



MERROW RESIDENTS' ASSOCIATION

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Merrow Residents' Association's Response to the Guildford Borough Proposed Submission Local Plan

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 450 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.

There are five schools located within Merrow, one being a large secondary Catholic faith school with 1250 pupils (St Peter's), shortly to expand by more than 100, another being a primary Catholic faith school, 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 which 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.

The Merrow Residents' Association has been in existence for over 40 years and continues to provide a focus for Merrow on environmental, planning, historical and local issues and has an active membership of over 600 people. It is served by a voluntary committee that acts in an apolitical manner to ensure that Merrow retains its present unspoilt and attractive appearance.

The Merrow Residents' Association is an active member of the Guildford Residents Associations and wishes to be associated with its response to this consultation.

Summary Comments and Objections

The Merrow Residents' Association is disappointed that so little time has been allowed for responses to this consultation not least because totally new and incomplete documents on transport infrastructure were released at the same time as the 6 week consultation period commenced.

- Chapter 3-we object to this chapter as it is unsound since it contains no town centre masterplan and because too much space has been allocated for retail use that could be used for housing.
- Policy S1- we object to this policy as it is unsound as it does not reflect the requirements of the NPPF.
- Policy S2- we object to this policy as it is unsound as the G L Hearn OAN is too high and should be set at no more than 510 new homes per year in accordance with the advice of NMSS.
- Policy S2- we object to this policy as it is unsound as the housing target has been inflated; the housing target should be corrected.
- Policy S2- we object to the policy as it is unsound as it does not follow the NPPF, the PPG nor the advice of Ministers in the DCLG on constraints.

- Policy H1- the University of Surrey should be required to provide accommodation for more than 60% of their eligible students.
- Policy H2- the policy should require that a proportion of smaller houses should be built as well as smaller apartments.
- Policy P1- we have made some drafting suggestions in the AONB policy wording.
- Policy P2- the policy is unsound as it does not follow the NPPF or the advice from DCLG Ministers.
- Policy P5- the policy will have to be reviewed as a result of the UK's decision to leave the EU.
- Policy E9- we support this policy on the Local Centre in Epsom Road, Merrow.
- Policy I 1- we object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion.
- Policy I 3- we object to the proposed development of the Sustainable Movement Corridor as it is neither cost effective and nor is it realistic to expect the corridor to deliver the benefits described.
- Policy I 4- we have made some drafting comments but support the drift of this policy.
- Policy A25- we object to this policy as it is unsound as it is not positively prepared.
- Policies A43- we object to the inclusion of policy A43 in the Local Plan as the site is at high flood risk.
- Policy A43A- we object to this policy on the basis that there must be a four way junction north of Potters Lane at Gosden Hill Farm and therefore there is no need for slip roads onto the A3 at Garlick's Arch.

Chapter 3 - Our Vision and Ambition

The Local Plan should not go forward for public examination when we do not have a town centre masterplan. It is axiomatic that a significant level of new housing could and should take place in the town centre on brown field sites.

So far as the town centre is concerned too much retail space has been identified for development when the amount of retail space required in the town centre, as in all other town centres, is diminishing over time. The plan lacks any assessment of retail trends and a strategy for delivery simply proposing that there should an increase by 40% in retail space. It is unacceptable and a waste of space for such a large percentage of the town centre to be allocated for retail use. Some of this land should be used for housing and not for retail. We do not wish to see the reputation of Guildford's shops being diminished in any way but a quick walk round the town centre would indicate just how many shops are empty. This trend is likely to accelerate.

We object to this chapter as it is unsound since it contains no town centre masterplan and because too much space has been allocated for retail use that could be used for housing.

Policy S1-Presumption in favour of sustainable development

The second sentence of the first paragraph states that applications will be approved ‘wherever possible’. This is an unwarranted and unwelcome extension of the wording of the NPPF and we request that this must be corrected to bring the policy in line with the NPPF. Therefore the words ‘wherever possible’ should be deleted from the policy.

We object to this policy as it is unsound as it does not follow the requirements of the NPPF.

Policy S2- Planning for the Borough

Evidence Base - The Strategic Housing Market Assessment

This policy is key to the whole of the Local Plan and underpins all the plans for development. The MRA has commented on the earlier SHMA and has attended numerous meetings to evaluate every element of the SHMA. We have always been troubled by the very high OAN in the SHMA and fail to understand why the figure is so high leading to a housing target that is so much higher than the housing target that has been set by the Council of GBC in recent years.

We commented at an earlier stage of the development of this draft Local Plan as follows:

“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.”

Subsequently the Guildford Residents Associations (GRA) commissioned a review of the SHMA and the OAN by NM Strategic Solutions Ltd (NMSS) and GBC will, we are sure, be aware of the detail in that report which the GRA will be taking forward to the Examination in Public of our Local Plan. This report appears on the GRA website <http://www.guildfordresidents.co.uk/>

The OAN suggested by NMSS is 510 and this is a figure that we can support. We understand and accept that ‘standing still’ is not an option and that an OAN must be set for the Borough of Guildford to follow the guidelines in the NPPF and the PPG. This is exactly what NMSS have done to meet the demands for new housing, business and schools in Guildford. We do not intend to repeat the detailed arguments from NMSS in this response except to point out that the report does meet our concerns about international and student migration to which we have referred in previous responses to GBC and the OAN appears far more sensible and reasonable than the figure in the West Surrey SHMA of September 2015. In summary NMSS suggests that the September 2015 West Surrey SHMA inflates the proposed housing figure due to failure to

correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.

We are aware that CPRE has also commissioned an independent review of the SHMA and the OAN by Green Balance and they recommend that the OAN for homes in Guildford should be reduced from 693 to 481- a figure that is independently and remarkably close to the figure from NMSS.

We conclude that the OAN for Guildford should be set at no more than 510 new homes per year in accordance with the conclusions of the report from NMSS.

Housing Target- We are concerned not only at the high housing target that appears in Policy S2 but also at the way that the numbers have been presented in both the draft Local Plan and also in the Land Availability Assessment. It is suggested in Policy S2 that the housing target for the period of the plan is 13,860 but a detailed examination would indicate that it is either 15,116 as this figure appears in the LAA on page 17 or 15,060 being the figure that can be calculated from table I on page 28 of the draft Local Plan after adding the numbers in the table to the homes with planning permission taken from the text in the LAA. This is confounded by the fact that the table in the LAA on page 17 adds up to 13,708 and the Local Plan table on page 28 to 13,652 and although very similar are not identical - when they should be exactly the same.

We object to the way that the housing target has been inflated in this way to a figure that is significantly in excess of the OAN. The Local Plan commentary states that the number of new homes is greater than the figure in the policy to allow for flexibility but as with most figures in this plan, that figure is open to a different interpretation.

We conclude that the housing target in the draft Local Plan is confusing and should be corrected.

Constraints - The housing target of 693 does not reflect the fact that there are real constraints in the borough, that we are a gap town and that constraints should be applied to the overall housing target as well as on a site by site basis in accordance with paragraph 14 of the NPPF and paragraph 044 of the Planning Guidance. Further comment on this appears on page 7 et seq. This is a serious failure in this draft Plan. In particular the Green Belt is a real and valid constraint and has not been given sufficient weight in the draft as described above.

We conclude that the draft Local Plan does not follow the NPPF, the PPG nor the advice of Ministers in the DCLG.

We object to Policy S2 as it is unsound and unsustainable on three counts, described above.

Policy H1 - Homes for All

The University of Surrey - should be required to build sufficient student accommodation for those of their students who wish to live on campus therefore relieving pressure on rented accommodation in Guildford where so many students now live. The recommended figure of 60% of students having their own accommodation on campus in Policy H1 in the draft Local Plan is too low and should be raised. This in turn would release accommodation onto the open

housing market. It is disappointing to note that the University currently has planning permission for student accommodation to house 2,120 students which it has not built and yet does not appear willing to use these permissions and it is understood that they only plan to house 42% of its students on campus. It calls into question whether the University is really concerned about the future of Guildford and its surroundings or more concerned about the business case to develop Blackwell Farm to raise money to develop the University.

We recommend that the figure of 60% of University of Surrey students having their own accommodation on campus should be raised.

Homes for All - Care Homes - this policy, inter alia, covers care homes although there is no specific reference to care homes in the policy itself. Mention is made of the need for 242 registered care bed spaces at paragraph 4.2.3- this being derived from the SHMA- and also in paragraph 4.2.10 in the reasoned justification section.

The need for care bed spaces is reflected onto page 18 of the LAA where it states that 51 bed spaces should be provided at 179 Epsom Road, Merrow (LAA site 2235) whilst the same site appears on page 183 of the LAA and is described as a vacant care home where there is a planning application for 24 dwellings which has been refused and is going to appeal

We recommend that page 18 of the LAA be amended to reflect the position described on page 183.

Policy H2 - Affordable Homes

We fully understand and support the comment from many of our residents that affordability is critical to allow our youngsters to get a foot on the ownership ladder. We also appreciate that the term has a restrictive definition in the NPPF. However, the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments as well as smaller houses into which older residents may downsize. This should appear in the Local Plan at policy H2. We appreciate that smaller houses may not deliver the level of profitability associated with the sale of 4 and 5 bedroom houses but they must still appear in the housing mix irrespective of the views of developers.

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.

Conclusion - the policy should require that a proportion of smaller houses should be built as well as smaller apartments.

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

We are generally content with this policy as it follows the NPPF. Although we would like to see a definition of 'major developments' in the Local Plan we are aware that no such definition exists.

However the wording of the paragraph about the AGLV review is misleading and it would be more accurate to say that the boundaries will not be amended until the review is both completed 'and its conclusions implemented'.

We also suggest that the wording in 4.3.5 which states that 'all development proposals within and adjacent to the AONB will be expected to conserve or enhance the special qualities' should be moved and placed within the policy itself.

The wording of Policy P1 only refers to conserving and protecting the views of the AONB whereas Government Policy is very clear that all land that 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.

We therefore suggest that the wording of the first bullet point should read 'conserve and / or enhance the setting of the AONB and the views into, within and out of the AONB'

Policy P2 - Green Belt

We are content with the first four paragraphs of the policy as this follows the NPPF.

That said, we fail to understand why the draft Local Plan goes against the explicit provisions of section 9 of the NPPF and proposes large scale development in the Green Belt across the borough and also goes against the provisions of the PPG and advice from Ministers in the Department of Communities and Local Government. If GBC persists in removing large chunks of land from the Green Belt it must explain why it is proposing to do so in the reasoned justification of this Policy.

The Green Belt is intended to prevent urban sprawl by keeping land permanently open in accordance with the NPPF and to safeguard the countryside from encroachment but a quick look at the map of the proposed new developments on the north east side of the borough would indicate that the continuous green ribbon along the A3 will have been destroyed by the development at Wisley, Garlick's Arch and Gosden Hill Farm and that we really would have continuous development from the M25 down the A3 into Guildford. We take the view that this is totally unacceptable.

We are struck by the fact that GBC seems to consider the Green Belt as a ready supply of land for development whilst at the same time they are not considering all the sites in the Town Centre that are available for development. Put another way a small amount of Green Belt was lost in 2003 whilst a far greater amount is being identified for removal from the Green Belt in this draft- when will this erosion of the Green Belt stop? To make matters worse some of the land removed from the Green Belt in 2003 is still undeveloped- that is very difficult to explain. Paragraph 83 of the NPPF states that Green Belt boundaries should be permanent and should endure beyond the plan period. It does appear as if GBC have lost sight of this requirement.

We have read the Green Belt and Countryside Topic paper with some care in the hope that it would explain why so much Green Belt land has been identified for removal from the Green Belt and for development. In the Topic paper it is suggested by GBC that '*our evidence base*

identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns.’ It is clear that GBC have taken a view that some building in the Green Belt may be necessary but they have been unable to substantiate the extent of this proposed development which would be harmful not only to the Green Belt itself but also to the borough.

The paper concludes that the affordable housing and economic need in Guildford is so severe that some Green Belt must be sacrificed. To make such large inroads into the Green Belt needs very careful examination and explanation and we are not convinced that such a case has been made. The views in the paper are entirely subjective based on a SHMA where we have argued that the OAN is too high (see the arguments on page 4 that the OAN should be not more than 510) and also on the affordable housing need where we argue that this need is not being adequately addressed by the Plan which is far more aligned to the demands of developers who make the highest profit from the sale of large four and five bedroom houses built on open land unencumbered by existing structures. GBC is relying solely on the need for new houses derived from the SHMA and has not given sufficient weight to the harm to the Green Belt that the proposed developments would cause.

As we understand current procedures the approach should be that the council works out what housing need is and then, when drawing up the housing target, determines whether environmental constraints (e.g. Green Belt) will hinder the ability to meet that housing need and allows therefore that housing target to be adjusted to something which is deliverable without having to rip up such environmental constraints.

The NPPF is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space; an Area of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding or coastal erosion.

The PPG states that unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

We are also aware of clear Ministerial guidance on building in the Green Belt- *“the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.*

“...we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of

the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.

“Planning Guidance, updated in March 2014, 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” – Nick Boles to Sir Paul Beresford MP 18th June 2014.

We are also aware of the guidance given by the DCLG to their Inspectorate in December 2014 that the outcome of a Strategic Housing Market Assessment is untested and should not automatically be seen as a proxy for a final housing requirement in Local Plans. This is just what GBC have done.

When one considers all these arguments when put together, we conclude that GBC has not made a convincing case that so much land should be removed from the Green Belt for development.

We object to Policy P2 as it is unsound and does not follow the policy established in the NPPF nor the advice from Ministers in the DCLG.

Policy P5 - Thames Basin Heaths Special Protection Area

This policy will have to be reviewed in the context that it follows European Union Directives 92/43 and 79/409 which may be revoked when the European Communities Act is revoked unless it is replaced with less onerous and more flexible UK legislation to protect certain ground nesting birds. The present regime is a blunt implementing instrument and needs to be refined.

Policy E9 - Local Centres

We have noted that Epsom Road, Merrow appears in the list of 14 existing Local Centres in this policy.

We support this policy which must be interpreted both positively and flexibly to allow these centres to retain financial viability and so that they are not swamped by businesses that are peripheral to the main objectives of providing for everyday shopping and service needs.

Policy I 1 and Appendix C - Transport Infrastructure - this has been reviewed in detail by Richard Jarvis BSc, MS, CEng, FICE, FCIHT, who is a qualified civil engineer, and expert in transport planning and his comments appear on the GRA website <http://www.guildfordresidents.co.uk/>

We can do no better than to quote from his report:-

1. The cumulative effect of the additional traffic generated by the developments in the proposed submission local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have *‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’*.
2. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the proposed submission local plan. Congestion will worsen. The

network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

We are also very disappointed that nothing is said in the Local Plan about the need for a bus interchange so that anyone entering the town centre by bus can change from one bus to another without having to walk more than a few yards. This omission must be corrected.

We must also be mindful of other new development in the borough that may put additional pressure on our roads- for example the proposals from Surrey County Council for the expansion of Newlands Corner- a proposal that is hotly disputed by residents in Merrow.

Conclusion - we object to this policy since the additional traffic generated by the proposed developments would increase traffic congestion. This is unacceptable.

Policy I 3 and appendix C - The Sustainable Movement Corridor

This corridor has absolutely no relevance to Merrow and is a very expensive aspirational proposal at about £100m. We do not believe that a case has yet been made for this corridor and we take the view that it will do little to improve traffic flow and accessibility to the areas of the town that will be connected by it.

The proposals that have been seen are likely to cause grid lock in Burpham if Gosden Hill Farm is developed and 2000 homes, two new schools and a Park and Ride are constructed and will only increase traffic congestion as the roads to be used cannot take pedestrian, cycle and bus lanes in the way proposed without having a very serious detrimental effect on vehicle movements due to the narrowness of the roads that it is proposed would be included in the corridor. The vehicles that will still need to access the town centre for a variety of reasons will suffer serious delays.

We object to the proposed development of the Sustainable Movement Corridor as it is neither cost effective and nor is it realistic to expect the corridor to deliver the benefits described.

Policy I 4 - Green and Blue Infrastructure

This policy is particularly important to residents in Merrow who value the Green Belt on the entrance from the East of the borough, Clandon Park, Merrow Downs and the SSSI in the quarry on the Clandon Golf site are equally important in addition to other areas in Guildford described in the policy.

These must be protected to preserve our attractive, accessible countryside, gardens, allotments and natural open spaces, retain the green character of the edge of Guildford, and its approach roads, make the green corridor along the river more of a feature, protect views throughout the borough and ensure that 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 our streets.

We have noted that the wording of Policy I 4 in paragraphs 5 and 6 is subtly different and we suggest that the wording in the fifth paragraph should follow the wording in the sixth paragraph

and state that ‘development will not be permitted within or adjacent to national sites unless clear justification is provided that doing so would not be harmful to the nature conservation interests of the site.’

Green Spaces - The PPG17 Audit identified an overall deficiency in open space of 96.37ha in 2005. With the exception of Christchurch ward (in which Stoke Park is situated), all urban wards in Ash and Guildford show a deficit of open space per 1000 population. Although there is a surplus in some more rural areas (the wards of Effingham, Lovelace, Normandy, Shalford, The Pilgrims and Tillingbourne), it is outweighed by the deficit in the more urban areas, particularly Ash South and Tongham, Stoughton, Westborough, Onslow, **Merrow** and Friary and St Nicholas. Most settlements, with the exception of Flexford, Puttenham and Send Marsh were found to have access to a playing field, park or amenity open space for informal play or recreation.

It is unfortunate that so little is said in 4.6.38 of the policy on the value of these Green Spaces although it is said that these spaces should be protected. That is a weak statement and should be reinforced and placed within the policy itself at I 4.

Policy A25 – Gosden Hill Farm

The proposals in the draft Local Plan for Gosden Hill Farm are bound to have a serious impact on Merrow and are incomplete and premature. The MRA Executive Committee have spent a great deal of time considering these proposals with Associations and Councils in Burpham and Clandon and are agreed that this development should not be in the Local Plan at all as it is a key area of the Green Belt around Guildford which in turn is intended to prevent urban sprawl and to safeguard the countryside from encroachment.

We are reminded that the landowners applied for outline planning consent for homes, industrial units, a railway station, a new rail bridge and a perimeter road in 1982 and 1984 and the application was refused by GBC and went to appeal. The landowners lost the appeal in 1985. It is informative to reflect on the case put to the Inspector by experts for the Council when they said that ‘the development of the site would constitute an urban encroachment into the surrounding countryside situated within the Metropolitan Green Belt and would prejudice the long established principle of endeavouring to prevent the coalescence of settlements’ contrary to Government advice. Nothing has changed since 1985 and since the Metropolitan Green Belt was established after the Second World War. It is also informative to note that the application included a four way junction with the A3 on the site.

If Policy A25 were to be retained in the Local Plan - against our wishes - we have the following comments:-

- There is an aspirational suggestion on page 25 of the Transport June 2016 Topics paper that a tunnel might be built to relieve pressure on the A3 but we await proposals from Highways England, We are advised that any upgrading of the A3 or construction of a tunnel could not commence until at least 2021/22.
- If a tunnel were to be proposed and built it would have to have an entrance on a considerable area of land on Gosden Hill Farm. No land has been identified for this purpose but only for an A3 south bound intersection.

- We take the view that any further consideration of the development of Gosden Hill Farm should be held back until the plans of Highways England are known for the A3 as it would be ridiculous to go ahead with the plans for the development of this site and for utilising land close to the A3 that might be required for an A3 tunnel.
- We are absolutely clear that there must be a four way junction with the A3 on the Gosden Hill Farm site north of Potters Lane. Unless such a junction is in place the development should not take place. It is totally unacceptable that traffic for London from the site will have to go into and through Burpham to join the A3 to go north. Burpham is already a traffic hot spot and is frequently swamped with traffic and this additional traffic and the traffic from the new Slyfield development would make the situation in Burpham chaotic and totally unacceptable to everyone that lives in or needs to have access to Burpham. Put another way the existing road structure in Burpham couldn't cope with this additional traffic - in all honesty traffic congestion in Burpham, at times, is quite awful now as many residents of Merrow know only too well.
- The draft Local Plan addresses the timing of infrastructure construction at Gosden Hill Farm but the wording is woolly in Policy A25 and too loose and any developer worth his salt would drive a coach and horses through the wording. The necessary infrastructure must be built at the same time as the development and the four way junction with the A3 must be open before the first house is occupied. Preferably the infrastructure should be in place before the development commences but this may not be realistic.
- **The wording at Policy A25 should be amended to state, in terms, that no development may commence at Gosden Hill Farm until agreement is reached for a four way junction with the A3 and no homes or retail space or the Park and Ride may be occupied or in use until the four way junction has been completed and is open.**
- The proposed rail station at Merrow is also an aspiration and has been for decades. The draft Local Plan is devoid of any detail nor is it clear as to where the main buildings would be erected. We could assume that they would be on the Merrow Depot site. The traffic implications with a new station at the Merrow Depot would be serious. Not only is there the increased traffic due to 2,000 new homes at Gosden Hill Farm together with a Park and Ride and two schools, there would be a large volume of additional regular, daily traffic going to and from the station. The small lane that leads up to Merrow Depot is only just wide enough for two cars and with the new, added 'pinch points' it is even narrower in some parts. The junction going into the lane is too small for large volumes of traffic and struggles even with the existing levels. This would cause more accidents and even longer traffic jams. The railway bridge and junction are inadequate for the new housing development let alone the addition of the anticipated additional traffic going to and from the station daily, day and night. We would also suggest that there is potential for a bus service also to be added increasing the problems. If this station were to be built, the bridge from Merrow to Burpham would have to be re-built to expand the carriageway which would be extremely costly. Whatever the GBC thoughts are on potential plans for the station, very careful consideration needs to be given to parking and access. We would suggest that separate access and parking on the Gosden Hill estate and access from there via a footbridge would ease congestion at the bridge junction leaving the lane only for access by the businesses, staff and for disabled passengers only. The other alternative would be to site the station itself on Gosden Hill Farm.

- This proposed development is covered in the Burpham Neighbourhood Plan which has now been adopted and covers part of the Gosden Hill Farm site. Appendix 3 site 2 and site 3 describes the 'Green Cathedral' in Merrow Lane which is protected as it is common land under section 38 of the Commons Act 2006. This is the strip of land running down Merrow Lane between the Merrow Lane and Gosden Hill Farm. It does not form part of Gosden Hill Farm.
- It is unfortunate that in July 2014 Network Rail used an old gateway to cross this strip of Common land to get access to and maintain their substation on the rail track. They relied on a permission that had been granted to the landowner since 1967 for the purpose of clearing the track and to improve the drainage. This detail is contained in an email from the GBC Managing Director of 9th September 2014.
- The email from the Director General reads '*With regards to the second question we have carried out a review as follows. The access track was unused for a period of twenty years. There was an existing gate that was in evidence before Network Rail entered the land and the landowner has confirmed this. The access track in question forms part of a Lease Agreement dated 16 June 1967, made between Guildford Borough Council who are the owners of the adjoining land and the then tenant. There is a line in that Lease map that clearly denotes the access track being in evidence at the time of the Lease. As part of the Lease we granted the right to the tenant and his successors in title the right to "cut and fell timber and other trees, pollards, saplings and underwood" and to "grub up underwood" in that area. Improvement works have also been carried out to the culvert that is currently there. As part of the Lease Agreement we granted the right to lay water mains etc. in that area. Therefore it seems at present we granted the right to carry out the work to clear the access track, and improve the drainage.*'
- Network Rail did not have consent to use this gateway but they used it nonetheless and have placed metal gates in the gateway which gives the impression that this gateway could be used to access any development that might take place at Gosden Hill Farm.
- **We therefore request that Policy A25 is amended to make it clear that the Common land in Merrow Lane is protected and may not be used for access to any development in Gosden Hill Farm**
- There is an unfortunate contradiction in this policy in that in the allocation section it is proposed that there will be both a primary and secondary school whilst in the infrastructure section it is stated that the need for a secondary school will be determined at the planning application stage. We find this totally unsatisfactory because if no secondary school is required then the size of the plot on page 181 can be reduced to the site that was proposed in the earlier draft plan removing the added area on the north east of the site.
- All in all, it is impossible to support the proposals for this site not least because too much critical information is missing and far too much is aspirational and has to be taken on trust.
- **We object to Policy A25 as it is unsound and has not been positively prepared for the very many reasons described above.**

Policy A43 and Policy A43A

We have noted that Policy A43 and A43A were introduced into the draft at very short notice and without any consultation under section 18 of the Local Plan Regulations 2012.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

We object to the inclusion of Policy A43 in the plan due to the high flood risk associated with this site and we conclude that this aspect of the plan is unsound.

The Transport June 2016 topic paper suggests on page 25 that the slip roads in Policy A43A could provide a four way junction for Policy A25 Gosden Hill Farm. We note that this is only an aspiration and for that reason this suggestion does not appear in the draft Local Plan. We have explained on page 7 that there is an over-riding need for a four way junction north of Potters Lane at Gosden Hill Farm if that development is to go ahead. That being the case, there is no need for slip roads onto the A3 at Garlick's Arch and therefore Policy A43A should be deleted.

We object to the inclusion of A43A in the plan on the basis that there must be a four way junction north of Potters Lane at Gosden Hill Farm and therefore there is no need for slip roads onto the A3 at Garlick's Arch.

18th July 2016