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Planning Policy (DMP Consultation)  
Guildford Borough Council  
Millmead House  
Guildford  
GU2 4BB

17<sup>th</sup> February 2022

Dear Sirs

### **Guildford Borough Council Development Management Policies Regulation 19 Consultation**

The Merrow Residents Association is pleased to be able to offer some comments on the regulation 19 consultation on GBC's Development Management Policies. It is also pleased to note the responses to our submission of the 20<sup>th</sup> July 2020 contained in the regulation 18 consultation statement and that amendments have been made to meet some- but not all- of our concerns.

However further to our letter of the 20<sup>th</sup> July 2020 we still have some concerns and comments on housing density, height of buildings, design and parking and cycling standards.

#### **Housing density**

We are disappointed that there is no policy on housing density.

We were hoping to see:

- 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

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 mean increase in height particularly where it would affect views out of, across and into the area.

However, a policy covering the density of future developments cannot be considered without also considering height limitations- to which we refer below.

GBC in its comments on the 2020 regulation 18 consultation states that Policy D4 seeks a design-led approach with an appropriate density for the site being an outcome, as opposed to adhering to a predetermined density/ range. It goes on to say that whilst this approach may result in an average density across a site being within such a range, it is often the location of different development forms across a site which are more important in considering whether a proposal is appropriate.

This approach places GBC at the mercy of developers and provides them with maximum flexibility to cram new homes onto a site whilst arguing that they have followed a design-led approach.

### **Height of Buildings**

In our submission of 20<sup>th</sup> July 2020 on GBC's Local Plan- Issues and Options consultation we stated *'that 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.'* We still hold that view.

The planning application for St Mary's Wharf 21/P/02232 has brought the height of new buildings into stark relief. This has made it clear that the height of any new building shouldn't exceed the height of the current Debenham's building. The submission from Historic England is particularly telling when they say *"However, we consider that the proposal, because of its height and massing, will cause harm to the significance of a large number of heritage asset in the town centre. We have focused our advice on a specific number of assets where we consider the proposal will cause the greatest harm."* Could anything be clearer or informative than that?

We are aware that many Planning Authorities have addressed the height of buildings positively and produced guidance in an innovative manner. There are many examples of which Guildford planners will be aware. Why cannot GBC do the same? Such a policy would allow some discretion to be introduced into the height of buildings to allow for the level of the ground to be taken into account so that the number of storeys could be increased if the development took place on low ground or in a hollow and the number of storeys reduced if the development was on higher ground. Such a policy could also introduce a range of housing densities in the town centre, in the suburbs and also in the outlying areas and villages of the Borough.

It is our submission that we should do all we possibly can to protect the centre of town from high buildings that not only ruin the views across town but also adversely affect neighbouring properties and historic sites. The best way of doing this is to have a policy on building heights on which developers and Government Inspectors can rely. Without such a policy developers have free rein to submit proposals that would have the potential to ruin Guildford town centre for ever. Some have argued that we are too late and the height of the Solum development has set a precedent. We argue that this cannot be the case as the Solum development was approved on

appeal and took place before the Guildford Local Plan Part 1 was approved in 2019. Then is then and now is now.

In summary we take the view that Guildford needs a clear policy that covers both the height of buildings and the density of housing and that the starting point should be that no building should have more than 6 storeys in the town centre and this should be reduced to 3 storeys in areas outside the town centre.

In addition we consider that policy D11, The Corridor and The River Wey & Godalming Navigations, should be amended to specifically limit building heights so that they comply not only with the above limitation but also restrict building heights to maintain the historic character of this waterway.

## **Section 5: Design Chapter**

We recognise that GBC has addressed the Policy comments in respect of the built environment objectives such as fabric first and low carbon heat sources by way of trying to set requirements at a high aspirational level rather than a technically detailed and specific level. The language GBC use is: *"It is considered more effective that the policy includes the qualitative considerations and requirements that we think are imperative in achieving this. The setting of quantitative standards may not always deliver these outcomes nor will they likely be appropriate/justified in all circumstances."* In order that this high level approach has some meaning, we need to be assured that the GBC planning department will have the skills and resources to assess and critique planning applications that should include the specific details of solutions proposed.

### **Policy D11: The Corridor and The River Wey & Godalming Navigations**

Further to our comments on building heights we consider that policy D11, The Corridor and The River Wey & Godalming Navigations, should be amended to specifically limit building heights so that they comply not only with the above limitation but also restrict building heights to maintain the historic character of this waterway.

### **Policy ID10: Comprehensive Guildford Borough Cycle Network**

We are surprised that a Sustainable Movement Corridor (SMC) is marked on figure 2 of this policy that runs along the Epsom Road through Merrow towards the Clandon Cross Roads. So far as we are aware this is the first time that this route has been described as an SMC and so far as we are aware there has been no consultation on describing this route in this way. We find it disappointing that this revelation has been hidden in this consultation. We are aware that there has been some suggestion that the SMC in Gosden Hill Farm might pass through Park Lane into Merrow but that is another matter.

We urge GBC to produce a specific policy on the SMCs in the Borough on which there could then be a useful and constructive dialogue. This is a suggestion that we have put to a number of Borough Councillors on a number of occasions in the last few months.

We are also concerned to note that the SMC is defined as a corridor serving Blackwell Farm, the Weyside Urban Village and Gosden Hill Farm- there is no mention of the SMC in Merrow. That definition needs to be revisited.

We are also concerned at the assumption that if E-Scooters were to be legalised that they would be permitted to use dedicated cycle lanes. We are surprised at this unwarranted assumption bearing in mind the number of accidents that have been recorded between E-Scooter riders and cyclists.

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

We acknowledge the detail in your Topic Paper on parking standards which has led to your proposals. However, we make the point very strongly that experience of local developments over the past twelve years or so has demonstrated the inadequacy of existing parking standards, leading to a permanent overspill of parking onto nearby roads. We can cite examples of both large and small developments in Merrow where the result of inadequate onsite parking provision within the curtilage of new properties has led to roads becoming permanent overspill parking areas. The assumption that car ownership will fall if less space is made available for parking is typically, demonstrably false and is already leading to a situation which Policy ID11 professes to aim to avoid: "This policy aims to make provision to meet the needs of new residents and occupiers whilst limiting overspill parking on adjacent streets".

Your own "Issues, Options and Preferred Options" paper of 2020 stated that in order to achieve the aim "avoid the potential problems of congested on-street parking in new residential developments and overspill parking on adjacent local streets", you proposed to:

*"Define one set of minimum car parking standards for new residential developments in the rest of Guildford borough (except Guildford town centre)".*

Your proposed Policy ID11 in an almost complete reversal now sets maximum standards across all suburban areas and strategic sites. We fail to understand why this unacceptable change has been made. The rationale has not been explained either in the policy or in the SPD except by saying that the policy must cater for new developments where there will be no car parking provisions at all.

While we support the philosophy of a "modal shift" in respect of travel, high levels of access to safe walking and cycling routes and public transport as an alternative to use of private vehicles is an aspiration not presently in sight. With an ageing demographic, walking or cycling to local facilities are not options for many and public transport in Guildford has a long history of inadequacy, recently deteriorating further. We believe that the zero-carbon ambition, in respect of personal mobility, will drive the adoption of electric vehicles rather than a significant abandonment of motor cars.

We believe the setting of maximum parking standards for suburban areas, including strategic sites, is fundamentally flawed: land is expensive in Guildford and no developer is likely to allocate more space for parking than the design and, crucially,

location of the development justifies. We note that the National Planning Policy Framework, Section 9, "Promoting Sustainable Transport" specifically advises against setting maximum standards other than in special cases:

*"Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport."*

We recommend strongly that ID11 should set only minimum parking standards in all areas of Guildford, including strategic sites and that these standards should reflect at the very least the current, (though frequently inadequate), levels.

Yours faithfully

Andrew Strawson  
Chairman