



Merrow Residents' Association

www.merrowresidents.org

[REDACTED],
Court House, 4 Abbots Way,
Guildford. GU1 2XP

chairman@merrowresidents.org

Mr David Reed BSc DipTP DMS
Planning Inspector
c/o Programme Officer- Mr Robert Young
Guildford Borough Council
Millmead
Guildford
GU2 4BB

14th October 2022

Dear Mr Reed

Examination in Public: Guildford Borough Council Development Management Policies

Hearing statement from Merrow Residents' Association

Herewith our reasons why we believe some elements of the Development Management Policies are unsound.

Policy D4. Achieving high quality design

We covered this in our letter to Guildford Borough Council on 17th February 2022 when we said that 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

We went on to say that it was 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.

Guildford Borough Council 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.

We went on to say in our letter that we were aware that many Planning Authorities have addressed the height of buildings positively and produced guidance in an innovative manner. 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, historic sites and conservations areas. The best way of doing this is to have a policy on building heights on which developers and Government Inspectors can rely.

We conclude that policy D4 is unsound because it doesn't include any restriction on the height of buildings.

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.

Policy ID11: Parking Standards

In our letter of the 17th February to Guildford Borough Council we expressed concern about parking standards. We said 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 current 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".

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,

We take the view 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. It follows that we take the view that Policy ID11 is unsound.

Yours sincerely



Chairman