

Comments on EIA Scoping Request 25/S/00006

Submitted by the Normandy Action Group

Thank you for allowing us, as a group of residents concerned at the prospect of a potential major development on a Green Belt site in Normandy, to comment on this EIA Scoping Request. We believe that some of the arguments put forward in the application as to why certain elements should be 'out of scope' are contestable. We have listed all the issues or concerns we have regarding the proposed scope, but not weighted them for importance/criticality - we presume this will part of the Council's assessment process.

1. Introduction

We will argue below that, of the areas listed in table 1.2, only two should be 'scoped out' entirely: Major Accidents and Disasters, and Wind Microclimate. We believe that all of: Agricultural Land, Waste and Resources, Daylight, Sunlight, Overshadowing, and Solar Glare, and Lighting should be within scope of this EIA. We will also argue that a number of the sub areas in 'scoped in' areas that are proposed to be 'scoped out' should be included.

2. The Site and Local Context

2.1.5 The statement *'There are no other environmental or landscape constraints on the site'* is misleading. The historic Footpath 361, bordered by environmentally important oak trees (see below), traverses the site. A large part of the site features on the [Interactive Map](#) as a Surrey Biodiversity Opportunity Area. In addition to the areas of Ancient Woodland referenced in 2.1.4 there are numerous Veteran and Notable Trees (as per the [Ancient Tree Inventory](#)), and the site sits on a [B-Line](#) pollinating insect migration route. In addition, areas of the site are prone to significant flooding and thereby serve to mitigate the risk of further flooding downstream. Although some of these points are picked up elsewhere in the document, the aim here appears to be to give the impression that this site is not environmentally significant, which is far from the case.

2.2.1 Similarly, the way the flood risk is characterised (*Flood Zone 2 (0.1% to 1% annual chance of flooding, 1 in 30 year risk of surface water flooding)*) would appear to suggest that flood risk is a minor consideration, whereas for the residents of Normandy it is ever-present. It is significant that for many years Normandy has had a local [Flood Forum](#), chaired by our MP; that indicates something about the reality of the threat we face here. The watery nature of the broader area is clearly evidenced in the naming of the nearby areas of Flexford, historically 'Flaxford' as it was a flax growing area (i.e. damp), and Pond Hill (near to the Old School House). Although south of the proposed site, some of the areas of 1930s development were planned with drainage ditches between houses / gardens. We attach images from last November's flooding of areas that are part of or adjacent to this site, and one must expect that such events will become more likely in future given climate change.

2.3 *Aspects to be considered in the scheme design and environmental assessment.* This list of 'sensitive receptors' is generic, and fails to highlight some of the specific considerations that need to feature in the EIA. In particular:

- The extended, 10-year, time frame for the development;
- The already significant constraints on the local sewerage and highways infrastructure;
- The current flooding issues and the increased flooding risk that would follow from a development on this scale;

- The fact that the two adjacent roads are 'C' and 'D' roads respectively, with notorious bridge pinch point hazards both under (Westwood Lane) and over (Glaziers Lane) the railway line.
- The fact that the development would roughly double the number of dwellings in the village, and increase the density of dwellings compared to the existing ones - and therefore make a material change to the nature of Normandy as a settlement and a community.
- The fact that there is no mention in this section of this development in the context of others in a 5 km radius, and the resultant risk to the purpose of the Green Belt: in this context to prevent urban sprawl between Guildford and Aldershot. This is referenced from para 5.2.9 onwards but should be front and centre in the summary;
- The fact that much of the land is possibly prone to subsidence by 2030 and likely prone to subsidence by 2070, which should be accounted for in the scheme design – see the British Geological Survey's site [GeoClimate UKCP18 Open](#).

3. The Proposed Development

3.1.2 The list features a number of items that are implied as being of benefit to the community, but which in reality are not. Nor is there any realistic prospect that they would all be included in the development. However, as this is not central to the EIA Scoping Request we shall not comment further at this point.

4. Consultation, Site Selection, and Alternatives

4.1.2 There may be '*no suitable alternative sites within the Applicant's control*', but we would submit that the local planning authority needs to look at alternatives in the authority area, irrespective of who has control. There are certainly alternatives that need to be considered, especially as the *Grey Belt* classification is not a given (see below) and in the context of the risk, already mentioned, of cumulative developments giving rise to uncontrolled urban sprawl between Aldershot and Guildford.

5. Approach to Assessment

5.1.19 It is hard to take seriously the claim that *significant effects to soils would not result from the development*. The idea that constructing so many houses and other buildings can be done without seriously detracting from the quantum of soil that has hitherto supported agriculture is hardly credible.

5.1.20 In addition, it is important to point out that the way the land has been used in recent years reflects the planning blight that has existed since the developer made their first attempt to build on it ten years ago. Previously the land was in mixed, rotational, arable and grassland use, but more recently the owners are understood to have imposed very short-term leases on the tenant farmer, who therefore has no option but to restrict the use to quickly grown and harvested silage and haylage. Preserving agricultural land is strategically important to this country from the perspective of food security. We therefore submit that a chapter on agricultural land quality should be included in the EIA.

5.1.23 Assessment of the management of waste should include the implications for the highway infrastructure. As already stated, the site is bordered by C and D roads, with pinch points at the two bridges under/over the railway. These roads also feed into the busy Aldershot Road and Wanborough Hill junctions. We also find it misleading to refer to the proposed development as an *urban project*, given that this is not an urban area. Normandy is decidedly rural or at most semi-rural.

5.1.26 We would challenge the bald statement “*Given that the proposed building heights for the majority of the Proposed Development are likely to be comparable to the existing buildings in the local area it is considered unlikely that significant effects on daylight, sunlight, overshadowing or solar glare will occur.*” The idea that almost doubling the number of buildings in Normandy would not impact solar glare is bizarre. Furthermore, the document (5.1.25) states that some of the buildings may be as many as four storeys high (completely out of keeping with the local built environment in Normandy), which would have a major consequence for artificial light profile.

5.1.28 Lighting. The statement that “*The Proposed Development is to be located on land considered to be Grey Belt*” must be challenged. It is not Grey Belt until it is properly assessed against the criteria in the NPPF, including footnote 7 to para 11 (the need to demonstrate mitigation of flood risk and risk to sensitive habitats). The EIA should not be framed on the basis of this assumption. The description of the site as ‘urban-fringe’ is also very misleading. Normandy is a dispersed collection of five hamlets with low-density, linear development, and would only become ‘urban’ if this development were allowed to go ahead.

We have already challenged the notion of ‘minor increases’ in sky glow. The area has minimal streetlighting and provides unusually dark skies for the SE of England. The impact on dark skies and also on wildlife of additional lighting brought about by a development of 950 homes, plus commercial premises and streetlights, must be assessed as part of any environmental assessment. Nor is there any mention of the light impact on the view from the Surrey Hills National Landscape. There should be a full lighting assessment.

5.2.10 We would submit that the Assessment of Cumulative Effects should take into account the fact that the construction period is so long: at least 10 years – para 16.2.21). The developer must consider the cumulative impact of this development as well as all other developments that are likely to start or be completed within the timeframe of the construction period, including those already in the Local Plan such as Blackwell Farm. This must be for the duration of the construction phase, not just the three years currently suggested.

A notable omission from the list of sites in Table 5.4 is the proposed construction of 200 houses at [Shortlands Farm](#) just to the west of the proposed development. This would add significantly to the cumulative impact on local facilities, roads, sewerage and other infrastructure, and the existing communities that make up Normandy.

5.2.15 Emissions from traffic during construction, which would have a long term and major effect should be scoped in when assessing climate change impact.

6. Air Quality and Odour

6.1.3 We wish to challenge why ‘emissions of odour’ is scoped out. Building does create odour, which would impact on those in neighbouring properties, and should be scoped in. The Developer is intending to construct on a Green Belt site where current odour and emissions are minimal. Construction traffic created by the development would have a significant impact on this; the developer needs to show how they are going to mitigate the impact of construction and operation on the Green Belt in terms of air quality and odour.

6.2.11 ‘*Realignment of roads*’ is an unrealistic concept given the nature and location of the three roads that bound the proposed site, (the fourth being a railway line).

6.3.1 The town of Aldershot may be 5km from the proposed development, but there is an expanding conurbation in Tongham and Ash that is much closer to Normandy, and which

should be taken into account. The Blackwell Farm proposal in the Local Plan would also see Guildford expand significantly closer to Normandy from the east.

7. Cultural Heritage and Archaeology

7.3.5 and 7.3.6 We submit that both Lord Pirbright's Tomb and the Normandy War Memorial should be included among the Built Heritage Assets 'scoped in'. This is because of the high probability that major improvements would be needed to the road junctions where Westwood Lane and Glaziers Lane join the A323, to cope with the significant additional levels of traffic generated by the development. Each asset is located close to one of these junctions. In the case of the War Memorial in particular, the developer should be obliged to show how the potential harm to the asset would be mitigated should major improvements to the junction be needed. It is one of the places where the community comes together at a particular time of year (Remembrance Sunday) and must be preserved for that purpose.

7.3.9 The list of relevant historic sites omits some that are among the most important and relevant to the proposed development area. The Wanborough Romano Celtic Temple Complex and the Cleygate Farm/Bailes Lane Roman settlement (including the section of Winchester to London Roman road), are mentioned only (7.3.10) as part of the wider study area, and the determination of the route of the Roman Road is said to be "speculative". This is underplaying the evidence and the potential significance of this feature.

7.4.3 We therefore challenge the statement "*the potential is likely to be regarded as moderate for the Roman period with a possible Roman road across the Site and the presence of a nearby settlement and temple complex.*" Given the high and very high significance of Roman material identified within the Normandy area and included in Guildford Borough Council's Local Plan, and the Area of High Archaeological Potential nearby, there is a strong possibility that the proposed development area is crossed by the Winchester to London Roman Road. We therefore highlight the need to follow relevant statutory requirements in the NPPF and Local Plan policy D3, and for the local planning authority to undertake adequate consultation with Surrey County Council's Historic Environment Planning team in considering this aspect of the Scoping Request.

8. Climate Change and Greenhouse Gases

8.3.2 The statement: "*Nor is it a significant carbon store, as the land does not include peat deposits, so soil and vegetation carbon stocks that may be subject to disturbance in the agricultural land are relatively minor.*" is incorrect. Long term grass cover with mulch or grazing animal manure returning to the soil greatly helps to improve soil carbon. This is released during construction or any disturbance of the soil. Whilst not as high as soil carbon under woodland, it is still significant and should be scoped in (Table 8.1).

8.4.2 Clean water availability is mentioned only as a *de minimis* source in the context of climate change impact. We can find no reference to it elsewhere in the document, although one might have expected it to be covered in Section 10; we are therefore referring to this paragraph to our comments there. SE Water, which supplies this area, indicates that we are in an area of water stress; the assessment of the impact of further housing should therefore include the availability of clean water for the new homes and provide an assurance that this would not impact on existing homes and businesses.)

9. Ecology

9.2.12 It is stated: "*The Woodland Trust's online Ancient Tree Inventory was reviewed for known ancient or veteran trees within the Site and adjacent land. Interactive online mapping*

provided by the charity 'Buglife' was used to determine whether the Site falls within an Important Invertebrate Area or 'B-Line'." However, the outcome of these searches is omitted. In fact, a significant number of the trees outside of the areas of Ancient Woodland have been given Notable and Veteran Status on the Woodland Trust website (with TPOs applied for in some cases), and the site does lie in the path of a B-Line. These factors should therefore be given due weight. Nor is there any indication in the Scoping Summary (9.5.1) of the importance of protecting the areas of Ancient Woodland, which until now have not been accessible to the public, were they to be exposed to the occupants of 950 new houses.

9.2.99 This argues that *"the social, community, economic, or multi-functional importance attributed to ecological features are not assessed as they fall outwith the scope of this assessment."* If they are not to be assessed here, we would argue that they should be in Section 12 'Human Health', as they definitely benefit the existing people of Normandy and the removal of the open spaces and fields would adversely impact current residents.

9.3.20 It is stated that *"An unremarkable diversity of wintering bird species were [sic] recorded using the Site, with none of those recorded in significant numbers."* We would dispute this statement, as the southern part of the site in particular is frequently home to wintering populations of Fieldfare and Redwings; as their presence is temperature-sensitive it presumably depends on conditions at the time the survey was undertaken. It raises the broader question of how much faith one can have in the ecological surveys conducted, over a very limited period, by contractors appointed by the developer.

10. Flood Risk, Drainage, and Water Environment

10.3.8 - Existing drainage - and 10.3.14 - Foul Water Provision - are both stated as being *"still under review"*. This is disappointing and, we would submit, unacceptable. Both these elements are fundamental elements impacting the sustainability of this site, and both must be included in the EIA. The means of avoiding flooding and of dealing with the foul drainage flows that the development would generate must be demonstrated by the developer.

8.4.2 Clean water availability – please see comment above.

11. Ground Conditions and Contamination

We have no comments on this section.

12. Human Health

We have a number of concerns about the statements in Table 12.6, which overall conveys a blandly utopian view of what would be major disruption to people's way of life over an at least ten-year period should the development go ahead.

Risk Taking Behaviour. This is 'scoped out' for the occupation phase, but the proposal includes retail units. How would the developer ensure that the retail units do not result in increased risk-taking behaviour? We submit that this should be scoped in.

Community Safety This should be scoped in for the occupation phase. Normandy would be transformed from a collection of dispersed settlements into a small town, with clear implications for how people behave, and therefore for community safety.

Community Identity The idea that such a dramatic change in the nature of the community can be mitigated by 'stakeholder engagement' is fanciful. The response to the 'consultation' carried out by the developer to date has been overwhelmingly negative. The developer must scope in the impact on current community identity of doubling the size of the village,

increasing traffic on local roads by 2-3000 vehicles (post development), and increasing pressure on all local services and infrastructure.

On-site construction vibration needs to be scoped in. Network Rail will be able to confirm that they have had to undertake extensive piling work to shore up the railway embankment. Piling may be needed for larger infrastructure on the site because of the subsidence risk referred to in Section 2 above.

Operational plant noise. The developer may not know exactly what this would be, but including its likely impact on the existing community and wildlife is important so that any design would ensure minimal disruption to human health and well-being.

Off-site construction traffic noise. This would have an impact on all those in the surrounding area as large numbers of HGVs rumble down small roads, and should be scoped in.

As stated above, we would argue that the impact on human health and well-being of removing the open spaces and fields comprising the site, together with the flora and fauna that inhabit it, should be scoped in, as these benefit the existing people of Normandy and their removal would have a substantial negative effect.

13. Landscape and Visual Aspect

Great effort on the part of the applicant has gone into demonstrating that the views of the site from the immediately surrounding area are limited, missing the point that the reason it is valued is precisely because it is hidden and untouched, and can be appreciated in full by following Footpath 361 that traverses it. It is noticeable that most of the images in Appendix 13.1 are taken in winter and seem to highlight some of the scruffier parts of the surrounding area; if they had been taken in summer and by a more sympathetic photographer, they would have presented a much more flattering picture.

13.4.9 The logic in the statement: "*The Site plays a small role in the setting to the Surrey Hills National Landscape as only a small part of the Site is apparent*" is disingenuous. Were up to 950 houses, in some cases rising to four storeys (para 5.1.25) to be constructed, the site would be apparent, and would constitute a major intrusion on the existing setting.

13.4.11 This account of the visual receptors for walkers using Footpath 361 through the centre of the site fails to mention that from the mid-point of the path there are views across the open land to the Hogs Back. This provides a visual context for the village, a series of hamlets behind, but linked to, the ancient ridgeway.

14. Noise and Vibration

Figure 14.1 It is strange there is not a further noise survey location proposed for the southern half of the site, adjacent to South Lodge. The developer has indicated that most of the higher density, higher-rise, development would take place in this area.

14.4.2 and 14.4.6 It is good to see that the on-site noise impact of the development will be scoped in to the ES. This is a peaceful rural area, where ambient noise levels are very low, and the loudest noise at present is probably bird song. However, we do not accept that off-site construction traffic noise should be scoped out. Existing housing development along Glaziers and Westwood Lanes is predominantly linear, and would be affected by a significant increase in construction traffic, which would also affect pedestrians on those roads. We therefore submit that noise monitoring should be scoped in during the construction phase as well as the occupation phase (14.4.8).

14.4.5 We would query why on-site construction vibration is scoped out, particularly for piling. Were 3 or 4 storey buildings to be erected, it would be reasonable to expect some sort of piling: the ground largely consists of shrinkable clay, the proximity of trees is a risk factor, as is a high water table, leading to greater levels of expansion and shrinkage of the clay. We would expect there to be a requirement for soil and bore tests to calculate the degree of piling and/or deep foundations required, and the impact of this to be assessed.

15. Socioeconomics

This section is silent on the impact of the development on people living in Normandy. The effects over a ten-year period of construction noise, dust, and other disruption on people's ability to work and their health and wellbeing, and the impact on existing businesses and existing community facilities in the area of the development, must all be considered.

16. Transport and Movement

16.2.15 assumes that a Construction Environmental Management Plan (CEMP) will be prepared, and states: "*there is no need to scope an element of your [sic] assessment into the EIA just to confirm this*". However, we would argue that the EIA should include the impact of construction so that the CEMP can use the data therein to ensure that construction takes place without causing any environmental damage.

From the perspective of accidents and safety, it is also extremely important that the CEMP takes into account the proximity of Normandy Village School to the site, with small children taken to and from each day on what are generally narrow pavements, also - for many - involving a crossing of the already busy A323.

16.3.1 This states, regarding Westwood and Glaziers Lanes: "*From inspection, traffic on both roads is relatively light*". That depends very much on your perspective; if you are a local resident, particularly a pedestrian, it certainly does not feel so. We hope this will be subject to a rigorous data collection process, rather than subjective opinion. In addition, there is no mention at all of the fact that both roads encounter difficult bridges under and over the railway respectively, which act as significant hazards and impediments to traffic flow.

16.3.9 This implies that trains and buses are easily accessible for all at both ends of the site, whereas public transport for the south end of the site is only trains and for the north end is only buses; this should be taken into account.

16.4.14 and 16.4.15 The developer must ensure that the effect of 10 to 11 years of construction traffic is taken into consideration, as they appear to dismiss this by saying that it would be less than the final effect from the completed development. On the contrary, the level of construction traffic for the 10-year operational phase would involve a significantly higher number of HGVs than during even the design life of the development. They must include in the CEMP the effect of noise, vibration, pollution, wear and tear on minor roads from construction traffic that would include concrete waggons, stone waggons, cranes, transportation of heavy plant and removal of excavated material from the development site. Glaziers Lane and Westwood Lane are simply not designed for the large numbers of construction vehicles that this development would require.

The vibration alone from the vehicles passing the listed properties could cause irreparable damage, given that the latter do not have substantial foundations, would be unable to install double glazing or adapt the properties for the noise, vibration, and dust generated by the construction process, and would therefore be the most sensitive to the works.

The developer must show considerate construction routing as well as the intended servicing routing for the development during its phased construction and in its permanent state. This should take into account the height and width restrictions of existing bridges on both Glaziers Lane and Westwood Lane, the difficult existing junctions of Glaziers Lane and Westwood Lane onto Guildford Road, and also the narrow, winding, and steep nature of Wanborough Hill towards the A31. They must also consider how construction workers would get to site and where they would park, noting that parking along both roads bordering the site would cause significant disruption and pose issues for road safety, especially where children and elderly use footpaths to get to and from school/bus stops etc.

Tables 16.1 to 16.5. The traffic data more resembles urban and city traffic numbers and delays and not rural ones. We would argue that the data should look at current numbers, then likely future numbers from this development, and assess the impact, and not use averaged data from urban areas. Also, the entire section of Westwood Lane alongside the proposed development is 40mph, i.e. above the minimum level of 50kph in Table 16.2, so this table does not convey an accurate picture.

Table 16.6 It is difficult to understand from the transport section what is scoped in and out as this table at the end has not been completed. However, we submit that all matters of transport should be scoped in as the development would almost double the size of the village in property numbers alone so the impact of the development during construction and operation would be significant and would become even more so during the years after full occupation as families grow, extensions are built, teenagers learn to drive, and so on.

The EIA should also look ahead to 2040, i.e. 2-3 years after final occupation, as this is when the real impacts would be seen, especially as not all buildings would be completed when houses were, e.g. the claimed community facilities (shops, community centre, health centre, schools) and this would also impact the ongoing vehicle numbers to and from the site

17. Conclusion

In our view, the approach that the developer has taken to this Scoping Request illustrates that they have not listened to the people of Normandy during the initial consultation process that they have run as part of their 'stakeholder engagement'. Their report shows that the developer does not understand the wider local area, the heritage and history of Normandy, nor the significant disruption and damage that the construction works and their outcome would inevitably cause. This in turn leads to further unease and a lack of trust around surveys being paid for by the developer, their timing, and how the findings will be shared and interpreted.

In short, we do not believe that this EIA Scoping Request adequately addresses all the factors that would need to be incorporated into an Environmental Statement as part of an outline planning application. This proposal, if implemented, would constitute a significant and irreversible loss of countryside in the Green Belt. As such it is important that the decision-making process is comprehensive and transparent from the outset.

We hope these comments will be helpful to the planning officer considering the EIA Scoping Request.

Normandy Action Group
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