

Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey
GU2 4BB

Date: 31 October 2025

Our ref: 69909/01/DL/PH/40087596v5

To Whom It May Concern

Planning application for Land at Shortland Farm, Ash, Guildford

We are pleased to enclose an application for outline planning permission for the redevelopment of Land at Shortland Farm, Guildford Road, Ash, Guildford (the Site) to Guildford Borough Council 'GBC'). The Application is submitted on behalf of Gleeson Land Limited, a promoter with significant experience delivering land with implementable planning permissions. The description of the proposed development is as follows:

"Outline planning application with all matters except for the accesses from Guildford Road and Wyke Lane reserved for subsequent approval for the demolition of the existing buildings and hardstanding and the erection of:

- *up to 200 residential dwellings including affordable housing and plots of self-build plots (Class C3);*
- *green and blue infrastructure; and*
- *associated service and utility structures."*

The correct planning application fee of £30,437.00 has been paid under separate cover¹.

Submission documents

A suite of application reports and plans have been submitted to accompany the Application. These include some documents that are submitted 'for approval', whilst others provide background, illustrative and accompanying information. All documents are submitted to assist GBC to reach a decision on the determination of the planning application. In addition to the Cover Letter (prepared by Lichfields) the submission documents enclosed are:

- 1 Application Form & Ownership Certificates (prepared by Lichfields, submitted through the planning portal)

¹ £15,695 + (£189*7.8), or £189 per 0.1 hectare (or part thereof) in excess of 2.5 hectares

- 2 Application drawings (prepared by OSP Architecture and Mayer Brown (access)):
 - a Site Location Plan (ref. 25019 – S101B)
 - b Parameters Plans:
 - i Land Use Parameter Plan (ref. 25019 – C102)
 - ii Heights Parameter Plan (ref. 25019 – C103)
 - iii Green Infrastructure Parameter Plan (ref. 25019 – C104)
 - c Access drawings:
 - i Primary Access (ref. MJGWYKELANE 1/01 Rev.P4)
 - ii Emergency Access (ref. MJGWYKELANE 1/06 Rev P2)
 - d Indicative plans and plans submitted for information
 - i Existing Buildings Sheet 1 (ref. 25019 – S110)
 - ii Existing Buildings Sheet 2 (ref. 25019 – S111)
 - iii Existing Buildings Sheet 3 (ref. 25019 – S112)
 - iv Existing Floor and Site Levels (ref. 25019 – S102A)
 - v Illustrative Masterplan (ref. 25019 – C101A)
 - vi Outline Landscape Strategy (prepared by Cornus)
- 3 Design & Access Statement (including Accessible Homes statement, Minimum internal space standard statement and open/amenity space assessment) (prepared by OSP Architecture)
- 4 Planning Statement (prepared by Lichfields)
- 5 Landscape and Visual Impact Assessment (prepared by Leyton Place)
- 6 Green Belt Technical note (prepared by Leyton Place)
- 7 Topography Survey (prepared by MK Surveys)
- 8 Ecological Impact Assessment & SANG Statement (prepared by FPCR), including BNG report (Appendix G)
- 9 Completed Biodiversity Statutory Metric (prepared by FPCR)
- 10 Heritage Impact Assessment (prepared by Lichfields)
- 11 Desk-based Archaeology Assessment (prepared by Lichfields)
- 12 Flood Risk Assessment (prepared by Aegaea)
- 13 Drainage Strategy (prepared by Aegaea)
- 14 Utilities Statement (prepared by TDS)
- 15 Transport Assessment (including Parking provision statement and Site waste management plan) (prepared by Mayer Brown)

- 16 Outline Travel Plan (prepared by Mayer Brown)
- 17 Arboricultural Impact Assessment and Tree Survey (prepared by Aspect)
- 18 Contaminated Land Report (prepared by RSK)
- 19 Noise Assessment (prepared by Cass Allen)
- 20 Air Quality Assessment (prepared by Cass Allen)
- 21 Statement of Community Involvement (prepared by Lichfields)
- 22 Energy and Sustainability Statement (prepared by Daedalus)
- 23 Lighting Statement (prepared by Tetrattech)

Key principles of the proposals

The plans and documents submitted to accompany this planning application assess the proposed scheme's compliance with relevant local development plan and national planning policies.,

It is considered that the Site meets the definition of grey belt (as defined within the NPPF), and the proposed development meets the relevant 'golden rules' required of major development involving the provision of housing on grey belt land. The Site is considered to form 'appropriate' development in the green belt (National Planning Policy Framework (NPPF) paragraph 155) and therefore there is no requirement to assess the application proposals against the NPPF paragraph 153. Furthermore, the NPPF (para 158) states that "a development which complies with the golden rules should be given significant weight in the planning process.

Nonetheless, even if the site were not considered grey belt and therefore inappropriate development in the green belt, the scheme clearly meets the test at NPPF paragraph 153 and demonstrates very special circumstances.

As GBC accept that they cannot demonstrate a five-year housing land supply², paragraph 11(d) of the NPPF indicates that planning permission should be granted unless: (i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or (ii) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole.

The application submission establishes that the proposed development accords with part (i) as the analysis within the Planning Statement does not identify any relevant grounds that would result in strong grounds for refusing the application proposal. As such, the tilted balance is engaged so planning permission should be granted unless the adverse impacts of doing so significantly and demonstrably outweigh the benefits (which, as set out above, include the weight to be attached to the schemes compliance with the golden rules).

² Five Year Housing Land Supply - Guildford Borough Council Interim Position Statement - 01 April 2025

It is considered that the benefits in this case clearly outweigh the harms, even without the application of the tilted balance. In the context of paragraph 11(d)(ii), the adverse impacts of the development (or harms) do not significantly and demonstrably outweigh the benefits.

Pre-application Engagement

The accompanying Statement of Community Involvement (SCI) summarises the pre-application engagement undertaken. This included engagement with key stakeholders including local parish councillors and a consultation website inviting responses from the local community.

A request for pre-application advice was submitted to GBC on the 7 July 2025. Despite receiving confirmation of receipt of the pre-application request and the appropriate fee on the 11 July 2025, no contact was made by GBC to enter into pre-application discussions until the 9 October 2025. On the 13 October 2025 Lichfields contacted GBC on behalf of the applicant to enter into a Planning Performance Agreement (PPA) rather than pre-app as the application was now very close to submission.

Conclusion

We look forward to hearing from GBC to discuss these proposals in more detail throughout the determination process. We would also welcome discussion about a PPA to formalise this process.

Please do not hesitate to contact me or Rachel Clements (rachel.clements@lichfields.uk) should you wish to discuss the application in more detail, or if you have any queries.

Yours faithfully



Daniel Lampard

Senior Director, Head of Thames Valley Office

BA (Hons) DipTP (PD&D) MRTPI

Copy Gleeson Land Limited