

Dear Mr Saleem

Application Reference: 25/P/01725

Land off Glaziers Lane, Normandy, GU3



Outline Planning Application (all matters reserved except for principal access(es)) for the demolition of existing stables buildings and the phased, residential-led development, including up to 950 dwellings (including older persons accommodation) (Class C3); 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; up to 2,500 sqm neighbourhood centre, comprising 1) community hub/facilities including café facilities (Class F2 / Class E(b)), 2) retail floorspace (Class E(a)), 3) medical facility (Class E(e)) and 4) nursery/early years provision (Class E (f)), associated Green and Blue Infrastructure including drainage, a Forest Building including café facilities (up to 250sqm) (Class F2 / Class E(b)); a bike and transport hub; and other associated infrastructure and earthworks of land at Normandy and Flexford

Taylor Wimpey (UK) Limited

Summary

1. Normandy Parish Council (the parish council) **OBJECTS** to this planning application and asks that it be refused.
2. The applicant claims that the proposal constitutes sustainable development and that the benefits of granting permission would demonstrably outweigh the adverse effects. The parish council strongly disagrees. On any reasonable analysis the applicant has failed to demonstrate that the proposal is either sustainable or suitably located. As a result, it does not pass the tests set in planning policy for it to be considered 'appropriate' development in the Green Belt. Despite superficial appearances, the development would not be well connected, and residents would be car dependent. This results in substantial impacts on the highway network which there are no proposals to mitigate and there is insufficient evidence to exclude an adverse effect via air pollution on the integrity of the Thames Basin Heath SPA and the Thursley, Ash, Pirbright and Chobham SAC (the European Sites). We assume that the applicant intends to provide additional information regarding the likely effect on the European sites and reserve the right to make further comments on that, and other matters. A number of important infrastructure related issues are inadequately dealt with.

3. Development of this scale should always be ‘plan-led’ so that the cumulative effects and long-term implications can be properly assessed. The planning obligations to pay for necessary mitigation should be comprehensively assessed and fully agreed before any decision. Delivery of that mitigation should be assured so that planning obligations can be used promptly to achieve the infrastructure improvements required. This application demonstrably fails to meet that requirement. It is a classic example of a developer seeking to impose major growth without proper care or consideration for its impact on existing communities or the quality of the built environment that would be created.

The Planning Policy Position

4. The relevant planning policies for the determination of this application are set out in the Guildford Local Plan Strategies and Sites 2015 – 2034 adopted in 2019 and the Guildford Borough Development Management Policies 2023 (the local plan). There is no neighbourhood plan for the area. The weight to be attached to some policies (in particular those relating to housing) will be reduced given that Guildford cannot demonstrate a 5 year housing land supply. Others however retain their full weight and it is important that Guildford does not adopt a ‘defeatist’ approach by assuming that the local plan no longer provides a strong enough framework to manage development in the area.
5. The policies of the National Planning Policy Framework (NPPF) are an important material consideration - but they are only a material consideration.
6. The application site is not allocated for development in the local plan. It was initially considered for inclusion but only because it was a candidate site for the provision of a new secondary school. Once it became clear that the school site was not required, it was removed from the draft plan.
7. In recommending that the site be removed the report to Full Council says (our emphasis):

*Given the site consists of the whole land parcel assessed to be **high sensitivity Green Belt**, the allocation of this land would result in significant harm to the **Green Belt**. However great weight was given to allocating a site that could provide an eight form entry secondary school in the west of the borough. Whilst there would continue to be some sustainability benefits associated with the allocation of the site in relation to additional services, given the other harm we do not consider that this is justified without the benefits associated with the provision of the secondary school.¹*

¹ Full Council Report May 2017

8. Speculative development on the proposed scale conflicts with Policy S2 of the local plan which sets out the spatial distribution for housing delivery. This policy carries reduced weight at present, but it is essential that Guildford remember that Paragraph 7 of the NPPF says (emphasis added):

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner

9. Whilst the government has set higher targets for housebuilding, it has never, to our knowledge, suggested that this should be at the expense of creating high quality and well connected new development. Even Para 11(d) of the NPPF reiterates this point. It reminds decision makers that development should not be permitted where (emphasis added):

*any adverse impacts [of doing so] would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, **having particular regard to key policies for directing development to sustainable locations**, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination*

10. This emphasis on the importance of ‘a sustainable location’ is replicated in Policy S1 of the local plan, which is not out of date and carries substantial weight. It is also evident in the consultation version of the NPPF published in December 2025² which places considerable weight on the importance of choosing ‘the right location’ as a determinant of sustainability.

11. In his Written Ministerial Statement of the 16 December 2025 the planning minister also emphasised that future planning policy will be based on (our emphasis):

*a permanent presumption in favour of **suitably located** development*

12. For environmental and landscape reasons the spatial distribution of development in the local plan recognises both the importance of the Green Belt and the need to protect the countryside as separate requirements. Development in the countryside is restricted by Policy P3 of the local plan, which says:

² The consultation draft is not currently a material consideration, but if it is published before the application is determined then it will be.

Within the area of countryside, as designated on the Policies Map, development will be permitted provided it:

- a) requires a countryside location or where a rural location can be justified, and*
- b) is proportionate to the nature and scale of the site, its setting and countryside location, and*
- c) does not lead to greater physical or visual coalescence between the (i) Ash and Tongham urban area and (ii) either Aldershot or Ash Green village.*

13. New development on the scale proposed does not require a countryside location (at least not in the sense that it represents a policy justification) and it is not proportionate to the nature, scale or setting of the location. Although the visual impact would be limited it would cause significant harm to the character of the area. It would lead to the coalescence of Flexford and Normandy, effectively creating a new settlement in the countryside, which itself will become subject to further pressure for growth. That is a separate but equally important consideration from the impact on the Green Belt.

14. The parish council's contention is that for a number of important reasons, all arising from the size and location of the proposal, it does not constitute sustainable development as required by the local plan or the NPPF. The applicant has failed to demonstrate that it would be 'suitably located' or to justify the scale of development in this particular location.

Green Belt/Grey Belt Classification

15. The applicant submits that the proposal site constitutes 'grey belt' land as defined in Planning Practice Guidance. We note that GBC may have provided advice on this matter in their letter of 11th November that it may meet the first part of the definition of grey belt, when assessed against the contribution to Green Belt purposes A, B, and D as required by the NPPF. We await a copy of the letter and reserve the rights to comment further on receipt of the letter. That is far from the end of the process though in determining whether development would no longer be considered 'inappropriate'.

16. We do not agree with the applicant's claim that the site makes only a 'modest' contribution in relation to purpose C. It lies in established countryside and there are in fact no 'urbanising influences' within the site which diminish its contribution to openness. The defining feature is the ancient east/west public right of way which bisects the site and enables walkers to experience precisely the sense of openness and absence of development which defines the essence of the Green

Belt. The fact that there is development (which is inset from the Green Belt) on its edge simply emphasises, rather than diminishes, its contribution to purpose C. That is important in relation to the next step in assessing whether development may be allowed.

17. NPPF Paragraph 155 requires that (even if it is grey belt) development of the land:

would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan

and that

The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework

18. It is worth restating here what is required to meet this latter test. Para 110 says (our emphasis):

*The planning system should actively manage patterns of growth in support of these objectives. **Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.** This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.*

Para 115 says:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) **sustainable transport modes are prioritised** taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) **any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.***

19. We have explained below why the application is not focused on a location which is or can be made sustainable.. The applicant's own evidence confirms that the significant impacts it has on the transport network are not effectively mitigated (let alone cost effectively). The application site therefore fails the 'sustainable location' test for release from the Green Belt. Development should still be considered inappropriate and require a 'very special circumstances' justification. Whilst that might be provided by a shortfall in housing delivery, in this case the adverse impacts are so severe that they outweigh that benefit.

20. The applicant's Green Belt Assessment also fails to grapple with the question of the impact of the proposed development on the fundamental purpose of the Green Belt. The only argument offered on this point is that it would represent the urbanisation of just a small percentage of the total Green Belt in the area. That is obviously the wrong approach since it has no regard to the openness, quality or location of the land in question all of which must be important in any evaluation.

21. We urge Guildford to consider the wider implications of their decision on the Green Belt protection afforded by the local plan. The fundamental purpose of the Green Belt remains the prevention of urban sprawl and the maintenance of separation between major conurbations such as Guildford and Farnham/Ash/Tongham. If that is to be preserved then it follows that the development of large areas of open land within that gap would undermine its fundamental purpose. Any other interpretation inevitably leads to the loss of the vast majority of Green Belt land not subject to some other protection. If the applicant's arguments are accepted, development within the Green Belt (the very sprawl it is intended to prevent) will only stop once the gap between settlements is almost filled and the remaining slither of land on either side is finally considered subject to protection. That amounts to the overturning of one of the most established policies in land use planning. It cannot be the correct interpretation of government policy and we urge Guildford to 'draw a line' by its decision on this application.

22. There is ample evidence on which to do so. As we have previously quoted, in 2017 Guildford reported that the site consisted of:

a) *high sensitivity Green Belt,*

and that

b) *the allocation of this land would result in significant harm to the Green Belt.*

23. What was true in 2017 remains true in 2026. There has been no change in the physical condition of the site or its locational relationships that could lead to a different assessment. No change in government policy has made that function any less important.
24. In summary, the site makes an important contribution to the purpose of the Green Belt and thus fails to pass this 'gateway' set by the NPPF even if GBC consider this to be technically grey belt land. Development of the site remains inappropriate. This provides a strong reason to refuse the application and the tilted balance can also therefore be excluded. That is a separate and additional consideration over and above the fact that in policy terms the applicant has failed to demonstrate that the site is 'suitably located' or to justify development in open countryside.
25. We also do not accept that the application satisfies the 'Golden Rules' set out in Para 156 of the NPPF. As we explain below, the application does not propose to make the *necessary improvements to local or national infrastructure* required to create a sustainable development or fully mitigate its impact. Unless and until it does the Golden Rules are not satisfied. As Guildford will be aware, the Golden Rules apply to any development proposed in the Green Belt.

Sustainable Location

26. The applicant presents the site as well connected to local services and facilities and capable of meeting the NPPF objectives. But when considered against the most important county wide policy, Surrey County Council's Local Transport Plan³, it falls short in almost every respect. The journey management aspects of LTP4 are based on two fundamental principles (original emphasis):

Avoid unnecessary travel by reducing the number and length of trips needed. We aim to achieve this through improving planning for homes and employment sites, travel planning and levels of digital connectivity.

Shift travel choices to more sustainable modes of transport, including public transport, walking and cycling, away from car use.

And more specifically in *the Planning for Place* section:

Avoid and reduce the number and length of trips needed by improving land use planning, travel planning and levels of digital connectivity.

³ Local Transport Plan 4 adopted July 2022

27. Nothing about this application is consistent with those objectives. That is a direct consequence of the location chosen by the applicant. Far from being well connected, residents on the site would be completely car dependent or otherwise cut off from essential facilities and services. The nearest supermarket is about 5 miles away and the closest secondary school is over 3 miles away. That conflicts directly with everything that LTP4 seeks to achieve.

Self Containment

28. In order to avoid 'unnecessary' car trips large green field development should demonstrate high levels of self-containment i.e. the ability to meet daily needs without car use. That is unlikely to be achieved bearing in mind what is proposed will almost double the size of the existing village by nearly 2,500 people. The village would be much larger than Bramley or East Horsley which have a wider range of facilities.

29. No commercial or employment opportunities are included on the site, except for the proposed primary school, access to which is likely to require car use on the part of almost all staff. No retail outlet is proposed which would serve anything other than 'top up' shopping which itself frequently generates trips by car, especially where walking distances are significant (which they would be). Access to existing local activities, such as sports clubs and community buildings, is also likely to be by car.

30. The application is vague as to any agreement with Surrey County Council regarding the proposed new primary school. If it is to be additional to the existing Normandy Primary School then some families in the northern part of the site would be within an acceptable walking distance of the 'old' school. If the existing school closes, most of the development, and much of the surrounding area, will not be within walking distance. As a result additional traffic will be imported into the new development from the surrounding area something which has not been assessed as part of the application.

31. Where parents drive to work to save time they will frequently make 'combined journeys' of school drop off and onward commute even if they live close enough to one or other school for walking to be a practical proposition. Time taken and parental convenience is the key determining factor in these choices, not distance.

32. SEN School Proposal – a SEN school recently shut in the centre of Guildford due to funding, recruitment challenges and rising costs (Challengers shut in 2024). The current government Policy is to create more inclusive schools, rather than

additional SEN schools. In addition, the majority of the young people would need to be transported in to the school, at a huge cost, and this would bring more vehicles into a known traffic blackspot, i.e. the Wanborough/Puttenham Hill-Hogs Back Junctions. In addition, the 3-storey building that is suggested will damage the heritage setting of Westwood Place by creating a highly urban view. The central area of the development will also have a negative impact on the setting of the grade II listed Glaziers, isolating it from the path that leads between it and Westwood Place.

Bus Services

33. As the applicant acknowledges the only bus service which would serve the site is the Stagecoach Number 20 service between Aldershot and Guildford. This route is already close to capacity during peak periods and Stagecoach is not willing to divert the route to this proposed development. No new or enhanced bus services are proposed nor are any new bus stops to be provided within the site. Whilst the number 20 provides a frequent and fast service, much of the developed area will be more than 1km from the nearest bus-stop, a distance which all professional guidance and advice considers to exceed an acceptable walking distance.⁴ It is therefore highly unlikely that bus use will actually be a preferred or practical option for many residents. They will have no option to but to choose car journeys (or remain isolated from friends, family and services).
34. The Surrey Connect service is incorrectly described in the Transport Assessment. In the West Guildford zone only a very limited range of trips are permitted and these are only to locations in Guildford. It is not possible to use this service to access any other part of Surrey or North Hampshire. To suggest that it is a viable alternative to scheduled bus services is not credible. Due to limited numbers of buses and drivers, it is not a reliable service and has limited evening hours, so is not suitable for people working non-9-5 jobs.
35. It is telling that the Transport Assessment's 'Bus Service Strategy' consists of a few paragraphs, the essence of which is 'we have nothing to offer'. There are no proposals of any kind in the Framework Travel Plan to add, improve or facilitate bus use by over 2,000 people in what is, allegedly, a sustainable location.

Wanborough Station

⁴ Based on the Institution of Highways and Transport (as was) 'Providing for Journeys on Foot' 2000 typology which the applicant cites in the application

36. Much is made of the proximity to Wanborough Station and claims of support from the government's ambition to make the most of the connectivity options that stations provide.
37. Whilst the southern section of the site would lie within a reasonable walking distance of the station, the northern section is over 1km using the proposed walking and cycle routes, which is in excess of a suitable walking distance. Also, this is only a benefit if the station is itself accessible, which at present it is not. Access to the Guildford direction platform is only possible via a steep staired footbridge. There is no access for wheelchair users, those who find steep stairs difficult or those carrying heavy or bulky items. Network Rail support the application but only on the basis that financial provision is made for the replacement of the footbridge and the installation of lifts to give access to the Guildford platform. In their letter of the 8th January 2026 Network Rail made clear that their 'enthusiasm' was predicated on an offer from Taylor Wimpey to include in the development:

Subject to the detail being worked through to confirm feasibility, an accessible footbridge at the station, likely comprised of two lifts and a bridge with stairs over the railway tracks. Network Rail & South Western Railway support this proposed investment. This is particularly relevant with consideration to the proposed Special Educational Needs and Disabilities school to be included as part of the development.

38. These measures do not feature in the planning application, are not included in the proposed planning obligations to be covered by a Section 106 agreement, and there is no indication that the cost and/or practicality of their installation has been assessed. Network Rail confirm that they will not fund any improvement works because usage of the station is and will remain very low (it is in fact the 8th least used out of 84 stations in Surrey). Guildford will be aware that works to improve railway stations and access to operational lines are notoriously complex and expensive to implement. The application is based upon a false prospectus of accessibility which simply does not exist.
39. If any weight is to be given to the likely benefits of proximity to the station, Guildford must obtain detailed and credible proposals for the implementation of the station upgrade. These must be included as planning obligations and agreement reached for them to be implemented before the occupation of any residential development.

If this cannot be delivered then proximity station will be of far less significance than the applicant suggests.⁵

Impact on European Sites

40. Policy P5 (Thames Basin Heath Special Protection Area) of the local plan says that:

Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development

41. As Guildford will be well aware, Policy P5 is entirely consistent with national law and with the NPPF and other government policy. It is not out of date and carries full weight in decision making. Where the integrity of a European site is likely to be affected by development, the competent authority (Guildford in this case) must be satisfied by way of appropriate assessment that there will be no adverse effects on its integrity:

An appropriate assessment must contain complete, precise and definitive findings and conclusions to ensure that there is no reasonable scientific doubt as to the effects of the proposed plan or project⁶

42. If the outcome of an appropriate assessment is that there would be an adverse impact on a European site, that will constitute a 'strong reason' to refuse permission in accordance with the local plan and footnote 7 of the NPPF. Where such a strong reason exists then land will not be grey belt nor does the presumption in favour of sustainable development (the so-called tilted balance) operate.

43. There is no doubt that the application site lies within the zone of influence on the adjacent European sites. The applicant has assessed that there could be impacts from recreational disturbance and proposes to provide the necessary SANG and SAMM mitigation. They have also accepted that there could be an adverse impact from reduced air quality caused by increased traffic on the A324 Pirbright Road. The application must therefore provide sufficient evidence to demonstrate beyond reasonable scientific doubt that no adverse effect will arise in accordance with the guidance issued by Natural England.⁷

⁵ Guildford will also need to be sure that any proposed planning obligations can meet the tests set in Reg 122 of the CIL Regulations. If there is an unresolved tension between Reg 122 requirements and the delivery of necessary mitigation then consent should be refused.

⁶ Planning Practice Guidance Paragraph: 003 Reference ID: 65-003-20190722

⁷ Air pollution and development: advice for local authorities Natural England October 2025

44. All of the distances to the SANG have been given from the closest possible point which we do not consider an appropriate method. The proposed upgrades will not create suitable access for all users. There is also an over-reliance on existing PROWs, the majority of which do not accommodate cycling requirements.
45. In the somewhat inappropriately named supporting document *Information to Inform Habitats Regulation Assessment*⁸ the applicant confirms only that no information is yet available in relation to the scale or significance of this potential impact:

*Given the proximity of the overlapping components of the Thames Basin Heaths SPA and Thursley, Ash, Pirbright and Chobham SAC (Ash to Brookwood component SSSI) to the A324 Pirbright Road, detailed assessment is ongoing at the time of writing to determine whether damaging exceedances of critical levels or loads are likely to occur as a result of the proposed development. This assessment will be updated upon completion of the analysis.*⁹

46. It is unfortunate that the application was made (and validated) without this information since many aspects of consultee responses will depend on the outcome. It also means that the assessment of the ecological impact required for the EIA is incomplete. If the application were to be determined with no further submissions then it would have to be refused as the applicant is no doubt well aware. We therefore assume that there will be further information in due course and reserve the right to comment upon it.
47. With that in mind, we would also point out that Natural England guidance requires cumulative impacts to be considered, not just the isolated impact of this application. Although the proposed development at Shortlands Farm is still subject to consideration, this should be scoped into the assessment.¹⁰ Similarly any assessment for the Shortlands Farm application and all other applications with a 5km radius should now include the predicted impact of this proposal.

Highways Issues and the Impact on the Strategic Road Network

48. The NPPF encourages applicants and local planning authorities to take a 'vision led' approach to transport planning through which walking and cycling in particular are promoted, and car journeys reduced because other options are both feasible

⁸ CSA Environmental January 2026

⁹ Ibid Para 4.9

¹⁰ If it is not included at this stage, and consent at Shortlands Farm is granted, then the assessment will be immediately be flawed. Even if this is not done now, following the Supreme Court decision in CG Fry it would be necessary for it to be revisited at subsequent stages of the decision making process.

and desirable. But there is an important difference between ‘vision led’ and ‘wishful thinking’ – which is all that we see in the Transport Assessment for this application.

49. The Transport Assessment presents a distorted picture of the scope for walking to important services and facilities.
50. It plots these against the nearest part of the development, not the development as whole (set out in Table 6.1). It suggests that the ‘preferred maximum’ distances¹¹ to local services and infrastructure represent a desirable target to be achieved. In fact typical walking distances would be much greater for most residents and none would be contained within the ‘desirable’ or even ‘acceptable’ walking distance¹² which would be a more reasonable aspiration for genuinely ‘vision led’ new development. The reason the applicant does not highlight these more realistic benchmarks is simply because when they are used, the poor connectivity and ‘walking performance’ of the development becomes apparent. This brings the application into direct conflict with the ambitions set out in LTP4 and the NPPF.
51. No walking distances to bus stops are included in the Transport Assessment. That is because almost all parts of the development perform extremely poorly against the benchmark of a 400m walking distance to a bus stop.¹³ Very few residents of this development would find bus use a convenient option – even though a good service is provided by the Stagecoach route 20. Again this is in conflict with LTP4 and NPPF policy. In fact, the closest homes would be about 600m from the nearest bus stop.
52. Whilst the Christmas Pie route does run through Normandy, it is not particularly accessible during autumn and winter (ie 2 school terms) and so cyclists would need to go on the main roads. There are no dedicated cycle lanes on the A323 and there is no room on this narrow road to add them in. So the implication that there are a wide range of facilities within a 15-20 minute cycle is not correct.
53. The Transport Assessment and the ‘vision led’ traffic modelling it presents are based upon achieving a significant modal shift from baseline, in particular to achieve 15% travel by rail. However few specific measures are proposed to achieve these outcomes, and the applicant disingenuously claims a benefit from measures which are not even included in the application. Most importantly this includes the provision of accessible facilities at Wanborough Station.¹⁴ The

¹¹ Based on the Institution of Highways and Transport (as was) ‘Providing for Journeys on Foot’ 2000 typology

¹² Based on the Institution of Highways and Transport (as was) ‘Providing for Journeys on Foot’ 2000 typology

¹³ Chartered Institution of the Highways and Transport Planning for Walking 2015

¹⁴ Transport Assessment Para 7.4.2

Framework Travel Plan is equally devoid of any meaningful content. No credibility can be attached to these modal shift figures or the 'vision led' figures claimed in Table 7.12 of the Transport Assessment or the consequent reduced highways impact which is claimed for the vision led approach. Only base line plus development outputs should be considered in relation to junction modelling.

54. We note that the applicant has not included any specific committed development in their modelling, relying on TEMPro background growth to account for increases in housing numbers. Despite the comments in the Environmental Statement (and the advice provided by Guildford) the potential impact of development at Shortlands Farm appears to have been ignored. This should have been included in the assessment of likely cumulative impact. If it is not included now and consent for Shortlands Farm is granted then the modelling for this application would become out of date and would have to be rerun.
55. The modelled impact on some of the relevant junctions and road sections appears to be incomplete and potentially underestimates the future load on the network if Shortlands Farm and other applications/developments within the 5km radius have not been included. We await the highway authority's comments on these results. However, it is apparent that there is a major unresolved issue in relation to access to the A31 via the Wanborough Hill/Puttenham Hill roads. The applicant acknowledges that these perform badly at present and would be made significantly worse by the development without a 'broader strategic solution'. What they fail to suggest is what that 'broader strategic solution' might be, how it will be delivered or how it will be paid for. The words of the Transport Assessment are carefully phrased, but they clearly recognise that Guildford cannot give permission for development to go ahead unless a satisfactory solution to the harm the proposal will cause can be devised and implemented. We look forward to seeing those proposals.
56. Overall the application fails to demonstrate that it would provide the necessary improvements to local or national infrastructure required by the Golden Rules. It fails to meet the objectives of LTP4 and it leaves severe impacts on the strategic road network unmitigated.

Heritage Assets

57. The current transport plan brings all of the HGVs during the 7+ year build phase along Westwood Lane to the Guildford Road. The impact of vibration, noise, dust, pollution, excavation and construction work on the built heritage assets has not been assessed. The heritage assets (all Grade II Listed) most impacted include Westwood Place and associated buildings, Buckhurst, Great Westwood House and Barn, Wyke Church and Normandy War Memorial. This also includes heritage

properties on Glaziers lane, namely Glaziers and Halsey Cottage. Many others in neighbouring communities where these vehicles will pass will also be damaged.

58. During the built phase the Heritage Impact statement already recognises in 6.83 that "Although such harmful impacts would be minimised to some degree this way, they would not be removed entirely and the positive contribution to significance made by an area of open green land within the wider landscape setting of the identified listed buildings would be diminished. That less than substantial harm must be accorded considerable weight and importance." in accordance with paragraph 215 of the NPPF.

Community and Essential Infrastructure

59. If this development were to be permitted it would mean 2,000 or more additional residents requiring access to local public services and facilities, including education, primary healthcare and waste water treatment.

60. We understand that the applicant is not responsible for the planning of education services, but Guildford, as local planning authority, does have a responsibility to ensure that the impact of new development on access to education is properly considered. This gives rise to two main issues.

61. Firstly, Guildford should not be willing to grant planning consent until there is certainty over the future of the existing Normandy Primary School or its relationship to a new primary school – not least because this has an important impact on assessing the transport and accessibility credentials of the proposal. That requires discussion with the local community and with the parish council as their representative.

62. Secondly, the applicant accepts¹⁵ that there is a serious issue in relation to the provision of secondary school places. The development is projected to generate a need for 124 places¹⁶ but there is effectively nil capacity within accessible secondary schools to provide these. The only option is to make provision through the expansion of Ash Manor School. Financial contributions via planning obligations may provide a financial mechanism to achieve this but no costings have been provided and no confirmation provided that the development can provide the necessary planning obligations. Just as importantly it is essential that detailed and credible plans for the expansion of the school have been approved before the occupation of any new dwellings is permitted. It is not sufficient for the

¹⁵ Environmental Statement Chapter 15 Socio Economics

¹⁶ Ibid Table 15.12

County Council to receive funding via planning obligations and to sit on that funding until some unspecified point in the future. Mitigation only occurs when it is translated into ‘bricks and mortar’ improvements. If Guildford cannot be sure when or how additional school places will be provided then the Golden Rules are not met and planning permission cannot be granted.

63. In respect of local healthcare the application contains no specific proposals to ensure that the needs of new residents can be met without an adverse impact on those who already live in the area. Whilst it is welcome that land may be made available for new facilities, that offer is of no value unless it has been confirmed that the Integrated Care Board will provide them on a long term basis. Again, this must be confirmed before any decision is taken on the application.

64. Finally we note that Thames Water has, as yet, given no indication as to when and how the necessary waste water treatment upgrades will take place. If consent is being considered, it should be subject to a condition which restricts the occupation of any dwellings until the upgrade is complete.

Flood Risk and Drainage Management

65. The initial consultation response from the Local Lead Flood Authority has found fault with almost every aspect of the applicant’s proposed flood risk assessment and drainage strategy. Although most of the land lies in Flood Zone 1, there are significant areas in Zone 2 and 3. Even allowing for the fact that it is proposed to avoid any built development in these areas, the impact of changes in localised runoff rate and surface water/fluviol flood water pathways represents a risk both on and off site.

66. Localised flood risk does exist both on the site and on adjacent land, particularly around Glaziers Lane. We look forward to the applicant’s response to all of the issues raised.

Conclusion

67. Major development should be plan led and subject to careful assessment of its long term impacts. Its location should be chosen for its intrinsic sustainability rather than relying on expensive and uncertain mitigation, and it should be supported by fully costed infrastructure improvements. That requirement is embedded in local and national policy.

68. The site is not allocated for development in the local plan and lies within high sensitivity Green Belt and countryside, where development would cause significant

harm and undermine the fundamental purpose of preventing urban sprawl. The applicant's case that development would not be inappropriate in the Green Belt is flawed and incomplete. The application does not meet the Golden Rules.

69. This proposal fails to demonstrate that it would be sustainable or suitably located. It would place residents in a car-dependent environment and create new, significant, and unmitigated impacts on the local highway network. It lacks credible proposals for sustainable travel or to deliver the infrastructure on which it depends. There is insufficient evidence to exclude adverse effects on the integrity of nearby European protected sites, and the application was submitted without a complete environmental assessment. Essential infrastructure concerns remain unresolved, including education, healthcare, and waste water provision, and the flood risk and drainage strategy has been found inadequate by the local lead flood authority.
70. Taken together, these factors clearly and demonstrably outweigh any potential benefits, providing strong and compelling reasons for the application to be refused.

Yours sincerely

Normandy Parish Council