



MERROW RESIDENTS' ASSOCIATION

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Comment on the Strategic Development Framework, Supplementary Planning Document dated January 2020

I am writing to comment on this Supplementary Planning Document (SPD) on behalf of the Merrow Residents' Association as we have some very serious concerns about some elements of the strategy. We attended the consultation meeting organised by GBC's consultants on 11 December 2018 and are very disappointed that this strategy doesn't follow the thrust and conclusions of that meeting with particular reference to Gosden Hill Farm.

As you will be aware Merrow is only separated by the railway line from Gosden Hill Farm and therefore decisions taken about Gosden Hill Farm are bound to impact on Merrow especially so far as traffic is concerned.

Approach to addressing the Climate Emergency

GBC declared a climate emergency in July 2019 and has confirmed in a subsequent press release its commitment to working with a local Climate Change Partnership to achieve a net zero carbon emissions target in the borough by 2030. This is a huge commitment that has a direct impact on the proposed housing developments in the Borough.

MRA's interest is principally focused on Gosden Hill Farm. The SDF/SPD has some high-level aspirations, but totally lacks any substance to give confidence that the net zero target by 2030 will be delivered. The impact of this ambitious target is that by 2025 100% of all new buildings must be designed to Net Zero. To achieve there must be a clear plan as to how GBC will measure compliance with this target at design stage in a way that informs good design is delivered by the commercial developers. To ensure ALL new buildings meet Net Zero Carbon, Building Regulations Approved Document Part L needs to become the legislative driver for this.

Unfortunately, there is no connection between the proposed changes to Part L (2020) and the need for an urgent response to climate change. The Gosden Hill Farm development is a part of two million homes are likely to be built between 2020 and 2025 in the UK. If the required standard is not met when homes are first constructed, they will require retrofit before 2050, which is likely to be five times more expensive than building them properly in the first place.

The risk of a similar built-in deficiency legacy applies to the lack of provision of electric vehicle (EV) infrastructure for homes and public EV charging.

Key issues with the proposed Part L consultation

1. Fabric performance is likely to get worse – a home in 2020 could be less insulated than a home under 2013 Building Regulations. The use of an energy efficient heating system has the ability to mask fabric performance.
2. Carbon and primary energy factors disguise the energy efficiency of a home. The energy consumption of a home can be high but carbon emissions low. This leads to inefficient homes which appear to be performing well.
3. Local authorities will lose the ability to meet their climate emergency zero carbon commitments if they are stripped of their powers to go above and beyond the new Part L. We believe it is essential that GBC retain their powers to impose local requirements.

There is a solution that GBC could implement or use as a model approach. We suggest that GBC use the “The London Energy Transformation Initiative” (LETI) guidance as a basis for putting GBC en route to a low carbon future for the built environment. This allows local authority planners, housing associations, developers, engineers, architects, sustainability professionals, contractors and facilities managers to work from a common platform.

We have the following specific comments on the SPD which we have discussed with the Burpham Neighbourhood Forum, the Burpham Community Association and West Clandon Parish Council.

5.2.3 This covers, inter alia, the proposed Guildford East (Merrow) Railway Station. It would be helpful if more were said about this proposal which has been under discussion for about 30 years. We have seen correspondence between GBC and Network Rail from 2015 and reference to ‘Network Rail’s letter to Martin Grant Homes of 16 September 2014 (from Sam McCarthy, Alliance Commercial Director) that provides comfort that, subject to further assessment and securing approval from the DfT, ‘South West Trains and Network Rail consider the delivery of a new station at Merrow to be feasible and viable’. We take the view that this strategy should cover the plans for this station and the timescale within which the station would be constructed so that this can be incorporated into the masterplan for the site. In the absence of such plans it is difficult to see how a meaningful masterplan can be constructed.

5.3 This covers the successful integration with neighbouring suburbs- we assume this covers Merrow. We oppose the need for such close integration and make a similar comment on 5.4.9 as Merrow wishes to remain as a separate community.

Figure 25 on page 101 causes us great concern. Firstly we continue to demand a 4 way junction with the A3, this being the approach we took at the consultations on the Local Plan and at the examination of the Plan by Inspector Jonathan Bore. In the absence of a 4 way junction on the Gosden Hill Farm site all traffic wishing to go north on the A3 will either have to go through Burpham or go up Park Lane into Merrow and thence on the A25 going through Clandon on the A247 joining the A3 at Garlicks’s Arch when the slip roads in policy A42 have been constructed. Considering just how much traffic will be generated in Gosden Hill Farm from the 1800 houses, the two schools, the new Park and Ride and the new railway station this would appear absolute madness. We suggest that there must be some traffic modelling work on access and egress from this site to determine just how this additional traffic can be managed. This should have already been completed before this SPD was produced but better late than never. The possibility of a 4

way junction is covered in the transport strategy of policy A25 to link the A3100 London Road, the B2215 London Road and the A247 Clandon Road.

It has been suggested to us that a 4 way junction will exist after the two slip roads at Garlick's Arch have been completed. This is a flawed suggestion since in order to get to any new London bound slip road at Garlick's Arch one would either have to go through Burpham or Merrow. This would not overcome the problem we have described.

If GBC are obdurate and do not accept the need for a 4 way junction then we trust they will safeguard land for a link road to the A247 in accordance with the transport strategy in policy A25 as referred to above. We note that this land has been safeguarded in figure 27 and trust that it will remain safeguarded in the masterplan.

Secondly we are concerned at the suggestion of a new entrance to the site in Merrow Lane close to the railway line. We have been in discussion with GBC about this gateway which crosses common land that hadn't been used for at least 20 years until it was opened up illegally by Network Rail in 2014 in order to get access to their substation. Brand new aluminium gates have now been installed even though GBC confirmed that the gateway would be returned to its original state after Network Rail had completed their work on the sub-station. To make matters worse Martin Grant Homes who own Gosden Hill Farm have provided evidence to GBC that the gateway which crosses common land has been used for agricultural purposes although we have not been able to see this evidence and are currently challenging the GBC response to our FOI request to have sight of the evidence. We have clear photographic evidence that the gateway has not been used for agricultural purposes for many years and therefore any such claim is spurious. In any event and notwithstanding our FOI challenge we object to this gateway being used for access to Gosden Hill Farm. The access to the site should either use the existing farm track to the existing farm buildings or from the road adjacent to London Road to the north of the site- see figure 29.

Thirdly we query why the site for the Park and Ride is placed in the northern part of the site when it makes more sense for this to be near to the proposed railway station on the south of the site. We do not support the often heard suggestion that sites for a Park and Ride should be reserved for vehicles where the occupants are to use the bus. This is wasteful and since the Park and Ride facilities are supported by the Council and the public there are no compelling reasons why they can't be used by the public at large, since in any event the occupants of cars left at the Park and Ride could walk across Gosden Hill Farm and catch their train. We suggest that re-positioning of the Park and Ride should be given serious consideration.

Junction improvements are also covered in this figure at the south west side of the site between Merrow Lane and New Inn Lane. This could become a very serious bottleneck unless traffic exits the site to the north and avoids the area around the railway bridge. We will cover that in our comments on figure 27. In passing the positioning of the new road lay out at this point is careless because a road is identified as running through common land and houses when it should have been running along New Inn Lane.

5.4.8 Mention is made of the Grade 1 listed Clandon Park Country House. Unfortunately this has now been severely damaged by fire and has not yet been re-constructed.

On the same page there are photographs of Merrow Lane which is described as a highly attractive green route. It may be attractive at the moment but it won't be attractive at all if the traffic from Gosden Hill Farm is to be routed through this Lane and Park Lane into Merrow.

5.4.9 suggests that one of the purposes of this development is to integrate local communities over the long term. We must categorically oppose this suggestion as residents in Merrow have no wish to be integrated with those in Burpham or Gosden Hill Farm. Far from it. We are a separate community and wish to remain so.

Figure 27 on page 107. Our comments on this figure are broadly the same as on figure 25. We notice that a 4 way junction with the A3 on the site is included which is welcome but we object to the proposed access to the site at the south west corner off Merrow Lane close to the railway line as discussed at figure 25.

In addition we object to the proposal that the current access to the farm and farm buildings should be restricted to access to Gosden Hill Farm and about 100 homes. This appears to be an attempt to construct a small secluded development within the site- possibly of superior homes surrounding the existing farm. This shouldn't be permitted and this access to the site should serve the whole site and should be one of two major access points. It follows that we do not support the proposal that pedestrians and cyclists in parts of Merrow Lane should have priority but that the lane should be for the use of all.

The proposed access to the site on the south west, if it is retained, should be for the use of pedestrians and cyclists only for which specific consent from the Planning Inspectorate on behalf of the Secretary of State in Defra would be required as the gateway crosses common land.

This figure also suggests that the Sustainable Movement Corridor(SMC) should be extended from Gosden Hill Farm under the railway bridge and through to Park Lane into Merrow and thence on the Epsom Road into Guildford. This is nonsensical as the railway bridge is very narrow and controlled by lights and any suggestion that it is sensible to increase bus and other traffic along this route is, quite simply, ridiculous and will be resisted by this organisation. Epsom Road in Merrow is already a serious traffic pinch point and is not conducive to a continuation of the SMC. It should also be noted that GBC never suggested that the SMC should be extended in this way at the time that the Local Plan was out for discussion nor does this appear in Policy ID3. The suggestion should be dropped immediately.

This also calls into question the viability of the eastern section of the SMC (SMC6) since the roads in Burpham are too narrow to allow the widening necessary for dedicated bus and cycle lanes so what is the purpose of the Corridor for the Gosden Hill Farm site when there can be no effective Corridor in Burpham or indeed Merrow? We suggest that the necessity and viability of SMC6 should be reviewed.

5.10.4 and 5.10.5 This covers the possibility that the railway station will be constructed on the site. Surely a decision has to be taken at the masterplan stage as to whether the station will or will not be constructed. You can hardly put forward a sensible and realistic masterplan until you know the answer to that key question.

K C Meldrum CB
On behalf of the Merrow Residents' Association