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18<sup>th</sup> February 2022

## Response to the Development Management Policies (DMP) Consultation

The society has reviewed the DMP document and makes the following comments on the proposed policies. Where we suggest specific wording changes or additions these are in **bold underlined**

### Section 1 Next Steps

1.21 For clarity the DMP should include an appendix of SPD's that are in operation and continue to support the LPSS. This list should also include any planned SPD's

### Policy H4: Housing Density [Deleted]

#### Comment

The Society notes that Policy H4 has been removed and replaced by policy D4 and D5.

The proposed Policy H4 in previous drafts did discuss Densities and Heights:

*The NPPF and PPG set out a range of considerations and tools that can assist in establishing appropriate densities on a site or in a particular area, such as accessibility, characterisation and design studies, environmental and infrastructure assessments, and site viability. This is considered preferable to setting minimum density ranges for specific locations (the Town Centre, strategic sites or within 500 metres of existing or planned transport interchanges). To set out minimum density ranges is considered to be restrictive and complicated to ascertain and will limit the flexibility that is often needed when determining a planning application.*

*The Council's preferred option requires the optimal use of land by building homes at the most appropriate density. It is considered the most appropriate approach for Guildford. To apply prescriptive density ranges would restrict the flexibility to take all the site constraints and considerations into account. Sites within Guildford can often have their own challenges, such as the topography of the site, being partially within the flood plain or the impact on views which are crucial to the character and setting of the town centre. Flexibility is needed to ensure the right development can take place. Whilst seeking the optimum use of the land there also needs to be flexibility to ensure that a well-balanced range of housing can come forward to meet Guildford's housing needs.*

*When considering the relevant issues and options for housing density in Guildford, the Council's preferred approach is to enable well-designed housing at an appropriate density. There will be a presumption for higher density development in the Town Centre. In the Town Centre there are more limited opportunities for development, yet it is a sustainable location so housing density needs to be optimised. There will also be a presumption for higher density development on strategic sites and within 500 metres of existing or planned transport*

*interchanges. This is because the size of strategic sites will enable thoughtfully designed higher densities, and being in close proximity to transport interchanges enables opportunities to optimise densities on sustainable sites. The results of the assessment suggest that the preferred option provides a greater amount of guidance and flexibility specific to Guildford borough to help meet the relevant Local Plan objectives.*

**The Society believes the council by not having clarity on density and height will face major difficulties in managing proposed developments in the future.**

As we noted in our response to the first draft of the DMP -- The Society proposes that heights for buildings should respect the height of surrounding buildings and should also ensure the underlying landform can continue to be understood. We propose that the presumption for the borough is that buildings over 6 stories high in town centre and 4 stories in other areas will be allowed only on an exception basis.

We continue to see the 'Ratchet Effect' applied by developers, by referring to other developments, many of which are not good examples of development, as precedent in the Town Centre. This has been apparent recently where we have had developers justifying buildings of inappropriate mass and scale.

Other Towns have Area SPD's or Height SPD's to manage density and height effectively. The Society is aware of at least four other LPA's in the near vicinity who have produced such documents.

The council in its SPD- Strategic Sites discussed density effectively and there needs to be an extension of these planning guidelines.

The Society is not against tall buildings but believes there needs to be a proper debate as to where these fit, if required, in Guildford Borough. Height and Mass is a particularly critical issue in areas with Heritage and Countryside value. Many councillors have said that they are against Guildford becoming like Woking; we see nothing in the DMP document to allow effective management of this issue.

## **H5 Housing Extensions and Alterations including Annexes**

### **Comment**

We would propose that the Policy H5 (1) uses the word "unacceptable" which doesn't appear to have real meaning.

The government's objective is to build back better and to aspire to beauty. Surely the first objective should be for the extension to enhance the existing dwelling. In many cases the design objective should be to ensure that the enlarged building looks as though it were conceived as a single structure.

The factors as laid out in H5 1)a) should be considered cumulatively for their effect and this should be made explicit. For example, a one-off redevelopment of a house in a traditional brick and tile road that is not only substantially larger but also has only a flat roof, white rendered walls, large picture windows, minimal landscaping and high automatic gates is more likely to be unacceptable than a large building with a flat roof, but otherwise utilising a pallet of materials and features reflecting its neighbours.

Monitoring Indicators should also have regard to the number of objections to applications and quality of arguments deployed, not simply inspectors' decisions.

## **H6: Housing Conversion and Sub-division**

### **Comment**

The policy should have a 1 d) statement that covers the quality of conversion and sub-division.

This needs to ensure that matters such as floor to ceiling heights, area of glazing, thermal insulation, thermal gain, sound transmission, safe and attractive common parts etc. are to a high and futureproof residential standard.

Where a building was originally constructed for non-residential purposes, this can become even more crucial.

Although outside the scope of the DMP subdivision of dwellings causes a number of issues and is unlikely to make bed-sit accommodation cheaper than similar space in an HMO. Management and long-term maintenance of common areas can be very difficult if the units are sold off individually having negative impacts on neighbours.

There are good planning reasons to apply conditions that supports high quality conversion and sub-division.

## **Policy H7: Review Mechanisms**

### **Comment**

Viability Statements should be made public in all cases most developments don't make these public, but some significant ones do – this should be mandated. The Local Plan and recent windfall development proposals have a number of schemes of circa 200- 500 dwellings on restricted sites. Some of these schemes might be usefully used for mixed use development with 'public good' being provided. The policy should be clear that the council will consider affordable housing being delivered outside the site either by contributing to council schemes or the provision of other sites.

## **H8: First Homes**

### **Comment**

For all forms of affordable housing, it's essential that applicants agree to a post-construction review of the affordable housing contribution. This policy must be enforced as a matter of course since in negotiation developers are likely to make a final offer of an initial contribution provided there is no future review. Such concessions would be contrary to public policy because any concession would be seized upon as a precedent. This policy objective and non-negotiability should be made explicit.

To ensure that the price of first homes is not manipulated those units need to be identical to non-discounted units. Even so there is a risk that those receiving discount will agree a higher base price of those buying a similar non-discounted unit, thereby frustrating government policy. Monitoring land registry prices would be insufficient verification since various incentives are typically negotiated individually on each unit. Developers should be required to provide full disclosure of all terms in order to verify that the appropriate discount has been given and to verify that this form of affordable housing policy is effective.

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

### Comment

The society has three main proposed changes

- a) The wording could be made crisper and easier to understand in places by splitting paragraphs into bullet points.
- b) The Accurate Visual Representation Para 5.9 in the Reasoned Justification should be included in the Policy itself.
- c) Policy D4 should be positioned to accommodate new SPD's or Area Action Plans etc coming forward as a result of the Town Centre Master planning exercise now underway.
- d) The policy at two states - Development proposals are required to have regard to relevant national and local design guidance or codes.

The Society would like to see more explicit guidance by reference to what constitutes good design using examples of good and bad. This could include referring to Design Guides/Codes and SPD's whether in place e.g. Strategic Sites – SPD, sites such as Weyside, or in plan.

Design springs from a principle, a philosophy. Its output may be visual, but to be valid and of quality, its inputs are multi-faceted. It considers the long-term performance of the building, so how the maintenance and management of the property (for example a block of flats to be sold off on long leases) has informed the design needs to be expressly outlined in documentation seeking to demonstrate that the design is of good quality. The design also needs to consider the needs of a range of occupiers over the decades and centuries for which the building may exist. So properties developed to market to 1st time buyers or for buy-to-let (for example 2-bedroom, 2-bathroom flats) may subsequently be occupied by pensioners: well-designed internal layouts, services and features, down to detail such as switches and handles, should reflect this to comply with D4 1 j) Lifespan..

Note this doesn't mean just referring to the past and looking at other Design Guides from other LPA's may be appropriate. In the past GBC design guides have included many vernacular features, quite often from the arts and crafts movement, so developers have taken these and added them to new mass market housing where they look out of context because the feature originally typically had some function or reflected human craftsmanship which the modern version totally misses.

Finally there needs to be a comment on the Development Design Process for Major or Significant Sites; where the DMP should refer to the desirability of Architectural Competitions to get a range of design options and also confirm the requirement that groups such as Design Southeast should be consulted..

## Policy

- 1) Development proposals are required to demonstrate how they will achieve the ten characteristics of well-designed places as set out in the National Design Guide:
  - a. Context – enhances the surroundings
  - b. Identity – attractive and distinctive
  - c. Built form – a coherent pattern of development
  - d. Movement – accessible and easy to move around
  - e. Nature – enhanced and optimised
  - f. Public space – safe, social and inclusive
  - g. Uses – mixed and integrated
  - h. Homes and buildings – functional, healthy and sustainable
  - i. Resources – efficient and resilient
  - j. Lifespan – made to last
  
- 2) Development proposals are required to have regard to relevant national and local design guidance or codes. **(See comments above)**
  
- 3) **Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place.**
  - a) **respond positively to the history of a place,**
  - b) **value significant views (to and from), surrounding context,**
  - c) **surrounding context including urban space and public realm,**
  - d) **built and natural features of interest,**
  - e) **prevailing character, including building heights and scale,**
  - f) **landscape and topography.**
  - g) **heritage**
  - h) **skyline**
  
- 4) **The use of innovative design approaches, including use of materials and construction techniques, will be supported where this presents an opportunity to create new or complementary identities that contributes to and enhances local character.**
  
- 5) Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:
  - a. Layout – settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines.
  - b. Form and scale of buildings and spaces – height **(See comment above)**, bulk, massing, proportions, profile and roofscapes/Skylines
  - c. Appearance
  - d. Landscape – landform and drainage, hard landscape and soft landscape
  - e. Materials
  - f. Detailing
  
- 6) Development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:
  - a. the site size, characteristics and location;

- b. the urban grain of the area and appropriate building forms, heights and sizes for the site; and
  - c. the context and local character of the area.
- 7) Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.
- 8) Development proposals are expected to be designed so as not to hinder the potential future delivery of adjoining development sites.
- 9) **Development proposals should ensure that Accurate Visual Representations (AVRs) are made available to allow assessment of the likely impact of development on the townscape (including Streetscape)/landscape setting or nearby heritage asset.**

**AVRs are expected to be submitted from views that have been agreed with the Council.**

- a) **In the town centre, they will be expected for any visually prominent proposals or proposals for additional storeys.**
- b) **In other conservation areas and the AONB, they will be expected on any major development proposals whilst,**
- c) **for the rest of the borough, they are likely to only be necessary on significant development proposals.**

**Applicants will also be required to submit digital models of proposed developments so that their impacts can be assessed independently by the Council through the use of visualisation software. The council currently uses VuCity.**

**The computer models may also be made available to the public by viewing facilities.**

### **Masterplanning and Design Codes**

- 10) Strategic sites listed in LPSS 2019 Policy D1(13) are required to produce masterplans and follow a Design Code approach through the planning application process. This will require a Design Code to be agreed prior to the granting of full or reserved matters planning permission for any phase of the development. Where outline planning permission has been agreed subject to Design Code agreement, any relevant Reserved Matters applications which are submitted without the Design Code being agreed will be refused.
- 11) Masterplans and Design Codes will also be required for any site that will be developed in more than one phase or by more than one developer. Failure to agree a Design Code approach is likely to result in the refusal of an application.
- 12) **Work is underway on the production of a Town Centre Masterplan this may result in supplementary policies that will have to be adhered to when designing new developments.**

- 13) A design code will be required for any other site or part of a site where it is considered necessary to set design parameters.

### **Policy D5: Protection of Amenity and Provision of Amenity Space**

#### **Comment**

Many of the changes to D5 are welcome.

The Society would propose that

Unacceptable impact applies to other types of neighbouring properties e.g. Health Centre. Although it cannot always be provided all residential developments should provide dual aspects. We also propose that Workplaces needed to be included particularly with Working From Home or in small local shared spaces becoming more prevalent.

#### **Policy**

##### **Protection of amenity**

1) Development proposals are required to avoid having an unacceptable impact on the living **or working** environment of existing residential properties **and in some case workplaces** or resulting in unacceptable living conditions for new residential properties, in terms of:

- a) Privacy and overlooking
- b) Visual dominance and overbearing effects of a development
- c) Access to sunlight and daylight
- d) Artificial lighting
- e) Noise and vibration
- f) Odour, fumes and dust

##### **Provision of amenity space**

2) All new build residential development proposals, including flatted development, are expected (**Does this need strengthening to Should?**) to have direct access to an area of private outdoor amenity space.

In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:

- a) take into account the orientation of the amenity space in relation to the sun at different times of the year;
  - b) address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties; and
  - c) design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents.
  - d) **To increase amenity designs should consider providing dual aspects wherever possible.**
- 3) All balconies or terraces provided on new flatted development proposals are required to be:
- a) designed as an integrated part of the overall design; and
  - b) a minimum of 4sqm.
- 4) Development proposals are required to have regard to relevant national and local design guidance or codes, including in relation to garden sizes and residential building separation distances.

### Policy D5a: External Servicing Features and Stores

#### Policy

- 1) Development proposals are required to demonstrate that:
  - a) bin storage, cycle parking, **delivery set down lockers**, and electric vehicle charging points, whilst being designed to meet practical, **including easy access**, needs, are integrated into the built form and do not detract from the overall design of the scheme or the surrounding area; and
  - b) external servicing features are designed as an integrated part of the overall design or are positioned to minimise their visual impact.

### Policy D6: Shopfront Design and Security

#### Comment

This policy should refer to the GBC Guidance on Shopfront Design and Security in Historic areas.

### D7: Advertisements, Hanging Signs and Illumination

#### Comment

Para 5.58 Highlights the economic benefits of advertising. There is discussion of the proliferation of advertising. The Society believes the policy needs to highlight that proliferation is a Nil-Sum game and as well as harm to the Built environment can cause light pollution etc.

The policy needs to allow for refusal of consent on the grounds of proliferation.

There should be an presumption that moving image, television screen type advertisements should be banned, particularly in Heritage areas, as there are few locations where they are acceptable.

We note that compared with the withdrawn policies 2003 Policies G8 and G9 the proposals are considerably stronger but are considerably weaker than the GBC Design Guidance for Advertisement and Signs. At the least, the new Policy should make affirmative reference to the Guidance.

The society would like to see a presumption against LED screen type advertisements particularly in heritage areas, and a presumption against freestanding advertisements on paved areas whether as part of telephones, bus shelters or similar." (Q18)

### Policy D12: Sustainable and Low Impact Development

#### Comment

We welcome this revised policy. One comment is that energy efficient heating etc can have design impacts e.g. Air Source Heating Heat Exchangers this policy need to cross refer to D4 on Design?

Should the notes have clear mention of standards such as Passivhaus as standards to be aimed at?

At D12 3) does this need to encompass all developments?

Should it be noted that off-site fabrication is encouraged if it lowers impact of building work?



Finally, the Policy should refer to the adaptability in buildings. The era of rebuilding every 60 years may be coming to an end and buildings will need to adapt by reconfiguration to new uses and occupants.

## **Policy**

### **Fabric first**

1) Development proposals are required to demonstrate how they have followed a 'fabric first' approach in line with the energy hierarchy.

### **Embodied carbon**

2) Development proposals are required to demonstrate that embodied carbon emissions have been minimised by:

a) sourcing materials locally where possible; and

b) taking into account the embodied carbon emissions of materials based on information provided in a respected materials rating database.

3) Proposals for major development are required to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions.

4) **Adaptability Proposals for Development should consider how basic Building Structures can handle changing requirements over time e.g. Mixed Use development may need accommodate varying proportions of Commercial vs. Dwelling space**

### **Energy improvements**

5) Development proposals that will improve the energy efficiency and carbon emission rate of existing buildings to a level significantly better than the Council's adopted standards or national standards for new buildings, whichever is most challenging, are encouraged.

**Environmental Technology e.g. Air Source Heating, PV Cells can have a considerable impact on the look of a building and this must be considered to conform to Policy D4.**

### **Waste**

6) Proposals for major development, and development proposals that involve the demolition of at least one building and/or engineering works that involve the importation or excavation of hard core, soils, sand and other material, are required to submit a Site Waste Management Plan.

### **Water efficiency**

7) New developments are expected to incorporate measures to harvest rainwater and conserve water resources and, where possible, water recycling/reuse systems.

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

### **Comment**

Although unlikely to feature in the current planning regulations, it is worth noting that Heritage Assets also have an economic significance. Guildford's High Street is a classic example with shoppers attracted to grouping of heritage assets in an interesting location. If this was lost the centre of the town would cease to attract visitors.

## **POLICY ID11: Parking Standards**

### **Comment**

The Future of the motor car is uncertain it is possible that numbers of cars per household may decrease as alternately fuelled vehicles are more expensive, active travel may take over some travel, public transport can improve.



Should a comment be added to Reasoned Justification that:

New developments should consider how car parking is planned to allow for reversion of parking areas to open space, or more accommodation. An example is that small temporary at edge Multi-storey parking might be provided that can be redeveloped as car numbers decline

Yours Faithfully

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