



Merrow Residents' Association
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Planning Policy
Guildford Borough Council
Millmead House
Guildford
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1st February 2023

Dear Sir/Madam

Guildford Local Plan: Development Management - Main Modifications 2022

Response from the Merrow Residents' Association on Main Modifications Consultation

As an apolitical organisation we are pleased to have the opportunity to comment on the main modifications to the Development Management Policies (DMPs) but at the same time we are extremely disappointed that these modifications do not cover the height of buildings nor make the amendments we were seeking on parking standards.

Policy D4. Achieving high quality design

We are not alone in seeking a policy on building heights in the Borough. We have suggested such a policy in the various consultations where we have commented and we put this suggestion to the Inspector Mr Reed both before he examined the DMPs in public and also in person when we attended the hearings and discussed our concerns with him. Since that time GBC have approved plans for high buildings on the St Mary's Wharf site (21/P/02232) and the planning committee have refused a planning application for the development of North street (22/P/01336) where the height of the proposed buildings was one of the issues in contention. This should be taken with the concerns raised in Council by our own councillors- concerns that have been brushed aside by officers who have taken the view that constraints on building heights should be addressed on a case by case basis and that the height of buildings can be considered with reference to Policy D4.

We submit that the wording in Policy D4 which states that '*Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to the history of a place, significant views (to and from), surrounding context, built and natural features of interest, prevailing character, landscape and topography*' is far too inexact and weak. For instance more needs to be said on how the policy defines the use of the words 'understanding of the place' and 'significant views' since such terms are extremely subjective. What we need is clarity for both developers and the local authority and Policy D4 fails to do that so far as the height of buildings is concerned.

We are absolutely clear that Guildford needs a height policy if we are to avoid a plethora of high rise developments. We have two new sites within the town centre with tall buildings (the Solum development and St Mary's Wharf) and more will follow unless the brakes are applied either with a policy on height or a SPD. As we have indicated a number of apolitical organisations in the town share our view-a view that now has political overtones which does tend to mask the core of the issue. We need a height policy so that developers are aware of what is required at the time that they are considering the financial viability of a site that they are considering purchasing and so that they can include reference to this policy in any viability assessment that they conduct on the development of the site and the number of affordable or social housing homes that they would be able to provide.

Policy ID11: Parking Standards

On parking standards we are disappointed that there is no reference to minimum parking standards since they are contained in GBC policies at the present time. This omission is unfortunate since we have severe car parking problems both in Guildford itself and in Merrow. There are no curbs on the number of cars that anyone can own and therefore home owners in Guildford are at liberty to own as many cars as they wish. There is very little free space for roadside car parking in Merrow at the present time making it even more crucial that any new development has adequate on site car parking for the cars that the new residents may own. The availability of on site car parking is becoming even more important as more people work from home or leave their car at home using buses and cycles to get to work. We understand and accept that we need more homes in the Borough but we don't need more car owners seeking on street car parking spaces and overflowing to other areas because of an inadequacy in new on site car parking.

One recent example in Merrow makes the point very clearly. An application for the demolition of a house on the corner of Holford Road and Epsom Road, and its replacement with a block of flats, was withdrawn (22/P/00711). This application didn't meet the current minimum parking standard and could have been refused for that reason alone. In the absence of a minimum parking standard the application might have had legs and its approval would have led to additional on street parking in a very busy area of Merrow. It is of course possible that the highways authority would have recommended refusal in any event, as they did, but a minimum parking standard would have put the issue beyond doubt and made it that much more difficult for the applicant to succeed if the application were to go to appeal.

We therefore hope that the Inspector can be persuaded to include a modification to Policy D4 so that GBC is required to have a policy on building height that could be achieved through a SPD. We also hope that the Inspector might consider a minimum parking standard in areas outside the town centre in Policy ID11.

Yours faithfully

Andrew Strawson
Chairman