



## MERROW RESIDENTS' ASSOCIATION

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

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The Merrow Residents' Association responded in detail on 18<sup>th</sup> July 2016 to the last submission Local Plan and this response should be seen in conjunction with that submission where we commented upon 16 policies.

In accordance with the request from Guildford Borough Council, we are only primarily commenting upon proposed changes to the Plan which were agreed by the Borough Council in May 2017.

However, we should make it clear that we are only commenting on those elements of the draft Local Plan that affect residents in Merrow and we will leave other residents' associations such as the Guildford Residents Associations (GRA) of which the MRA is a member to comment on the wider borough issues.

In general, we should comment that we are pleased to see the significant changes that have been made, but, in our opinion, they do not go far enough. In particular, a significant number of the reservations that we expressed have not been addressed and we still find the Local Plan unsound in a number of material respects. These are: -

#### **Chapter 3 – Our Vision and Ambition**

- We continue to take the view that there should be a Town Centre Master Plan and it follows that a significant level of new housing could and should take place in the town centre on brownfield sites.

#### **Policy S1 – Presumption in Favour of Sustainable Development**

- We continue to have concerns about the second sentence of the first paragraph and are of the view that the words 'wherever possible' should be removed as this is an unwarranted and unwelcome extension of the NPPF.

#### **Policy S2 – Planning for the Borough – our Spatial Development Strategy**

- MRA has commented on the earlier drafts of the SHMA and voiced its objection to the OAN. We now wish to comment on the West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017. We dispute the revised OAN. Even though the housing target figure has been reduced to 12,426 homes (558 pa), we believe

it is based on a fundamentally flawed analysis of the demographic and economic need figures that have been produced by GL Hearn.

- GRA commissioned a review by NM Strategic Solutions Ltd (NMSS) of the Addendum Report as well as the original SHMA. Their detailed reports and the credentials of Neil McDonald who prepared them can be found on the GRA website.
- The NMSS study established through a thorough analysis that there are a number of serious defects in GL Hearn's Report which cast grave doubt on the reliability of their OAN. In particular, GL Hearn have seriously over-estimated the population growth for Guildford which can be largely attributed to significantly over-estimating net migration into Guildford in student age groups, most probably as a result of the under-recording of student migration out of Guildford. If plausible adjustments for the outflow of students in the period 2001-15 are made, this would reduce the demographically-based estimate of the number of homes needed for the period 2015-34 from 558 to 404 pa based on student figures alone. Furthermore, trust in the OAN is also undermined by GL Hearn's totally flawed estimates of the number of homes needed to support economic growth.
- We consider that the significant shortcomings in GL Hearn's Reports highlighted in NMSS's Review make it impossible for GBC to make an informed, evidence-based decision on the housing figure. Consequently, in common with many other Guildford organisations and individuals, we have no confidence in the SHMA and OAN produced by GL Hearn to the extent that the Local Plan should not rely or depend on them.
- **We therefore object to Policy S2 and the OAN in G L Hearn's Report which should be disregarded.**

### **Policy H1 – Homes for All**

- We are disappointed at the very weak amendments made to the draft Local Plan on student accommodation. In the first place the need for student accommodation is being overstated as the independent report from NMSS makes clear.
- Secondly the wording in policy H1(5) has now been weakened in that it is no more than an aspiration that 60% of full time students will be provided with accommodation on campus.
- **We take the firm view that this figure should be a requirement and that a figure in excess of 60% should be incorporated in the Plan.**

### **Policy H2 – Affordable Homes**

- Whilst still appreciating the need for affordable homes, we still take the view that the Local Plan must require a proportion of smaller houses as well as a realistic proportion of one and two bedroom apartments.
- Our view on the need for smaller houses has been underlined by recent developments in Merrow where there was no provision for smaller two bedroom houses even though these had been offered by the developer. It remains the case that many smaller families

would prefer to live in a house with a garden rather than an apartment and that clear need should be addressed in this Local Plan.

### **Policy P1 – Surrey Hills area of outstanding natural beauty**

- We are disappointed at the changes that have been made to Policy P1 and that much of the earlier detail has been removed on conservation, public enjoyment, support of the rural economy and public access. This has reduced the impact of this policy and the deleted words in Policy P1(1) should be re-instated.
- As we indicated in our July 2016 submission, we are clear that government policy states that all land that forms the views into and out of an AONB should be protected.
- **We believe this specific provision should be included in Policy P1(3).**

### **Policy P2 – Green Belt**

- There has been no retreat by Guildford Borough Council on the annexation of Green Belt space, a distinct lack of clear argument of justification as to why this is needed for development and no cost benefit justifications versus other alternatives, such as more intensive use of brownfield and urban sites.
- We explained why we object to this policy in our submission of July 2016. We need to return to that submission since it is absolutely clear from section 9 of the NPPF that the Green Belt is intended to prevent urban sprawl by keeping land permanently open and to safeguard the countryside from encroachment. However, the map in the current draft Local Plan of the proposed new developments on the north-east side of the borough shows that the continuous green ribbon along the A3 will have been destroyed by the development at the Wisley airfield, Garlick's Arch and Gosden Hill Farm and that we would have virtual continuous development from the M25 down the A3 into Guildford. We take the view that this is totally and completely unacceptable. There would be hardly any countryside left along this stretch of the A3 and the protection offered by the NPPF would have been overturned and ignored.
- 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, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.
- Moreover, the NPPG offers specific guidance on Green Belt - guidance that has been ignored where it raises the question as to whether **housing and economic needs override constraints on the use of land, such as Green Belt.**
- We are clear and are also advised that the NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. So far as this Plan is

concerned neither the NPPF nor the NPPG has been followed and the Council have erred in proposing so much development in the Green Belt.

- In particular, no exceptional circumstances have been advanced in accordance with paragraph 83 of the NPPF as to why the Green Belt should be eroded in the way proposed not least because it has been clearly demonstrated by NMSS that the OAN is clearly overstated and should be significantly reduced.
- **We object to Policy P2 in that it is unsound and does not follow the NPPF nor government guidance**

#### **Policy P5 – Thames Basin Heath Special Protection Area**

- There is no suggestion in the draft Local Plan that this protection area and the legislation will be reviewed but this is understandable whilst the Brexit negotiations are ongoing.

#### **Policy ID1 and Appendix E – Transport Infrastructure**

- We made some very specific comments in our July 2016 submission reflecting the views of Richard Jarvis BSE, MS, CEng, FICE, FCIHT who is a qualified Civil Engineer. Once again, we reflect his views on this version and in summary these are: -
- *“In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place”.*
- In particular and in addition we are concerned at Policy ID1 in that it states that the delivery of development may need to be phased to reflect the delivery of infrastructure and that the delivery of the infrastructure will be secured by planning condition and planning obligation. It is our clear view that this provision is far too weak and is a watering down of previous assurances provided by senior councillors.
- At the very least, the Local Plan should make it clear that the development of a site may not proceed until all elements of the infrastructure are agreed by Guildford Borough Council, that the developer has agreed and provided a satisfactory guarantee that these conditions will be met and that the essential elements of the agreed infrastructure will be in place to ensure that any additional traffic will not cause severe congestion in the locality.
- **We object to Policy ID1 for the above reasons.**

### **Policy ID3 – Sustainable Transport for New Developments**

- We continue to be extremely concerned at the proposals for the Sustainable Movement Corridor which has the potential to cause major gridlock in Burpham if the Gosden Hill Farm development proceeds.
- In addition, we must echo the comments made by the Burpham Community Association when they say “The proposed Sustainable Movement Corridor cannot be delivered as the roads are too narrow and have pinch points. This certainly applies to Burpham. The A3100 London Road will become an SMC supposedly carrying north and south bound bus and cycle lanes in addition to general traffic lanes north and south bound; four lanes of traffic where only two exist at present”.
- It follows that we continue to 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 ID4 – Green and Blue Infrastructure**

- We continue to object to the weak statement in 4.3.38 and continue to take the view that this this should be reinforced and placed within the policy itself at ID4.

### **Policy A25 – Gosden Hill Farm**

- We set out extensive and strong objections to the Gosden Hill Farm proposals in our response to the 2016 draft Guildford Local Plan, covering both general and specific concerns. In our view, these concerns have not been adequately addressed in the changes made in this version and so continue to stand as a critical part of the overall submission for the Inspectors' review. The additional comments from the MRA on this Plan now focus on the changes brought forward and should be read in conjunction with previous comments.
- We find it extremely difficult to make any definitive comment on many aspects of this policy since there is so little detail currently available. All internal design, infrastructure and transport connections for the Gosden Hill Farm site remain open - so are both impossible to sensibly comment on and a continuing area of risk. Increased reliance on the developer to cover major costs for infrastructure including the Sustainable Movement Corridor, A3, Park and Ride and Merrow Station adds additional risk – both on the timing and the completeness of the necessary infrastructure delivery and that so much of the proposed development is now to be funded by the developer. This underscores the need for more detail to appear in the policy so that the developer cannot wriggle out of his obligations at any planning application stage.
- In the context that Policy A25 has been retained, in our view quite inappropriately, we make the following comments on the revisions:
- We note the new requirement for a minimum of 1700 homes during the Plan period. Given the uncertainties around growth projections over a period of this length, the recognised economic challenges from Brexit and other UK macroeconomic

circumstances and the still open questions over the local housing need, we recommend that this rate of development must be reviewed and challenged periodically through the plan period. The rate of housing growth contained within the revised Plan remains very high and gives great concern for the sustainable development and maintenance of the current Guildford way of life without significant detriment.

- In addition, we must comment that although the number of new homes to be built has been reduced during the lifetime of this Plan that there is a clear intention that more houses will be built on this site after the Plan period and therefore there is no real reduction in the number of houses to be built on this site. This can be quite properly described as a smoke and mirrors presentation which fools no one.
- We made some very specific comments in the July 2016 submission reflecting the views of Richard Jarvis BSE, MS, CEng, FICE, FCIHT who is a qualified Civil Engineer. He now comments that the improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 southbound carriageway nor an understanding of the implications of the Sustainable Movement Corridor for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are clearly not suited to carrying large volumes of traffic. Under the Plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demands on the A320 and roads in Jacob's Well.
- We strongly support the recognition and explicit requirement to improve the A3 road junction and connection to the Gosden Hill Farm site. However, this covers only the southbound carriageway and still leaves the new development very inaccessible either off or onto the northbound carriageway. This makes very little sense and feels like short-term planning for this very significant development. This can only exacerbate the already well recognised traffic pressures in the area. We believe that the Gosden Hill Farm development should only go ahead with a four-way junction connection to the A3; and that this should be part of the explicit pre-planning required as the preconditions for the development. This would seem to us to be an absolute fundamental element of the Local Plan.
- The proposal for a 7000-sq. m strategic HQ building further highlights the necessity for good connections to the site and provides additional support to our recommendation of a four-way junction with the A3.
- It is clear that there is a high early dependency on Highways England for A3 improvements. It is also clear that all the strategic development sites (Blackwell Farm, Gosden Hill Farm, Slyfield, Garlick's Arch and Wisley airfield) are on or close to the A3 and the Sustainable Movement Corridor. Given that the first is already under strain and that the second does not exist, this suggests that all the strategic housing development sites are fundamentally dependent on these major road infrastructure enhancements.
- Our previous objections to the severe impact of the Gosden Hill Farm development to surrounding communities (Burpham, Merrow, Clandon, Send, etc.) still stand. We appreciate that the housing figure has been spread over a longer period of time with the

slower housing ramp up but this doesn't reduce our real concern about the severe traffic congestion that will flow from the development of Gosden Hill Farm.

- As previously stated above in relation to Policy P2, 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. We take the view that the benefits related to the development of Gosden Hill Farm do not outweigh the harm to the Green Belt that would follow and that the Council have made an error of judgement by including Policy A25 in this draft local Plan.
- We must also return to a topical issue in this response related to common land in Merrow Lane bordering Gosden Hill Farm which was covered in our July 2016 submission. There was an overgrown gateway about 100 metres from the railway line in Merrow Lane which we understand was the subject of an agreement between GBC and the landowner. Network Rail used that gateway without legal authority in 2014 to access and cross Gosden Hill Farm to upgrade their electricity substation and subsequently have replaced the gateway with a modern new galvanized gate instead of returning the gateway to its original state as required by Guildford Borough Council. A dispute continues between the Burpham Community and Guildford Borough Council on this matter and the landowner has indicated that he wishes the existing gate to be retained rather than being replaced with more appropriate post and rails fencing. We need to make our position clear in that this access point from Merrow Lane into Gosden Hill Farm across common land does not amount to a public right of way and we shall resist any proposal to use this gateway as an access point of any nature to Gosden Hill Farm at any time in the future.
- **We object to Policy A25 for the reasons explained above. The policy is unsound and if it is to be retained in the Local Plan must include a four-way junction onto the A3. If no four-way junction is to be provided then there should be no development at Gosden Hill Farm - this being the publically stated view of members of the Guildford Borough Council Executive Committee.**

#### **Policies A43 and A43A**

- **We continue to object to the inclusion of 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.**
- **We object to the inclusion of A43A in the Plan on the basis 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.**

#### **Conclusion**

We appreciate that these comments will be submitted to the Inspector for the Examination of the Local Plan in public and we reserve the right to request to speak at the Examination in Public to underline the specific concerns expressed in this consultation response.

19<sup>th</sup> July 2017

