



## MERROW RESIDENTS' ASSOCIATION

[www.merrowresidents.org.uk](http://www.merrowresidents.org.uk)

### **Merrow Residents' Association's Responses to the Guildford Borough Local Plan – Matters and Issues for Examination (Part 1)**

#### **Hearing Statement dated 9<sup>th</sup> May 2018 submitted by Keith C Meldrum CB on behalf of the Merrow Residents' Association ID 8825057**

---

Herewith the Merrow Residents' Association's Hearing Statement to Part 1 of the Matters and Issues for Examination which should be read in conjunction with the Association's response of 19 July 2017 to the last submission Local Plan.

#### **Calculation of the Objectively Assessed Need for Housing (OAN)**

As we indicated in our July 2017 response, we are not content with the Guildford Borough Council OAN. We have consistently disputed the original OAN and the revised OAN.

The Guildford Residents' Associations commissioned a review by NM Strategic Solutions Ltd. The Inspector will be aware of that review and the credentials of Neil McDonald. He has prepared a supplementary statement which we have seen and with which we totally agree. It is clear to us that the demographic based OAN has been overstated and should be reduced considerably in accordance with Mr McDonald's recommendations.

On the issue of affordable housing we are concerned that Guildford Borough Council's housing target may be inflated to increase the level of affordable housing available in the borough. However, due to the very definition of affordable housing and the existing high market prices in Guildford borough, we consider this would do little to improve affordability for most of those (especially younger households) attempting to step on to the housing ladder in Guildford borough. We covered this in our July 2017 response and conclude that the affordable housing target should not be raised as it is highly unlikely to achieve its objective.

#### **Housing Trajectory**

The housing trajectory which does start at a low level and rises towards the later years of the plan period is a sound basis for meeting housing need not least because it is critically important that the infrastructure is in place at the same time as housing development is taking place and there are bound to be delays in the first few years while the infrastructure improvements are approved and constructed. Gosden Hill Farm is an example of where considerable road infrastructure will first need to be put in place otherwise there will be massive traffic congestion in the area and specifically in Burpham as we described in detail in our July 17 response.

#### **Spatial Strategy, Green Belt and Countryside Protection**

We have already commented in our July 2017 response on the need to protect the Green Belt. We are concerned that the extent of the development proposed in the Green Belt will have a significant harmful impact on the landscape especially if the ribbon development proposed on

the land adjacent to the A3 from Burpham up to the junction with the M25 at Wisley were to go ahead. It is axiomatic that if the Housing Target for the borough were to be reduced then the need for the proposed level of erosion of the Green Belt would also be reduced.

In response to 9.4 we do not believe that the potential for further residential development in the urban area has been adequately explored.

On 9.5 we have already argued that we do not believe that the strategic locations for Green Belt release are justified by exceptional circumstances. Guildford Borough Council have not made a fully argued case for so much Green Belt release. Their arguments as to why exceptional circumstances apply to justify amending Green Belt boundaries are particularly weak.

On 9.7 there are a number of situations in the plan where the protection of the landscape would be adversely affected especially at Site A26 - Blackwell Farm.

On 9.8 it is clear to us that if there were to be a greater housing requirement this would have a significant adverse impact on the Green Belt and on the Spatial Strategy. For that reason alone it is our view that the OAN should not be increased.

#### **Site Allocation A25 – Gosden Hill Farm, Merrow Lane, Guildford**

We will not repeat all the arguments and concerns which we stressed in our July 2017 response.

However, we are concerned at the suggestions that a junction at Garlick's Arch to the A3 would be an adequate response to the additional traffic that would be generated at Gosden Hill Farm. The Inspector will be aware of the detailed proposal for this site and that there would be considerable additional traffic generated by the housing, retail development, new schools, the Park and Ride and Merrow East rail station.

It is not sufficient for the Council to merely assert at paragraph 8.72 on page 77 of their Response to the Initial Questions that *"Proposals for the development of the site should have regard to the potential opportunity to provide an all movements junction of the A3 trunk road."*

We are firmly of the view that there should be a 4-way junction with the A3 to serve the Gosden Hill Farm site. We have had some correspondence with Guildford Borough Council through one of the Merrow Ward Councillors on the Council's interpretation of Policy A25 Infrastructure requirements in paragraph (2). The Council have said that:-

*"The Submission Local Plan is proposed to form part of the development plan for the area.*

*If adopted in its present form, requirement (2) of Policy A25 in the Submission Local Plan (December 2017) would be considered through the development management process for planning applications, a process which concludes with the planning decision-making process.*

*In essence, we consider that there are three possibilities that could emerge from the development management process for a planning application for the site:*

- 1) *It is determined that the potential opportunity is not a material consideration and should not be responded to in any form in a development of the site.*
- 2) *The development of the site does not require the potential opportunity to be realised as part of the promoter's transport strategy, but nevertheless their proposal provides for the potential future realisation of a connector road on the site only by, for instance, laying out built development in such a way that a connector road could later be provided across the site or by providing a road of suitable standard or capable of being upgraded to a suitable standard across the site.*
- 3) *The promoter's transport strategy requires the potential opportunity to be realised.*

*In terms of the second and third possibilities, its onward connection could be achieved either by new road and bridge to that section of the B2215 London Road to the north of the A3 or by new road to the A247 Clandon Road. In either case third party land would be required."*

This interpretation is of immense concern to Merrow Residents' Association as it means that any discussion/decision on a 4-junction to serve Gosden Hill Farm would be left to the planning application stage. Consequently, there is no certainty that a 4-way junction would be included in the plans to serve the site. The absence of such a junction would lead to totally unacceptable traffic congestion problems in Burpham exacerbated by London bound traffic from the Gosden Hill Farm site that would have to be routed through Burpham. Alternatively, traffic might flow from the Gosden Hill Farm site under the railway bridge into Merrow, down the A25 to the Clandon crossroads and thereafter meeting the new junction at Garlick's Arch from the East. This would lead to unacceptable traffic flows and congestion on the roads in Merrow.

This real potential problem could be overcome by making a 4-way junction an infrastructural requirement at paragraph 1 of Policy A25 rather than an all movements junction aspiration at paragraph 2. We take the view that this 4-way junction onto the A3 should include a new road and bridge to that section of the B2215 London Road to the north of the A3 near Potters Lane

This uncertainty about the road infrastructure makes the plan unsound in so far as it relates to this site. We would be very grateful to have the opportunity to discuss our proposal with the Inspector at the hearing.

We note that in Appendix 1 of the Council's Response to Question 3 (Relationship between phasing of the developments and transport schemes), the new rail station at Guildford East (Merrow) is scheduled for Years 6-11 (2024/25-2029/30). However, we have noticed that in the Council's recently published Corporate Plan it has a Target Completion Date of 2023. We are concerned that this may signal that development of the Gosden Hill Farm site might commence in that part of the site adjacent to Merrow Lane which leads from the B2234 when there is no road infrastructure in place that could cope with resultant traffic apart from mention in paragraph (3) of the 'Opportunities' listed in Policy A25 – *"Potential to provide a through route within the site to divert the B2234 to form a more direct link to the A3 at the improved junction"*. This might involve incorporation of a disputed right of way for farming purposes across common land in Merrow Lane into a field which is part of the Gosden Hill Farm site. The Council should be required to clarify the intentions in respect of the railway station and the potential B2234 diversion.

On 11.13 it follows that we cannot support the release of this site from the Green Belt under the conditions that have been specified as the exceptional circumstances condition in the NPPF has not been met.

On 11.4 we are, as we explained in our July 2017 response, concerned at the proposed urban sprawl on the north eastern side of Guildford from Gosden Hill Farm to the M25 and this should not be permitted as it is contrary to paragraph 80 of the NPPF.

**A43 Land at Garlick's Arch Send and A43A New North Facing Slip roads on the A3**

On 11.34 there are no local exceptional circumstances that justify the release of this land from the Green Belt. If a 4-way junction onto the A3 is constructed to serve the Gosden Hill Farm site with a new road and bridge to that section of the B2215 London Road to the north of the A3 near Potters Lane there would then be absolutely no reason for A43 and A43A to be retained in the Local Plan.

It follows that we are concerned at the effect of this proposed development on the Green Belt and that it will only exacerbate the urban sprawl proposed from Guildford to the M25 to which the Inspector has referred.