



Andrew Thompson
Planning Management
Guildford Borough Council
Millmead House
Guildford, GU2 4BB

Please reply to:
Guildford Society Planning Applications Team
Flat 4 Catherine's Place
Chestnut Ave
Guildford GU2 4AE

Email: chair@guildfordsociety.org.uk

12th October 2025

Dear Andrew Thompson

25/P/01156 Outline planning application with all matters reserved except for means of access to the site, for the phased development of a residential-led mixed-use development comprising up to 1,800 dwellings (Class C3 Use),

The Society **Strongly Objects** to the planning application for this site.

As well as the application we have also seen the first ideas emerging for the Nuthill Farm adjoining site, which will also have an impact on the site. This site will be for commercial buildings which will be focused on distribution use from the limited details available. Our understanding of what is proposed for the site is at Appendix A

DEVELOPMENT JUSTIFIED

The Society accepts that development of this site is justified to meet the demand for housing and commercial use. The government is now requiring Guildford to supply 1,155 Dwellings per annum, compared to 562 Dwellings per annum (Source Interim Land Supply Statement 1-4-2025). It must be expected that other large sites will be bought forward, some of these might be to the east of Guildford, potentially on the eastern edge of Guildford which will have an impact on Transport, and Education and Health Facilities.

The proposed quantum of development if developed effectively is not a major concern. We are concerned that the basic plan proposed for Gosden Hill with limited A3 Access, limited links to the surrounding area will not integrate well into existing and future developments.

The Strategic Development Framework Supplementary Planning Document (SPD), adopted July 2020, summarised Guildford Borough Council's (GBC) vision for the site to be:

"Gosden Hill should become a sustainable and highly attractive area of the town.

In the future, the development will be identified for its rich and abundant landscape, its convenient transport connections and its successful integration with neighbouring suburbs."

We don't believe that the current plans achieve this vision.

PLANNING

The site has been the subject to considerable thought by GBC during the Local Plan Process. This resulted in it being adopted as a Strategic Site in the Guildford Borough Local Plan: strategy and sites 2015 – 2034 (LPSS2019), adopted April 2019. LPSS2019 policies have been developed in more detail in various documents including the Strategic Development Framework SPD which considers each of the nominated strategic sites documenting design principles for each site. . The LPSS2019 and Strategic Development Framework SPD were both the subject to significant local government funding to produce, and both were subject to extensive public consultation to comply with legal planning requirements.

Although the Local Plan 2019 is now subject to revision as its 5 year life expired in 2024 it is noted that:

- Policies in an existing local plan do **not automatically stop applying** simply because the plan has passed its stated end-date or is being replaced. A local planning authority must keep the plan under review and decide which policies need updating, and some policies may be formally “saved” or carried forward until replaced.
- **Policies remain material:** Decision-makers will continue to apply relevant local plan policies unless those policies have been superseded by a newer plan or by national policy.

For Supplementary Planning Documents

- These do not have a fixed expiry date. Their validity depends on their relevance and consistency with the adopted Local Plan and national planning policy. SPDs remain valid until they are formally withdrawn, replaced, or become inconsistent with updated planning policy.

Both are subject to changes in National Policy. An immediate impact on Guildford of National Policy changes is that the LPSS is deficient due to the requirement from National Government for the borough to deliver approximately twice the number of houses as originally proposed in the LPSS2019.

The proposals for Gosden Hill have been the subject to major change compared to the plans documented in the LPSS2019 and Strategic Development Framework SPD

The applicant is now proposing a plan that has significant changes from the proposals in the LPSS2019 and Strategic Development Framework SPD. The applicant at the Planning Statement at section 7.10 has documented why these changes have been made. We disagree with several of these changes as they appear focused on short term development of the site rather than creating a site that can integrate to the local area and other potential sites. The SPD majored on making the site sustainable and less car dependent, we contend that this hasn't been achieved.

SPATIAL PLANNING

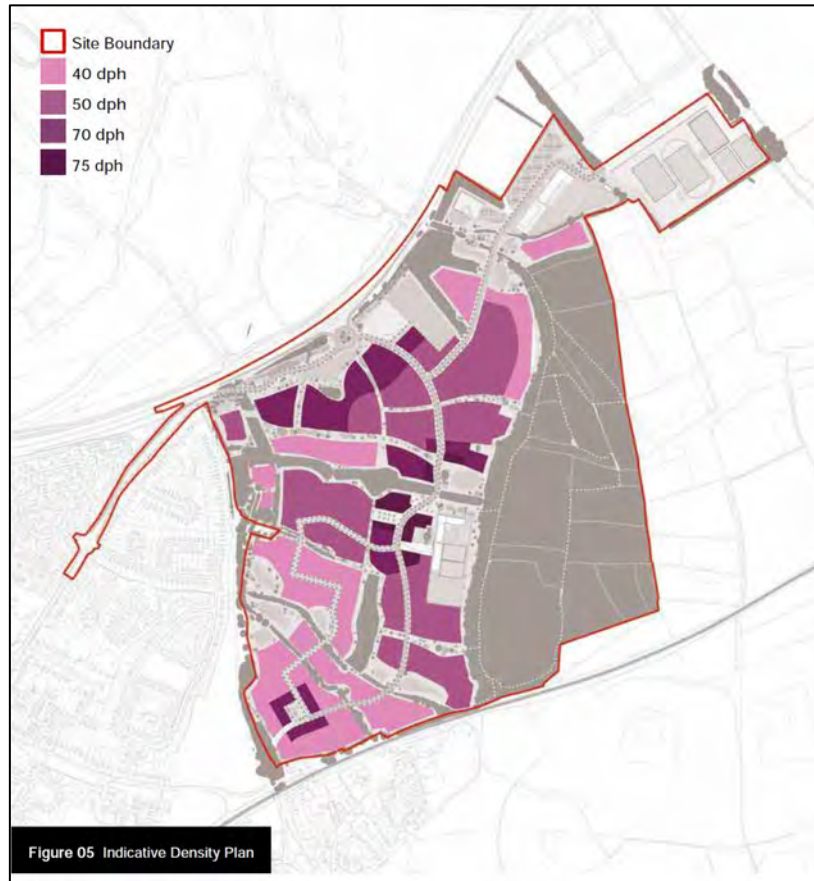
The plans propose the removal of the two-centre approach, as proposed in the Strategic Development Framework SPD with one centre being proposed for the central area of the site. The SPD proposed two centres to create a development with lower buildings in the north of the site, limiting visual intrusion on the A3 corridor and to provide a centre near the proposed rail station.

It is noted that the developers have reversed the density of the development as to the proposed density layout in the Strategic Development Framework SPD, see illustration below:



The Society believes that site of this magnitude even at an early stage should have a proper electronic model developed e.g. VU City to provide a proper view of the options for building placement on the site. This is especially important as an electronic model allows for the topography of the site to be modelled and aid understanding what views from the views from the surrounding countryside e.g. North Downs, and access routes need detailed evaluation.

The current planning submission proposes, see illustration below, taller, high density buildings near the A3, where they will be highly visible. We comment further on this in our comments on Design Principles below.



It is noted the proposed Nuthill Farm development of commercial units subject of a pre-application discussions on the northern border of the site will place more traffic onto the site road network including a limited number of HGV's. How this limit on HGV's is enforced is not clear. These vehicles will impact the housing that are placed along this access route.

The Nuthill Farm Site has been sold by Martin Grant Homes to another developer. The current pre-application covers only a small portion of the Nuthill Farm site, and it can be expected other areas of the farm will be proposed for development in the future.



SITE INTEGRATION

The revised plan essentially creates a long Cul de Sac development with access limited to one, likely to be congested route, along the London Road. For Gosden Hill to be a “a sustainable and highly attractive area of the town” there needs to be far more consideration on making the site integrate to surrounding areas notably Merrow and Burpham (and potentially other developments coming forward in the east of Guildford as part of the LPSS 2019 review).

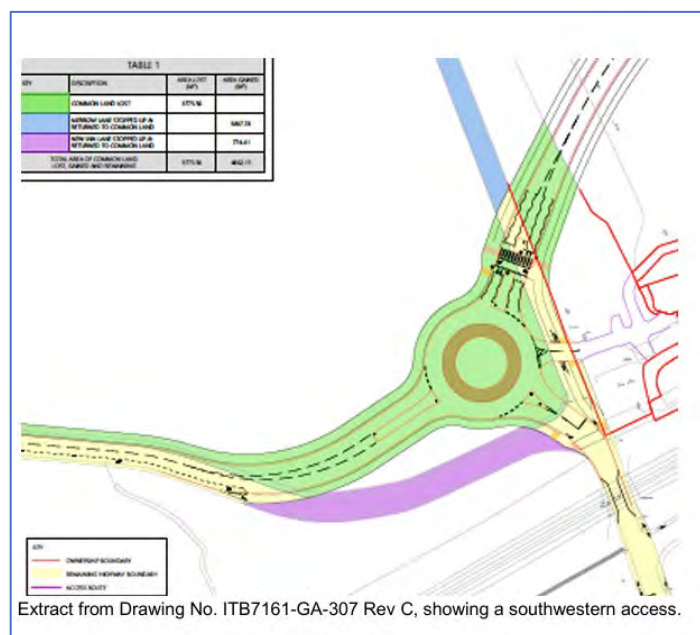
The Strategic sites SDF at para 5.4.9. states:

The site should be linked, physically and functionally, with the surrounding neighbourhoods and with the wider town. It should be well connected to the wider town, and in particular to Burpham and Merrow so that neighbouring communities can become integrated over the longer term. The development of a range of community facilities at Gosden Hill, including primary and secondary education, will also enhance provision for the existing resident population. Local services and facilities should be located at the most connected points within Gosden Hill to ensure they are within walking distance of all homes.

The proposed transport network doesn't encourage permeability to the surrounding area being very focused on the northern entrance, with some access to New Inn Lane. The dropping of any road access to the southwest of the site as included in the SPD as a vital transport link, and the train station is a major issue. Although there are issues with a southwest access in that it might encourage through traffic, we submit that a road access is required to provide for, at a minimum, a bus route to go towards Merrow and its amenities, as well as for pedestrian and cycle access. Traffic engineering measures should also be capable of discouraging through traffic.

We note Surrey County Council (SCC) in their comment letter note that a southwest access has been discussed at length in pre-application discussions and plans were drawn up.

We are also concerned about the access to the site for emergency vehicles, a southwest link would provide for alternative emergency vehicle access which for a site of this size seems highly desirable.



DESIGN PRINCIPLES

It is useful that a document describing how Design Guides are to be produced has been made available.

However, we are seriously concerned about the absence of any real design information within the application. It is impossible to judge the quality and appropriateness of the application without proposals that demonstrate how the housing will be integrated on the site taking account of the complex topography and existing landscape features. The parameter plans are insufficient in explaining the overall design layout and urban design. We believe design guides not being available until a future stage means that decisions on this application being made based upon minimal information and series of photos from other developments elsewhere. The design quality of this sizeable development would be left completely open and dependent on the approach of the developer or developers who take the development forward.

In the Strategic Development Framework SPD it states:

'The master plan should include a new green gateway to Guildford, maximising the opportunity to make a statement about both the quality and identity of the town, whilst providing strategic planting as a buffer to the A3. New business development adjacent to the junction within a richly planted landscape presents an opportunity for a unique, architect designed building of substantial quality and integrity.'

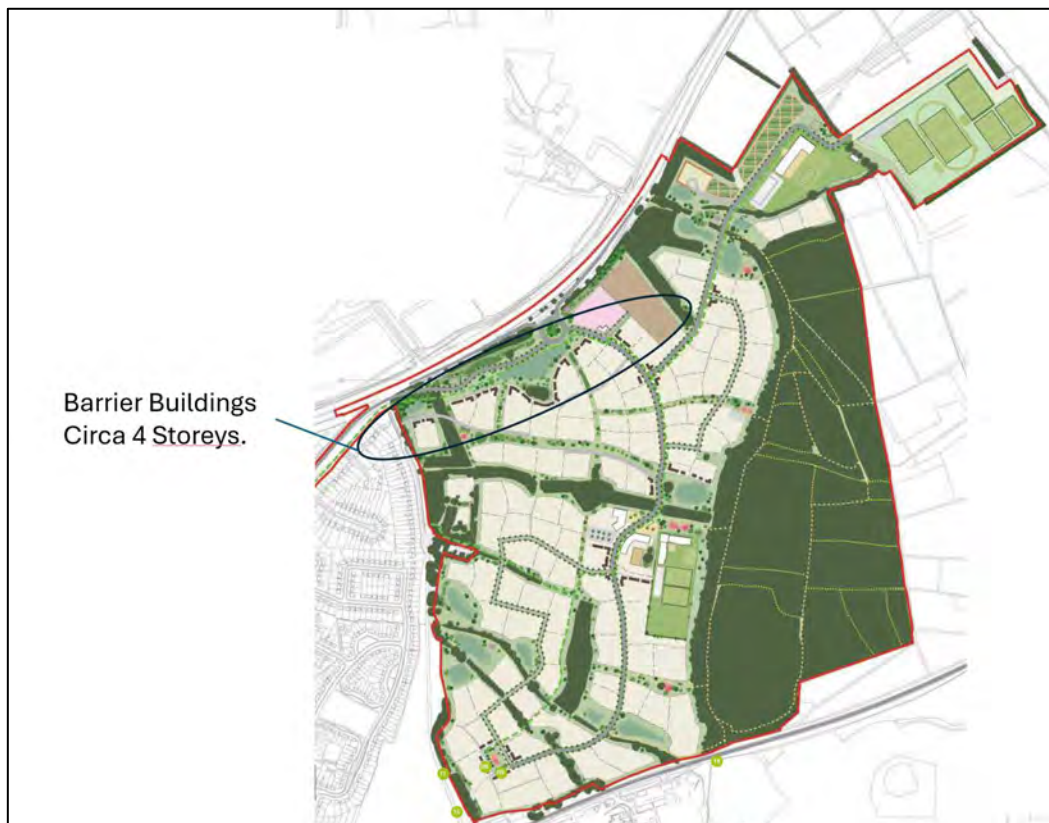
The application proposals ignore this 'green gateway' and proposes a wall of apartment buildings as the gateway. How these buildings are to be designed to minimise noise and pollution from the heavily used A3 is not described. This is of major concern as the examples of gateway sites illustrated in the application to support this proposal by the applicant appear to be of very poor quality. The current situation where the arrival southbound into Guildford has substantial landscape and tree screening along the edge of this site needs to be retained or replicated to retain this 'green gateway'.

The site does have a ground level substantially below the A3 at its northern edge, the original proposals used this to make the lower buildings less obvious and created some semblance of a green corridor.

Developers view of the wall of buildings below.



Map showing position of the taller buildings along the boundary.



The Society has an additional concern that building a wall of buildings needs to be very carefully designed, as the buildings are considered to form a sound barrier they may suffer from small windows and blank facades.

TRANSPORT

Cycling

We welcome the provision of cycling routes within the site. However, the cycling provision outside the site is dire. Notably the London Road is a very unpleasant cycle trip with narrow cycle lanes separated from traffic by a painted line. To encourage modal shift especially on the route into Guildford Town to provision of proper cycling routes needs to be considered.

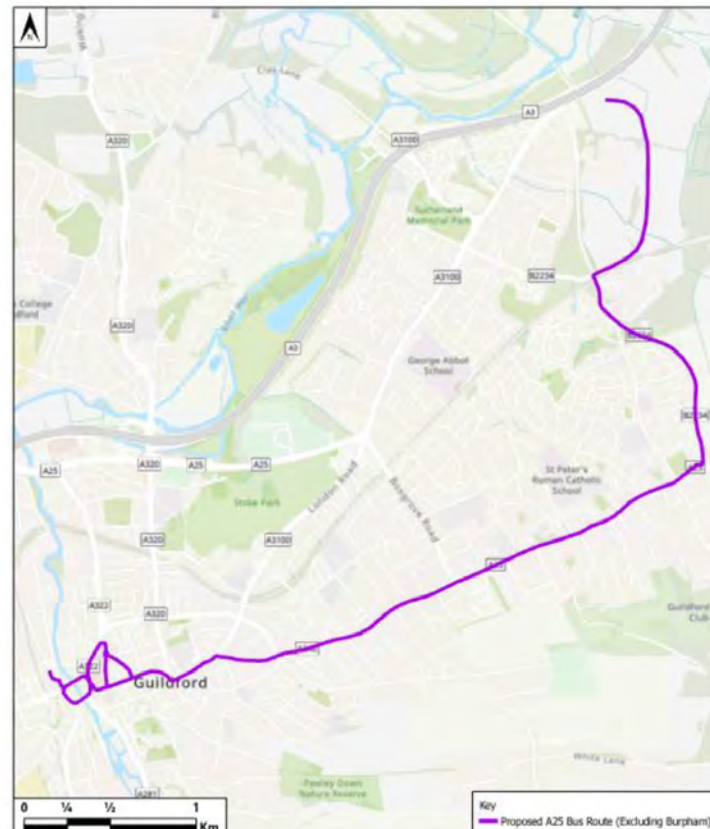
We are concerned that the modal shift assumptions used for traffic modelling are not correct, in part due to the failure to recognise the dire state of cycling provision in the borough.

Bus

The Bus plans are not compliant to the proposed plans for the site as they appear to require a southwestern access corridor.

Extracted from Transport Information

Image 2.1: Gosden Hill Bus Service Route



As this is not committed too, in the proposed plans these are not achievable plans.

We note that Active Travel England have commented at length on the viability of the provision of sustainable travel to the site.

Road

A3 Access

The LPSS2019 proposed in Policy A25 that:

- (1) *An improved junction on the A3 comprising the relocated A3 southbound off-slip, a new A3 southbound on-slip and connection via a new roundabout to the A3100, with associated infrastructure on the A3100 corridor within Burpham*
- (2) *Deliberative process of consideration to be undertaken as part of the development management process of the potential opportunity to provide an all-movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon*

Road. Land could potentially be required to be safeguarded for the provision of a connector road to the B2215 London Road/A247 Clandon Road.

The inspector at the local plan examination was very concerned to receive assurances that National Highways, or Highways England as they were known during the LPSS examination) were committed to A3 improvements to unlock sites at Gosden Hill Blackwells Farm etc. This assurance at the examination has proved to be very limited with A3 schemes being removed from RIS budgeting, except for the M25 Junction 10 to the north of Guildford.

One of the major underpinning principles supporting strategic site development in Guildford has thus not been delivered.

The proposals for the road access are adding traffic to an already overloaded traffic network. The network is also having to cope with extra loads coming from other developments. In particular we note that:

- The A3 exit in a southbound direction to the roundabout looks a minimal affair, it should be noted that A3 traffic at present on the Burpham Exit can queue up the dual lanes before the first Roundabout (London Road/Great Oaks). The 'Weave Length' is only 500metres for the exit from the entrance /exit to the Sunday market site at Nuthill Farm, this is half the desired length of 1 KM.
- Traffic from the South has a very convoluted access method continuing north on the A3 past the site to the Ripley exit, turn right at B2215/A247 roundabout across the A3 and regain the A3 at the A247/A3 junction on the southbound slip. This places more load on the B2215/A247 Junction which can get overloaded at peak times and is particularly awkward with traffic accessing the adjoining Petrol Station and parking for Waitrose. It also creates a very short use of the A3 for Local Traffic from A247/A3 access to the access to the site. This risks replicating, admittedly to a lesser degree, one of the major traffic issues in Guildford namely the use of the A3 for local traffic in between the A3/A25/A322 Junction and the university exit.
- The access to the A3 going north will place more traffic onto the network on the A3 Slip Road, which will be single lane and on the A3100/Clay Lane Junction which is already the subject to considerable congestion. Depending on the quantum of commercial traffic generated by the Gosden Hill site there may be issues with Heavy Truck Traffic blocking the Roundabout. The Strategic Development Framework SPD acknowledges this traffic problem at peak hours.

considered based on current requirements and usage but taking account of Guildford's future expansion and changing needs to discourage car traffic in the town centre.

Train Station.

The intention to provide a train station has been dropped and the site plans adjusted to remove one of the centres. This decision appears to have been made via desk-based exercise (Minimum Viable Product Appraisal) that answered the question *'What transport strategy would provide suitable infrastructure and services to enable and encourage trips by sustainable modes arising from the Gosden Hill development'*.

This appears to be an intellectually suspect approach. A development of the Gosden Hill size is never going to justify a rail station. A rail station should be examined in the context of impact on the travel opportunities for those living to the east of Guildford including Gosden Hill and other potential sites. It is assumed this process looking at a wider context for a station, was followed for the LPSS 2019 to propose that a station be provided.

It should also be noted that the new rolling stock being introduced at present on the 'New Line' to London has better acceleration and top speed compared to the current trains. This should allow an extra stop to be accommodated, and overall journey times to be improved. This increases the appeal of 'New Line' services. The transport information shows London is still a major draw for travel, and a station would provide, particularly if service speeds are improved, a viable alternative to the fast services from Guildford Station. This would decrease commuting pressure into Guildford Station at peak times.

A station also eases access to Guildford Station creating other journey possibilities and serving as an adjunct to bus services.

The dropping of any mention of a rail station at Gosden Hill also has implications for the proposed Guildford West station near the Royal Surrey County Hospital & Research Park. This station has greater issues with its development, as it may require the acquisition of several houses to provide access from Park Barn to the station. It must be feared that this station is also at risk of being abandoned.

With dropping of plans to provide a rail station, residents commuting to Guildford are left with limited options, such as driving or taking the bus. Additionally, rejecting the active travel route into New Inn Lane is likely to increase dependence on cars. The suggestion that commuters will choose to walk approximately two miles to London Road station does not provide sufficient reassurance.

We are particularly unimpressed by the traffic assessment claim that cars from the 1800 houses will result in 'negligible', 'low' and 'small' increase in traffic (*Section 7.26 of the Planning Statement*), nor do we believe that a minor change to the carriageway on Clay Lane will have an appreciable effect on London Road traffic. If each new home uses the national average 1.54 cars, plus school, employment Park-and-Ride traffic, there will be a minimum 3200 cars on site with only one route out to visit the shops, to go into Guildford centre, to travel north or to use our schools and facilities.

Inevitably, motorists approaching or leaving Guildford on London Road will face long queues and will be tempted to rat-run through adjacent roads. Indeed, this already happens. There must be a comprehensive plan for this and other perverse effects of creating a giant cul-de-sac at Gosden Hill which empties into Burpham.

We note Surrey County Council, in their comment letter, still maintain that a site for a train station should be preserved.

CONSTRUCTION TRAFFIC

We strongly object to the proposed route for construction traffic via Merrow Lane and Old London Road. This has a major impact on local residents, all construction traffic access should access via the A3 from start of construction via the proposed junction.

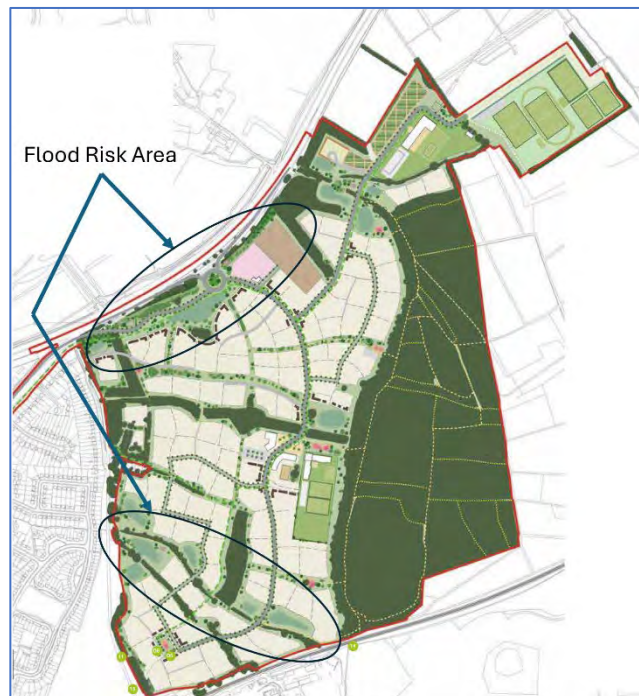
SANG

The site will provide a SANG to the east of the proposed development. Part of this existing woodland is Ancient Woodland. This is a fragile environment and measures are needed to protect the area from the impact of 2000 to 3000 people and their pets living in proximity. We question whether the area of ancient woodland should be excluded for the SANG area requirement.

FLOODING

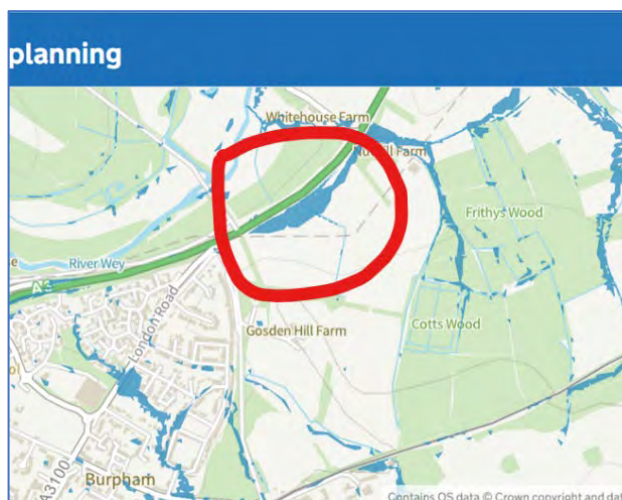
We appreciate the inclusion of balancing ponds for modern surface drainage, but are concerned about the flood mitigation timing. Completing measures near Great Oaks Park in Phase 1 would be more reassuring. Dividing the development may benefit developers financially, but it hinders essential infrastructure, especially regarding flooding and construction traffic.

We note that the Environment Agency have raised concerns objected to the plans as they are proposed.



The Flood Risk area at the north of the site is a concern as it could impact the road junction proposed. How this junction will be constructed to mitigate for the flood risk is not explained. Note that the junction if blocked will cut off the majority of the site.

The proposed larger buildings along the A3 need also to be considered as their foundations may have an effect on the drainage patterns into the floodable area.



UTILITIES

It is requested that utility companies confirm the capacity for water, sewage, and electricity will be available prior to the construction of any homes.

Water – The Utilities Statement indicates that there is currently insufficient water for the initial phase and the cost and timeframe for additional supplies are substantial and largely undefined. It is recommended that approval is contingent upon a detailed and costed plan to provide adequate water supply.

Sewage – Records from Thames Water and the Environment Agency show that the Merrow-Burpham combined foul main pipe is at full peak-flow capacity. The Utility Statement recognizes the need for increased off-site capacity, which should be established before connecting new properties.

Electricity – The commitment to electric vehicle charging points, solar panels, and battery storage is noted. As heating and lighting will rely solely on electricity, additional supply depends on completing the Weyside substation and further off-site work, with costs and timelines yet to be determined. Proceeding without a clear and costed plan may result in houses that lack essential services.

CONCLUSION

Creating costly local plans with identification of strategic sites and infrastructure provision in planning policies which are then changed with limited explanation brings the entire planning system into disrepute.

As we have highlighted, we believe the proposed development fails to address the vision laid out in the Strategic Sites SPD with its major changes to the how the density of development is to be managed in the landscape, inadequate transport provision, and limited attention as to how the development integrates to the rest of Guildford.

Guildford to thrive it must have the requisite level of infrastructure development. It needs to be made clear to government that just building houses without proper infrastructure is not an option.



The Society asks that GBC provide robust planning guidance after necessary consultation on :

- The design of and planning of the site and its relationship to the topology.
- Allowing for the Future Provision of a Rail Link
- Understand from Highways England the potential to provide effective 4-way access at Burpham to the A3
- Provide guidance as to how a Sustainable movement corridor is to be created along the London Road Corridor.

The Developer needs to respond to these discussions but also:

- Create an electronic three-dimensional computer model of the site for options to be considered.
- Look at the southwest access again to allow for at a minimum Emergency Vehicle Access and also bus services via a bus gate
- Respond to the concerns expressed by the Environment Agency SCC and other government bodies.
- The phasing of Utility provision to the site is a major issue that needs to be considered.
- Modify the scheme to allow for access to a potential Rail station with the higher density hubs located as proposed in the SPD.
- Explain why the current application has a totally revised density, heights and massing profile – the topography has not changed.
- Revise the Traffic Models.

Yours Sincerely

Guildford Society Planning Group

Appendix A

Nuthill Farm Proposal

Mortimer RE is a firm of developers and real estate agents; www.mortimer-re.com. They clarified that they are not affiliated with Martin Grant Homes (MGH), but their project would be included as part of the larger MGH development. Their scheme is situated on one of the land parcels sold by MGH. As a result, it will function independently from the rest of the development but will use the MGH highways network, specifically providing direct southbound access to and from the A3, while northbound traffic would need to use London Road and Clay Lane.

The proposal outlines 16,000m² of “modern, high-quality employment space” on a 10-acre site. The plans specify several two-storey steel-frame buildings with glazed ends and insulated wall panels, similar to Mortimer’s Bourn Quarter Business Park in South Cambridgeshire (<https://bourn-quarter.com>). The Burpham project has been described as offering “industrial/logistics” units with some B8 space intended for warehousing and storage, including facilities for technical, start-up workshops and distribution/warehousing. The scheme would include 160 parking spaces (one per 100m² of floorspace) and facilitate a limited number of HGV movements each day to service the warehouse units, although the precise volume of HGV movements would depend on tenancy. Additional pedestrian and cycle connections are proposed, but since these would fall outside Mortimer-RE’s ownership, they would form part of the broader MGH scheme.

Current information suggests the proposal may create 306 jobs on site, with an additional 129 projected jobs indirectly associated. This would require clarification upon application submission. With 55% of the local community commuting outside Guildford for work, local employment opportunities may be considered beneficial. The roles are anticipated to be technical and professional, aligning more closely with operations at Guildford Business Park rather than Slyfield Green. Provided sketches indicate landscaping measures throughout the site, including a 12-metre wide tree buffer along the A3 for visual screening. The site intends to follow energy sustainability principles, incorporating solar panels and EV charging infrastructure.