



# MERROW RESIDENTS' ASSOCIATION

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

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## **Response from the Merrow Residents' Association to the Guildford Borough Council's Local Plan; Development Management Policies – Issues and Preferred Options Consultation.**

### **General**

This Association has developed its own thinking on the Guildford Borough Council Local Plan as the plan has taken shape not only because Merrow lies in the Borough of Guildford but also because of the impact that the development of Gosden Hill Farm and the construction of a new railway station at the Merrow depot will have on the whole of Merrow.

We are concerned at the lack of objective criteria against which to measure actual performance. This leaves full flexibility in the hands of the planning authority and a very real risk that they can then have their arms twisted more easily by the developers. We understand that this will be addressed at the next stage in the development of these policies. It is a shame that more detail hasn't been included in this version of these policies.

We feel that these policies do not give enough prominence to the need to conserve water by harnessing rain water in new developments nor to the need to conserve the green spaces in the borough. In the same vein far too little is said about the real potential problem of water supply to the new strategic developments nor to the disposal of sewage from these sites. We note that there is no specific policy covering the Green Belt (Policy P2 in the LPSS) or the AONB and this should be rectified.

We are also concerned that some but not all of the commentary is very backward looking, based on existing circumstances, rather than forward-looking and aiming towards a more future proofed and consciously planned end state. This may be great to maintain the status quo, but fails to grasp the issues and opportunities that are demanded by the scale of the Local Plan housing developments. For instance, with the move away from retail sales towards internet sales would it not be sensible to include this as a new policy to explain the parameters within which retail space can become housing space?

## **Policy H4: Housing Density**

### **Q1 We agree with the preferred option.**

We would be expecting:

- a set of structured and challenging target density rings around Guildford and the main villages
- consciously maximising the density around the hubs and closest to the best travel connections
- keeping the suburban and country areas to lower densities where the transport hubs are weaker
- making better use of energy efficient building structures and design, allowed by higher density building
- consideration being given to the quality of life, and their health and safety, for those living in high density developments as this can be compromised as the Covid 19 pandemic has demonstrated
- that the Burpham Neighbourhood plan's own housing standards should be recognised

The current wording allows for this outcome but does not yet mandate it with specified densities, which we believe is the only way to achieve optimised results.

It is critically important to ensure that there is a clear distinction between housing density and the height of any development. High density doesn't also mean increase in height particularly where it would affect views out of and into the area.

Therefore, a policy covering the density of future developments cannot be considered without also considering height limitations. These should cover all urban development otherwise tower blocks will damage the character of Guildford. There should be a presumption against any further tower blocks in the town centre and the height restriction should be clearly defined. We take the view that no new building in the borough should be more than 6 storeys and this should be reduced to 3 storeys in the outlying areas of the town- such as Merrow and Burpham.

## **Policy H5 Extensions and Alterations**

### **Q2 We agree with the preferred option.**

## **Policy H6 Conversions**

### **Q3 We agree with the preferred option.**

We suggest the addition of reference to the application of minimum space standards. There should be adequate provision for storage, e.g. bicycles, and we urge the adoption of minimum external amenity standards.

## **Policy E10 Rural Development**

### **Q4 We agree with the preferred option.**

Whilst we agree that a policy must be achieved to cover development in rural areas and especially in the Green Belt it is at the moment far too vague and open ended.

In particular the term 'small scale' needs to be defined as what is small scale to one person may be large for another. For instance, is a single football pitch 'small scale'? We suggest that the answer is yes but for two pitches the answer is no. We would not support this provision being extended to cover a new 18-hole golf course in the Green Belt.

We are puzzled why reference is made to a sports pavilion or clubhouse, in isolation, whilst such a development would of necessity be associated with a playing field or golf course. This needs to be clarified.

It should also be made clear that if the proposed development in the Green Belt were to fail that the land must be returned to its original use. It should not be possible for the land to be developed for residential or commercial use.

The same general concerns apply to the section on the countryside so far as the definition of 'small scale' is concerned. The definition needs to be far more specific and with less wriggle room.

We suggest that In DMP 2020, No.3.15 "Preferred option for rural development" box under the heading Countryside (within the box) the words 'or light pollution' could be added within the brackets at the end of the sentence: "New buildings in the countryside should be clustered together where possible to reduce their visual impact on the character of the countryside and any built features should avoid harm to the local environment or residential amenity (particularly through noise or light pollution)."

In addition, we support the concept that new buildings and change of use of existing buildings must be operated as part of the farm and support the farm's agricultural operation. This should be clear in the policy to ensure that the landowner cannot separate the buildings into a separate operation leading to more development. This shouldn't become a route to development of a financially unviable farm.

## **Policy E11: Horse Related Development**

### **Q5 We agree with the preferred option.**

Whilst it is both reasonable and correct to major on the advice in the Defra Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids this code has very severe limitations from a planning aspect as it is more involved with the care of animals and the conditions under which they are kept and exercised which will in turn relate to the species, size and number of animals to be held on the premises.

It would be wise to consult the British Horse Society website for livery yards and the standards required for hiring out horses in The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018 Guidance notes for conditions for hiring out horses November 2018 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/762420/animal-welfare-licensing-hiring-out-horses.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762420/animal-welfare-licensing-hiring-out-horses.pdf). This quite recent legislation is very broad and does cover the essential elements of the construction and operation of premises where horses are kept- although it relates to premises kept where horses are for hire the standards are applicable to other premises where horses are kept.

There are two significant omissions from this policy. The first is that stacking and removal of manure should be specifically covered as this is one of the most common causes of nuisance to

neighbours and the general public. Secondly the lighting of outside arenas should be covered as in the same way this can be a real cause of concern and irritation to neighbours.

One also needs to be aware that there could be some new government legislation in place early in 2021 arising from Brexit. Defra has yet to decide what if any of the Animal Health Law EU Regulation EU 2016/429 should be enacted in England with particular reference to registration of premises where farm animals and horses are habitually kept. In addition Defra is mulling over the possibility of introducing the licensing of livery yards. If that were to happen the scheme would lay down construction and other standards. That consideration is on the side burner at the moment due to Covid 19 and other heavy work commitments related to Brexit.

## **Chapter 5: Design**

Since MRA's principal interest is on the environs of Merrow, the major development in the Local Plan is Policy A25 the development of Gosden Hill Farm. "Gosden Hill Village" as it is described in the outdated brochure that can be found at this URL:

[https://issuu.com/broadwaymalyan7/docs/gosden\\_hill\\_village\\_guildford\\_-\\_vi](https://issuu.com/broadwaymalyan7/docs/gosden_hill_village_guildford_-_vi). On page 16 of this document a section entitled "understanding the planning policy context in Guildford" can be found. Whilst this refers to the GBC draft local plan, it doesn't address the final local plan which was adopted 5 years after the brochure was published. In particular careful reading of the whole brochure will leave the reader wondering why there is no mention at all about sustainability, energy, carbon, climate change emergency or other related issues.

### **Policy P6: Biodiversity in New Developments**

#### **Q6 We support the inclusion of this policy with additional comments:**

*Requires schemes to include features in or on building structures that support wildlife wherever possible, including integrated nesting boxes and green roofs and walls that will last for the lifetime of the development and cater for appropriate species and habitats. Should include integral roosting features for bats as well as nesting boxes (bats 'roost', birds 'nest').*

*Built features are expected to be permeable for wildlife. More detail here would be useful, e.g. development boundaries should be permeable to wildlife also.*

### **Policy P7: Biodiversity Net Gain**

#### **Q7 We agree with the preferred option.**

*4.74 - Surrey has lost significantly more of its biodiversity than the country as a whole, partly because it has suffered a particularly high degree of habitat loss and fragmentation. As a result, and because there is uncertainty around the achievement of BNG if the target minimum is 10 per cent, the Council's view is that the net gain level in Guildford borough should be higher and has chosen 20 per cent because this level has been tested through the government's impact assessment and found to have a limited impact on costs. With a BNG of 20 per cent there will be greater certainty that the Local Plan is consistent with the NPPF where it calls for measurable net gains. We support the GBC view that net gain should be elevated to 20% in Guildford.*

*4.76 - The government has stated it will consider exempting self-build sites. The Council does not agree with this as there is no clear justification. We support the GBC view. Self-build sites should not be exempt.*

## **Policy P8: Woodland, Trees, Hedgerows and Irreplaceable Habitats**

**Q8 We agree with the preferred option.**

## **Policy P9: Priority Species and Priority Habitats on Undesignated Sites**

**Q9 We agree with the preferred option.**

## **Policy P10: Contaminated Land**

**Q10 We support the principle of the option but it is too weak as drafted.**

In para 4.111 it is stated that the remediation of the contaminated land **should** be sufficient to avoid risk of contaminants to sensitive receptors. Then the policy states that 'aims of the policy **could** be ensure by...' This is far too weak and permissive. This is a major issue at the Slyfield strategic site and we question whether the proposal goes far enough to deal with the environmental contamination at the Slyfield sewage works and the area where there is an old covered tip from which gas still leaks.

It is argued that the Weyside Urban Village Environmental report recently published contains numerous errors and misunderstandings and seriously underplays the seriousness of the environmental contamination on the Slyfield site and also underplays the measures that will have to be taken to deal with this extensive contamination.

## **Policy P11: Air Quality**

**Q11 Support in part.**

One simple remedial action to improve air quality in Burpham and Merrow is to demand either a 4-way junction with the A3 on the Gosden Hill Farm site or to have a link road running south of the A3 from the site to the new slip roads on the A247 at Garlick's Arch to avoid the need for north bound traffic from the site to either go through Burpham to the A3 or through the outskirts of Merrow.

## **Policy P12: Water Resources and Quality**

**Q12 We support this policy so far as it goes** but far more should be done to harness rainwater from new developments for residential and commercial use. It should not run to waste.

## **Policy P13: SuDS**

**Q13 We support this option in principle.**

We have concerns about this draft policy as the Guildford drainage system is already under massive strain and Guildford is prone to serious flooding. Little is said in this policy about surface water drainage and flooding and how surface water can be harnessed to residential or commercial use. This should be rectified in the next iteration of this policy although we note that the issue is covered in policy D12.

## **Policy P14: Regionally Important Geological/Geomorphological Sites**

**Q14 The objective of this policy is supported.**

#### **Policy D4: Achieving High Quality Design and Local Distinctiveness**

**Q15 We agree with the preferred option.**

There are likely to be some interesting challenges when and if housing design follow some of the ideals in “Passivehaus”, LETI or the other low energy and sustainable building initiatives. These tend to lead to buildings with minimum external surface area, relatively simple external profiles and designs that can be challenging to the traditional concepts and expectations of the urban environment of Guildford.

#### **Policy D5: Privacy and Amenity**

**Q16 We agree with the preferred option.**

However, the provisions are non-specific and that could prove unsatisfactory in their application. For that reason, we suggest that the council set minimum standards for external amenity as has been done by other authorities.

#### **Policy D6: Shopfront Design**

**Q17 We agree with the preferred option.**

#### **Policy D7: Advertisements, Hanging Signs and Illumination**

**Q18 We agree with the preferred option.**

#### **Policy D8: Public Realm**

**Q19 We agree with the preferred option.**

We would like to see an addition to the objectives which is designed to seek opportunity for the introduction of green planting.

#### **Policy D9: Residential Intensification**

**Q20 We agree with the preferred option.**

High density accommodation, often of flats or apartments in multi-storey buildings with shared common areas will be frequently seen as an elegant solution for residential accommodation having the lowest energy consumption as well as lowest “embodied carbon” in the construction materials.

High thermal mass and well insulated buildings often of concrete construction from new or recycled materials are frequently favoured over traditional house construction. However, such high-density accommodation brings its own problems to the residents in terms of access to open space and quality of life and it is for that reason that such developments must be carefully designed and placed so that they are ‘pleasant and safe’ places to live. The Covid19 pandemic has also highlighted the challenges associated with high density accommodation.

The policy should also specify that buildings must be in keeping with their setting and do not harm views to and from an AONB.

## **Policy D10: ‘Agent of Change’ and Noise Impacts**

**Q21 We agree with the preferred option.**

## **Policy D11: The Corridor of the River Wey and the Guildford and Godalming Navigation**

**Q22 We agree with the preferred option.**

## **Policy D12 Sustainability and Low Impact Development**

**Q23 We agree with the preferred option.**

We agree that the “fabric first energy hierarch is essential”. However, this can be interpreted simplistically to be just the building fabric. Best practice should also be extended to the engineering systems employed. These critical systems are often forgotten and poorly executed. The engineering of heating systems for example must evaluate different technical options and document how the optimal system was selected. The design and installation of a heating system will be much more sophisticated than the crude installation of a condensing gas boiler that is common today. Examples of aspects that should be considered are:

- Fully integrated multi-disciplinary design.
- Select most appropriate heat source and F&R operating temperature range.
- Minimise piping heat losses.
- Avoid need to replace systems to meet known climate change requirements (e.g. zero carbon 2050).

The policy should include adequate scrutiny of the competence of the parties executing the design and installation and commissioning of the buildings. This is currently not covered.

It is noted that embodied carbon is excluded from the UK building regulations and that guidance has been excluded from Policy D12. Whilst references to embodied carbon are included, Policy D12 should address this subject more fully.

We also support, in particular the comments on water efficiency as Guildford is under serious water stress (para 5.105) and far too much water goes to waste. However, this should be a requirement and not an expectation.

## **Policy D13: Climate Change Adaptation**

**Q24 We agree with the preferred option.**

It seems a little odd that D13 is separated from D12. It is essential that as far as possible climate change be integrated into and within sustainable low impact development. Best sustainable practice reduces the retrofitting and upgrading of buildings at great expense to providers of social housing, home owners or owner/occupiers. A recent article in the UK’s Daily Telegraph identifies the risk of a short sighted, poorly managed approach: “Nearly two million homes that will require retrofitting to meet energy efficiency goals have been built since the UK brought in legislation to tackle carbon emissions, the government’s advisers on climate change have said. Since 2007, 1.8 million homes have been built that are “not fit for purpose”, the Committee on Climate Change (CCC) said yesterday in its annual report to parliament on the country’s progress towards net zero carbon emissions. That meant there are more homes requiring zero-carbon retrofit now than there were when the Climate Change Act was passed in 2008.

The CCC criticised the Government's 2015 decision to abandon standards for all new homes to be carbon neutral from 2016, and suggested that it may now need to change stamp duty or raise council tax to encourage a huge retrofitting operation. The report said that overall the UK is "not making adequate progress in preparing for climate change" in areas including green transport and moving toward low carbon power, despite having made a legally binding commitment to net zero emissions by 2050. Buildings accounted for 18 per cent of the country's greenhouse gas emissions in 2019."

The essential link between D12 & D13 should be emphasised.

#### **Policy D14: Climate Change Mitigation**

##### **Q25 We agree with the preferred option.**

This is probably the most important policy statement, but one that says almost nothing apart from wait and see. The key issue here is that Guildford Borough Council's ability to implement energy and sustainability related policies that go beyond the minimum of what many consider wholly inappropriate UK building regulations is dependent on possible amendment to the Planning and Energy Act 2008.

Clearly GBC has no direct influence over the evolution of Acts of Parliament, and therefore it is accepted that it is logical for GBC to wait and understand national changes before being able to decide finally on local policy. This is a wholly unsatisfactory situation in the eyes of many, but one where there is no obvious alternative action that can be taken

#### **Policy D15: Large Scale Renewable and Low Carbon Energy**

##### **Q26 We agree with the preferred option.**

Whilst agreeing with the simple policy objective to identify sites for renewable and low carbon energy development, it is not clear how GBC intend to evaluate potential sites.

The renewable and low carbon energy sources considered seem to focus on wind and solar. Research shows that deep geothermal sources are only possible viable in parts of South West England and parts of Wessex and Cheshire. We question whether ground sourced heat pump central plant systems have been evaluated for developments in the borough? (it is noted of course that these may not be considered large scale in the context of this policy.)

In land allocated for future low carbon developments, the same criteria should be written in the 'Preferred Option for large scale renewable and low carbon energy' box as for that written in the 'Alternative options for large scale renewable and low carbon energy' box, i.e. criteria that prevents negative impacts on landscape, heritage, Green Belt, etc."

We are opposed to the allocation of one or more sites for renewable and low carbon energy development anywhere within the Green Belt. To allow such visually intrusive developments such as solar farms or wind farms would defeat the 'openness' objective of the Green Belt

#### **Policy D16: Designated Heritage Assets**

##### **Q27 We agree with the preferred option.**



**Policy D17: Listed Buildings**

**Q28 We agree with the preferred option.**

**Policy D18: Conservation Areas**

**Q29 We agree with the preferred option.**

**Policy D19: Scheduled Monuments & Registered Parks and Gardens**

**Q30 We agree with the preferred option.**

**Policy D20: Non-Designated heritage sites**

**Q31 We agree with the preferred option but with the rider below.**

We suggest that permitted development rights should automatically be withdrawn from all locally listed buildings in order to provide adequate control over any proposed alterations to the appearance and setting of these heritage assets.

**Policy ID5: Protecting Open Space**

**Q32 We agree with the preferred option.**

**Policy ID6 Open space in new developments**

**Q33 We agree with the preferred option.**

**Policy ID7 Sport, Recreation and Leisure Facilities**

**Q34 We agree with the preferred option.**

We agree that new facilities such as golf courses should be required to have their own water facilities through reservoirs etc and should not have to rely on mains water.

**Policy ID8: Community Facilities**

**Q35 We agree with the preferred option.**

**Policy ID9: Retention of Public Houses**

**Q36 We agree with the preferred option.**

**Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network**

**Q37: We agree that there needs to be a policy.**

However, the preferred option is not actually “an option” but rather a route map to the production of a future policy. The policy is vague, lacking in both detail and commitment to implement. The lack of clarity on ownership of the policy and its implementation needs swift resolution. We suggest GBC should seek to take ownership of cycling policy away from SCC.

Para 6.61. We are disappointed that the amalgamation of SCC and GBC proposals are not available as part of this consultation.

The proposals are actually very limited and offer nothing materially better to cycling in Merrow or its cycle connectivity with, specifically, Guildford Town centre & Station. Of equal importance to creating new routes is the maintenance of ALL the existing facilities many of which are inadequately maintained. Policy must prioritise ensuring existing facilities are fit for purpose and safe before creating new routes.

Future policy needs to consider the provision of secure cycle storage facilities at “end of journey” locations e.g. in the Town centre, at the workplace, station, schools etc. In order to be secure the facility should ensure that both wheels can be locked. The policy needs to accept that some uses are unlikely to be suitable for cycle journeys e.g. evening trips to events such as theatre/cinema

### **Policy ID11: Parking Standards**

#### **Q38 We agree with the preferred option.**

While there have been attempts in the past to limit parking provision in new developments on the assumption that it would reduce levels of car ownership, the evidence is that it doesn't - it simply leads to parking on local roads, often inappropriately, resulting in congestion and irritation to neighbours. There is nothing to suggest that car ownership will reduce; the current national emphasis on reducing pollution from vehicles is focussed on transitioning to electric or hydrogen vehicles, not reducing numbers.

Reflecting acknowledgement of the problems caused by inadequate parking provision in new developments, the Parking Standards Policy ID11 states in the Issues section, "A Ministerial statement in 2015 additionally required that Local Planning Authorities should only impose maximum parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network.

This statement was incorporated into the second NPPF (2018) (and is retained in the 2019 version) together with a further potential rationale that maximum parking standards could be set in order to optimise the density of development in city and town centres and other locations that are well served by public transport."

The recommended parking standards in ID 11 propose a maximum level for the town centre and a minimum level for elsewhere in the borough; it is good to see that the Burpham and Effingham Neighbourhood Plans have been acknowledged and this seems to be why stipulation of a minimum level is adopted for areas outside the town centre. However, the range of minimum parking allocations (relating to numbers of bedrooms) falls short of the Burpham Neighbourhood provision - which calls for a minimum of three spaces for residential accommodation with 4 or more bedrooms and we recommend this addition to the range.

It is difficult to understand the rationale for setting a maximum parking allowance for town centre residential development - developers are unlikely to allocate in excess of a minimum allowance where space is especially valuable and inadequate allowance is likely to cause even more disruptive “fly parking” than it would outside the centre. It is therefore strongly recommended that the stated levels should be minimum, not maximum.

The problem that GBC has had to wrestle with is that the SCC guidance went for maximum standards in new developments. This does not fit with the wish to keep on-street parking to a

minimum in new developments, which is expressed in the Neighbourhood plans for Burpham and Effingham, for example. (The proposed Send plan which is to be examined soon wants to treat the SCC standard as minimum.) So, given that there is going to be an SPD on parking (at some time), the distinction between the town centre, where the proposal is for maximum standards, and other residential developments having minimum standards makes no sense. We are suggesting a minimum standard for both.

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On behalf of the Merrow Residents' Association