

# Summary of Public Body Feedback on 25/P/01725

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Here is a high-level summary of the public body feedback for planning application **25/P/01725**, grouped by three categories of **Objection**, **Funding required / Further Consultation / Deferral**, and **No Objection**. As these are AI-generated, they may contain small errors of detail, but we believe that they nevertheless represent a fair summary of the submissions that have been made.

## 1. Objection

### 1.1 Environment Agency

The EA **objects** to the application and recommends refusal in its current form.

- **Inadequate Flood Risk Assessment (FRA):** The submitted FRA does not adequately assess if the development will increase flood risk elsewhere.
- **Technical Discrepancies:** The EA noted a contradiction where the FRA claims all dwellings are in Flood Zone 1, but the applicant's own modelling shows dwellings in the southwest corner affected by flood extents.
- **Missing Data:** The applicant has not yet submitted their detailed modelling for the EA to review and sign off.

### 1.2 Dr Al Pinkerton MP (Surrey Heath)

Dr Pinkerton submitted a formal **objection**, citing conflicts with various Local Plan policies.

- **Green Belt Harm:** He argues the site is "high-sensitivity" Green Belt and development would cause significant harm to its openness.
- **Transport & Parking:** He questions the "Vision-led" approach to transport, arguing that mode-shift forecasts are unrealistic for a rural area and that parking provision has not been quantified.
- **Flood Risk:** As Chair of the Normandy Flood Forum, he highlights persistent local flooding and concerns that the Hockford sewage treatment site lacks the resilience for a development of this scale.
- **Infrastructure Phasing:** He expresses concern over the A31 Hog's Back corridor and requests that improvements be secured through Section 106 obligations before home occupation.

### 1.3 Ash Parish Council

The Parish Council has registered a formal **objection** based on 18 specific points.

- **Environmental & Heritage Impact:** Concerns include loss of natural habitat, wildlife, Green Belt land, and conservation areas.
- **Infrastructure & Safety:** They cite increased traffic, highway safety issues, insufficient parking, and likely increased pressure on existing services such as schools and doctors.
- **Development Scale:** Arguments are made against the overdevelopment, bulk, massing, and the "out of scale" character of the proposal.

- **Utility & Flooding:** Concerns are raised regarding site flooding and the capacity of the existing foul drainage system.

## 1.4 Normandy Parish Council

The Parish Council has issued a comprehensive **objection**, noting that 95.6% of surveyed residents oppose the development.

- **Green Belt Impact:** They argue the proposal represents inappropriate development on high-sensitivity Green Belt land, causing significant harm to its openness and purpose.
- **Infrastructure Stress:** Concerns were raised regarding the severe pressure on local primary care, health services, and the A31 Hog's Back corridor.
- **Environmental Concerns:** The council cites high risks of flooding, harm to wildlife habitats, and inadequate sewage capacity at the Hockford treatment site.

## 1.5 Wanborough Parish Council

This council **objects** to the proposal, focusing on the specific impacts to their neighbouring village.

- **Coalescence:** They argue the development would lead to the physical and visual merging of Normandy with Ash Green and Wanborough, destroying the distinct identity of these rural settlements.
- **Station & Traffic:** Concerns were highlighted regarding the repeated flooding at Wanborough Station and the projected 74-vehicle queues on Wanborough Hill.

## 1.6 Pirbright Parish Council

The Council has submitted a formal **objection**, focusing on the "village-to-town" transformation of the area.

- **Green Belt Incursion:** They argue that the scale of 950 homes constitutes an "urban sprawl" that destroys the essential character and openness of the Green Belt.
- **Traffic Displacement:** Concerns are raised that the development will increase "rat-running" through Pirbright as motorists seek to avoid congestion on the A31 and A323.
- **Ecological Connectivity:** They noted that the site acts as a vital corridor for wildlife between different protected heathlands, which this development would sever.

## 1.7 Worplesdon Parish Council

Worplesdon Parish Council strongly **objects** due to the cumulative impact on the wider local infrastructure.

- **Road Network Saturation:** They argue that the local road network, particularly the A323, is already at breaking point and cannot sustain the additional thousands of vehicle movements daily.
- **Inadequate Mitigation:** The council expresses scepticism that the "Vision-led" transport improvements will actually reduce car dependency in such a rural setting.
- **Harm to Amenities:** They highlight the potential for increased recreational pressure on the nearby Thames Basin Heaths Special Protection Area (SPA).

## 1.8 Puttenham Parish Council

This council has registered an **objection**, primarily concerned with the impact on the Hog's Back and the A31.

- **A31 Junction Safety:** They cite grave concerns regarding the Wanborough Hill junction with the A31, which they describe as already dangerous and over-capacity.
- **Visual Intrusion:** The council argue that the development would be visible from the North Downs Way and would degrade the scenic beauty of the surrounding countryside.

## 1.9 The Guildford Society

The **Guildford Society** strongly objects to the planning applications (25/P/01725 and 25/P/01726) for up to 950 dwellings and a new SANG at Land Off Glaziers Lane, Normandy. The Society argues that the proposal represents a "windfall" site that bypasses strategic planning and threatens the borough's infrastructure and environmental character. Reasons are below:

- **Strategic Planning & Green Belt:**
  - The Society believes the site should be treated as a "strategic site" in a Local Plan exercise rather than being approved as a windfall development, which they argue weakens democratic accountability.
  - They contend the development causes major harm to the Green Belt by encouraging urban sprawl and failing to maintain the separation between Guildford and nearby towns like Ash and Farnham.
- **Transport & Infrastructure:**
  - **Roads:** Concerns are raised that traffic modelling ignores congestion further into Guildford, specifically along Aldershot Road.
  - **Sustainability:** Public transport is described as limited and unreliable, with no commitment to divert bus services into the development or create a genuine integrated hub at Wanborough Station.
  - **A31 Impact:** Increased traffic could block access to the Royal Surrey County Hospital (RSCH) for emergency vehicles.
- **Design & Rural Character:**
  - The Society objects to the "urban characteristic" of the design, specifically 4-storey apartment blocks (14m high) that are out of scale for a rural setting.

- They argue the development will be clearly visible from the Surrey Hills National Landscape (SHNL) and will cause light pollution in a current "dark zone".
- **Environmental & Flood Risks:**
  - The area is prone to regular flooding, and the Society claims the plans lack the detail necessary to prevent increased risk to surrounding properties.
  - The proposed SANG is criticized as "inadequate," being located nearly two miles from parts of the development and offering limited value due to winter flood risks.
  - The developer has reportedly acknowledged they cannot meet the requirement for biodiversity net gain across both sites.

The Society warns that this development is part of a series of disjointed proposals that risk creating "ill-defined settlements" dependent on cars with inadequate provision for sewage, schools, and medical facilities.

## 1.10 Surrey Campaign to Protect Rural England (SCPRES)

The **Surrey Campaign to Protect Rural England (SCPRES)** has submitted a formal **objection** to planning application 25/P/01725, requesting its refusal based on significant harm to the Green Belt and local rural character.

### 1. Green Belt and "Grey Belt" Reclassification

- **Grey Belt Status:** SCPRES rejects the applicant's attempt to reclassify the site as "Grey Belt".
- **Thames Basin Heaths SPA:** The site lies within the influence zone of this internationally important habitat. SCPRES argues that under **NPPF Footnote 7**, this environmental asset provides a strong reason to restrict development.
- **Openness:** The project would cause "major harm" to the openness of the Green Belt by covering 59.9 hectares—half of which would be built upon—with housing.

### 2. Sustainability and Transport

- **Public Transport Gaps:**
  - **Buses:** The majority of proposed homes are well beyond the standard 400-meter (5-minute) walking distance to bus stops.
  - **Rail:** While Wanborough Station is nearby, parts of the northern neighbourhood are beyond the acceptable 800-meter walking distance.
- **Road Impact:** SCPRES is concerned that rural roads like Westwood Lane and Glaziers Lane cannot safely accommodate the increased traffic. They note that even the applicant's mitigation only promises to avoid "severe" impacts rather than eliminating significant ones.

### 3. Rural Character and Design

- **Alien Density:** The existing area consists of low-density housing (6–16 dwellings per hectare - dph). The proposal introduces densities up to **55 dph** and **4-storey buildings** (up to 14 meters high), which SCPRES describes as "alien" and "highly urbanised".

- **Assimilation:** The organization disputes that three heavily urbanized neighbourhoods can be successfully "assimilated" into a tranquil rural landscape.

#### 4. Infrastructure and Environment

- **Inadequate Facilities:** Existing GP services and shops are oversubscribed. SCPRE views the proposals for "potential" health facilities and small shops as vague and unconvincing.
- **Flood Risk:** SCPRE notes an objection from the **SCC Flood Risk Team**, stating the development does not meet national standards for sustainable drainage.
- **Agricultural Land:** The project would result in the irreversible loss of 13 hectares of **Best and Most Versatile (BMV)** agricultural land.
- **National Landscape:** The development would be clearly visible from the **Surrey Hills National Landscape (SHNL)** to the south, causing visual damage to the designated area.

SCPRE contends that the supply of housing does not outweigh the permanent loss of rural Green Belt land and the destruction of Normandy's village "ambience". They argue the application fails to meet National and Local Policy requirements.

### 1.11 Lead Local Flood Authority (SuDS Team)

The Surrey County Council SuDS Team has issued an **objection** based on insufficient information regarding surface water management.

- **Inadequate Strategy:** The team states that the proposed surface water drainage strategy does not provide a suitable basis for assessment.
- **Missing Data:** They note a lack of detailed information regarding the proposed discharge rates and the specific storage volumes required for the Sustainable Drainage Systems (SuDS).
- **Groundwater Concerns:** The team highlight that the applicant has not yet demonstrated that the use of soakaways is feasible given the local ground conditions.

### 1.12 Active Travel England (ATE) Planning

ATE has requested a **deferral**. They do not currently support the application and require further evidence, revisions, and dialogue before making a final decision.

- **Project Scope:** The proposal involves up to **950 dwellings**, a primary school, a Special Educational Needs school, a neighbourhood centre (including retail and medical facilities), and a transport hub.
- **Concerns with Data:** ATE criticizes the applicant's use of 2011 and 2021 Census data, noting it focuses too heavily on vehicle-based commuting trips while omitting daily walking and cycling trips to local amenities.
- **Infrastructure Gaps:**

- **Off-site:** Current roads like Westwood Lane and Glaziers Lane lack safe pedestrian/cycle provision due to high speeds and lack of lighting.
- **Public Transport:** There is significant concern regarding the **delayed delivery of the northern entrance at Wanborough Station**, which is essential for reducing car dependency.
- **On-site:** The internal layout is criticized for not being "direct" or "coherent," and ATE recommends a **modal filter** to prevent through-traffic in the local centre.

**Required Actions:** The applicant must revise the Transport Assessment (TA), commit to financial contributions for local cycling improvements (LCWIP), and improve bus stop facilities.

## 2. Funding Required / Further Consultation / Deferral

### 2.1 Network Rail

Network Rail provide a comprehensive response as a statutory consultee, focusing on the boundary with the Reading to Guildford railway.

- **Wanborough Station Improvements:** NR notes the development will increase station usage. They require improvements, specifically **Step-Free Access (SFA)** between platforms, to mitigate this impact.
- **Safety & Trespass:** They discourage placing Local Areas for Play (LAPs) near the railway and request 1.8m high anti-trespass fencing.
- **Operational Requirements:** Buildings must be set back at least 2m (3m for overhead lines) from the railway boundary to allow for future maintenance without encroaching on rail land.
- **Drainage:** Storm/surface water must not be discharged onto rail property, and soakaways must be at least 20m from the boundary.

### 2.2 Forestry Commission

The Commission provides site-specific comments focused on the protection of **Ancient Woodland**.

- **Buffer Zones:** While a 20m buffer is proposed, the Commission strongly encourages a **minimum 30m high-quality buffer** due to the scale of the development and resulting recreational pressure.
- **Buffer Quality:** They recommend buffers include thorny species to protect the woods from humans/pets and be free of walkways.
- **Mitigation:** They request a sensitive lighting strategy and a detailed Arboricultural Method Statement to protect trees during construction.

### 2.3 Active Travel England

Active Travel England has requested a formal consultation as the development meets their statutory thresholds (exceeding 150 units and 5 hectares).

- **Consultation Requirement:** They note the application includes 950 new homes and requires their Development Management Team's review.
- **Thresholds:** They highlighted that authorities must consult ATE for developments involving over 150 residential units, 7,500m<sup>2</sup> of GFA, or sites of 5 hectares or more.

## 2.4 National Grid

National Grid has issued a standard response stating that **no National Grid Electricity Transmission assets are affected** in the area.

- They advise the applicant to consult National Grid Electricity Distribution and National Gas Transmission separately.

## 2.5 UK Power Networks

UK Power Networks provide a standard technical response regarding their existing infrastructure.

- **Safety & Access:** They warn that no building or structure should be erected under or near overhead lines, and clearance must be maintained for safety.
- **Asset Protection:** They request that the developer contact them to discuss any potential diversions or new connections required to serve the 950 dwellings.

## 2.6 Thames Water

Thames Water has identified significant **capacity constraints** regarding both water and sewerage infrastructure.

- **Sewerage Network:** They indicate that the current network cannot accommodate the needs of 950 dwellings and have requested a detailed "Drainage Strategy" be secured by condition.
- **Treatment Capacity:** Specific concerns exist regarding the resilience of the Hockford sewage treatment works to handle this scale of development without increasing overflow risks.

## 2.7 SCC Education Infrastructure

Surrey County Council (SCC) has formally requested a total financial contribution of **£9,898,407** to mitigate the impact of the 950-dwelling project. This funding is essential because central government grants typically cover only one-third of the costs for school expansions, and without developer support, the council's ability to fulfil its statutory duty to provide school places would be jeopardized.

The funding requirements are broken down as follows:

- **Primary Education Funding:** SCC requires **£4,666,609** to create 238 additional places in the Ash and Tongham planning area. The developer must also reserve land on-site for a new two-form entry (2FE) primary school.
- **Secondary Education Funding:** A contribution of **£4,317,157** is sought to provide 171 secondary school places.
- **Early Years Funding:** A total of **£914,641** is required for 67 new early years places, alongside dedicated land for on-site provision.
- **SEND Provision:** The council also mandates that Special Educational Needs and Disabilities (SEND) provision be included directly on-site.

SCC emphasizes that these contributions are a planning necessity to prevent new residents from displacing local children at existing schools, which are already facing increased pressure.

## 2.8 Surrey Police and Sussex Police

**Surrey Police Designing Out Crime Officer** has formally requested the following **Funding and Infrastructure Requirements:** a financial contribution of **£226,381.18** via a Section 106 agreement to mitigate the impact on policing services.

- **Necessity:** Surrey Police argues that the existing local policing infrastructure cannot accommodate the estimated **2,280 additional residents** without a significant drop in service levels.
- **Funding Allocation:** The requested funds are earmarked for specific "infrastructure" needs rather than general staffing or officer salaries. These include:
  - **Staffing & Equipment:** Provision of uniforms and radio equipment for the additional 4.09 officers/staff required to cover the new population.
  - **Fleet:** Contribution toward two additional police vehicles.
  - **Premises:** Expansion or adaptation of police stations and custody suites.
  - **Technology:** Support for ANPR (Automatic Number Plate Recognition) and Mobile Data Terminal (MDT) infrastructure.

### Designing Out Crime (DOC) Advice

The officer also provides specific recommendations to improve the safety and security of the development's masterplan:

- **Public Open Space (POS):** Caution is raised regarding the "Green and Blue Infrastructure" that wraps around the site. Police advise that these areas must be overlooked by dwellings to provide natural surveillance and prevent them from becoming "enclaves for crime and anti-social behaviour".
- **Permeability:** While the plan aims for a "permeable" layout, the police warn that excessive or unnecessary paths can provide easy escape routes for offenders. They recommend that all paths serve a specific purpose and follow "pedestrian desire lines".
- **Active Travel Hub:** The proposed bike and transport hub is flagged as a high-risk area for cycle theft and anti-social behaviour. Police demand that this facility be designed to **Secured by Design (SBD)** standards, incorporating high-quality CCTV and secure storage.

- **Parking:** To prevent vehicle-related crime, parking should be "on-plot" or in small, overlooked courtyards rather than in large, isolated rear parking areas.

The police force focuses on "**Secured by Design**" principles to ensure community safety.

- **Crime Prevention:** They request that the developer engage in detailed discussions regarding the layout to minimize opportunities for crime and anti-social behaviour.
- **Infrastructure Hub:** Recommendations include ensuring the proposed neighbourhood centre and transport hub have adequate lighting and surveillance.

## 2.9 Surrey Hills National Landscape (AONB)

The Planning Adviser for this body has expressed concerns regarding the **visual impact** on protected landscapes.

- **Landscape Character:** While the site is not within the National Landscape itself, its scale may impact the setting and views from the nearby Surrey Hills.
- **Mitigation:** They emphasize the need for high-quality design and materials that are in keeping with the local rural street scene.

## 2.10 SCC Archaeologist

The County Archaeologist recommends a program of **archaeological work** before any development begins.

- **Heritage Assets:** Given the size of the site (over 59ha), there is a high potential for undiscovered archaeological remains.
- **Pre-commencement Condition:** They suggest a condition requiring a written scheme of investigation and field evaluations.

## 2.11 Surrey County Council Highways

The council is currently reviewing the highway and transport issues related to the application.

- **Complexity Delay:** Due to the "nature and complexity" of the 950-dwelling proposal, the council cannot meet the statutory deadline for a full technical assessment.
- **Request for Deferral:** The Highway Authority explicitly requests that Guildford Borough Council refrain from determining the application until a final technical recommendation can be provided

## 3. No Objection

### 3.1 National Highways

- Given the location and distance of the site to the SRN, which is some 7km away to the nearest SRN (the A3), they are content that proposal is unlikely to have a significant impact to the safe and efficient operation of the SRN/A3 and recommend No Objection.

### 3.2 Countryside Access Officer (Surrey County Council)

This team offers **no objection**, provided specific requirements for public rights of way are met.

- **Public Access:** Safe access must be maintained on Footpaths 361 and 363 at all times; no construction access is permitted via these footpaths.
- **Site Management:** Any temporary closures for safety require 3 weeks' notice and a fee.
- **Infrastructure Protection:** Requirements include ensuring proper drainage away from the right of way and preventing any obstructions (vehicles or materials) on the paths.