

## **PARISH COUNCIL RESPONSE TO THE LOCAL PLAN CONSULTATION**

### **Background**

The Parish Council of Normandy represents 6 hamlets i.e. small settlements joined together by a common administrative area. These are Normandy, Flexford, Christmas Pie, Willey Green, Wyke and Pinewoods.

Each of these hamlets are distinct but are to some extent strung together by essentially what might be described as ribbon development along the roads that crisscross the parish area.

Archaeological evidence of a Romano-Celtic Temple and a pre roman temple site along Green Lane East together with a metalled road along the line of Green Lane East and Flexford Road was established in about 1984. This was constructed in Roman times but also has been evidenced in use in Medieval times and shows the importance of this area historically as well as ecologically

The Parish Council area lies to the North of the Hogs Back ANOB. Views from the Hogs Back are not discernable when travelling the A31 towards Farnham from Guildford. However on the reverse journey one has almost uninterrupted views past The Parish Council's area to the SSSI Heathland mentioned below. The view is uplifting and relatively unspoiled

### **Our Green areas and wildlife**

Woodlands at Ash, Wyke, Cleygate and Pirbright form part of the SSSI stretching from Ash to Brookwood.. This land is also protected as a Special Protection Area (EU) Special Area of Conservation (EU). Other land within Normandy and Flexford is designated by SCC as Sites of Importance for Nature Conservation

Flexford abuts the AGLV which has been recommended for redesignation as ANOB covering the neighbouring Parish of Wanborough which in itself lies in the lea of the Hogs Back. Properties within both Flexford and Normandy enjoy views to the Hogs Back and these are jealously guarded

Normandy Parish Council has leisure facilities at Manor Fruit Farm leased from Guildford Borough Council and owns the land called Normandy Common which was purchased from the MOD in 1945. Normandy Common is rich in wildlife which the Parish Council seeks to promote having undertaken a number of measures in recent years to increase the population of dormice and bats. Normandy Pond has won awards in past years and was the subject of analysis by SCC which discovered inter alia unusual species of dragon flies. The Pond is an SNIC.

Normandy common also abuts Wyke School Woods another SNCI. The Parish Council believes that the adjoining swathe of land on the Common also shows those features. The Parish Council are funding a survey this upcoming

year from Surrey Wildlife Trust to seek advice on the conservation and promotion of the area in which rare orchids and beetles have been viewed **(See in particular Appendix 1, plus 1A and 1B ecological surveys and reports concerning the area as a whole)**

The village lies within the metropolitan green belt .To the north, woods and acid heath land prevail and in the south there is mainly good quality arable farm land. Essentially what is the area of Normandy Parish Council amounts mainly to farming land with a population which is largely settled . Woods and hedgerows abound land which has largely been used for grazing. There are a number of working farms in the area as well as a considerable number of riding establishments

The density of development in the area is medium and consistent with what is essentially a Rural community. The area has seen a number of small high density infills as a result of changes in Govt Policy over the last 10 years. These are mainly at the sites of lost facilities such as the garages (Westwood Lane and the Guildford Road) the shop/post office in Westwood Lane, the shop in Glaziers Lane ,and the site of the Old Village Hall .There has been an extension to the mobile home site and 13 affordable homes are presently being built at Beech Lane as a result of the Housing Survey carried out with the support of the Parish Council in 2010.

The Parish Council was disappointed to note that although the respondees who sought housing would prefer Shared Ownership it was not possible to provide it due to lack of Govt funding opportunities. It was not felt therefore that the provision for rented accommodation met the stated need

The number of properties that have been built by way of sensitive infill and exception to the green belt in the time since the last Local Plan took effect in 2003 amounts to at least 97 homes. And in these areas the properties have been built to current density standards

It should be noted that the Farmhouse on Normandy Common was the final home of William Cobbett author of Rural Rides where he lived and continued his occupation of Farmer until his death.

The Parish was also the scene of the most recent outbreak of Foot and Mouth disease in 2007 which emanated from the research facility on the Normandy /Pirbright border.

The residents of Normandy and Flexford enjoy their rural environment. The area is very well served with footpaths and bridleways providing good and now improved access to the SSSI's noted above .In 2008 the Worplesdon Bridleway Association with the support of the Parish Council improved the bridleway across Normandy Common to achieve better access. They were supported in doing so by funds from the BBC. The project also sought to ensure that dormice bats and birdlife were supported by the addition of boxes along the route

When the red flags are down the SSSI's are an important area of recreational use for the residents of the area. Normandy Parish Council works hard to increase access to the countryside as part of it's commitment to the green belt

## **Infrastructure**

It is a true rural area in the sense that it has little by way of facilities and despite the efforts of the Parish Council there is no centre to the Village

It's transport links are poor, there is no village shop, pub, post office garage or other service of that nature.

## **Transport**

It has access to the major towns of Guildford and Aldershot along the A323, Farnham along the A31, Godalming through the B3000 and Woking through Pirbright.

The residents of Normandy need to have their own transport as they are poorly served by public provision. Those who live in Normandy along the A323 are over 1km from the train station at Wanborough which is accessed by poorly lit roads and in parts without footpaths .

Those who live at Flexford and Christmaspie are over 1km from the main bus service on the A323 Guildford to Aldershot service .The same comments apply to the lighting and footpath provision

Flexford /Christmaspie Pensioners with bus passes park their cars at the parish council owned car park because they cannot manage the walk to the bus stop. The car park is very often full.

Due to these travel difficulties Normandy has a Community Bus Service run by volunteers drivers and the Emmanuel Church who have to raise the monies locally by donation to subsidise the travel costs. It offers a service to pensioners once a week to Tesco in Aldershot and once a week to Guildford Tesco. Pensioners and those with disabilities rely o this provision

## **Railway**

Wanborough Station. Until only a few years ago no trains stopped at Wanborough on a Sunday and a service during the week consisted of 1 train an hour except at 'commuter times'. The service now runs half hourly Monday to Saturday and hourly on a Sunday

Essentially the service which stops at Wanborough is on the Ascot to Guildford line with a limited number of trains continuing on to Redhill. This is a small unmanned station with an even smaller car park of 8 spaces which are filled to the brim .

Access and Egress to the Station is achieved from the North over an offset hump backed bridge followed by an immediate hidden turning into a hairpin bend. People travel **to** Normandy to return to their homes.

The comparative cost of using the train versus car use shows Annual train fare £736 plus daily car parking fee as against petrol of £400. It has already been explained that most residents use cars. There is no incentive to use the train unless the cost of parking in Guildford becomes prohibitive

### **Bus service**

The main bus service through Normandy is the 20 service along the A323 see accessibility for those in Flexford /Chrismaspie referred to above

There is an infrequent bus service the 520 which travels around Normandy through Flexford for the purposes of shoppers. The bus stop situated at the beginning of Westwood Lane outside St Marks church is dangerously placed (only recently) and capable of causing congestion in a relatively narrow road

### **Appendix 2 attached shows time tables for buses**

### **The Road network in Normandy and Flexford**

Normandy is basically served by the A323 Guildford/Aldershot road with roads leading down Westwood Lane and Flexford Road from the Hog's Back.

It also has the Normandy/Pirbright Road A324 which serves as the route to Woking. Each of the roads from the Pirbright Road to the A323 are not suitable for lorries and are single lane roads which must be passed with care. The road runs next to the SSSI and at Cobbetts Hill crosses part of it.

The roads at Westwood Lane and Glaziers Lane have offset bridges which either pass under or pass over the railway and again there are historic traffic concerns in connection with their use. Neither road is capable of being widened at that point and there are real problems with sight lines both in connection with the travel down the road itself and also where on Westwood Lane there is a junction with Beech Lane.

Westwood Lane is the main access /egress from the A31 Hogs Back and travels through Wanborough soon to be designated AONB. The road through Wanborough is effected by 2 right angle bends which flood infrequently

The Crossroads at Normandy are historically accident prone for those passing over from Glaziers Lane to Hunts Hill Road.

The A323 has a 90 degree bend at Bailes Lane which is also accident prone and is the site of 20/20 a recycling centre and other such business activities, as well as the Mobile Home site which has approximately 130 units entering onto it

Each of the roads from the A323 into the Normandy settlement (apart from Westwood Lane and Glaziers Lane) dwindle to a single track and half of those become unmetalled muddy tracks (eg Bailes Lane, Elmbridge Lane)

A similar story relates to Flexford Flexford Road becomes a track leading to the Youth Hostel and the Flax pond. Green Lane East and Beech Lane again become single track unmetalled roads after a few hundred yards.

Normandy Parish Council's only traffic calming measures were the imposition of 30mph limits on part of the roads criss crossing the 'residential area' These are rarely enforced. Lorry Bans exist on the roads from the A324 to the A323 for safety reasons

## **Shops and other essential services**

### **Shops**

There are no shops Normandy apart from the specialised Music Shop called Sessions music on the Guildford Road

There are none at all in Flexford

### **Doctors Surgery**

There is a doctor's surgery at Glaziers Lane but in truth it is an outpost for the larger Fairlands Practice. There are only 2 GP consultation rooms in comparison to the surgery at Fairlands and a considerable number of the patients at Normandy find they have to make appointments at Fairlands. This is particularly the case should an appointment be needed on the same day or in an emergency at all.

Again transport problems from Flexford mean that a journey of over 1km needs to be undertaken by car to the Surgery and access to Fairlands can only be achieved by public transport if the car is left in the council car park which as we have said is often full.

From Normandy even if the bus is utilised there is a long walk from the bus stop to the surgery and for that reason most journeys to and from the Doctor are taken by car

Normandy surgery qualifies as a rural dispensary

### **Schools**

#### **Wyke School.**

This is a primary school which is over subscribed. There is insufficient land available on site to allow the school to expand. The problems at Wyke

School with regard to traffic around drop off and pick up times are immense and for some parents dropping their small children off means that they have to cross the busy A323, as there is insufficient parking and drop off /collection points along the road in which the school is situated. The County is presently seeking to appoint a School Crossing Patrol Officer

As before in our comment on public transport, families living in the Flexford area are situated over 1km from the school which takes children from Wyke (2km) and Ash (2.5km) as well as Normandy .

Mothers in Flexford who have attempted to walk their small children home from school comment that the journey takes 45 mins with children and 30 mins of brisk walking without

**Secondary schools** are found at Ash and at Park Barn , Guildford or Godalming for those who use the state system. Again transport for children attending those schools who live in Flexford is available via a bus service situated over 1km unless there is school specific transport

### **Lighting**

Normandy is a village and as such street lighting is poor in a considerable part of the area and in keeping with its village status. The poor lighting is a positive feature of the night time view from the Hogs Back, an Area of Outstanding National Beauty

### **Broadband/telephone services**

Normandy is uniquely badly placed in the scheme of things even though the County has spent a considerable amount of money in its contract with British Telecom to upgrade the telephone and broadband cabling to the village. Large areas of the village are not served by the fibre optic cabling. The telephone cabling from BT is provided by 3 exchanges, Aldershot, Puttenham and Worplesdon Puttenham must be up rated in order to take advantage of the fibre optic cabling

### **Mobile phone services**

The area is notoriously difficult for reception such that the only reliable method of making and receiving calls in the area for the vast majority of residents is Landline

## **The Evidence Base for the Consultation**

The Parish Council has read the evidence base produced by Guildford Borough Council and notes the evaluation carried out of the land presently

within the green belt. It notes that the area scores poorly for retention for the green belt using the system that the borough has identified. The Parish Council rejects the evaluation system used.

It is clear that no account whatsoever has been taken of one of the major purposes of the green belt which is "the prevention of urban sprawl". Normandy Parish Council is very firmly of the view that the land within the parish that is designated green belt **is** the effective barrier between the growing sprawl of Aldershot (which has now passed over into Ash) and Guildford. The Parish Council's area also provides a buffer to the development that runs along the Blackwater Valley Relief Road ie the A331

It is a buffer against that sprawl and it is important in Normandy Parish Council's view that the area retains its green belt status.

Again no account has been taken of the concept of 'openness' yet this too is one of the main purposes of the green belt

Flexford and Normandy as they are now display all those features that are referred to in the National Planning Framework Guidance **see further detailed analysis at Appendix 3**

The Parish Council refer to the Introduction above and say there are absolutely no grounds to suggest that the hamlets of Flexford and Normandy should be take together as if they are a village. The character of the area is that of hamlets washed over by the green belt and there have been no changes that allow the Borough Council to form a different view

The scoring system used appears in the Parish Council's view to have been applied arbitrarily and with little subjective evaluation .The additional information supplied by these documents will hopefully assist future decision making

The Parish Council notes for instance that the Borough Council has scored Normandy highly on the basis that it has a doctor's surgery, a school and a station however these have been truthfully fairly reported upon above and in the Parish Council's view cannot warrant the scores applied.

The Parish Council considers that in comparing the scoring given to East and West Clandon for instance that Normandy's scores are inappropriately high and do not take account of the **actualite** .

The Parish Council is particularly surprised at the manner in which Normandy and Flexford/Christmaspie have been evaluated as one contiguous 'village' .when compared to other areas in the Borough for instance

East and West Clandon have been evaluated separately despite the fact that the distance between the two areas is so much less than the distance between Normandy and Flexford It should be noted that East and West Clandon share the same facilities

In Normandy Parish Council's view too much weight has been given to the fact that East and West Clandon are separate Parish Councils. There can be no other logical explanation for the manner in which these two entities have been assessed so differently

**(See Appendix 4 a specific comparison as between 'The Clandons' and 'Normandy' reworking the figures provided in the assessment as an illustration)**

Normandy Parish Council also notes that in the documentation produced the existing settlement boundaries appear to have been moved and are shown to be linking with the land plots identified in the SHLAA. The Borough Council seems to say therefore that not only are these plots identified as available for housing but the settlement boundaries are moved in order to enclose the proposed plots. This is **rejected** by the Parish Council

It is Normandy Parish Council's firm view that their green belt status must be retained and that the most suitable way to achieve this would be by 'wash over' as there is no sufficient village area to justify 'inset'

### **The context for future development**

The Parish Council is mindful of the requirements placed upon Guildford Borough by Government to set aside land for housing and accepts that Normandy Parish Council needs to play its part in provision of homes not only for its own growing population but also for some who choose to work in the wider area. The Parish Council is keenly aware of the housing needs of the **key workers at the Royal Surrey County Hospital** for instance.

However Normandy Parish Council **rejects** the idea that there should be development to the degree as suggested by the Borough in its plans which in Normandy Parish Council's view would serve to increase Normandy and Flexford initially by approximately 50%. Clearly such development would not be sustainable nor desirable

### **The proposed plots**

Normandy Parish Council has carefully considered the plots that the Borough say may be available

**This should not be even considered until the Borough have properly accounted for available sites for housing within the town area. It is the Parish Council's view that if a balanced assessment were made there would be no need to discuss the question of making changes to the green belt as the housing needs of the Borough could easily be accommodated on land already available which is not green belt land**

There are additional concerns about density and how this will impact on the medium density style of the area The Parish Council would expect to make further detailed comment at the next stage of the consultation

### **In order to support such development**

The analysis failed to take account of other essential features of infrastructure which if in good supply may be said to support the idea of sustainable development . Normandy has considerable problems. The Parish Council has already outlined the fact of there being no local shops or facilities.

In order to support that development there needs to be strong consideration given to the improvement of the present infrastructure for instance more effective traffic calming measures ,safer road junctions and a local shop would be nice . Normandy Parish Council recognises the difficulty in provision of a shop because despite all their efforts they have not been able to persuade supermarket providers such as Tesco Sainsbury's or One stop to take over either the old Westwood Stores or to apply to redevelop the site of the Duke of Normandy PH. The Parish Council do not believe that investors would be prepared to commit to a shop even if all of plots were utilised in the manner suggested by SHLAA

### **Flooding**

Studies have recently concluded concerning the major flooding problem that we have in the Flexford area.

Flexford has been identified by the Borough Council and SCC as one of the locations in the Borough 'at the greatest risk of flooding' However it should be noted that no assessment has been carried out of the land to the north of the railway at Flexford,

It is easily observed however that the undeveloped land is boggy full of streams and ponds and is likely to suffer the same problems as that to the south due to the geological substructure beneath what traditionally has been high grade and lush farming land

A copy of a Study carried out by Normandy Historians is attached and marked **Appendix 5** being a description of the Geology of Normandy and a map from around 1780

**Appendix 6 will also assist "Flexford /Normandy Rural Assessment Rolling Claylands"**

Flooding problems are also experienced along the Guildford road in Normandy described historically as ancient Marshland.

Both areas are identified as land for substantial development The assessment carried out of the available land only takes into account old data regarding flood risk and we heavily question its value. .

The Parish Council has been concerned over many years that a large number of its residents are effected by sewage back flush due to the inadequate drainage especially in the land south of the railway line broadly covering the area at Flexford. Houses along the Guildford Road have historically suffered flood damage with resultant insurance problems

The flood propensity of large areas of land being developed around those existing areas of concern needs to be looked at carefully. All of the identified plots save for SHLAA sites 2009 and 48 already have identified flood problems

## **The way forward**

### **Normandy's Housing Survey**

In the housing survey that was carried out with the assistance of the Parish Council it became clear that many of those who sought housing in the area also sought the property to be made available by way of shared ownership. This provision was dismissed because at that stage there was little or no Govt funding available to Housing Assns which would allow them to make schemes available at a cost that could be managed by the future residents.

Given the proximity of Normandy to the Research Park, the hospital, the university etc all on the North side of Guildford, Normandy Parish Council would say that there is a clear role for shared ownership property which would assist key workers, young professionals and first time buyers

Normandy is already well served by provision of affordable housing for rent at Wyke Avenue, Walden Cottages Szabo Crescent and Manor Farm Close. There is also proposed development at Beech Lane for which permission was recently granted and is now under construction. There are also Housing Association properties for rent at the Paddocks (6)

### **Traveller Pitches**

At present Normandy has two sites within the green belt which have been developed prior to obtaining planning permission and as a result of which temporary and personal licences have been given to the occupiers for no more than 5 years. At the end of the 5 year term Normandy Parish Council strongly believe that that land should be returned to its original use

Normandy Parish Council has also successfully absorbed the Showmans Guild site at Whittles Drive.. Apart from sensitive infilling to meet the reasonable growing needs of the individuals and families already based at Whittles Drive it is believed that no more sites or pitches need to be made available in this part of the Borough

## **SANGS**

In the light of the information in this document but more particularly **Appendix 1, 1A and 1B**. Normandy Parish Council would suggest that IF the Borough were determined to revise the green belt status of the area there is room for designating much of the identified land as SANGas opposed to mark the for development. The identified habitats are settled and established and untouched in the main by modern cultivation methods using pesticides and fertilizers

Normandy PC would point out the value of that land to wildlife and plants as opposed to the rolling pastures of the farmland at Wanborough where the hedgerows have been grubbed out and the farmland intensively cultivated using modern fertilisers and pesticides. The land at Wanborough is of course awaiting redesignation from AGLV to AONB.

## **GENERAL COMMENT ON THE LOCAL PLAN AND OTHER PROPOSALS FOR THE WHOLE BOROUGH**

**The Parish Council would make the following additional observations**

**1 It is the responsibility of the Borough Council to deliver details of available sites for development and the Parish Council believes that greater weight has been given to the proposal that housing should be placed in the green belt rather than persuing land availability through development of town sites either by**

A compulsory purchase where powers are available

B Negotiations with existing land owners and potential developers to unlock the potential in the land

C Provision of flats/apartments over shopping areas car parks and offices to a higher level of density than suggested. There are a number of sites in the borough that would be amenable to medium and even high rise development. The Parish Council points to development at Woking as a good example of this provision

**2 All green belt around Guildford should be retained as much as possible but if following (1 )above it is necessary to seek some development in those areas it should be evenly distributed across the Borough by way of sensitive infill and with the intention of retaining the openness of the green belt**

**3 Sadly in the Parish Council's view, development in the town centre since the 1960's has in itself harmed the historic value of Guildford**

This now almost amounts to a cobbled High Street and the first floor of the shops in the top part of the cobbled High Street. The Castle, the town's churches The Angel Post House and the Guildhall with Tunsgate are almost

all that remain plus a few pubs and they too are under threat. There is little to hold back the Borough from planning to go 'up' rather than 'along' and it is extremely important to make very good use of the available land

**4 The Parish Council is of the view that the Town has lost its sense of identity and asserts that one of the good things about living in Guildford is the fact that it is surrounded by green belt.**

The historical importance of the growth of Guildford appears to have been lost or forgotten. The Borough is reminded that Guildford was named for the existence of the golden wode flowers (Guild) growing on the banks of the Wey and for the crossing (ford) of the river at Guildford by the pilgrims on their way to Canterbury. The historic wool industry led to the wealth of the town and some of the wool produced in Guildford was used to stuff the woosacks upon which the Lords sit in Parliament. The greenbelt around Guildford is ancient and the ancient settlements are mentioned in the Domesday Book.

**5 The Parish Council agrees with the Guildford Vision Group that there should be a master plan which should include developing the riverside**

In particular the land used for parking at the Electric Theatre and land used as the car park next to the 'White House' and behind the old "Greyhound" , as well as the car park between the Crown and County Courts should all be considered for mixed housing and car parking with some space for cafes and and visual amenity. To leave those sites as they are in that area is to be regretted.

There are other sites around the Borough which should similarly be made available

**6. In particular the Parish Council notes with regret the intended use of the site at Bedford Road and other sites outside the core centre of he town.**

It has been the case for many years that retail and commercial units remain un-let whilst more and more land is made available for them to occupy at the expense of residential use. The Parish Council points in particular to the recommended use for the Bedford Road car park. In the Parish Council's view this should be amended to mixed use of car parking and residential on the 'flats over model' It is suggested ha he redevelopment of he North Street site will provide more than enough by way of retail units. So far as office use is concerned the Borough should bear in mind the trend for small offices with home working facilities as well as the apparent over supply

**The Parish Council regrets the apparent lack of imagination and calls upon the Borough Council to engage with developers and land owners to ensure that brown field sites are used for the new Local Plan as preference**