



## MERROW RESIDENTS' ASSOCIATION

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### MRA Response to the Draft Local Plan Consultation (July/September 2014)

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#### **Merrow**

Merrow Ward is centred on the old village of Merrow, on the north-east border of Guildford Town. It is bounded to the north by the Guildford to Effingham Junction railway line, to the east by the National Trust estate of Clandon Park and the southern edge provides entry into the North Downs. A substantial area of Merrow, in the south-east, is comprised of two golf courses; Guildford Golf Club, the oldest golf club in Surrey, and Clandon Golf.

The main route between Guildford Town and Leatherhead (A246, Epsom Road), passes directly through Merrow and links to the A25 to Dorking via a tight, narrow bend between St John's Church and the Horse and Groom inn. These roads become seriously congested at peak commuting times. A Park & Ride facility has been provided on the Epsom Road, just to the east of the developed region of Merrow; this provides some alleviation of Town Centre traffic and congestion but does not help reduce traffic bound for Merrow itself, much of which is associated with local schools.

Merrow has a population of approximately 8000 in 3300 households within an area of 440 hectares. There is a mix of housing types, including terraces and purpose-built flats but a predominance of detached properties. Over seventy percent of households own their accommodation either outright or with a mortgage. A council-owned estate was built in the 1950s (Bushy Hill) but since the 1980s many of these properties have passed into private ownership; social rented housing in the Ward now amounts to around 900 households. A further large estate (Merrow Park) of several hundred houses and flats was constructed in the mid-1980s between the Bushy Hill estate and Clandon Park. While much of Merrow fits well with the affluent majority of Guildford borough in the least deprived quartile in England, there is nevertheless an area within Merrow that qualifies as one of the 66 most deprived areas in Surrey.

There is a frequent bus service linking Merrow to Guildford Town Centre and out towards Leatherhead, some of the services looping around the two largest housing estates. The nearest rail station is just within walking distance of the western edge of Merrow but most residents would require transport - bicycle, bus or motorcar - to reach a station.

Merrow is served by three small retail centres: two of them are in close proximity to Merrow schools and one of these two lies opposite a doctor's surgery, leading to serious parking and traffic congestion problems during term-time. The third and largest retail centre lies on the main Epsom Road and includes a petrol station with grocery outlet, and two restaurants. There is a performing arts school and a collection of small industrial units behind the shops plus an 80-lot allotment garden nearby. Parking availability for this concentration of activity is inadequate and this regularly leads to congestion and dangerous parking practices.

Merrow Park surgery has 10,700 registered patients, significantly more than the population of Merrow, and so draws attendees into the Ward.

There are five schools located within Merrow, one being a large secondary faith school with 1100 pupils, and there is a large comprehensive school of nearly 2000 pupils just over the Ward boundary in Burpham. Many pupils travel a considerable distance to these and other local schools by car or school bus that causes serious congestion from both moving and parked vehicles during term-time. This problem has been exacerbated over the past decade by significant expansions of the schools without commensurate improvement to the road network or parking areas.

There is a small business park at the northeast corner of Merrow, comprising a mix of trade, light industrial and some office units. Adjacent to Merrow Business Park is a Surrey County Council depot, accommodating approximately 200 staff. Access to these sites is far from ideal, being located adjacent to a sharp bend in the road and a very narrow railway bridge.

## Summary Comments

- MRA has been actively involved in all stages of development and consultation on the Local Plan, and whilst it recognises the importance of the Plan, and the need for some reasonable development of housing and employment within Guildford, we find the Plan as it stands incomplete, based on poor data, and an unacceptable basis for making informed decisions for the future. Most importantly, the Plan leaves a large number of strategic decisions unaddressed.
- We understand that this is the last occasion when residents' comments can truly influence the Plan; this is unacceptable since the Plan has not been sufficiently developed since the Issues & Options consultation to allow them to do so in a meaningful way, the evidence base is incomplete or out of date and the proposals for infrastructure improvements are not yet available.
- We do not have an agreed up to date SHMA and the assessment of housing need in the current draft SHMA is not justified by an analysis of the data. The current SHMA (the Guildford SHMA) remains in Draft. A new joint local authority SHMA is being prepared but will only be seen by the public after this consultation has been concluded. Meanwhile new ONS statistics predict the population of Guildford will be just under 5000 people fewer than assumed in the draft Guildford SHMA, greatly reducing the need for additional housing. The MRA believes that even these new ONS figures overstate the likely population growth as virtually all the growth to 2021 is predicted to come from net international migration. This prediction is based upon the net international migration over the past 5 years that is highly unlikely to be repeated.
- The housing figure has not been put to the test insofar as it has not been subjected to the constraints in the NPPG.
- The draft appears to ignore the wording in the NPPF that development in the Green Belt is inappropriate and should only be permitted in exceptional circumstances. These exceptional circumstances have not been listed nor described.
- We object to the proposed development at Gosden Hill Farm for the simple reason that the proposal does not include any detail on the infrastructure needed, on how the traffic from such a development would be channelled and how the impact on Merrow residents and on Burpham itself can be mitigated.
- No attempt has been made to rectify the current infrastructure deficit in the Borough. We appreciate that this is not the purpose of this Local Plan. However it could be extremely damaging to the town to consider any new major development on the outskirts until this severe infrastructure deficit has been addressed and resolved.

- The GTAM project should be completely re-worked as it is based on incorrect, out of date and incomplete assumptions
- The proposed sustainable movement corridor is expensive and will not benefit residents in Merrow and should be carefully considered, costed and subject to an impact assessment.
- Schedule B is extremely vague and doesn't provide enough detail to allow a full assessment to be made of the proposed new developments. The Infrastructure Delivery Plan should have been available at the time this consultation was launched.

The MRA offers a number of comments and recommendations on the draft Local Plan but retains the right to amend these comments when more advanced evidence base documents and supporting papers become available.

### **Question 1. The Evidence Base**

Question: Do you agree that the evidence used for the draft Local Plan: strategy and sites is adequate, up-to-date and relevant?

Answer: No.

Some important elements of the evidence base are not up to date and others are missing entirely. In particular we are still waiting to see the combined SHMA and the May 2014 version does not take into consideration new ONS data nor does it explain the assumptions made on the key element of international migration. There are major gaps on infrastructure and transport and the studies that are necessary to underpin any proposals on transport. Some of the evidence is presented in an unhelpful fashion giving the impression that it is being worded to support a predetermined outcome.

More detailed comment can be found against the appropriate policy below, from page 5.

### **Question 2. National Policy and guidance**

Question: To the best of your knowledge, do you consider that the draft Local Plan: strategy and sites is consistent with national policy and guidance.

Answer: No, it fails in three major respects:

- a) The housing assessment does not take account local factors and the constraints specified in the NPPG.
- b) Current infrastructure deficits, the solutions to which are not covered in this draft Local Plan or elsewhere, are not considered as constraints.
- c) The specific infrastructure needs arising from the specific proposed developments do not appear in the draft Local Plan.

### **Question 3. Sustainability Appraisal and Habitats Regulation Assessment**

Question: Having looked at the Sustainability Appraisal and Habitats Regulation Assessment do you agree with:

1. The Sustainability Appraisal of the draft Local Plan: strategy and sites?

Answer: No.

The appraisal rests on the assumption of a housing target of 652 dwellings pa and there is no logical support for this figure in the public domain. Also it does not take full account of the current infrastructure deficit and the inadequately developed infrastructure plans to support the growth incorporated in the draft Local Plan.

2. The Habitats Regulations Appraisal of the draft Local Plan: strategy and sites:

Answer: No

The appraisal is based on a housing target of 652 which is not reasonable nor based on sound evidence.

The assumption that the development of further SANGS will provide adequate protection for the Thames Basin Heath area is pure supposition and not evidence based.

#### **Question 4. The Vision**

- a) Question: Do you think the vision of the draft Local Plan: strategy and sites depicts the borough that communities would want to be living and working in by 2031?

Answer: No.

It is too vague to form a judgement and creates aspirations that can never be met.

- b) Question: Do you think the ambitions, issues and strategic objectives of the draft Local Plan: strategy and sites are representative of the issues the borough faces and the things that we will need to achieve to meet our vision for 2031?

Answer: No.

They are far too vague to make a sound judgement

#### **Question 5. The Key Diagram**

- A) Do you think that the Key Diagram is representative of the key aspects of the draft Local Plan: strategy and sites?

Answer: No

It is far too complex. We question its purpose.

- B) Is there anything missing or is there a way to make the Key Diagram clearer?

Answer: Yes.

The chart should include details of the proposed developments in areas surrounding Guildford town- at the moment they are no more than blobs on a map.

#### **Question 6. The content – paragraphs, policies and site allocations**

Please see **Summary Comments** on pages 2 and 3.

## Comments by Policy

### *POLICY 1: Presumption in favour of sustainable development*

**MRA Response** : We support this policy only in part.

Although the NPPF states, in terms, that there must be a presumption in favour of development the Local Plan must also state how that development is to be delivered. The draft does not suggest how the current infrastructure deficit can be remedied nor does it suggest exactly what infrastructure is necessary to deliver development in the major areas proposed for development. So far as Merrow is concerned this criticism is directed at the proposed development of Gosden Hill Farm- detailed comments on this can be found below: Policy 2, MRA Response, Gosden Hill Farm, the Merrow depot and the Impact on Merrow

### *POLICY 2: Borough Wide Strategy*

**MRA Response** : We object to this policy.

#### **The Housing Target**

The proposed housing target is a more than doubling of the target since the year 2000 and is not supported by the evidence. The SHMA remains a draft and is to be followed by a joint SHMA; it is based on inaccurate and out-of-date data; its forecasting logic is not supported by Edge Analytics; it takes a totally illogical and unsubstantiated view on international migration; it has not been approved by the Council; and is not in line with the NPPF and NPPG.

The assessment of housing need in the current draft SHMA is not justified by an analysis of the data. A new joint local authority SHMA is being prepared but will only be available for scrutiny after this consultation has been concluded. Meanwhile new ONS statistics predict the population of Guildford will be just under 5000 people fewer than assumed in the draft Guildford SHMA, greatly reducing the need for additional housing. The MRA believes that even these new ONS figures overstate the likely population growth as virtually all the growth to 2021 is predicted to come from net international migration. This prediction is based upon the net international migration over the past 5 years which is highly unlikely to be repeated. It should be noted that the draft SHMA does explain that student international migration associated with the University will only present a very limited housing need.

The housing figure on which the key elements of the Local Plan is based seems to have been plucked out of the air and certainly has no sound foundation in the Evidence Base.

GBC should have made an attempt to explain their housing figure and not simply have referred to a draft SHMA that is neither complete nor accurate nor up to date.

This consultation should have invited comment on the draft SHMA produced in May. It is very surprising that comments on that draft SHMA are not being invited as comments offered earlier do not form part of this consultation - and cannot be taken into account by the Inspector. This is even more surprising in that the Local Plan- to a very large extent - is being built on the draft SHMA.

According to the Guildford SHMA (page 20) some 43% of international migration in 2005/10 was due to migrants other than students. The drivers for this migration are unknown but are likely to include workers coming to the UK. This rate of migration is unlikely to continue since the same rate of expansion of the EU is unlikely to be repeated. The draft SHMA does not explain that non-student

international migration will be extremely limited in the years ahead as the EU will not expand in that time frame in the way that it has in recent years.

The draft SHMA contains numerous factual inaccuracies - for instance on the number of houses built in the last 15 years and on the housing target in place during the same time frame. The Foreword to the draft Plan refers to “persistent under delivery of housing in past years” This statement is not supported by the NPPG and GL Hearn note in the draft SHMA that we met our housing target over the 10 year period (2001/11) covered by the last Local Plan”. It is only true of the period since the onset of the recent economic downturn and this is too short a basis on which to judge delivery performance. It should be noted that the housing target figure in recent years is set at 652. The MRA fail to see how such a target can be used since this is derived from a draft out-of-date un-adopted SHMA. The new joint SHMA that is being produced covering Guildford, Woking and Waverley will not be available for some time yet. This new joint SHMA should have been available during the course of this current consultation. There will no opportunity to comment on this key piece of evidence and that is massively disappointing.

The draft Plan does not set out its approach to constraints to development that under the NPPF can lead to the housing target being reduced from the objective need. For example, the Foreword to the Plan and the Infrastructure Baseline document indicate that inadequate investment in infrastructure has been made in the borough for some time. The NPPG (paragraphs 30 and 31) indicates that inadequate infrastructure is a valid constraint. Other constraints include the AONB, SSSIs and SANGS.

### **Gosden Hill Farm, the Merrow depot and the Impact on Merrow**

Merrow will be directly affected by the proposed developments at the Merrow Depot and on Gosden Hill Farm (Burpham); and will be indirectly affected by a general increase in traffic caused by the proposed Ripley/Send, and the proposed Wisley Airfield developments. The plan does not identify the combined impact of all these developments, and illustrate how they will be accommodated. The road infrastructure is already overloaded and any additional development will have a strong negative impact on the situation. Access from and to the A3 would need to be robustly addressed to stop any increase of the ‘rat-run’ through Merrow, Burpham and Guildford to access both sides of the A3.

MRA do not object to the proposed development of the Merrow depot for housing since it will help meet the housing target, and most importantly also enable Surrey County Council to exit a site where their activities are continually in conflict with the peaceful lives of the Merrow Common area residents. However that support is dependent upon a satisfactory road infrastructure being put in place that would address the present serious access and egress problems with the site that seriously affect residents in the area. (See comment under Undefined Infrastructure Improvements, below).

The plan suggests that there might be a new train station at the Merrow Depot. We appreciate that there was a consultation on this within the Surrey Rail Strategy in 2013. At that time the MRA took a neutral view of this suggestion. It is clear that this new station would bring additional traffic to the area, especially in the early morning, placing even greater strain on the current infrastructure. If this proposal were to be pursued there should be a road bridge over the railway for the proposed Gosden Hill Farm development to access or alternatively site the a car park on the Gosden Hill Farm side of the track with a footbridge to the actual station, as we have with Guildford station.

### Undefined infrastructure improvements

We find it totally unacceptable that for housing developments of the scale of Gosden Hill Farm and Merrow Depot, the broad intentions and principles for infrastructure improvements, in particular the roads, are not defined in any way whatsoever. The Topic Paper “Infrastructure and delivery” explains that all this will be sorted out and refined as the Local Plan is developed. Furthermore, these critical documents will be “finalized to accompany the submission of the draft local plan”. In Merrow it is the

infrastructure improvements that will affect residents most, but it is these very improvements that will enable the developments to be viable. It is clear that the intention is to reach a stage where the Plan is approved without local interests being able to scrutinize and comment on the proposals. This is not acceptable. MRA does not expect the infrastructure improvements to be fully developed, but it certainly requires to see clear definition of the principles, options and acceptable timeframes

#### Use of CIL.

The topic paper identifies that timing and costing for the use of the CIL to fund and enable the infrastructure improvements is still to be defined. We understand from Officers that a CIL charging schedule is being drafted and will go out to consultation before too long and it will be submitted for examination at the same time as the Local Plan. We also understand that the CIL and section 106 contributions will be sought in parallel should this development go ahead. MRA is very concerned to ensure that the timing of any infrastructure improvements are not left to the end of any housing developments and, bearing in mind the scale of the Gosden Hill Farm development, that due consideration is given to minimizing the impact of a 10 year project on Merrow and Burpham. Without very significant funded infrastructure improvements the development at Gosden Hill Farm would be an absolute disaster. The Plan as it stands has not addressed this aspect in any meaningful manner.

#### Congestion on the A3.

The intended developments in GBC's jurisdiction, when combined with the likely expansion intentions in Woking and Waverley Local Plans will inevitably lead to an increase in traffic on the A3, and the associated potential for hold-ups and restricted flows. The current plans DO NOT include a clear strategy for A3 improvement looked at holistically. We find it unacceptable that this is omitted from the Plan, particularly as the likely improvements will require space and new access points that are likely to constrain some of the developments.

#### Influence of Burpham on Merrow.

We find the plan deficient in that it seems to look at parts of the Borough in isolation. Merrow residents are most concerned that the impact of the proposed Slyfield relief road and the associated impact on Burpham, for example, will have an adverse effect on Merrow as these seem to be looked at in isolation. This is mostly related to traffic, the loading of existing roads, and a lack of clarity about road infrastructure improvements.

### ***POLICY 3: Homes for all***

**MRA Response** : We object to this policy.

**“Homes for all”** : The title is misleading. The GBC Sustainability Appraisal (July 2013) defined the objective as “SA Objective 1 – To provide sufficient housing of a suitable mix taking into account local housing need, affordability, deliverability, the needs of the economy, and travel patterns.” The objective is not to provide “homes for all”.

**Density** : The policy is insufficiently precise. The Plan should set out a framework of indicative housing density ranges for different areas coupled with a very clear policy that appropriate density, building height, spaces between buildings and the ratio of hard to soft surfaces should be decided on a case by case basis according to the character of the surrounding area. To support this framework, the Evidence Base should include a data base of the current density of development in different communities across Guildford, including recent developments. Where it is not out of character, the framework should allow reasonable increases in density in urban areas where appropriate to allow for blocks of flats and to allow for increases in the density of affordable housing.

Access to public transport should be taken into account, as one factor among several, when considering appropriate density and parking requirements. However, inappropriately high density that harms character would be unacceptable and unsustainable regardless of whether a location is close to a bus stop or railway station.

It is very unlikely that any development above 4 or 5 storeys would be generally acceptable in any location in Guildford given the importance of the topography and of views into and from the town. Lower densities of 20-30 dwellings per hectare may be appropriate to retain character in some parts of garden suburbs and villages. 30-40 dwellings per hectare will often be an appropriate range, with building height confined to 2 -3 storeys.

High density and taller buildings should be avoided around the edge of built areas to continue the approach of soft green edges that are a valued feature of Guildford.

**Travellers :** It is recognised that the borough is required to provide sites through the plan-making process. However, Government policy is very clear that “Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances”. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Guidance is also clear that any boundary review to meet an identified need for a traveller site should be “an exceptional limited alteration” in “exceptional circumstances”, “to meet a specific identified need” and “specifically allocated in the development plan as a traveller site only”.

**Viability :** This is too vague and is open to abuse by developers who should not be protected by GBC if they overpaid for the land making the development uneconomic.

#### ***POLICY 4: Affordable homes***

**MRA Response :** We support the principle of this policy but question the amount of affordable housing that needs to be built.

We support the intention to provide more affordable homes although question the reasons given in response to Policy No. 2. We are concerned at the 40% affordability target and consider that this may be too high. We suggest that GBC explore ways to build a reasonable number of affordable houses within a lower and more acceptable overall housing target.

We challenge the implied conclusion that building more houses will bring down house prices, thereby making them more affordable. The analysis excludes the impact of being within commuting distance of London, which pushes house prices to undesirably high levels. There is also clear evidence in Guildford that developers make more money from larger and higher value houses which underpins our argument that building more houses will not have any real effect on house prices. What we need is a wide range of house sizes and prices - this would address the needs of the market.

#### ***POLICY 5: Rural exception homes***

**MRA Response :** We have no comment on this policy.



***POLICY 6: Making better places***

**MRA Response** : We have concerns about this policy

Section 7, paragraph 62 of the NPPF states “Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.”

We support the Guildford Society proposal for a Design Review Panel to be established in the borough. We believe that its conclusions should take into account the GBC Residential Design Guide and GBC Landscape Character Assessment.

There is little in the draft plan that suggests that Merrow could become a better place- and many elements of the plan could lead to Merrow becoming a worse place to live and work.

***POLICY 7: Sustainable design, construction and energy.***

**MRA Response** : We support this policy but it must be more precise in its goals, emphatic in its approach and state how conflicting priorities will be addressed. The policy should include an aim to harness rain water.

***POLICY 8: Surrey Hills Area of Outstanding Natural Beauty (AONB)***

**MRA Response** : We support this policy.

To avoid confusion, the types of developments referred to by the phrase ‘the AONB does not preclude specific types of development’ should be specified as is done in Policy 10.

Countryside and villages in the Area of Outstanding Natural Beauty should be given the highest status of landscape protection in line with legislation. There should be no major development whatsoever in the AONB. (There is no exceptional public interest that would justify overriding this.) Indeed, there should be no development in the AONB unless this serves the purpose of designation, associated statutory duties and is consistent with conserving and enhancing natural beauty.

We take the view that it is logical for AONB candidate areas, identified in the 2007 Review of the Area of Great Landscape Value and more recent Landscape Character Assessment, to be given a high level of protection from development.

The wording of the draft Policy 8 protects the views into and out of the AONB only with regard to the AONB itself and land that is designated an AGLV, whereas Government Policy is very clear that all land which forms the views into, and out of an AONB, should be protected. In its March 2014 Planning Practice Guidance on Natural Environment - Landscape the Government emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.

It states that under Section 85 of the Countryside and Rights of Way Act 2000, "relevant authorities", including planning authorities, are required in "exercising or performing any functions in relation to, or so as to affect land" in National Parks and AONBs to "have regard" to their purposes. It goes on to state:

"The duty is relevant in considering development proposals that are situated outside National Park or

Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas."

Policy 8 does not follow this - although the 2003 Local Plan did. We therefore regard the draft Policy 8 as a dilution of GBC's earlier policy on AONB and not in line with Government policy.

We therefore believe that the relevant policy in the 2003 local plan should be retained which reads:

"The Surrey Hills Area of Outstanding Natural Beauty, as defined on the Proposals Map, is of national importance and will be subject to the most rigorous protection. Development inconsistent with the primary aim of conserving the existing landscape character will not be permitted. Small scale development for agriculture, forestry or outdoor recreation as well as that in support of services for the local community will normally be acceptable provided the proposals conserve the natural beauty of the landscape. Important views to and from the Area of Outstanding Natural Beauty should be retained."

As a fall back and since the draft policy on the importance of protecting the views into and out of the AONB is so very weak we take the view that this should be replaced with the words "The importance of protecting views into and out of the AONB will be included in the Policy".

### ***POLICY 9: Villages and major previously developed sites***

**MRA Response** : We have no comment on this policy.

### **POLICY 10: Green Belt and the countryside**

**MRA Response** : We object to this policy.

It does not mention the need for permanence of Green Belt boundaries. It does not but should define the exceptional circumstances required to change Green Belt boundaries. The NPPG (paragraphs 30 and 31) indicates that inadequate infrastructure is a valid constraint and it is clear that this has not been taken into account in the proposals for development in the Green Belt.

It is also clear that this policy is at odds with many recent Ministerial statements and, in particular, the letter from Nick Bowles of 18 June to Sir Paul Beresford where he states, in terms, that 'the NPPF makes clear that most development in the Green Belt is inappropriate and should be approved only in very special circumstances. Planning Guidance also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt'. What can be clearer than this.

The analysis of Green Belt in pages 52 and 53 is wholly inadequate as a basis for review of Metropolitan Green Belt around Guildford. A far more strategic assessment is required.

The absence of a strategic vision/masterplan and an approved housing target for the borough makes it harder to assess if development needs could be met by redevelopment of a range of town centre and other urban sites. Even if "exceptional circumstances" can be proven for development in the Green Belt we believe none should occur at the Strategic Sites (Gosden Hill Farm, Wisley airfield and below the Hogs Back) until such a plan is produced demonstrating that it is imperative, that appropriate infrastructure can be provided and that it will not exacerbate existing traffic flow problems or cause traffic problems in new areas - such as Merrow.

***POLICY 11: Ash and Tongham Strategic Location for Growth***

**MRA Response** : We have no comment on this policy.

***POLICY 12: Historic environment***

**MRA Response** : We object to this policy. The wording is too general and the supporting paragraphs do not enable the reader to see if the intended approach is adequate to achieve the policy or compatible with the economic, social and environmental policies in the draft Plan. More work has yet to be done to make more specific proposals which means that any required investment plan cannot be prepared.

***POLICY 13: Economic development***

**MRA Response** : We support the intention of this policy but the wording is poor and is insufficiently specific as to the sort of industries we wish to attract. This needs to be clarified so it can be seen whether the land provision is adequate and appropriate. Until it is proven that there are exceptional circumstances, there should be no encroachment of employment land into the Green Belt.

We caution against over expansion of retail floor space and question the wisdom of the proposed massive increase in area, notwithstanding a current trend for retailers to concentrate on a smaller number of large retail centres. We should diversify use of the town centre.

We should retain small scattered business estates hidden within communities. We should protect space within communities for small businesses such as printers.

There needs to be far greater understanding of the significant proportion of employment that is in rural areas. There is potential for technology to make this an ever more sustainable option and the growth in home working reduces the need for businesses premises. However, there are concerns that businesses unrelated to the land are using adapted farm buildings because of more relaxed planning, and that the countryside will become urbanised. Small, sensitively-located sites for appropriate rural businesses are required. In the Area of Outstanding Natural Beauty, the statutory purposes of conserving and enhancing the landscape and scenic beauty should prevail and shape the economy.

***POLICY 14: The leisure and visitor experience***

**MRA Response** : We object to this policy - it is weakly written and inadequately specific.

The word “expect” in the first line is not adequate. The Council should object to any proposal that stands in the way of meeting the objectives described in 4.161.

The reference to “low and ultra-low emission vehicles” in the policy is odd as GBC has no control over the achievement of this aim.

This is a poorly drafted section in part reflecting the failure to appreciate the positive links between:

- Guildford’s green and historical character and how we wish to preserve it;
- the rich cultural life of the borough and how we wish this to develop; and
- our economy and how we intend it to grow.

With care, the sectors of our economy that rely on the environmental and cultural attributes of our borough can thrive and increase significantly alongside growth in our knowledge-based, high technology

sectors. At present, we are not poised to achieve this. The tourism and cultural sector of our economy is being treated as “assorted odds and ends” tagged on to the mainstream economy and there is a perception that to expand our mainstream economy we need to overcome constraints and expand.

We should treat Guildford’s culture and environment as the foundation of a strategy for the benefit of residents, visitors and the economy. We should consider both what we currently enjoy and what we want for the future. If we can get this right, we will:

- sustain the wellbeing of the community;
- build a strong visitor economy; and
- also support our high technology, knowledge based economy.

We believe that the environmental character and cultural richness of Guildford plays a critical role in attracting dynamic post-doctoral academics seeking to exploit the commercial potential of their ideas.

We should make much more of the opportunities provided by the River Wey that runs through the town and opens out into attractive water meadows, Surrey Hills Area of Outstanding Natural Beauty, our countryside and open spaces, our historical buildings and our cultural and sporting venues.

### ***POLICY 15: Guildford town centre***

**MRA Response** : We support the Vision but object to this Policy because it is insufficiently specific. The expression “build on these assets” is inappropriate and could be seriously misleading.

We believe the monitoring section should include measures assessing the risks being taken in such a proposed expansion in retail space e.g. shop vacancies.

Guildford is in a vulnerable position with the prospect of significant town centre change and redevelopment taking place with neither an up-to-date plan nor an up-to-date planning brief in place. We supported the creation of a Vision document but until a Supplementary Planning Document (SPD) is in place we remain vulnerable. We suggest we cannot wait until adoption of the Local Plan to produce a new Town Centre SPD. We propose that a draft should be produced in parallel with the Local Plan consultation even if for some legal reason it cannot be adopted until later.

The absence of a town centre plan also hampers effort to identify how many homes can be accommodated there. It is not possible to determine whether we need to develop in Green Belt countryside without GBC having decided the housing target and set out the options for meeting this target.

Residents do not want Guildford to become just like any other town. Our scenic, historic High Street with alleyways, views onto Area of Outstanding Natural Beauty and potential river setting, provides a unique shopping experience. That distinctiveness has great commercial and visitor value. The High Street remains vibrant in part because enormous effort goes to ensuring it adapts to retail needs while retaining character. We must guard equally against loss of character and marginalisation as a boutique area if the major retail focus is moved towards the north side of North Street. Impact on the viability of the High Street should be an important consideration in assessing any proposals for town centre development.

Great care is needed to ensure that North Street is developed in keeping with the character of the High Street rather than as a “could be anywhere” shopping mall. We would like North Street to be enhanced in a way that it too enjoys great views and provides a variety of well-designed shop fronts that follow the rise of the land. The aim should be to create such an attractive mix of outstanding new buildings with enduring appeal and retained original buildings, that North Street becomes as worthy of protection in the future as the High Street is today.

It is essential to avoid over-expansion of retail floor space given the rise of electronic shopping, notwithstanding the trend that retailers are reportedly concentrating in a smaller number of larger centres. We should keep a range of short stay car parks, including some surface car parks, to support convenience shopping and plan innovatively to enable people to collect from shops items ordered electronically otherwise pressure for out of centre locations will increasingly draw custom from the High Street.

We must be realistic about the extent of pedestrianisation that will be appropriate beyond the High Street. We do not support full pedestrianisation of North Street because this would cause unacceptable congestion on York Road and other surrounding residential roads. Perhaps the bottom section of North Street only could be a “shared space” with buses and pedestrians. Roads converge in the centre of the town to get across the gap in the downs and Guildford does not have sufficient road capacity to divert traffic around the centre.

Providing space for a very attractive and central, state of the art bus interchange with connections to all parts of Guildford will be essential to reduce car dependency for journeys to the town centre and to transform attitudes to public transport. We need pick up and drop off points near all key facilities and links to the railway station. Residents in Merrow attach great importance to this.

More generally, we should integrate the river more fully into the High Street. We should retain and open up views to the river at Millbrook. Care needs to be taken to enhance the centre of Guildford in ways that do not just extend the current gyratory congestion outwards into surrounding residential communities.

### ***POLICY 16: District and Local Centres***

**MRA Response** : We support this policy.

We agree that district and local centres are a focus for communities - this includes Merrow. However development must be in line with the character of individual centres.

Within the 'Guildford urban area' we also want to defend the diversity and identity of local centres by encouraging small local shops and a range of appropriate community cultural and leisure facilities. There is a concern that the draft Local Plan treats communities outside the town centre as part of a homogeneous urban area. This does not apply to Merrow - as will be seen from our introduction.

The Plan needs to provide a strategy for ensuring local centres are not swamped by large new supermarkets.

Appropriate locations for supermarkets should be identified in the Local Plan, rather than opportunistically as has happened recently with more attention given to adequate car parking.

We support a tightly drawn town centre boundary. We should retain the green, residential character of routes connecting the town centre to other business areas. We welcome the clear distinction between the town centre and the residential character of adjoining suburban areas - such as Merrow.

### ***POLICY 17: Infrastructure and delivery***

**MRA Response** : We object to this policy as it not yet backed by adequately developed proposals to allow us to judge if they will allow the objectives of the draft Local Plan to be achieved.

We welcome the proposal to produce a living draft Infrastructure Delivery Plan (IDP). However, it is not acceptable that this is not yet available for review during this consultation especially as GBC has limited or no control over the infrastructure to be provided by other bodies (Highways Agency, SCC, Thames Water etc.). In the foreword to the plan the Leader of the Council states "...and over many years the town's infrastructure has been neglected" We fully support that view.

The IDP must set out how:

- Measures to tackle the current infrastructure deficit and the capacity and other improvements required to deliver growth, will be tackled together to ensure ambitious, efficient and strategic approaches are adopted.
- Long term aspirations will be broken down into manageable delivery phases capable of being funded from a variety of sources e.g. developer contributions, business rate receipts, Enterprise M3 Partnership funding, partner contributions and, where appropriate, national infrastructure funding. The necessary funding cannot be found from developers' contributions alone

GBC must move quickly to identify any sites that need safeguarding to prevent development that would impede subsequent construction of critical infrastructure e.g. a new bridge across the railway/river to unify the town, a state of the art central bus interchange with full connectivity to all sides of Guildford to integrate the town and make a car less necessary for getting about, provision of improved sustainable transport to reduce reliance on a car for getting to work, and more park and ride facilities as part of the mix of provision to support those who travel into Guildford to work. Parking should be underground wherever possible and appropriate contributions made by developers and employers. Improved A3 junctions are needed to serve the town until a longer term solution for the A3 is implemented.

The Local Transport Strategy for Guildford, produced by SCC, is intended to be in draft in July 2014, and to contain a schedule of the scheme, for consideration by the Local Committee. The published timetable says that this will be available for public consultation in September 2014 - after this draft Local Plan consultation has finished. We hope that it will be informed by a new scenario test run by the SCC team, developed using the draft Local Plan developments.

A detailed study should be carried out, taking into account the proposed developments, looking at traffic, bus facilities, pedestrian and cycle movements. The output should include a preferred solution, building on the A&M Vision, GTAMS and the GVG bridge proposal, and used to inform the SPD. We should bear in mind that parts of Guildford are hilly and in those areas buses and not cycles may be necessary.

We also need a far more forward looking approach to water supply, sewerage provision, landfill remediation and flood risk management. We deny ourselves win-win opportunities by failing to bring forward investments, such as relocating the sewage works at Slyfield to allow for 1000+ new dwellings.

### ***POLICY 18: Sustainable transport for new developments***

**MRA Response :** We support this policy in principle though the wording should be more forceful in tone – change “We will expect” to “We will ensure”. However, the proposals are insufficiently developed for us to judge if they will adequately support the developments in the draft Local Plan.

It is unclear how GBC will “facilitate the use of low emission vehicles”.

A large number of people commute into and from Guildford for work and no matter how many homes are built we will not change that pattern. Also relatively narrow roads converge in the town centre and come together to pass through the downs leading to traffic congestion **now**.

Given these factors, new development should be conditional on delivery of an ambitious phased investment strategy. In the words of the Guildford Economic Development Study, “Transport infrastructure underpins economic performance through connectivity - linking business to business and people to employment opportunities”.

Given the constraints on land availability, it is unlikely to be possible to choose between locations for development based on minimising travel. It will be more realistic to provide transport options that are as sustainable as possible where land is available. It may be necessary to rule out some locations due to unacceptable congestion, at least until improved transport solutions are in place.

We strongly oppose the approach that proximity to transport trumps other factors when considering new development. Impact on character can be just as important in terms of sustainable development. For example, being close to a bus stop or railway station does not necessarily make high density development that harms character acceptable.

No further significant town centre development should be allowed that will increase traffic on the gyratory and feeder roads until a sound transport and funding strategy is in place. We must ensure that any development that occurs before the new plan is adopted, at sites such as the Waitrose development, is compatible with transport capacity, does not jeopardise future plans and contributes to transport and parking solutions.

We must emphasise that Guildford is in a valley at a point where the River Wey cuts through the North Downs. The river presents a natural constraint which severely limits room for manoeuvre. The North Downs is the boundary between the Weald to the south of the town and the London Basin to the north. Four major roads pass through the Borough. The M25 enters the Borough briefly at Wisley at its junction with the A3 which runs from north to south through the Borough, linking with the A31 which joins the A331 Blackwater Valley Road. In the absence of major industrial development, the main source of pollution has been identified as motor vehicles. Much of the local infrastructure in and around the town centre and surrounding urban area is already at full capacity. Local roads and schools are at capacity. Anyone using the A3, A31 and M25 daily knows that they are at capacity at peak times. Air pollution at the junction [10] of the A3 and M25 is already very poor and would rise even further if the 3 designated areas for extensive development were allowed. The cumulative effect of developing Wisley Airfield, Gosden Hill Farm and Blackwell Farm would have a catastrophic effect on the A3, A31 and local roads, particularly if the necessary infrastructure to alleviate the pressure around any of those sites is not fully funded and delivered before development begins.

We attach great importance to all new business and residential development making contributions to transport infrastructure. We are concerned that, because Guildford is so far behind with producing a Community Infrastructure Levy Charging Schedule based on the Local Plan and accompanying Infrastructure Delivery Plan, we will miss out on being able to charge developers a Community Infrastructure Levy to contribute towards essential infrastructure. The problem is made more pressing by the fact that, from April 2015, we understand it will no longer be possible to charge a developer a CIL if more than five contributions have been pooled for that purpose since 2010. This puts at risk the assurance in Policy 17 that “We will ensure that infrastructure needed arising from a proposed development is provided and available when first needed to serve the occupants and users of the development.”

Regarding the town centre, we cannot yet support the Allies & Morrison scheme as far as the road network is concerned on the grounds that it is just an idea at this stage. There has been absolutely no analysis of the implications of this scheme. We do not regard the SCC model SINTRAM as a suitable tool for dealing with the level of detail required in looking at the town centre. What is needed is a comprehensive study of town centre movements, road traffic and buses, cycling, pedestrians and

parking, with a local model. It is interesting that the parking strategy, adopted by the council in 2013, does not appear in the list of Key Evidence for the town centre (P15).

We note that the draft Local Plan makes no mention of additional highway capacity even though the evidence points to a need for this.

We are disappointed that the GBC commissioned Guildford Town and Approaches Movement Study was not informed by studies based on the developments included in the draft Local Plan. Also the only 'major' scheme in the plan is the Sustainable Movement Corridor (App B 2.1.1) which has not been properly analysed at all, even though the cost quoted is £75-100m. It must be acknowledged that this corridor would only benefit a small part of the borough.

### ***POLICY 19: Green and blue infrastructure***

**MRA Response** : We support this policy in general terms, though the wording is not sufficiently specific to indicate what is intended. For example, we would strongly object to the word "enhance" if this meant turning natural, unspoilt countryside into urban parks.

We must preserve our attractive, accessible countryside, gardens, allotments and natural open spaces, retain the green character of the edges of Guildford and of its approach roads, make the green corridor along the river much more of a feature, protect views throughout the borough and ensure new developments contribute to creating distinctive places and a sense of community and provide well designed spaces for vehicles to reduce the dominance of parked cars on streets.

More specifically, the Plan should set out steps to:

1. Protect the designated countryside around Guildford, in particular the Green Belt and Surrey Hills Area of Outstanding Natural Beauty (AONB), and support the Area of Great Landscape Value becoming AONB.
2. Protect green Public Open Spaces and their individual characters in the Local Plan. Resist turning natural, unspoilt countryside into urban parks in the name of attracting visitors away from the vulnerable Thames Basin heathland wildlife areas.
3. Ensure any 'Suitable Alternative Natural Greenspaces' provide genuinely new opportunities for informal recreation in newly created areas of high potential wildlife value rather than simply a rebranding of areas already enjoyed by residents for their natural beauty.
4. Ensure the amenity value and distinctive character of open land owned by GBC is fully recognised and enhanced by appropriate management to protect such land against:
  - harmful development (e.g. Stoke Park),
  - noise pollution (e.g. Riverside)
  - insensitive management
5. Secure the future of the valued qualities of Council owned farms including Burpham Court, Tyting and South Warren Farms, for the benefit of the community in perpetuity and ensure their management is resilient to anticipated changes in stewardship payments.
6. Retain current allotment sites for community benefit.



7. Designate adequate green space, allotments and public footpaths in new developments so they provide public benefit in perpetuity and are not lost within the curtilage of properties over time or developed.

Dated: 20 September 2014