premature and Must Be Part of a Local Plan Process

Our Original Position (Main Objection, Section 6): We submitted that a development of this scale, with the very considerable loss of open Green Belt land that it would represent, should only be considered as part of the ongoing Guildford Local Plan review. Only in this way could the relative merits of different potential sites across the Borough be assessed in terms of sensitivity and sustainability, and appropriately strategic decisions be taken.

The Applicant's Response: The Covering Letter's response to Worplesdon Parish Council (section 3.5) gives a generic explanation that outline applications are a legitimate route to housing delivery in the absence of an up-to-date adopted Local Plan. This is cross-referred to in the response to NAG (section 3.6).

Our Supplementary Position: The revised NPPF reinforces our objection. Policy GB7(1)(h)(iv) requires that development around a well-connected station must "not prejudice any proposals for long-term comprehensive development in the same location"; a speculative, standalone approval for 950 homes in advance of the Local Plan review does exactly that.

Policy S1 requires Local Planning Authorities to plan positively to meet needs. Here, the Plan exists - but it was deliberately **drafted to exclude this site** on grounds of sensitivity. This is not a situation of plan-absence; it is a situation of developer-initiated bypass of the plan-led process.

The Minister for Housing stated, on 18 December 2024, to the [House of Lords Built Environment Committee](#): “We are allowing Grey Belt release through two routes. The first is through the decision-making route, whereby if a local authority does not have an up-to-date plan, if it is subject to the presumption, Grey Belt can be released through decision-making, but not land of higher quality, so **no greenfield land will be released through that decision-making route**” (emphasis added.) This is an unequivocal statement: approving this application outside of the Local Plan process would therefore run directly counter to stated Ministerial intent.

Conclusion

The Applicant's re-submission of 13 July 2026 makes some changes, most notably the reduction in building height in the southern parcels. However, the response to the objections previously submitted by ourselves and many others fails to engage substantively with the great majority of the substantive planning issues raised, and in several critical respects effectively confirms rather than answers the original concerns.

As this supplementary objection has shown, the application suffers from major deficiencies, including:

- Failure to comply with the ‘Golden Rules’ justifying release of Green Belt land, particularly with regard to infrastructure deficits and non-sustainability;
- Failure to mitigate the harms to habitat and heritage that a development of this scale would cause to such a sensitive site;
- Failure to respect the identity and character of the local environment, and to give residents a meaningful say in shaping their own future.

The application is also significantly at odds with the stated intent of Government policy to strengthen Local Plans and to achieve a more strategic, joined-up approach to housing development, as repeatedly affirmed by Ministers.

For all these reasons we therefore **maintain our objection** to Planning Application 25/P/01725, as set out in our submission of 28 February 2026, in full, save as updated above in light of the recently published NPPF. We urge the Council to refuse permission for this unsustainable, inappropriate, and premature development that fails nearly every relevant Local Plan Policy and National Planning Policy test.

Yours sincerely,

[signed]

Sir Michael Aaronson CBE

Chair, on behalf of the Normandy Action Group