



Response to Local Plan: development management policies

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Introduction

This is the Guildford Society response to the Guildford Borough local plan: development management policies (LPDMP) this document proposes policies to support the local plan: strategy and sites (LPSS) as approved in spring 2019. We have answered all the 39 questions but have put question 39 first as it provides some context for the rest of our answers.

The LPDMP is the articulation of actual policy to support the plan that is in the LPSS. The LPSS was a plan showing how selected site policies could achieve housing to match the Objectively Assessed need for the Borough, the final plan showed how this OAN could be exceeded by circa 40%.

There are many aspects of the LPDMP to commend particularly related to environmental matters.

The society does consider that the LPDMP in critical areas to lack ambition and clarity. The lack of clarity leaves the borough at risk from ill-advised development to support the LPPS. There are areas in the policies which are vague and could result in large numbers of challenges to planning decisions being made by the council. Clarity is required to facilitate proper engagement between the development community, local council and residents of the borough.

The Society urges the council to review the policy in three key areas:

Firstly, housing delivery (policy H4) where the policy needs to reference clear Density and Scale criteria. The society has proposed amendments that it believes will allow the council to carefully manage new developments in terms of scale and density.

Secondly, design policies (particularly policy D4); must have more ambition including providing further standards for development as is done by other local authorities. The lack of policies for converting buildings is especially concerning, as we would like to see conversion of commercial to residential taking place in future.

Thirdly, biodiversity net gain (BNG) (policy P7): the society is concerned that the adoption of the BNG requirements does not cause adverse effects. There is some evidence that BNG requirements can cause developers to use greenfield as opposed to brownfield sites. Guildford Borough Council (GBC) planning needs to carefully examine the, Suitable Alternative Natural Greenspace (SANG), Community Infrastructure Levy (CIL) requirements and understand how these may influence developer decisions.

We also note in our detailed comments areas where policies appear to have been weakened notably in provision of play space and parking provision at social assets e.g. surgeries.

The council needs to be developing for the future and should be setting high standards for the built environment that is going to be required within the borough. We are building for the future we should not be reducing standards.

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Response to Questions

Question 39: Do you have any other comments or suggestions for issues that should be considered within the Plan?

Sadly, the LPDMP like so many Planning Documents has not been available even in draft form at the adoption of the LPSS. The LPSS was adopted in 2019 it is unacceptable that the LPDMP is only due for adoption in 2021. Surely there needs to a measure of parallel rather than sequential development of these critical documents.

The LPDMP is structured differently to the 2003 Plan. Many of the Policies do match, but quite a few do not, and it is then difficult to check whether 2003 Policy has been included in the LPDMP under a different heading. The Strategies part of the LPSS has 125 pages and the LPDMP has 219 pages. They replace the 2003 Plan which has 164 pages. With so much material, there may be errors in this response. The LPDMP gives the impression of the council being concerned with housing delivery with other matters being secondary.

The LPDMP in combination with the LPSS expands considerable the extent of Policy concerning land use. Most of the new Policy is welcome. There is some concern that the weight of new policy could deter new planning applications and thus endanger GBC's ability to deliver housing to Plan. This could have dire consequences for the Borough. (The Council already lists information that may be required for a full planning application under 36 different headings.)

The LPDMP has little to say on infrastructure provision. The LPSS was clear that infrastructure provision in its widest sense (Sewers – Transport links – Health Centres – Education) was necessary.

The LPDMP is silent on the relationship of the LPDMP to Neighbourhood plans. Policies need to be reviewed to ensure they link as appropriate to Neighbourhood plans.

For all LPDMP Policies the only alternative to the given preferred Policy is 'To not have a specific policy,' because "No policy' is the only reasonable alternative as no further options were identified.' This is obvious nonsense: reasonable alternatives, these should be identified even though they might not be as good. This issue is examined in Section 6 of the Sustainability Assessment, where for example the pros and cons of specific housing densities are investigated. The society is concerned LPDMP is open to challenge during applications as it does not discuss alternatives considered. The council need to document the alternatives considered more fully

Comments on the Appendices in the 2003 Plan:

- Appendix 2: Identifies shopping areas ... Now covered in the SPSS
- Appendix 3: List of scheduled monuments The new Pan should include such a list
- Appendix 4: Gives the SSSIs, SNCIs and RIGS. RIGS are given in the new P14 but where are the SSSIs and SNCIs?
- Appendix 5: Notifiable installations. Four gas installations are given. Should there be similar information in the new Plan?
- Appendix 6: Lists the PGNs, now obsolete.



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- Appendix 7: Glossary. Many 'Definitions' are scattered throughout the new Plan. A single Glossary would be better.

Question 1: Do you agree with the preferred option to address Housing Delivery in Guildford

Response

Policy needs substantial amendment to manage LPSS implementation effectively

Policy H4 as written appears to have no significant change except to say there should be higher density on strategic sites (there were none in the 2003 Plan). We could argue that the sites are edge of town and not different per se to other suburbs. There is a useful list of 'Transport Interchanges', not in the 2003 Plan.

We note that 2003 Plan Policy H10, 'New Residential Development' was deleted by the Secretary of State in 2007. It contained specific densities of 30 and 50 DPHa

The Society believes this policy is dangerously weak and should be strengthened considerably:

Firstly:

Sites included as policies in the LPSS show how housing demand vs. OAN, together with assumed windfall, can be achieved. The Dwelling numbers for the LPSS sites should be translated as a policy i.e. the LPSS numbers should be taken as the dwelling numbers with a tolerance of +/- 5%. This will prevent LPSS sites being subject to debate on raising dwelling numbers with impact on height and DPHa.

Secondly:

The policy should be enhanced to manage effectively DPHa numbers for new sites by referencing to the surrounding area. Policy H4 establishes a principle for transport hubs of considering height in area around the transport hub. The society proposes that this principle can be adapted to allow DPHa for new developments to be easily considered.

We thus propose that for new sites (5 Dwellings or more) not within the LPSS, that the DPHa for a site should take into account of the local area; and thus should match the calculated DPHa for the local area within a 300metre radius of the site within a tolerance of +/- 25%.

Thirdly:

There should be a policy on Height in the Borough.

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.

Fourthly:

Policy H4 helpfully details defined Transport interchanges. These are a natural attractor of development and commercial activity together with housing is a natural evolution near stations etc. Policy H4 proposes: *Higher density development in the Town Centre, strategic*

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sites or within 500 metres of existing or planned transport interchanges, unless there are strong reasons why it would be inappropriate.

The 500m rule is a very blunt definition as it has an effect of potentially allowing higher density in unsuitable areas e.g. sites to north of railway at Park Barn. Density of development, which will often mean building higher we propose this part of the policy is rewritten to be:

Higher density development in the Town Centre, strategic sites or within the nominated area (normally 500 metres) of existing or planned transport interchanges should include the optimum mix of Commercial, Retail, Dwelling Space, unless there are strong reasons why it would be inappropriate.

Scale even though denser and higher should respect the surrounding area. Denser development at transport interchange will normally allow density to be reduced in other parts of the area for a new development.

Question 2: Do you agree with the preferred option to address housing extensions and alterations in Guildford?

Response

Agree with Policy, with three proposed changes.

The Policy H5 represents no significant change to the main wording in 2003 Plan: the additional wording on basements and on annexes is welcome.

The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties. Should be amended to be: The report should show that there is no adverse impact to land and the structural stability of the application site and adjacent properties during construction and once built.

The policy either needs extension or an appendix to provide more detail. Other authorities provide far greater guidance in a easily consumed format.

There needs to be reference in the recent policy amendment to allow for extra floors to be added to flats, under permitted development rights. The LDMP needs to have clarity as how this is to be handled.

Question 3: Do you agree with the preferred option to address housing conversion and subdivision in Guildford?

Response

Useful new policy that needs enhancing

We believe policy can be further enhanced by adding:

Transport e.g. parking is considered

Sub-divided accommodation should comply with the Space Standards as laid out in Policy H1 in the LPSS. There may be an issue related to Permitted Development rights, but we are aware other local authorities have created policies to manage these effectively; as an one authority for example has a policy that states

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- 2.20.1 *The Council have been set a minimum housing target. The Core Strategy wants to ensure that housing targets are met and that the borough has the right mix of housing. The SHMA identified a need for larger accommodation, however policy contained within the Core Strategy has highlighted that there has been a loss of family housing and larger housing units through conversions.*

The core Strategy recognises that conversions play an important role in increasing the number and variety of housing stock, but often having an adverse impact on communities. In order to protect larger housing units, Policy DMH2 Conversions states that the conversion of dwellings with less than 150sqm of existing habitable floorspace will only be permitted where the property is unsuitable for families.

- 2.20.2 *The core Strategy recognises that conversions play an important role in increasing the number and variety of housing stock, but often having an adverse impact on communities. In order to protect larger housing units, Policy DMH2 Conversions states that the conversion of dwellings with less than 150sqm of existing habitable floorspace will only be permitted where the property is unsuitable for families.*
- 2.20.3 *In addition, conversions of dwellings of 150 sq ms or more of existing habitable floorspace (prior to any extensions carried out since the end of 2008) will only be permitted where the following criteria are satisfied: a.) at least one family-sized unit is provided with access to a dedicated rear garden; or b.) where four or more units are being provided, at least two are family-sized unit (one of which must have access to a dedicated rear garden); and c.) the provision of 1 bedroom/studio accommodation is limited to one unit, or 1 in 5 units in larger conversions; d.) All new units must comply with standards set out in Policies DMH4 and DMH6-7*

Question 4: Do you agree with the preferred option to address rural development in Guildford?

Response

The Policy needs strengthening

The Policy E10 cross refers to P2, P3 and E5. It extends considerably the permitted forms of development in RE8 but see also 2003 Plan Policy RE2 on development within the Green Belt, and RE9, which did permit wider re-use or adaption of existing buildings.

The Policy needs to comment on transport e.g. even small-scale business enterprises can generate traffic volumes in narrow roads. There needs to be a policy statement to allow the council to request site access requirements e.g. Bell Mouth gateways etc.

It is not clear that the Green Belt proposed forms (1) and (2) are compatible with the restrictions of the 'Non-agricultural uses within farm holdings', e.g. that outdoor sports would support the farm's agricultural operation.

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Question 5: Do you agree with the preferred option to address horse-related development in Guildford?

Response

Agree to policy

There is no equivalent policy to E11 in the 2003 plan the proposed

Question 6: Do you agree with the preferred option to address biodiversity in new developments in Guildford?

Response

Agree to policy

The Policy is more demanding than those in the 2003 Plan which is welcome. Planning applications may need to include separate documents to demonstrate they meet the requirements. A large-scale map to show the exact boundaries of the BOAs will be needed.

The text mentions the Green and Blue SPD – when will this be available as this it is a component of all plans?

This Policy should also apply to major redevelopments e.g. offices become flats where there may be considerable changes in the surroundings of a building that need to be considered.

Question 7: Do you agree with the preferred option to address biodiversity net gain in Guildford?

Response

Agree to the policy and the proposal for a 20% Net Gain

Policy P7 Proof of BNG of 20% is required for all sites except some previously developed sites. Again, this is a significant increase in requirements.

Despite the numbers quoted in the text, there must be some anxiety that P6 and P7 will inhibit house building in unexpected manner. There is some evidence that Brownfield sites with some environmental value are disadvantaged compared to greenfield sites. It would be useful to understand if the council has sense tested this policy on a number of major sites.

Question 8: Do you agree with the preferred option to address woodland, trees, hedgerows and irreplaceable habitats in Guildford? Do you have any other comments or suggestions?

Response

Agree to the policy

Provides considerably more protection than the 2003 Policy NE6.

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Question 9: Do you agree with the preferred option to address priority species and habitats on undesignated sites in Guildford?

Agree with the proposed policy

Provides considerably more protection than the 2003 Policy NE6.

Question 10: Do you agree with the preferred option to address contaminated land in Guildford?

Response

Agree with the proposed policy

Useful new Policy P10

Question 11: Do you agree with the preferred option to address air quality and Air Quality Management Areas in Guildford?

Response

Agree to policy with amendment

Policy P11 is a New Policy, especially regarding identified polluted areas (AQMA), of which there are two at the moment.

The aims of this new policy are welcome, but the wording will have to be framed very carefully. The general statement "Will only permit development where it will not give rise to adverse impacts" could be used to oppose all large housing developments.

The policy needs strengthening to mention that if an Air Quality assessment of a development shows the development will cause or extend an AQMA this pollution must be mitigated before a development can be approved.

Question 12: Do you agree with the preferred option to address water resources and water quality in Guildford?

Response

Agree to policy with amendment

Policy P12 New Policy to ensure that new development does not cause an unacceptable risk to surface or groundwater resources.

Should also cover major redevelopment of buildings so that water quality is raised.

Question 13: Do you agree with the preferred option to address sustainable drainage systems in Guildford?

Response

Agree to the Policy with minor query

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Policy P13 New Policy that covers recent legislation on Sustainable Drainage Systems (SuDS). Applies to all applications but especially to major ones.

We are unclear where matters of overall drainage capacity are considered in Policy terms does reference to legislation on overall provision of adequate drainage suffice?

Question 14: Do you agree with the preferred option to address Regionally Important Geological / Geomorphological Sites in Guildford?

Response

Agree to the Policy with minor query

Under Policy P14 Nine such sites have been identified and are listed. New Policy that seeks to protect these sites. No comment, except that in (1) the reference to biodiversity looks odd: these are geological sites.

Question 15: Do you agree with the preferred option to address high quality design and local distinctiveness in Guildford?

Response

Agree to policy with major amendment

High Quality Design is a worthy aspiration surely the policy should reference the use of the South East Design Panel and potentially review by a more local body with knowledge of Guildford. (The South East Design Panel has a paucity of local knowledge). The policy needs considerable strengthening on matters of consultations and links to Neighbourhood plans.

Central government seems very active in this area at present with a National Model Design Code under development based on the revised National Planning Policy Framework and National Design Guide setting out high-level best practice. This includes the terms under which planners could refuse development which fails to improve the character or quality of an area.

The completed code will aim to achieve a 'greater consistency of design quality' across new development and will factor in findings from the recent Building Better Building Beautiful Commission report. Timescales are unclear but it may be Q3/4 2020 thus will be time for consideration vs. LPDMP

The Policy D4 expands on the wording in the 2003 G5, G5(1), G5(2), G5(3), G5(4), G5(5), G5(6) and G5(7) Policies. The blanket Policy G5 of the 2003 Plan should be included in the LPDMP.

There are welcome General Principles (1) to (3), and especially the new clause (4) on avoiding piecemeal development. Respect for 'Landmark buildings' in G5(1) is replaced in (2) by understanding of 'features of interest', which is perhaps weaker.

The very clear statement Of 2003 Policy G5(6) that views are protected etc. should be include in the LPDMP. The word 'respond' in 7e does not carry the force of the wording in 2003 Policy G5(6): the wording of G5(6) should be included in the new Policy.

The policy needs to have more hard limits that are only broken in exceptional circumstances, this particularly applies to DPHa see proposals under Question 1.

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To avoid piecemeal development, for example where allocated sites are in separate ownerships, and the Council seeks comprehensive and integrated design, the best use of land and a well-connected development, it may call for a strategic plan to be produced for any development site, or sites, in the local plan (Or new site(s) brought forward) whether in single or multiple ownership. Such a Plan would cover phasing of the development including infrastructure provision, layout and design principles.

Character of Development (7) There should be a reference to the Strategic Development Framework – SPD that at 1.1.3 states *‘Nevertheless, the principles discussed for each of the named sites are able to be transferred and applied to other sites within the borough’*

Item e) It should be noted that the Guildford Town Centre Views SPD covers only the Town centre, but only in an highly selective manner. We are aware major Strategic Sites are considering these matters within EIA’s etc but it is not clear how smaller sites are covered.

Note:- Guildford urgently required an integrated computer model of the borough for planning purposes. A system has been installed for the whole of London. It is ironic that Guildford which is how of 5G and the Games industry, cannot use readily available and affordable technology to move into the 21st century for planning purposes.

The policies need to incorporate more ambitious standards to ensure mass, scale and basic amenities are incorporated. Looking at comparable documents from other authorities the society recommends that at a minimum the policy is expanded to include:

Private internal space additions

- One bed space, single bedroom must have a floor area of at least 7.5 sqm and be at least 2.15m wide.
- A two-bed space, double (or twin) bedroom must have a floor area of at least 11.5 sqm.
- Dwelling plans should demonstrate that dwelling types provide flexibility by allowing for an alternative seating arrangement in living rooms and by accommodating double or twin beds in at least one double bedroom.

Private outside space

- Flats - A minimum of 5 sqm of private outside space should be provided for one-to-two person dwellings and an extra 1 sqm should be provided for each additional occupant.
- The minimum depth and width of all balconies and other private external spaces is 1500mm.
- Houses - A minimum total private outdoor space of 70m² for 3 or more beds and 40m² for 2 beds will be
- It is essential that these space standards requirements are incorporated into the design of new proposals from the outset and are not treated as afterthoughts.

Spatial Quality - Development proposals should create well-considered layout arrangements within dwellings that improve the lived experience through generosity of floor-to-ceiling heights, and spatial arrangements that optimise quality of outlook and aspect. The minimum floor-to-ceiling height in habitable rooms is 2.5m (rather than a cramped 2.3M) between finished floor level and finished ceiling level.

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Aspect and outlook - All new dwellings should be dual aspect, unless there are exceptional circumstances that justify the inclusion of any single-aspect homes. Single-aspect dwellings that are north facing, contain three or more bedrooms, or are exposed to noise levels with significant adverse effects on health and quality of life, should not be permitted.

Where single-aspect dwellings are proposed (by exception), the design team should demonstrate how good levels of ventilation, daylight, privacy, and thermal comfort will be provided to each habitable room and the kitchen.

Spacing – Standards should be established for distances between facing dwellings and for the space between adjacent dwellings an example from another borough council is:

Distance between principal windows (main elevations with habitable rooms) and another, face to face: 22m if two storeys

Distance between principal windows (main elevations with habitable rooms) and another, face to face: 26m if three storeys

Distance between principal windows (main elevations with habitable rooms) and solid wall single storey: 11m

Distance between principal windows (main elevations with habitable rooms) and solid wall two storey: 14m

Mass as part of Views

The town centre views SPD October 2019 has reference to length of building skylines and gaps to provide views through large masses of buildings. This should be incorporated as policy in the LPDMP. As an example, Oxford don't allow a roofline longer than 60m before it is broken or stepped.

Sustainable Design

There should be standards for shading/insulation on south facing aspects. With the move to heat pumps for heating/cooling do there need to be policies on the placement of heat exchangers, noise impacts etc. (Air Condition placement currently causes planning issues)

Height

As stated in our response to Question 1

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.

Question 16: Do you agree with the preferred option to address privacy and amenity in Guildford?

Response

Agree to policy with amendment

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2003 Policy on privacy is set in H4 rather than in any of the G5 Policies. The new Policy D5 is stronger: it emphasizes the need for private outdoor amenity space and includes electric vehicle charging points, which is welcome.

Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of visual and acoustic privacy in relation to neighbouring property, the street and other public spaces.

The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound-sensitive rooms within dwellings.

Question 17: Do you agree with the preferred option to address shopfront design in Guildford?

Response

Agree to policy with amendment

The 2003 Policy G7 has a clause on respect for local character, this is missing from the new Policy. On the other hand the objection to blank facades in the new Policy is very welcome.

- a) There should be a reference to the GBC Guidance on Shopfront Design and Security in Historic areas.
- b) There needs to be addition to the policy to cover shops that are converted to other uses, how are blank facades going to be managed.

Question 18: Do you agree with the preferred option to address advertisements, hanging signs and illumination in Guildford?

Response

Agree to policy with amendment

This Policy is stronger than 2003 Policies G8 and G9, but is 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 technology of signs has changed considerably in recent years as regards use of large LED screens which can readily show unwelcome moving images and as regards the use of very large vinyls. The Guidance needs some updating.

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

How will 3) work in practice especially as so many retail premises have illuminated signs already.

Question 19: Do you agree with the preferred option to address public realm in Guildford?

Response

Agree to policy with amendment

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There is no comparable 2003 Policy. There is a 1995 SPG on Street Cafes but it needs updating: the new Policy D8 should make reference to this. The new Policy contains a section on Public art, which is welcome, but care is necessary to ensure it does not stifle creativity. The council's Art Strategy needs the flexibility to allow for temporary works of art.

A statement on the desirability of having greenery and planting in the public realm?

We are puzzled to the reference to charging points – as this whole policy appears focussed on the provision of car free areas.

Examples of 'high quality in terms of design and materials' should be illustrated. Many policy documents such the National Design Guide, and policies in other authorities use photos and drawings to illustrate points especially quality of design.

Question 20: Do you agree with the preferred option to address residential intensification in Guildford?

Response

Agree to policy with amendment

Policy D9 has no comparable Policy in the 2003 Policy.

The new 1(c) wording "Proposals involving 'back-land' development must avoid long, narrow and isolated access points" is very welcome. See comments about having robust policies to manage DPHa within an area.

There also needs to be a more robust policy than that proposed that requires a Transport Assessment to be made as intensification can be insidious resulting in Transport and Access issues occurring after time.

Question 21: Do you agree with the preferred option to address the 'Agent of Change' principle and noise impacts in Guildford?

Response

Agree to policy with amendment

Policy D10 has no comparable 2003 Policy. The new Policy works both ways: for example it protects an existing pub from noise complaints by new adjacent homes and also existing homes from a new pub.

Question 22: Do you agree with the preferred option to address the corridor of the river Wey and Guildford and Godalming Navigation in Guildford?

Response

Agree to policy with amendment

Policy D11 corresponds to 2003 Policy G11. It requires new development to 'protect or improve' the corridor under five headings which broadly match the Objectives of the first paragraph of the new Policy. It is not quite clear that the five numbered requirements of the new Policy will cover all the five 2003 headings. For example 'special historic interest' is not the same as 'special character of the landscape and townscape' (2003 G11 (2)), and there is

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no wording like 'Views both within and from the corridor' (2003 G 11 (3)). The new Policy should be enhanced as necessary to complete the coverage. There should be a point on views from and into the corridor. Also, point (1) last sentence could read "High quality design and appropriate scale will be expected".

This policy needs strengthening by:

Flood Prevention measures should be provided in a manner that consists of static measures (Bunds, Flood Plains, and Buildings) that minimise use of Floodwalls and moveable gates.

The needs to be a strong aspiration to provide over time Wey side paths on both sides of the navigation from the Ladymead Bypass south to the Rowing Club.

The policy should also reference views from and into the corridor.

Question 23: Do you agree with the preferred option to address sustainable and low impact development in Guildford?

Response

Agree with policy but needs considerable clarification.

The Policy D12 introduces requirements for energy efficiency, embodied carbon reduction, waste management and water efficiency. The 'fabric first' approach is welcome.

Agree with the policy as proposed with two amendments.

Para 5.98 states: "Demolition and rebuilding, and even refurbishment and retrofitting, create carbon emissions."

Buildings should be designed to have flexibility to accommodate a variety of uses, thus emissions can be reduced or avoided when the use is changed. An example is new buildings for student accommodation should be able to accommodate other types of residential, thus prefabricated Student accommodation should be avoided unless it can be easily removed.

The proposed policy at 3) states - Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs and how materials can be reused or recycled at the end of their lifetime. - the para 3 needs expansion to read - Expects developments to consider the lifecycle of buildings and public spaces, including how they can be adapted and modified to meet changing social and economic needs, this includes designing in the ability to change use if prefabricated components e.g. Bedroom modules, are used, and how materials can be reused or recycled at the end of their lifetime.

An extra para needs adding – There will be a presumption to favour schemes that re-use and re-purpose existing buildings, provided resulting revised building complies with standards of accommodation for new buildings.

The policy should also reference BREAM and PassivHaus standards

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Question 24: Do you agree with the preferred option to address climate change adaptation in Guildford?

Response

Agree to policy with amendment

The Policy D13 introduces requirements to prevent overheating, and to cope with more frequent and severe rainfall events. It is not clear how the overheating prevention measures interact with other Policies.

There needs to be a clause to encourage the use of small-scale energy generation technology e.g. PV Cells

Question 25: Do you agree with the preferred option to climate change mitigation in Guildford?

Response

Believe we need a policy now.

No Policy D14 is proposed pending expected new government legislation on carbon emission standards.

Surely a policy can be crafted to propose a 20percent reduction or use a central government standard if one is promulgated, using whichever is the higher.

Question 26: Do you agree with the preferred option to large scale renewable and low carbon energy in Guildford?

Response

Policy seems very unclear it needs redrafting.

This Policy D15 will allocate one or more sites for renewable and low carbon energy development (e.g. PV, CHP or wind farms).

The Policy is so vague that it might be better expressed in another Council document: careful cost benefit analysis is essential before any commitment is made, and it should not be assumed that development within the Borough is better than use of the National Grid to connect to facilities elsewhere. Electricity transmission is comparatively cheap.

Question 27: Do you agree with the preferred option to address designated heritage assets in Guildford?

Response

Agree to policy with amendment

Policy D16 includes Statutory Listed Buildings, Conservation Areas, Article 4 Directions, Scheduled Monuments, and Registered Parks and Gardens. The Policy expects all proposals affecting designated heritage assets to be supported by a Statement of Significance and Impact, and the Policy sets out what the Statements should contain. There is no omnibus 2003 Policy of this kind.

Response to Local Plan: development management policies

Policy should state that if a Statement of Significance is not provided, the proposal will not be approved. The LPDMP should include Table 1 together with links to where lists and details of heritage assets can be found.

Question 28: Do you agree with the preferred option to address listed buildings in Guildford?

Response

Agree to policy with amendment

The new Policy D17 is more precise and detailed than 2003 Policies HE1 and HE2. However, it does not include the prohibition of demolition of whole or part of a listed building given by 2003 Policy HE3. It also does not include the protection of the settings of listed buildings given by 2003 Policy HE4. The control of advertisements on listed buildings offered by 2003 Policy HE5 is now covered in new Policy D7.

But HE4 prohibits illumination while new D7 does not: this is a notable omission.

Question 29: Do you agree with the preferred option to address conservation areas in Guildford?

Response

Agree to policy with amendment

The content of the new Policy D18 is similar to that of the 2003 HE7 policy. The control of advertisements in conservation areas offered by 2003 Policy HE8 is now covered in new Policy D7. However, the specific protection given by 2003 Policy HE9 against demolition in conservation areas is not in new D18. It should be included. 2003 Policy HE10 on development which affects the setting of a conservation area is covered by the new D18.

Although there is a presumption to approve designs that blend with the conservation area, the council will on occasion considered a modern design for an area.

The specific protection given by 2003 Policy HE9 against demolition in conservation areas is not in the new D18 – is this an omission?

Question 30: Do you agree with the preferred option to address Scheduled Monuments & Registered Parks and Gardens in Guildford?

Response

Agree with the Policy with one query

The new Policy D19 contains more detail than 2003 Policies HE11 and HE12. The new Policy contains the presumption against 'substantial harm' to or loss of. Should this be strengthened to 'less than substantial harm'? (HE11 was deleted by the Secretary of State)

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Question 31: Do you agree with the preferred option to address non-designated heritage assets in Guildford?

Response

Agree to policy with amendment

The new Policy D20 is stronger than the 2003 Policy HE6. It requires a Statement of Significance and Impact for proposals affecting non-designated heritage assets, mainly locally listed buildings. This is welcome.

There should be links to the Council's lists of the assets set out in Table 2. There should be a reference to the procedure for regular reviews of the lists, making additions to and deletions from the lists.

Question 32: Do you agree with the preferred option to address protecting open space in Guildford?

Response

Agree to policy with amendment

The new Policy ID5 references GBC's 'Open Space, Sport and Recreation Assessment (OSSRA) 2017'. The 2003 Policy R5 prohibited development on open space if there was harm to the character of an amenity. This seems to have got lost in the new Policy. In other respects the new Policy uses different wording but to the same effect as the 2003 Policy.

A clause needs to be added to avoid developments that cause light, noise pollution.

As mentioned above the 2003 Policy R5 prohibited development on open space if there was harm to the character of an amenity. This seems to have got lost in the new Policy.

Question 33: Do you agree with the preferred option to address open space in new developments in Guildford?

Response

The policy needs revising as it is a weakening of current policy.

The text accompanying the new Policy ID6 makes substantial reference to OSSRA. The new Policy has tables specifying requirements. Some do not compare well with those in the 2003 Policy R2.

The 2003 Policy covered all developments of 25 dwellings or more. The new Policy differentiates between types of space and sizes of developments. For example 'Parks and recreation grounds' and 'Play space (youth)' are only required for developments of 250+ dwellings. The 2003 standard for 'children's play spaces' was 0.8ha per 1,000 people. It is 0.05ha in the new Policy, and that only for developments of 50+ dwellings. The new Policy also does not include the provision for small developments offered by 2003 Policy R3, which covers developments between 5 and 25 units. These are serious reductions in the requirements for open space provision, with consequent reduction in amenity for future residents compared with the past.

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This policy represents a reduction in the requirements for open space provision, with consequent reduction in amenity for future residents compared with the past. The time to walk to a play space for children seems optimistic would suggest the distance is reduced to 300m. The draft LPDMP should be amended so as to remove these shortcomings. Clause (11) on footpath provision is very welcome.

We are building for the future we shouldn't be reducing standards.

Question 34: Do you agree with the preferred option to address sport, recreation and leisure facilities in Guildford?

Response

The policy needs revising as it is a weakening of current policy.

The 2003 Plan had the Policies R6, R7, R8, R9 and R10 listed above. The new ID7 is an omnibus and generally more supportive Policy, but the new Policy appears not to have the limitations on floodlighting set out in 2003 Policy R6, the strong limitations on facilities associated with new golf courses set out in R8, the constraints on new noisy sport facilities etc. set out in R9, and on water based recreational facilities set out in R10. The brief new Policy has a weaker omnibus requirement regarding large facilities. This should be strengthened to include all the above factors.

This policy seems to be considerably weakened from that in the 2003 Plan, no reason is given for this weakening of policies. The policy should revert to those embodied in the 2003 plan.

Question 35: Do you agree with the preferred option to address community facilities in Guildford?

Response

Agree with policy but would it be effective?

Policy ID8 related to the 2003 Plan Policies

- CF1: Provision of new community facilities
- CF2: Loss of community facilities
- CF3: Pre-school education
- CF4: Expansion of schools
- CF5: Care in the community

The text explains that design guidance and provisions for schools and health care are included in the LPSS and thus cover 2003 Policies CF3 and CF4.

The new Policy covers 2003 Policy CF1. The 2003 Policy CF2 did not include the wording 'offering it for sale or lease', i.e. was more general. The 2003 Policy CF5 covered conversion of dwellings to care homes. It has no counterpart in the new Plan. The 2003 Plan had no Policy for conversion of dwellings to HMOs and neither does the new Plan.

Response to Local Plan: development management policies

This policy needs urgent sense testing, if it were in force would it prevent the current issues with Doctors Surgeries in Guildford? It is not clear this policy would be effective. The policy seems to have nothing to say on conversion of housing to care homes or HMO's should this be included?

Question 36: Do you agree with the preferred option to address the retention of public houses in Guildford?

Response

Agree with this policy

Policy ID9 is welcome. There could be a similar one for small shops in isolated communities. Should this policy be extended to cover all community facilities?

Question 37: Do you agree with the preferred option to address achieving a comprehensive Guildford borough cycle network in Guildford?

Response

Agree to policy with amendment

This new Policy ID10 aims to achieve a comprehensive Guildford borough cycle network based on a Policies Map showing specific routes (see Appendices 1 and 2 of the paper). It is to be welcomed.

We fully support the aim to achieve a comprehensive cycle network in Guildford in order to encourage Active Modes of Transport and Modal Shift.

The cycling network looks reasonable but there need to be a policies that ensure:

That as far as possible cycle lanes are established separating cyclists from traffic--- there are currently too many which are useless, being painted on pavements often with overhanging branches, or in the gutter of poorly maintained roads.

The Town Centre routes need greater definition, cycling around the gyratory in the town Centre is not to be encouraged until proper provision is made.

In the Town Centre we are concerned that, with increasing numbers of cyclists and cycle stands*, a balance should be established between their needs and those of pedestrians. Whilst we recognise the value of cyclists' "Share with Care" principle, it seems inevitable that there will be areas in busy parts of the town where there will be interactions with pedestrians which could disturb their peace of mind. Such interaction might also tend to inhibit the development of social activities such as out-door cafés in these areas.

We therefore believe that the Historic core of the Town should be defined so that conditions for cyclists may differ from those in the rest of the borough. These could be adjusted as necessary from time to time.

(*) As set out in Guildford Cycle Route Assessments (May 2020) by Transport Initiatives LLP & Urban Movement.

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Question 38: Do you agree with the preferred option to address parking standards in Guildford?

Response

Agree to policy with amendment

Policy ID11 gives tables of parking standards broadly similar to those given in Appendix 1 of the 2003 Plan. Omissions include standards for open air markets, DIY stores, garden centres and retail parks. More spaces are given for restaurants and fewer for cash and carry.

Further omissions are residential hostels and old people's homes. There are new entries for care homes and nursing homes. The standards for dwelling house are much the same.

The standard for doctors', dentists' and veterinary practices is considerably reduced to 1 space per consulting room, with 'remaining spaces on individual assessment'. This is too low.

Policy ID11 demands much more cycle parking than the 2003 Plan: this is to be welcomed. However, we note that Aim 4 and Table 6 set out to define minimum cycle parking standards for new developments across the borough, with denser requirements in town centres. While we support this concept in principle, we believe that, in order to balance the needs of both pedestrians and cyclists, the busy, historic core of Guildford should be identified and may require different arrangements for cyclists from the rest of the borough.

In Table 6, one space per two students is too low for residential colleges, when it is to be expected that most students will be cyclists.

We welcome that ID11 has a new table specifying provision of electric vehicle charging points.

The 2003 Plan had a section on parking for disabled drivers. There does not appear to be a counterpart in the new Plan.

Table 6 sets out to define minimum cycle parking standards for new developments across the borough, with denser requirements in town centres.

Neither Plan included provision for car clubs in new residential settlements. This should be considered.