

Merrow Residents' Association www.merrowresidents.org Andrew Strawson, Court House. 4 Abbots Way Guildford. GU1 2XP chairman@merrowresidents.org

Kelly Jethwa Planning Officer Guildford Borough Council Millmead House Guildford GU2 4BB

5<sup>th</sup> June 2023

Dear Kelly Jethwa

Reference: 23/S/00002; Gosden Hill Farm, Merrow Lane, Guildford, GU4 7LE Request for EIA scoping opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) regulations 2017 (as amended).

We are grateful to have the opportunity to comment upon this scoping report as the Merrow Residents' Association has a specific and particular interest in the development of Gosden Hill due its proximity to Merrow and to the traffic implications arising from the number of homes that it is proposed will be built together with the traffic arising from the new schools and the Park and Ride.

We have the following comments on the scoping report which we hope can be taken into consideration:-

## 1. The proposed development.

This organisation has been lobbying for a 4 way junction with the A3 on the Gosden Hill site as the Guildford Borough Council Local Plan was passing through the various consultation phases. That is still our firm view which we also expressed at the public examination of the Local Plan. This would avoid the traffic congestion that would occur with northbound traffic from Gosden Hill having to be routed through Burpham or through the outskirts of Merrow. We hope that this option can be addressed in the masterplan.

It is suggested at **1.12** that the policy (A25) in the local plan requires the 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 be investigated. This is not our understanding of the requirement in policy A25 which requires land to be safeguarded for the provision of a connecting road to the B2215 London Road/A247. This wording was introduced into the Local Plan by the Inspector who examined the Local Plan for soundness after a very detailed discussion. This is not the same junction as that appearing in Requirement (1) in policy A25 of the Local Plan.

We hope that the master plan will include a link road running through the site to the junction of the A247 and the A3 at Send Marsh to avoid the possibility of northbound traffic from Gosden Hill having to be routed through Burpham or through the outskirts of Merrow. This link road would achieve a great deal in reducing traffic congestion in the whole area covered by the Guildford Local Plan.

- 2. On **1.13** we have noted the recent report from National Highways in Route Strategy Initial Overview Report (<u>https://nationalhighways.co.uk/media/kb3dcekp/r17-south-coast-central\_acc.pdf</u>) which confirms that the possibility of a new railway station in Merrow is still live.
- 3. We have noted in the EIA scoping report summary that waste is mentioned but the **disposal of sewage and waste water is not covered in 2.9**. We are aware that this has now been covered by Thames Water and a copy of their response appears on the GBC website. This suggests that sewage treatment, surface water drainage, water supply and infrastructure should be covered in the EIA scoping report.

Furthermore we are surprised in **2.12** that it is suggested that low amounts of waste are anticipated in relation to the proposed development. This is a variance with our understanding since there are problems with the existing foul water disposal system in Burpham which is overstretched at the present time and where frequent problems occur. Resolution of this problem will be one of the major challenges for the developer of this site

- 4. **Population and Human Health. 3.13 and 3.18** covers the provision of medical and other services. The report should also cover the provision of a pharmacy now that Lloyds Pharmacy have withdrawn from Sainsburys in Burpham.
- 5. **Biodiversity.** There is no mention in **6.2 or 6.3** of the **common land green space** adjacent to parts of Merrow Lane. This should be corrected as any access road from New Inn Lane would in all likelihood be routed through this land and if proposed would have to obtain the consent of the Secretary of State in the Department of Environment Food and Rural Affairs. Some of this common land appears to have been erroneously included in the map at Appendix 1 of the scoping report.

In addition there appears to be a conflict in the site boundary as set out in Local Plan policy A25 and the Strategic Development Framework Supplementary Planning Document adopted in July 2020 and that set out in Appendix 1 of the scoping report. The latter includes a significant area of woodland to the east incorporating some ancient woodland that appears to be in the Green Belt

## 6. Traffic and transportation; section 7.

Policy A5 of the Guildford Borough Council Local plan from 2019 lays down a requirement that there shall a two way junction with the A3 and the A3100 on the Gosden Hill site. We re-iterate the point we have made in paragraph 1 that this Association has argued long and hard over time that there should be a 4 way junction with the A3 on the site to avoid traffic congestion in both Burpham and Merrow and we hope that this suggestion can be re-visited when the masterplan is being developed.

We note in **7.6** that a Transport Assessment Scoping report is being progressed. That is something that is of real interest. As described, the traffic analysis will be assessed using

the SINTRAM modelling carried out for the Local Plan. We understand that recent traffic forecasts for London Road in the SHAR(2016) are regarded as out of date. Since there is a new version of the model available, prepared by the SCC traffic modelling team, we hope that it will be used here.

In our view the Sustainable Movement Corridor proposed in the Guildford Local Plan of 2019 should be covered in the report as should the proposed link roads to the A3/A247 at Send Marsh covered in the report from National Highways which is referred to in paragraph 2, above.

- 7. Section 11 covers water resources and flood risk but appears to understate the current flood risk and also underestimates the potential problem of water supply and usage. It is suggested that more emphasis should be placed on rainwater harvesting and re-use to avoid placing a massive strain on the provision of water by Thames Water. It would be helpful if the overall benefits of a grey water system could be addressed.
- 8. **Climate change. Section 12.** We suggest that the impact of a mandatory maximization of solar panels should be assessed.

We trust that you will find these comments helpful.

Yours sincerely

Andrew Strawson Chairman