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*Via email only*

7<sup>th</sup> November 2025

Dear Andrew

**NETWORK RAIL CONSULTATION RESPONSE TO 25/P/01156 – GOSDEN HILL FARM, MERROW LANE, GUILDFORD, GU4 7LE**

These representations are submitted to Guildford Borough Council (GBC) by Network Rail Infrastructure Limited ('Network Rail') and South Western Railway (SWR) to 25/P/01156 ('the planning application'). Network Rail (NR) and SWR welcome the opportunity to comment on the planning application.

Since May 2025, SWR is in public ownership operated by the Department for Transport (DfT). Therefore, there is greater integration between track and train as the railway move towards Great British Railways (GBR). NR remain the statutory consultee for planning applications.

NR is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the DfT and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO).

Having reviewed the detail contained within the planning application, NR have the following comments to make.

The planning application is located at Gosden Hill Farm and this site forms Policy A25 of Guildford Borough Council's (GBC) Local Plan. The planning application proposes the following:

- Delivery of up to 1,800 new homes (which includes 720 affordable homes);
- Land for B1a/b Employment floorspace of up to 10,000 sqm;
- A local centre with up to 2,150 sqm of comparison, convenience retail and services (Use Class E), community uses and a health centre;
- Education facilities including early years, primary school (2 Form Entry) and land for a secondary school (up to 4 Form Entry);
- A gypsy and traveller site;
- A Park & Ride facility close to the A3;

- A Suitable Alternative Natural Greenspace (SANG) set within Cotts Wood and Frithy's Wood; and
- A range of other publicly accessible open spaces including amenity spaces, children's play and strategic landscaping.

NR has been engaged with the applicant and their transport consultant for many years regarding the Gosden Hill Farm site. Policy A25 of the adopted GBC Local Plan requires:

- Land made available for Guildford East (Marrow) railway station, and necessary and proportionate contribution towards the provision of the station

NR note the references within the Transport Assessment (TA) submitted with the planning application, to the previous discussions between NR and the applicant's transport consultant in relation to the need for, and provision of, a railway station as set out within Policy A25. The planning application does not include the making available of land for Guildford East (Marrow) railway station. Additionally, the planning application does not provide for any rail measures at all.

The planning application and submitted TA lacks an assessment of rail options stating that 'in the absence of robust transport evidence which includes rail as a sustainable transport option, a package of mitigation cannot be agreed or set out'. The planning application therefore considers that in the absence of a necessary and proportionate contribution towards the provision of a new station, no other rail contributions are needed. NR and SWR dispute this assessment.

Additionally, the TA sets out that it takes on average 37 minutes to travel to Guildford by bus and 23 min by cycle. In the peak, it is likely that the bus time will increase, and this assumes residents will travel from site to Guildford railway station, from where many are likely to then travel out of Guildford in the London bound direction. This will effectively mean travelling back on themselves which would seemingly appear to be a disincentive to use public transport to access Guildford rail station.

Guildford rail station car park is currently being re-built as part of a station re-development. No additional car park spaces are provided to accommodate potential demand from the planning application site. Guildford rail station already attracts commuters and other rail passengers from a wide catchment meaning that the station car park is at capacity most days. Whilst rail use fell during and post-Covid, more workers are returning to the office Monday to Thursday with typical AM and PM peaks being experienced again. Whilst some continue to work from home, this is becoming less frequent and, additionally, using the railway for leisure travel has grown exponentially since Covid. Rail demand therefore is returning to pre-Covid levels and, in some instances, beginning to exceed these.

To summarise, the planning application does not provide an assessment of rail options nor a contribution towards rail to accommodate use from the planning application site. NR and SWR therefore consider the planning application in its current form to be deficient in respect of the sustainable transport strategy.

NR also note the proposal to locate the schools, gypsy and traveller site and community facilities a significant distance from the railway. This is necessary to ensure minimal interactions with the railway, located on the site's southern boundary, to prevent trespass and risk to future occupiers and other vulnerable users. The applicant should commit to the



erection of a minimum 1.8m high anti trespass fence along the boundary with the railway and maintain this for the lifetime of the development for safety of future occupiers and users of the site.

I trust the above is sufficient at this time and clearly sets out NR and SWR concerns with the planning application. However, should further clarification be required then please do not hesitate to contact me

Yours Sincerely

Craig Hatton

**Senior Town Planner**  
**Network Rail Infrastructure Limited**