

MERROW RESIDENTS' ASSOCIATION

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Mr Chris Mansfield Executive Director Guildford Borough Council Millmead House Millmead Guildford GU2 4BB

14th May 2015

Dear Mr Mansfield

Proposal to remove the Clandon Golf Site from the Green Belt

I am writing to you as Chairman of the Merrow Residents' Association about the proposal from the Trustees of the Clandon Estate that the 146 acres of the Clandon Estate, now occupied by Clandon Golf, should be removed from the Green Belt in the next edition of the draft Local Plan. This proposal was submitted by Alliance Planning on behalf of the Trustees to Guildford Borough Council in September 2014.

Merrow Residents' Association (MRA) is an apolitical organisation with a membership of 600 representing the views and interests of Merrow having been established over 40 years ago.

At MRA's Annual General Meeting on the 30th March 2015 we discussed the proposal from the Trustees in some detail and there was overwhelming opposition to the proposal that the site occupied by Clandon Golf should be removed from the Green Belt. Of the 180 members attending the AGM only 6 people supported the Trustees' proposal.

You should be aware that our residents in Merrow had real concerns about the construction of the round-about on the A25 which provides access to the land now occupied by the Park and Ride when it was proposed in the early 1990s and were adamant that this access should be permitted for the sole purpose of access to the Park and Ride and to Clandon Golf and for no other purpose. This is because GBC's Planning Department at that time were absolutely clear that in accordance with Government Guidelines, if the golf venture were to fail the land used for this recreational purpose could not be developed but would have to revert to agricultural use. It is equally clear that the point was made at that time that the construction of a golf course should not be seen as a back door route for a full scale development on that site and some of our members are very disturbed by the fact that this is now being proposed so soon after the golf course was opened.

We have read the proposal from the Trustees with some care and we are very surprised at the arguments that they have deployed. They have tried to turn the conclusions of the Green Belt and Countryside Study on their head. The purposes of the Metropolitan Green Belt have been well understood for very many years. Section 9 of the NPPF makes it clear

that the Green Belt serves a valuable service to avoid merging of built up areas and to check urban sprawl. There is no justification in the proposal from the Trustees for overturning those objectives nor can there be as the proposal does not present any exceptional circumstances envisaged by paragraph 83 of the NPPF as to why this site should be removed from the Green Belt. In the absence of such evidence, we maintain that the whole site must remain in the Green Belt.

As you will be aware, the protection of the Green Belt has been the subject of considerable Ministerial correspondence before the General Election. For example, new guidance published on the 6th October 2014 reaffirmed how councils should use their Local Plan, drawing on protections in the NPPF to safeguard their local area against urban sprawl and protect the green lungs around towns and cities.

We would make the following detailed comments on the proposal from the Trustees of the Clandon Estate:-

- 1. We, like many other associations, were critical of the methodology adopted for the SHMA and took the view that the housing need figure was too high for reasons that we have explained in our response to the draft Local Plan and were related to mistaken interpretation of international migration and university student numbers. We do not accept the argument in para 2.37 of the Trustees' proposal that the housing area should be widened from the current coverage in the revised SHMA covering Guildford, Waverley and Woking
- 2. Throughout their submission the Trustees suggest that the highest housing need figure should be adopted as the housing target. This is totally unrealistic and takes absolutely no account of the constraints in the NPPF and the NPPG. This is a very serious failing in their proposal. In fact, the proposal at para 2.48 suggests that using constraints in the NPPF 'will not be acceptable' as it would lead to development by appeal a quite amazing and contradictory assertion. This suggestion that constraints should be ignored also appears in para 2.70 and runs throughout the proposal.
- 3. On infrastructure, the proposal suggests in para 2.55 that the site has no significant infrastructure or other constraints. We beg to differ fundamentally. There are existing and persistent traffic problems on the A25 running into Merrow during rush hours and when problems occur on the A3. These would be significantly exacerbated should a school and new houses be build on the Clandon Golf Site. This element of the proposal on its own, simply demonstrates that the proposal from the Trustees lacks credibility.
- 4. It should be noted in para 3.17 that land parcel E1 scores very low on the sustainability credentials in the GBCS from February 2013, far lower than other Green Field sites in the Borough.
- 5. It is not obvious from the comments in para 3.25 as to why it is suggested that the GBCS scoring is 'clearly flawed'.
- 6. The proposal at para 3.37 suggests that there is a footpath and cycleway along the A25 from the Park and Ride into Merrow. This is incorrect.

- 7. Comment at para 3.52 covers the suggestion of a railway station in Merrow. There have been no such firm proposals to date and if this railway station were to be built it would cause considerable traffic problems in the whole area adding to the existing traffic problems described in para 3, above of this letter.
- 8. Para 6.9 mentions the possibility that a hotel could be built on land parcel E1. We can find no other mention of a hotel in the Trustees' proposal we find this rather surprising especially as this suggestion does not appear in the summary at para 6.12.
- 9. We make no comment on the suggestion of a school on land parcel E1other than this is the responsibility of Surrey County Council and no such proposal has been made by them.

Government guidance makes it clear that sites should only be considered for removal from the Green Belt if no other sites are available for development to meet the housing target set by the Council. As you will be aware, there are many brown field sites in the Borough that should be considered for development, not least the Slyfield site, before any Green Belt sites are even considered.

The Clandon Golf site is located within the Surrey Hills Area of Great Landscape Value in addition to being in the Green Belt and a small part lies within an Area of Outstanding Natural Beauty. The NPPF is clear that development should only take place in an AONB in exceptional circumstances and for that reason we are surprised that none are detailed in the proposal. Policy 8 of the 2014 draft Local Plan suggested that AONB and AGLV areas are intrinsically linked. The policy provides that any proposals within the AGLV which would have a negative impact upon views into and out the AONB, and which do not respect the setting, would not be acceptable. We supported Policy 8 when we commented on the draft Local Plan - and we continue to support this principle now. Furthermore this point is emphasised in the GBCS of February 2014 where it is stated that 'any development within land parcel E1 would need to consider the landscape and visual effect on the Surrey Hills AONB and development within this designation should only be brought forward if no suitable areas outside the AONB can be developed' This is one more very powerful reason why the proposal from the Trustees of the Clandon Estate should be rejected.

I should be grateful if you would take careful note of the absolutely clear view of the Membership of the MRA that the whole of the Clandon Golf site, land parcel E1, should remain in the Green Belt and, consequently, should not appear as a potential development site in the draft Local Plan when it is eventually re-issued for public consultation.

I am copying this letter to Ward Councillors in Merrow, Clandon and Horsley and to the Leader of the Council.

Yours sincerely