

## **GRA Consultation Response**

### **STRATEGIC DEVELOPMENT FRAMEWORK SPD**

#### **Overarching Comments:**

GRA welcomes an SPD to guide Strategic Development. It is needed, especially in view of concern at the long time it is taking to produce Development Management Policies and an Infrastructure Plan.

We are concerned at lack of clarity regarding progress with other key SPDs that are cross referred in this document, eg Sustainable Movement Corridor and parking.

An advantage of an SPD embracing all the strategic sites should be that it is possible to consider common themes and expectations consistently yet tailor solutions to each site. Relevant to all the sites is the need for joined up traffic management and A3 capacity improvements. This SPD does not address how cumulative capacity issues will be addressed. It is too vague on how the “infrastructure first” requirement will be achieved opening the way for major development in advance of infrastructure improvements. There should be clarity over issues such as the need for a four-way junction onto the A3 for Gosden Hill or the AONB major development test to be applied to establish a link between the A31 and Blackwell Farm.

We welcome the fact the SDP addresses the issue of early development phases which are relevant to all the sites. However, this framework is far too weak on the expectations for any early development phases. Phase 1 requirements should include how the early phase relates to the overall masterplan, upfront mitigation (eg A3 screen, undergrounding) and upfront infrastructure (eg A3 links and sustainable drainage).

There is a lack of clarity regarding the relationship between the proposed layout of each site in this SPD and the Master Plans to be prepared for each site by developers. Are these plans indicative? What happens if a developer proposes a different layout? What happens if a developer proposes a stock house style no different from developments elsewhere?

There is insufficient focus on creating communities rather than building estates and how this will be achieved. It is telling that the typology chosen for a neighbourhood hub is not a community centre and does not function as one.

#### **Foreword:**

The document lacks ambition for local distinctiveness and sense of place. It relies too much on textbook design solutions rather than capturing the valued features that distinguish Guildford and each of the sites. Locally appropriate design guidance matters because currently the SPD risks encouraging tall, blocky designs and linear layouts that could harm the character of the borough. The document also lacks environmental ambition – eg Net Zero greenhouse gas emission target, Passive Homes, Biodiversity Net Gain, revised NPPF enhancement of Green Belt setting.

#### **Part 1: Background and context**

1.1.1 ADD: essential physical, **environmental** and community infrastructure.

### 1.1.3 Scope:

This should explicitly include Garlick's Arch in view of its scale, greenfield site and Green Belt setting. This site was added during the Local Plan process and, although smaller than other strategic sites, needs planning in a strategic way to create a community. Indeed, the current phase one planning application illustrates the problems when a "housing estate" extension is proposed rather than a new community designed.

The document should also refer to relevant principles applying to the North Street site and potentially various other large town centre residential developments. Post Local Plan adoption, North Street site has become a strategic *residential* site. Although it is a brownfield scheme with a more central location, it is sufficiently large that many principles in this SPD apply including the need to create a community, design character that responds to setting, and establish transport connectivity, impact on views and sustainable drainage from the outset.

We note that this report includes a less comprehensive approach to the Ash and Tongham sites, excluding various land parcels. We assume this is because development here was initially treated as a continuation of development in countryside beyond the Green Belt rather than as a new "strategic site" in the Local Plan. We trust that more work is being done to level up the coverage of this site in this SPD.

### 1.2.2 Infrastructure and mitigation requirements for all phases of development:

For avoidance of doubt this paragraph should not only refer to standards applying to reserved matters and full applications. It should also be clear that the SPD will apply across any phasing of development, including to any early development phases. Indeed, the SPD should be specific about infrastructure and mitigation required for any initial phases of development. Early development on each site is anticipated in the Local Plan housing trajectory. There should be no danger of essential infrastructure and mitigation being deferred to a later stage not least because there is always a possibility subsequent stages will not proceed as initially envisaged. This issue should not be left to part 4 of the document but also referenced clearly at the start.

1.2.5 It is not clear whether these proposals reflect community input. Community input was merged with Councillor input and never seen separately.

1.3.2 ADD: Requirements which should be met at the outline planning application stage and beyond, **including any early phase applications**, to ensure adequate and consistent approaches to quality and delivery.

### Fig2: Anticipated Planning and Design Process

There are a number of fundamental issues with this key diagram and we ask for it to be amended.

- It is being interpreted as if the GBC SDF provides the Master Plan for each site rather than informs Master Plans to be produced by developers.  
To avoid confusion and be consistent with the text on Pages 6 and 8\*, the figure should be clear in the Master Plan Section about who does what.
- The Figure should also be explicit that the developer's Master Plan stage will be "informed by strategic landscape, environmental, drainage, transport and other infrastructure assessments". Currently the figure only refers to "assessment by a design review panel" at this stage. The additional reference is needed to achieve the objective of the SDF that Master Plans will be responsive to the characteristics and context of each site. (For example,

the SDF expects sustainable drainage and environmental considerations to be established early to inform any Master Planning process rather than be factored in as constraints once a Master Plan has taken shape.) Without inclusion of such a reference to strategic assessments, the diagram simply signals supporting information can be left to the later application stage.

- The diagram needs to include reference to any early phase development. It should be clear early phases will be expected to deliver within the context of informed Master Plans and should provide appropriate standards of place making, landscape character, sustainability, mitigation (including landscape buffer) and infrastructure etc.

\* "a guide for future masterplanning, planning and development"

\* "the SPD will be a material consideration in determining the appropriateness of planning applications and ... implementation, including the preparation of master plans by the developers"

\* "It provides comprehensive supplementary planning and design guidance for the masterplanning and design of the strategic sites of Guildford"

\* "The Council will require the preparation of master plans by the developers"

2.1.2 This paragraph should refer specifically to climate change, environment and flood risk which are important considerations within the scope of the NPPF.

2.1.8 This list should include the Landscape Assessment

2.1.12 This paragraph should set an expectation that all plans (outline as well as detailed) will reflect these accommodation sizes to give an accurate understanding of building footprint relative to hard and soft landscaping. All too often developers scale down property sizes and exaggerate green spaces in earlier plans. For example, in the Boxgrove Gardens application, green space reduced and property size increased at each stage of the application process.

2.1.13 ADD highlighted text: ...the design of on-street car **and car club** parking within new developments... Such is the importance of shared vehicles that specific reference should be made here that parking standards apply to community provision as well as to individual properties.

In this paragraph, there is mention of a forthcoming SPD on parking. When is this expected to be issued?

2.1.15 This list should include the best available advice on sustainable drainage schemes (eg CIRIA).

## **Part 2: Design Principles**

The layout of this section is very confusing to follow with paragraph numbers running throughout the sub-division into themes A1 to E6. It is unclear that the prominently labelled typologies, density arrangements and parking considerations are all part of "B1. Anchoring development in its setting".

### **3.1 Building in Sustainability:**

3.1.1 ADD: **A4. Deliver environmental net gain**

The illustration on page 24 of "building in sustainability through a range of design measures" describes approaches at low density. A further illustration is required to show how sustainability approaches can be incorporated in areas of higher density.

[A1. Minimising Energy Consumption \(A1 heading is missing in consultation text\)](#)

This is a very down beat section. The document should establish an aspiration to exemplify best practice. Net Zero targets mean guidance is already out of date. Be more explicit about Climate Change driving ambition.

Good practice means not just having solar panels but also incorporating them into design and layout from the outset. This involves more than just southerly orientation. This section should include the requirement for solar energy and other sustainability features to be designed in such a way that they do not detract from the attractiveness of the roofscape and street scene. Eg flush solar panels, panels in well-designed inset areas of a roof not prominent in the street scene, panels set in glass. Can better illustrations be found than the retrofit solar panel on page 21?

## A2. Integrating SuDS

We welcome the caption on page 20 that “Sustainable drainage should be a key master plan consideration”. However, this expectation is not carried through consistently in the text.

3.1.7 It should be explicit in the text that this should be an early requirement informing the layout of landscaping and development from the outset.

3.1.11 While it is to be welcomed that SuDS design will be in the design and access statement and that a flood risk assessment will be submitted, this signals to a project manager that drainage can be left to the later, more detailed stages. The drainage strategy should be an early component shaping all aspects of development. When planning Opportunity Areas, the GLA learnt from earlier schemes such as Nine Elms, that it had failed to factor in drainage and the environment sufficiently early in the planning process, an issue it rectified for later schemes such as Old Oak Common.

## A3. Resilience and Adaptability

GRA attaches great importance to whether development and the materials used will age well and attractively or become tired and shabby. This is a key part of sustainability and should be a test in the SDF.

## Add A4. Biodiversity Net Gain and Nature Recovery

The SDF should include expectations for Biodiversity Net Gain as set out in the Government’s 25 Year Environment Plan. 15% net gain is proposed in the Environment Bill. An approach of contributing to nature recovery networks is required. Revisions to the NPPF require enhancement of remaining Green Belt. The SDF should set out expectations for how the strategic sites will contribute to these objectives and this should be treated as a key pillar of this sustainability section.

## 3.2 Context and Local Identity

Paragraph 3.2.2 refers to evaluating key features and assets to shape and drive the master plan. Yet paragraph 3.2.3 suggests no need for evidence to be given until the Design and Access Statement is submitted with the outline planning application. We suggest this is too late. This SDF should set the expectation that strategic evaluations will inform, and be provided as part of, a Master Planning process. Refined assessments should accompany subsequent applications.

### B1. Anchoring development in its setting

3.2.11 Page 27 should give good illustrations of Art and Craft movement homes across the borough, including at varying densities, as well as more modern interpretations of this style.

3.2.11 ADD: Understanding how local examples of this have led to good urban places **and whether traffic and parking have been issues** can inform placemaking.

Without a reference to traffic and parking, any suggestion historical patterns of development provide a model for future development is meaningless. Places with a finer grain of buildings and streets may be wonderful to live in or dysfunctional in terms of parking and congestion. Space for vehicles (be they electric or hydrogen, shared or individually owned, business vans etc) needs to be designed in from the outset. This was not done well at St Lukes and the site is dominated by on-street parking, pavement parking and cars overhanging drives. Some progress was made in providing less prominent car spaces on Boxgrove Gardens but provision is inadequate with many residents parking in neighbouring streets. Also, mothers with children find getting between their home and separated parking space in Boxgrove Gardens challenging.

#### Character Typologies:

We query the choice of areas.

#### CHARACTER TYPOLOGY 1

Specify orange/red brick, often used in combination with more brown hues eg clay tiles. Unless reference to “red brick” is more specific, developers interpret this as a pink/red which is often used in combination with grey tiles elsewhere.

#### CHARACTER TYPOLOGY 2



This description is inaccurate. It is an interface between the upper High Street and residential arterial routes not a neighbourhood core. Boxgrove, Merrow and Burpham have community cores. This part of Guildford, where Holy Trinity and Christchurch meet, does not have a community core. It is an area of mixed use with retail, business, office, leisure and residential. The area includes examples of unattractive, overdevelopment, such as along Alexandra Terrace, to which reference is omitted. The hotel application deceptively included a roundabout at the end of Alexandra Terrace with a fountain in the centre for which there was insufficient space. In practice, the limited street width, with overbearing buildings on either side, means vehicles struggle to find space to do a three-point turn in the cramped

and congested access road. The street scene when approaching from the Epsom Road is of cascading blocks of development that dwarf the older character building on the corner of the High Street that ought to be the landmark feature. This development has undermined the integrity of

place. It overhangs the pavement presenting an unattractive panelled façade when viewed from the High Street. The development also appears blocky in distant views of the town.

We do not recognise the characterisation that taller buildings on corners are a desirable feature. The pavement in front of Trinity Gate is unpleasant to use and the small amenity area unappealing and never used. The attractive flint house on the corner of Waterden and London Roads is not taller, nor is the character toilet block (old fire station) on North Street that is shown. The pub on the corner of Harvey and Epsom Roads is not tall. Significant buildings such as Christchurch on Waterden Road and GLive are not on corners and are set back from the street.

Two of the corners at the junction of Waterden and London Roads have green landscaping which is valued because pollution from queuing traffic disperses more readily than if would if these corners were enclosed by tall buildings. The green area outside GLive, the landscaping in front of Trinity Gate and the front gardens in the vicinity are just as important as any corner buildings. The pedestrian entry to London Road station is defined by a grassy area with war time tank stoppers and trees. Further along the London Road, the junction that leads to George Abbott school is marked by an old and a new oak tree set in an area of grassland providing “legibility”.

Many properties in the vicinity use flint, bargate stone or feature bricks and have wooden detailing.



The case study does not lead to the conclusion that apartments of 5-6 storeys at key corners would be an attractive feature. More appropriate conclusions to draw from this area might be:

- creative use of materials such as stone and timber in imaginative modern design
- a mix of attractive low-rise feature buildings and good quality green amenity features on corners promote legibility of street layout and topography

- the value of frontage planting
- any larger buildings well set back from the street

Parking is a major issue in the area.

### CHARACTER TYPOLOGY 3

Parking is an utter nightmare for residents in those streets in this area that rely on on-street parking.

### CHARACTER TYPOLOGY 5

The urban character identified is not representative. For most of its route the Wey Navigation is a green corridor through the town, a feature to be enhanced. A small number of historical buildings are characterised by strong frontages along the Wey within the town centre and these should be protected. However, if this pattern were replicated in new development along the Wey, the effect would be oppressive and detract from this valued amenity and environmental asset. The objective should be to create a green corridor with pedestrian access along each bank of the Wey. As the Local Plan introduction states, for too long Guildford has turned its back on the river. Whenever redevelopment occurs in the vicinity, the building line should be moved back to enable a linear park to be created. Such set back should also provide scope for a floodable two-stage channel and amenity areas to reduce flood risk to homes and businesses. Any development should be of modest height with upper stories set back to avoid tall frontages having an overbearing impact on the river. The case for long, flat, linear frontages is not made. The town centre warehouse buildings identified do not provide a relevant typology for Slyfield.

#### Density Arrangement:

3.2.15 More detail should be provided on the inadequacy of space for vehicles in any character areas referred to. It is to be hoped that on those strategic sites with greater scope for public transport, car use will reduce (as well as change in vehicle power source). This does not necessarily mean, however, that car ownership will reduce as significantly. Also, shared ownership of vehicles still requires space for cars.

3.2.16 The density arrangements and illustrative designs shown bear no relation to the character of Guildford in design or materials. The building heights suggested are out of keeping with the height of development in Guildford's residential areas.

The document does not appear to be based on a strong appreciation of the character of Guildford and its valued traits. Guildford's green, downland setting means views matter and development is rarely grid-like. Soft green edges to development and space for mature trees matter in local character and views. Flat roofed designs tend to look blocky in views whereas pitched roofs can create a stepped, articulated roofscape that is attractive in views. In some places underground parking is appropriate, in others inappropriate due to flood risk. This document seems to include approaches that may be more suited to Aylesbury, Peterborough or Cambridge than to the rolling downland landscape of Guildford where you so often look onto development from above (eg from Hog's Back) or view it rising up a hillside (eg Gosden Hill).

#### Parking Considerations

3.2.19 This should refer to the high priority to be given to car club provision and to appropriate well landscaped parking spaces for car club vehicles.

Table 4 The proposed provision of electric charge points is inadequate to meet revised greenhouse gas emission targets and to support sustainability objectives. There need to be electric charging facilities on all allocated spaces outside the curtilage of a property and adequate charging points and spaces for business vehicles eg electric white van professionals.

This section should include not only the number and dimensions of parking spaces but also the design expectations for garages and parking spaces. These should be well landscaped such that vehicles are not overly dominant in the street scene. Frontage and on-street parking is assessed as an unattractive feature in Guildford's Landscape Assessment. We need to ensure this next generation of development achieves a better outcome with spaces for cars on the strategic sites much better designed and landscaped.

## B2. Responding to the land use, social and economic context

### B3. Responding to the landscape context

This section should expand upon the significance and implication for development of views, including into and out of the AONB. It should also provide far stronger expectations on the need to provide greenery to screen the edges of development, and to soften and break up the massing of development, when viewed from strategic transport routes such as the A3 and the railway. This is essential in order to avoid undermining the impression that Green Belt provides a strategic green gap between Greater London and Guildford. Green approaches and effective buffers of trees along the A3 were a commitment given by the Council, are in the text of the Plan and were supported by the Local Plan inspector. Soft green edges of trees to settlements and tree lined green approach routes are Guildford traits that contribute to local distinctiveness.

There is a disconnect between the density typologies provided and the landscape requirements in B3.

3.2.29 This section is far too low key. There is no mention of ancient woodland or of the Surrey Hills AONB being the highest status in terms of natural beauty of landscape. The Hog's Back is mentioned but not as part of the AONB. Slyfield is highly visible in views from the Merrow Down part of the AONB. Gosden Hill is a highly visible hillside.

3.2.30 The reference to biodiversity net gain is too vague. There is no mention of contributing to nature recovery networks.

## 3.3 Making Connections

The list of Key Considerations in para 3.3.2 includes references to future 'Bus Rapid Transit on the SMC'. This is not defined. It would be helpful to understand what is expected.

The emphasis on sustainable transport in paragraphs 3.3.3 and 3.3.4 is welcome. However, surely there should be a statement on ensuring appropriate and safe highways access for vehicles from the surrounding road networks and within the sites?

### C1. Strategic access and movement

#### 3.3.6 Sustainable Movement Corridor

The principle of a network of sustainable movement corridors radiating from the centre of town is welcome. The references in this paragraph are insufficient for this SDF. When will the separate SDP be available? It is of concern that figure 5 shows routes for the corridor that have not been consulted upon and the description "additional or alternative section" is ambiguous.

A distinction should be drawn between areas where the SMC is to be retrofitted within the existing urban fabric and locations where the dedicated, segregated sustainable transport will be designed afresh within the strategic sites. Onsite, the guidance needs to be less prescriptive about how outcomes are achieved. For example, the best route for cyclists and pedestrians may deviate from, and be more direct than, that for buses. Offsite, on existing routes, there needs to be more realism about the likely outcomes given space restrictions and the junctions to be navigated.

The strong linear design of a sustainable movement corridor within the sites could have an overbearing effect on the design and layout of the new communities. It may result in long wide central roads with oppressive walls of tall development along each side. This may work in the centre of a large city but may not be an appropriate design approach for Guildford's landscapes. For example, Gosden Hill sweeps up the hillside. A developer's master plan may craft a solution that separates cycle and bus routes and responds more sensitively to the edge of town or countryside setting of a strategic site. There was an outpouring of dismay when Solum was given the go ahead for the "great wall of Guildford" along the railway. Yet this SDF seems to be encouraging developers to provide long tall corridors of development. The laudable objective of providing effective, pleasant and safe dedicated routes for sustainable modes of transport on the strategic sites should be pursued in a way that creates communities with an attractive layout and design that sits well within Guildford's downland setting.

### 3.3.7 Stations

This paragraph identifies connections to the rail network. The Wisley site is not mentioned. There should be mention of the need to connect to Effingham Junction station.

### C2. Active travel

Figure 6 sets out a principle. However, the metric used for distance is relevant. Analysis of the likely distribution of workplace locations for residents in the sites may well indicate the continued importance of the car.

### C3. Cycle infrastructure

Are London cycling Design Standards appropriate for these sites? Assessing the scale of infrastructure required will not be straightforward.

### C4. Street hierarchy

We support the use of street trees (paragraph 3.3.21).

The street hierarchy section should set out Guildford's much valued policy of promoting "green approaches" (Local Plan refers to this). The new sites should contribute by providing attractive green corridors.

Do the two sections included on pages 46 and 47 bear any relationship to the sites, which are suburban rather than town centre?

The requirement for primary streets to include segregated bus lanes, cycle lanes and pavements means that the main streets in the sites carrying the SMC will probably need to be about 16m wide. This raises issue of practicality. The A25 where it runs past Stoke Park gives an indication of scale.

The design, height and scale of the buildings shown in the illustrative street hierarchy cross sections are totally inappropriate for Guildford's strategic sites. (see comments on 3.3.6 above). For examples the view onto blocks of this character along main routes and near the station at Gosden

Hill would be completely out of keeping with the garden suburb character sought. Tall flat-roofed blocky development on Slyfield would be inappropriate in views from the AONB (Eg from Merrow Downs) or in views across the Wey Corridor. Tall flat-roofed blocky development on Blackwell Farm would be inappropriate in views from the AONB (Eg Hog's Back).

#### C5. Promoting travel by public transport

3.3.30 This refers to the need for segregation of lanes and also the future Bus Rapid Transit. Bus stops (mentioned in 3.3.31) will affect adjacent cycle lanes.

3.3.32 refers to the 'forthcoming Sustainable Movement Corridor SPD'. It would be very helpful to understand the timetable for the delivery of that SPD.

3.3.33 This makes mention of subsidised or free bus travel. Is it the intention that this will be a cost for the developer?

#### C6. Future proofing

The section on future proofing should apply to all issues not just transport and parking. Eg Grey water use should be promoted.

3.3.35 Proposed provision of communal electric charge points is insufficient.

3.3.36 The section on car club provision should be drafted anticipating extensive use **now**. All the sites should make generous car club provision, especially Wisley which will be the most car dependent development. We welcome the reference to on-street car club bays. The guidance should require these to be well-landscaped, accessible spaces.

Care should be taken to distinguish between reduced car **use** and continuing **availability** of parking. Well designed spaces should be provided for the more environment- friendly cars that will be used. Reducing parking space provision only leads to unsightly parking along frontages and overspill parking. It does not promote more environment friendly behaviour. It is provision of better transport options that promotes behavioural change.

Checklist: Design Principle C

As these are new sites, there is no existing modal split. So presumably GBC has a view on what constitutes a base position that they wish to see shifted. It would be helpful to have this set out as an ambition.

Two of the sites do not have a relationship with the SMC. The Principle should reflect that fact.

#### 3.4 Strategic Masterplanning

The commitment to Garden City Principles on page 53 is welcome. However, the typologies currently proposed are inconsistent with these aspirations. For example, garden cities assume large trees yet the proposed design densities do not provide space for such mature trees.



*High quality landscaping integrated within the streetscape*

3.4.4 The landscaping may be attractive but the building design is not and does not reflect local distinctiveness.



*Landscaped interface between development and countryside*

This illustration is completely inappropriate for the design of the interface between development and the edge of the countryside in Guildford. The absence of greenery close to the properties contributes to a stark edge between development and surrounding land. The sparse planting on the surrounding grass area does not reflect the character of the borough, policies in the Local Plan on green edges and approaches, or the inspector's expectation that green buffers between development and Green Belt will be strengthened. A far more densely planted green landscape strip is appropriate. In many locations this green interface will also incorporate significant water attenuation features, eg at Gosden Hill to avoid flooding the A3 and at Blackwell Farm to avoid flooding the railway.

#### D1. Green infrastructure

The importance attached to green infrastructure in 3.4.8 is welcome. However, the proposed approach to hedges in 3.4.6 and 3.4.7 is bizarre and not supported. Ancient and species rich (not just arboriculturally high quality) hedges should be retained. It is not logical that other hedges should be removed. The proposal hedges along roads should be removed is strongly opposed. Hedges can be a valued local landscape feature along roads as described in the character typologies.

Refer to comments above on net gain and nature recovery.

#### D2. Blue infrastructure

This section is welcome but needs expanding to include:

- Making space for, and enhancing the nature conservation value of, water courses and their associated habitats.
- Avoiding development on areas of flood risk taking account of all potential sources of flooding and designing for resilience.
- Identifying the layout of attractive and effective sustainable drainage features from the outset responding to natural site features and nature conservation opportunities.
- Development design and layout to promote high water quality, mitigating any pollution risk, including during construction and road runoff.
- Promote opportunities for access enabling sensitive enjoyment of waterside areas.
- Ensure long term management is assured including of invasive alien species.

#### D3. Topography

This section is weak and wholly inadequate. Responding to topography is a very important element in capturing the valued distinctive characteristics of Guildford. Topography should be seen as presenting opportunities for good place-based design. Urban design that works well in Holland or

on the fens of Cambridge does not translate well to Guildford's landscapes. Tall buildings on corners and blocky flat roof designs may work on the flat but, in Guildford, obscure landform. This SDF should encourage urban planners and architects to respond positively with layout and form that reflect topography eg an attractive sweep to a road, a stepped roof line, lower, less blocky and more articulated buildings that reflect the gradient when viewed within the development and from outside, and space for sizeable trees positioned to break up the impact of development.

#### D4. Views in and out

This section is also understated. It should provide examples of the value of views and roofscapes throughout the borough. If too much reliance is placed on the cathedral and heritage assets, the rich range of views in and out, and of roofscapes, is not captured. The significance of the AONB, the highest landscape designation, and of the Wey Corridor, should be mentioned specifically. Great care should be required in the layout and design of park and ride sites. They can be prominent in important AONB views.

#### D5. Heritage assets

#### D6. Site constraints and opportunities

3.4.22 Overhead cables should be undergrounded and an appropriate buffer area along the cable route incorporated into the site layout and design.

#### D7. Compact neighbourhoods

3.4.25 Any proposals for higher density areas should not only take account of proximity to transport and other facilities but also impact on views. Higher density should not involve taller or bulkier buildings if a location is prominent and sensitive in views. The SDF should envisage development being less compact towards edges which should be more broken up and interspersed with planting as well as screened by significant tree buffers where appropriate.

### 3.5 Urban Design Principles

#### E1. Built elements

Figure 9 shows a person staring through a solid roof! It also shows insufficient space for green landscape features to the frontage.

Legibility: The photographs on page 65 are inappropriate examples for Guildford.

#### Landmarks:

3.5.12 As described in relation to Character Typology 2, we agree buildings do not necessarily need to be tall to be landmarks. Indeed, landmarks do not need to be buildings! We ask that the many references elsewhere in the SPD to taller landmark buildings on corners be deleted.



Landmark buildings provide gateways

The image of gateway landmark buildings is poor and inappropriate in a Guildford setting.

### Edges:

As with the illustration on page 55, this section fails to appreciate the significance of soft green edges as a distinctive characteristic of Guildford. Attractive substantial tree belts should provide the boundary between development and surrounding green open spaces. The tree belt at the boundary between Boxgrove Gardens and Merrow Downs AONB is an example. It is desirable for the arrangement of dwellings to be loose and less formal towards the edge of the open space as shown. However, rather than having low hedges and exposed frontages, the impact of development should be softened by significant belts of trees and shrubs and, if appropriate, water features. Both the photographs on page 69 are inappropriate. The river is a private frontage with no public amenity strip and the houses abutting a field do not benefit from any tree screen to soften the impact.

### E2. Height and mass

There is too much emphasis on increases in building heights to reinforce the presence of a Local Centre. This can be achieved through design without needing to build high. We emphasise landmarks in Guildford can be small or green features. Memorable buildings and structures do not need to be tall or big.

We welcome the suggestion of a building heights strategy.

### E3. Enclosure

3.4.15 We do not accept that “well enclosed” streets and spaces should be generally encouraged. For example, taller buildings benefit from spacing and set back. Inspectors often comment on variation in form as an attractive feature of Guildford’s residential areas. Continuous lines of development could be oppressive in a local context. We welcome the recognition that a looser grain of development may be appropriate in response to character and placemaking considerations. We suggest this should not be seen as “exceptional”. More emphasis should be placed on encouraging changes in the building line and small changes in heights to create interest. We welcome the advice that in more fringe locations at the edge of the strategic sites, there should be a less continuous building line.

### E4. Materials

This is another section that needs expanding to illustrate the rich legacy of materials that characterise Guildford and to encourage innovative incorporation into excellent modern design. Delete “even basic” from the reference to windows – they matter! This section should include reference to the importance of considering light pollution and impact on views when selecting materials such as use of glass.

### E5. Landscape function

### E6. Open space typologies

The “well-landscaped communal open space” shown on page 76 does not provide a good role model for any of Guildford’s strategic sites.

## **Part 3: STRATEGIC DEVELOPMENT FRAMEWORKS**

### **Slyfield:**

#### 4.3 Vision and Design Objectives

We have major concerns with the proposed objectives for this site. The current proposal for a tight urban grain along the river cuts across the thinking developed over many years in the Community Forum. At a recent Council meeting, GRA asked whether accommodating 1,500 homes would mean a Stalinist “wall” of flats along the Wey as you approach Guildford. We are not persuaded the guidance, as currently worded, avoids this. We suggest:

It will become a vibrant riverside quarter within Guildford. Layout will be designed to achieve a sensitive balance between residents enjoying the riverside setting and ensuring views onto the site across open water meadows have a green character that enhances the Wey corridor. A loose urban grain abutting the water’s edge will contrast with the more intense form of historic riverside development in the town centre. Older examples of riverside development will provide design queues for an architectural style that will be reinterpreted to achieve a soft, varied and broken frontage. A riverside park will open access to the waterside and will include new footpaths linking north to open countryside.

4.3.1 The last sentence needs redrafting to ensure the design is sensitive to impact on views of the site. This site will become a significant new boundary to the built up area of Guildford. The policy of green approaches and edges will apply. The Wey Corridor is an important landscape asset. A wall of development and excessive light pollution should be avoided. Alder carr and willows should be planted. Swales running towards the river can contribute to green character and a broken frontage. An aim to maximise views for as many residents as possible invites a developer to cram the frontage and should be deleted.

4.4.1 and 4.4.2 This drafting reads as if a developer is writing its own planning conditions to ensure there are no constraints! We suggest: There is some mature planting, and site investigations should establish where trees should be retained and supplemented and where new or replacement areas of planting will contribute to achieving an effective green corridor along the Wey.

4.4.4 A longstanding principle established through the Community Forum and with the Surrey Waste Plan Inspector, is that there should not be a road along the water frontage of the development. This is to avoid impact on riverside character including light and noise pollution. Any spine roads should be behind development. This should be stated in the SPD. Placing the sewer under the road should not be a reason for routing a road along the river’s edge.

4.4.5 We welcome the recognition of the prominence of this site in views of Guildford. Currently the SDP is inadequate in its response to this. Soft green landscape is essential and a soft open character not a wall of development.

4.4.6 refers to ‘connections’ to the town centre, but it should be noted that all such routes have to traverse the complex Stoke junction, as indicated in Fig 19.

4.4.8 refers to ‘numerous access points into the site for pedestrians, cyclists and vehicles’. This would appear not to be the case for vehicles, in that there is just one access from the A320 Woking Road, as shown in Fig 16. Is it the intention that there will be a minor road connection with existing streets e.g. via Waterside Road/Slyfield Green? The proposed new junction with the A320 will add traffic to the newly remodelled A3 junction, and will also need to accommodate the SMC. Given that

the SMC will also run on the A320 to the Slyfield Industrial Estate, the highway design of this section of the network will be challenging.

4.4.9 Stating “blocks” should form the main frontage to the river is far too crude a message for this guidance. In view of the number of units to be accommodated on this site, it is essential the waterside frontage is softer and lower. A stepped back and broken up profile should be encouraged with substantial planting to create habitat appropriate for this riverside location. We agree landscape planting should permeate but this needs expanding.

It is noted that there is no mention of a potential Clay Lane Link Road.

4.6.2 implies that journeys should use sustainable modes. Residents’ movements will not be confined to the route of the SMC, and adequate provision must be made for cars and other traffic. Why does Fig 18 not show the A3 as part of the highway framework?

The comment in para 4.6.3 about the design of the SMC on-site is noted. What are the implications for buses and other vehicles in terms of operations?

4.9.4 Parking should include adequate provision for people who need a vehicle for their business, including trades people with vans for whom close proximity to the business park could make this development a very sustainable location. Reference to basement parking needs to take account of flood risk, land contamination, land stability and construction costs. Drainage will be an issue and the interplay of various sources of flooding a risk.

4.4 Impact on views: A paragraph is needed on the fact Slyfield is prominent in views from the AONB (eg from Merrow Downs) and the extension will increase this effect significantly. Therefore, the SPD should ensure developers consider the impact on views in their design, layout, materials, colour palette, roof form and planting. Green roofs on business premises could reduce adverse impact and be more sustainable.

4.4: Non- residential design: The SPD is inadequate in its design advice for the business and industrial areas. The sewage and waste treatment works and Surrey depot will be significant developments that need robust design guidance including screening. Will the existing Slyfield Business Park SPD apply? Currently there are issues with the design principles that previously shaped development on Slyfield being flouted. Eg brash advertising, lighting and frontage colours.

4.4: Drainage, land stability and contamination: The site is deceptive, appearing to have a lower flood risk only because the landfill was closed off at a height above natural ground level. When water levels are high, as in 2000 and 2013, parts of this site, beyond the recognised flood risk areas, become saturated. What will finished ground heights be when “made ground” has been compacted? The 2015 Master Plan shows swales throughout the site to manage surface water. Are they still proposed? Even though GBC is doing preparatory and remedial works, should this SPD set out expectations for making the site safe, stable and resilient?

### **Gosden Hill:**

#### 5.3 Vision and Design Objectives

The objectives for Gosden Hill should be supplemented as follows: Impact on the character of the Metropolitan Green Belt will be softened by particularly attractive views of trees in the landscape when approaching from the north of Guildford.

5.3.3 A distinction should be made between strong and legible **sustainable** links to neighbouring communities and road links. There is a real danger of rat runs on this site given the location and A3 issues.

5.4.5 The SPD should capture that the part of the site adjacent to the A3 will both be “suited to water management and to the creation of water-based habitat” and also an area where a very substantial tree buffer is also required. This should be reflected in the land allocated for these uses.

We strongly oppose the proposal for an office by the A3. This is wrong in terms of landscape and sustainability. Any such development should be near the station. We also question the location of the proposed park and ride which would need very careful screening wherever it is located. Should this be by the station?

It is evident from Figs 27 and 29 that traffic wishing to travel north on the A3 from the site will use the existing slip road from Clay Lane, having reached there via Burpham.

Fig 29 shows the ‘primary multi-modal access’ in the north of the site. Is it correct that the A3 slip roads will connect to London Road which will be carrying the SMC? If so, the junction will be complex and longer distance traffic will mix with local traffic accessing the site.

Regarding the B2234 where it passes under the railway, it is clear that there is a capacity issue. What is expected of a ‘review of efficiency of traffic signal operation’?

Please confirm that there will be no parking provision at the new Guildford East Station.

Fig 31 shows a mixed use high density hub located adjacent to the new station. Will there be parking provided there?

Buses currently operate on the B2234, but this is not clear on Fig 29.

A link to the A247 should be programmed for early introduction.

Development phasing needs very careful consideration for this site. It is important to avoid a first phase without infrastructure or screening. Early phases should not create supposedly “interim” road links that become established and have ever greater impacts as development expands.

#### **Blackwell Farm:**

The SPD should set out the approach to applying the test for major development in AONBs which is required to establish the case for the proposed A31 link road being on AONB land. This should consider the need for this development, alternative ways of meeting the need and whether impact can be mitigated.

Applying the street hierarchy principles means that the spine road, which will carry the Sustainable Movement Corridor will be 16m+ wide. It is noted that there will need to be a terminus for buses at the southern end of the site. Fig 40 includes a comment on the spine – ‘avoiding excess ‘rat-running’ through street design measures and/or ‘monitor and manage’’. This will be a challenge.

Fig 38 shows a T-junction at the main entrance to the site. Fig 40 shows a straight connection from the Occam Road to the spine road, which is surely more sensible.

Confirmation that there will be no parking for cars at the new Guildford West Station should be included.

Fig 40 indicates a 'Primary multi-modal access from A31 Farnham Road', and it appears that the new link is expected to carry buses and to incorporate cycle ways. Is this a correct interpretation?

Advice is needed on screening park and ride from views.

### **Ash and Tongham:**

#### 6.3 Vision and Design Objectives

ADD strong green and blue infrastructure framework.

The new road bridge across the railway is fundamental to the plans. The design of the junction of the new crossing route with the new spine road for the planned development will be particularly important.

Clarification of the proposed network in the southern part of the site is needed. Are Figs 49 and 50 showing the same links? Figure 49 appears to show the spine road connecting to South Lane. And Fig 51 shows that access from White Lane will be possible.

7.5.4 refers to a 'circular primary street'. The street is curved, but is it circular?

### **Wisley:**

#### 6.3 Vision and Design Objectives

Delete "with excellent opportunities for access to the national highway network". Instead refer to the importance of creating sustainable travel solutions that are viable in the long term.

The access to the site is limited to two places, as shown in Fig 61, one off the new road between Wisley village and the RHS garden and Ockham Roundabout, and the other off Old Lane. Traffic analysis is required to judge whether this can be satisfactory, including at times when visitor numbers to the RHS garden are high.

There are references to 'active travel' indicated in Fig 61, to Cobham, West Byfleet, Effingham Junction and Ripley. What is this intended to mean?

Pressure on the surrounding local road network is going to grow as a consequence of the development and mitigating action will be necessary. This is not mentioned in the Movement Framework section.

## **Part 4 Implementation and Delivery**

This section is particularly welcome, especially in view of delay in establishing CIL. However, the approach needs to be more robust in ensuring "infrastructure first". Infrastructure investment and delivery need to be achieved from the outset. Although it is stated that infrastructure should not be left to later stages which are then treated as unviable, the SPD does do enough in preventing this from happening.

### **9.2 The Approach to Planning Applications**

9.2.2 This is welcome but does not go far enough in establishing the extent of infrastructure requirements for any earlier phases of development. The SPD states "piecemeal and ad hoc planning applications which fail to deliver coherent and integrated strategic infrastructure will be resisted." What happens if an early stage application is consistent with a master plan and provides

modest infrastructure but leaves crucial infrastructure such as A3 links, undergrounding or screening until a later stage?

9.2.3 Just as the requirements of phases are set out for Ash and Tongham in this paragraph, detail should be given for infrastructure requirement of early phases for other sites where early delivery allocations have been identified in the Local Plan.

9.2.4 In addition to describing which documents should be submitted as part of an outline planning application, the SPD should indicate documents that should be prepared early to inform a master plan. These could be refined prior to being submitted at outline stage but evidence of early *use* by developers should be clear. Any application should be expected to demonstrate that strategic assessments relating to issues such as landscape, drainage and transport have informed the master planning process.

9.2.5 A landscape and views strategy should be included.

### 9.3 Achieving well designed places

9.3.3 This omits blue infrastructure and drainage. Identifying drainage requirements and opportunities is a crucial step in determining appropriate site layout.

9.3.9 should refer to green, blue and grey infrastructure across sites.

9.3.10 should also include water and drainage design.

### 9.7 Strategic phasing principles

9.7.2 Reference is made to “encouraging early development on parcels where use of existing infrastructure can be maximised”. This could discourage early contributions to transport infrastructure.

The following approach is welcome: “ensure each development phase can contribute to wider infrastructure but avoid later phases becoming unviable”. However, greater clarity is needed on how this will be achieved for transport infrastructure requirements such as A3 link roads and stations.