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## General comments report

Respondent Organisation	Comment
	<p>1.4 OTHER CONSENTS &amp; REGULATIONS - GREEN BELT Please consider adding an additional paragraph before the last paragraph (using your own wording) as follows: "The outside appearance of an extension or alteration, which has existed for at least 10 years, may not be of a good design. But additional extensions or alterations may not normally be allowed. In these circumstances, a maximum of one further extension or alteration of no more than 2.0m out from an existing wall, may be permitted, provided that the outside design of the dwelling's ground floor, first floor or roof will be significantly improved. Such a design improvement will not be regarded as a disproportionate addition or causing harm to the openness of the Green Belt, but other planning rules will still apply." In theory it may be possible for a householder to improve an outside design by rebuilding part of a dwelling instead of extending it. However, there is a need for GBC to acknowledge that a householder may not be able to justify such large expense and disruption without gaining some more floor space. The SPD emphasises that good design is important. The appearance of a dwelling in the Green Belt will be seen by successive owners and their families, plus visitors, neighbours and people passing by. Therefore, GBC should do more to help householders, to ensure good design in the Green Belt. You may think that the suggested additional text, above, is not necessary. But I believe that it is, bearing in mind my own pre-planning application and subsequent correspondence during 2018. 3.3 ROOF &amp; BASEMENT CONVERSIONS "comply to" should be "comply with".</p>
	<p>3.7 BOUNDARY TREATMENT</p> <p>States:-</p> <p>"The wall or fence is not more than two metre sin height anywhere on your property except where it adjoins a road or footpath. In this case the height is restricted to one metre."</p> <p>I suggest tis general ruling should contain the following exceptions:-</p> <p><i>If the property is on a primary road (Class or B) then the front boundary fence height of two metres should be permitted, providing there is a sufficient practical distance between the house and road (i.e. suggest a car length or height of house, whatever is determined to be reasonable).</i></p> <p>Reasons:-</p>

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*Privacy and to help eliminate noise and exhaust fume pollution and to help eliminate rubbish (i.e. fast food containers) being thrown into property.*

*If the property has a rear garden boundary adjacent to a road or footpath, then a two metre height of fence should be permitted.*

*Reasons:-*

*Privacy and to help eliminate rubbish being thrown into property.*

Gregory Gray  
Associates

**Representations in respect of the Draft Residential Extensions and Alterations Supplementary Planning Document (SPD), May 2018**

General

1. Whilst the purpose of SPD is well-understood in the context of adding further detail to development plan policy (c.f. the NPPF) its value to development plan policies of general application is highly questionable. Its prescriptive nature also runs counter to progressive Government policy to expand the regime of residential permitted development by allowing larger extensions and alterations to dwelling houses.
2. We question the need for or value of guidance in the form of an SPD to regulate this type of development. In our view this can be more than adequately conveyed in non-regulatory leaflets or advice notes for prospective developers. The Planning Authority should encourage staff with appropriate design skills to assist applicants, rather than pattern-book solutions.
  
1. It would more usefully serve its purpose to advise on what development is deemed to be granted by permission by the GPDO and confine its intentions to guiding developments that exceed the allowance. Each Section should explain the circumstances when development does and does not need planning permission. In that way it would serve a more useful function but, again, does not require the status of an SPD.
  
1. Furthermore, the observation in the Foreward that it will: ‘... *provide planning committee members and officers with the tools to refuse consent for poor design*’ implies the document is intended to be applied as part of the development plan, which is contrary to the NPPF and an inappropriate purpose for the guidance.

Para. 1.1

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1. This section is contradictory in that it suggests on the one hand that there is no ‘one-size-fits-all’ solution, but on the other hand it seeks to introduce a level of prescription and detail that will thwart good design and ingenious solutions intended to meet the needs of the home-owner and small-scale developer.
  1. Furthermore it seeks to influence the design of extensions and alterations that do not need planning permission i.e. are permitted development. Such development is regulated by controls in the GPDO and it is not correct for the Council to seek to control their design or to give the impression that it can.
  1. Design Principles
  1. It is unfortunate that instead of encouraging innovation in design, the guidance seeks simply to advocate copying (*‘... looking for examples nearby’*) what has been done elsewhere.
  1. The SPD does not promote good design and instead encourages laziness and prescription. It is a fact that some of our most cherished streetscapes are the product of eclectic, non-planning. The photograph below of The Shambles in York is one of our nationally prized townscapes and enjoys statutory protection for its eclectic originality as well as history.

(\*\*Picture of York)

## 2.2 Impacts on Neighbours

1. It is not the case that all developments can give rise to overbearing impacts, daylight and sunlight or overshadowing. Existing properties can already be so affected by reason of their aspect and orientation without any new development next door.
1. BRE Guidelines for example are not to be employed rigidly. They are not mandatory and as the Guidance states: *‘should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer’*. Any standards need to be applied with caution, depending on whether it is an urban or rural location for example, whether it is the main glazing for a room where the primary window meets the typical BRE recommendations, based on a proper understanding (by the Council as much as developers) of impacts.

## 3.1 Front and Side Extensions

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1. There is no right to a view and no requirement for gaps between buildings to be retained unless they are necessary for a previously identified purpose such as for example, views of a listed building or important open space.

### 3.2 Rear Extensions etc

1. There is no reason why rear extensions should not in appropriate circumstances be used as balconies and upper roof terraces. Neither is there any overriding reason why there should be a slavish adherence to pastiche.
1. There are many successful examples of extensions that are different from the host building, are successfully integrated and can be appreciated as such. The images on page 25 of the SPD more than amply demonstrate this; the majority, it is noted, on older buildings.

### Conclusion

Accordingly, we object to:

1. the need for this document to be in the form of an SPD. It is an inappropriate use of SPD. It should instead be an informal Advice Leaflet only,
2. the exclusion of any reference to, or explanation of, permitted development rights so that applicants properly understand the circumstances under which it can actually be applied by the Council,
3. the inclusion of reference to it being used as a basis for refusing planning permission, which should be removed.

### **Comments to GBC Extensions and Alterations SPD draft 2018**

I would like to commend GBC for what is a very difficult task in setting policy to protect our local and regional character from inappropriate development. I believe in the whole this is very well written and well set out. I have however, the following comments and proposals to make under the consultation on this draft document. My suggested amendments or **“Proposal” is bold underlined** for each below. I would ask that a redraft be made for final consultation.

1. Draft document states: “It will sit alongside, and should be read in conjunction with Guildford Borough Local Plan policies (2003e), Neighbourhood Plans and other Borough guidance relating to design and local character.” **Proposal: I feel this is ill defined. Please indicate**

**its actual legal application to and significance in relation to the planning application process (where not under Permitted Development).**

2. “Good Design” referred to prominently up front but this term is not defined in any way and readers are left to assume the principles set out in detail are “good design.” **Proposal: be clear about what defines “good design” and what it means and refers to and avoid the blind ‘traditional-only’ viewpoint that extensions and alterations must mimic and match to be “good”. I believe that is too prescriptive and subjectively limiting. Design assessments require consideration of the overall context of the proposal with guiding principles as opposed to detailed rules precluding otherwise valid design solutions. There are plenty of examples of very successful extensions or alterations where a contemporary design sits in beautiful harmonic juxtaposition to the original works. Perhaps also include some real case studies of what is considered best practice and that which is not.**
3. Point made at outset re the importance of sustainability in design, but this has not made its way into the principles within the draft. This is no longer a nice to have and fundamentally needs to be embraced. **Proposal: a specific and strong emphasis needed to highlight design and construction, materials and systems consideration including use of local trades, specifications with use of recyclable materials / low impact carbon footprint sustainable systems such solar (noting integrated solar roof tiles and cladding, grey water harvesting, Green Guide A+ materials, natural ventilation, etc. Reference should be made to see local plans. Perhaps a new section required within the SPD.**
4. GBC policy/policies in regards to sustainability are not listed. **Proposal: review and include.**
5. Please define “group value” on Page 7. **Proposal: define meaning in document.**
6. 3 states “**Reflecting**the existing characterof the dwelling;”I believe this is not the correct word choice as it is unnecessarily limiting. **Proposal: “Reflecting” strongly implies matching or copying. Please consider the word “Respecting” as opposed to “Reflecting.”**
7. 3 Openings states: “It is essential therefore that new windows and doors adhere to the character of the property and the buildings that surround them.” **Proposal: wording “adhere to” strongly implies follows or sticks firmly to. Change “adhere to” to “should respect.”**
8. 3 Materials and Designing states: “Materials and detailing used in an extension should usually respond to and match that of the existing property and should be of the highest quality.”Use of the word “Complementary” is ambiguous and needs defining or altering and the statement may need to be re written in line with points raised in the following proposal. **Proposal: again, the use of the word “match” is too prescriptive and limiting. This statement should allow for a solution outline in point 2 above which may partially or fully borrow from the original works. Please bear in mind that the original works may not be ideal as presumption is made in the draft and that the alteration or extension may need to be less constrained by existing for an opportunity to better the overall outcome.**
9. 1 Side Extensions: states “the proportions and roof form (pitch of roof) should be in keeping with the design of the original house;”Sketches imply that mimicry of the existing rood is needed. I believe this could be better stated as taken in context overall a change in roof form could be very positive and desirable in certain cases.**Proposal: replace “be in keeping with” to “respect.”**

10. 2 states:” Side walls of extensions should be of a **solid finish** (except for conservatories);” and “No windows or openings on side walls facing neighbouring properties and private gardens (unless using obscured glazing);” I believe that fenestration may be needed for a given design to make it appropriate and possibly to take advantage of the surrounding landscape so long as it respects privacy of neighbours. This can be further managed by implementation of “screening”through soft landscaping/fencing as indicated under section 3.4. If a conservatory would be allowed and is by definition almost entirely glazed opening, than allowance needs to be made for openings to the side or rear extensions. This would be particularly appropriate for example where rear extensions might form studios, studies, sitting rooms, home offices or libraries have a northern aspect (with best light for visual work/reading). It is further noted that fenestration would reduce the visual aspect of blank elevation on surrounding properties. **Proposal: allowance should be made for access doors and for high-level (clerestory) and/or limited and/or obscured glazing (noting respectfully that obscured glazing is allowed under the proposed draft).**
11. 3 states: “Any significant change to the height or form of a roof will **not** be acceptable;”This may be unnecessarily constraining where a significant change may actually benefit the overall design. For example: where original design is deficient or where subsequent extensionwork has reduced the overall character of the original building and a more significant change would be of benefit. **Proposal: add to the statement wording to the effect of: “unless for the purposes of benefit to the design of the property by establishing or reestablishing a coherent, suitably massed overall design which enhances the overall character.”**
12. 6Materials and detailing: provisions restrict to providing what is in place which may or may not be a desirable precedent. **Proposal: section should allow for alternative solutions that respect existing or indeed, allow betterment. Richness in the built environment often comes from careful integration of “old” and “new.” Use of contrasting or dissimilar yet appropriate materials and fenestration should be considered an appropriate approach, but subject to the same objective review as for a matching design proposal should that be proposed.**

END

Highways  
England

**Our Reference:** 5088

**FAO:** Guildford Borough Council

**Draft Residential Extensions and Alterations Supplementary Planning Document (SPD) Consultation**

Thank you for inviting Highways England to comment on the above.

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Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A3.

We have reviewed the consultation and have no comments at this time.

Surrey Police

Dear Sir/Madam,

Thank you for the invitation to comment on this document. As Designing Out Crime Officers for Surrey Police. We would be very happy to contribute to this document with advice on how to design in better security as part of the extension, using the principals from Secured by Design. Do feel free to contact us if you would value this input.

[http://www.securedbydesign.com/wp-content/uploads/2017/06/Secured\\_by\\_Design\\_Homes\\_2016\\_V2.pdf](http://www.securedbydesign.com/wp-content/uploads/2017/06/Secured_by_Design_Homes_2016_V2.pdf)

The above link details the standards and advice we would be recommending. Security will be particularly important as single story additions for example can often provide climbing aids to first floor windows or obscure good natural surveillance.

It is also a good opportunity to encourage householders spend a little extra and incorporate good standard doors and windows (PAS 24 2016), laminated glass and good quality alarm systems, regulated by:

National Security inspectorate (NSI)

<http://www.nsi.org.uk/information-centre/business-security-options/intruder-alarms/>

Security Systems and Alarms Inspection Board (SSAIB) <https://ssaib.org/>

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	<p>Please also see our general advice sheet and do contact us if we can assist further</p>
Natural England	<p>Draft Residential Extensions and Alterations SPD.</p> <p>Draft Residential Extensions and Alterations Supplementary Planning Document (SPD)</p> <p>Thank you for your consultation on the above dated and received by Natural England on 3rd May 2018.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Biodiversity enhancement.</p> <p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>

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Landscape enhancement

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

Protected species

Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.

Strategic Environmental Assessment/Habitats Regulations Assessment

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Generally I think this is an excellent document. My only comments are as follows:

	<p><b>Section 3.1 Front and Side Extensions</b></p> <p>"Extensions that face the highway and public footpath should have active frontages such as front doors and windows facing the street" - is maybe unduly prescriptive?</p> <p><b>Page 22</b></p> <p>There appear to be a number of spelling mistakes. See "appropriate" and "in"</p>
	<p>I have no comments except that the format presented is unfriendly as a brochure of obscure size. This should be an A4 .pdf document to facilitate printing and reading.</p>
<p>West Horsley Parish Council</p>	<p>I have read the document and have the following observations which I hope are helpful:</p> <p>General typos etc:</p> <p>Page 5 for consistency are LDCs the same as Certificate of Lawfulness.</p> <p>Conservation Area should always be capital C A as in some places it is and some it is not.</p> <p>There are a few typos throughout the document, but I expect that these will be picked up.</p> <p>3.3 Roof and Basement Conversions - there is no reference to Velux windows as these seem to be increasing within applications. Under this, and perhaps at the start of the document it would be helpful to see that the dark sky status of Parishes e.g. West Horsley, Effingham etc are protected. These are a key feature of Neighbourhood Plans so worth a mention at least. Especially the need to focus on preventing light pollution especially in the AONB and Green Belt. page 29 mentions roof lights, but again there needs to consideration of protecting against light pollution.</p> <p>There needs to be some reference to protecting the environment.</p>

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3.4 Decking, Terraces etc. Would it be helpful to provide guidance on hot tubs and other structures that people now place in their gardens?

3.7 Boundary Treatments - perhaps more emphasis on protection/replanting of hedges and preferred species to use - a reference to neighbourhood Plans would be helpful here.

Glossary of Terms - perhaps include curtilage and neighbourhood Plans as these would be helpful for people new to planning.

Many thanks and I hope this was useful!

I have read the GBC SPD 2018 (Draft), alongside the Governments "Permitted Development rights for householders" Technical Guidance document 2017, and have the following comments/queries to make regarding the Draft SPD:-

- Overall I feel that it is a useful document - my major concern is that GBC Planning Dept do not "practice what they preach" with regards planning approvals and impacting neighbours (section 2.2), two recent examples being Tynley in Clay Lane (16/P/00064) which is too over developed and overlooks adjacent properties; and 10 Douglas Close (15/P/02031) which is a much larger property than those around it (adding additional stories to a bungalow).

- No mention is made of back filling by selling off gardens (section 2.1)

- On page 30, are rear facing dormer windows still acceptable?

- In section 3.5 the SPD states that "garages should be matching or similar materials to your home". Many people erect stand alone "flat pack" garages, often in grey slab material or metal, that does not match the main property. Will these still be acceptable. Also no mention in the SPD of the need for "dropped curbs" for new garages.

- Finally, in the 2003 GBC Local Plan (section 5.29 - Rural small dwellings), to preserve smaller, affordable properties in areas (green belt), the 85 square metre rule applied meaning that the homeowner could not extend the property beyond a total living area of 85 Square metres - does this rule still apply (as it was a useful way of preserving smaller rural properties)?

	<p>Rear Extensions</p> <p>Applications made under Permitted Development and Certificate of Lawfulness should take into account the density of the housing. Where houses are only 1 or 2 meters from each other these extensions often creates negative impacts on the neighbouring properties in terms of loss of privacy and amenity, daylight and sunlight. Quite big rear extensions can be built without neighbours views being taken into account because these extensions fall under permitted development, which seems designed to favour the party wanting the extension</p>
Surrey Bat Group	<p>Thank you for alerting us to this. We are rather disappointed to note that there is no mention of protecting biodiversity within the proposed guidance. Extensions and alterations frequently involve complete or partial removal of the roof or banks of cladding or hanging tiles, which as far as roosting bats are concerned could be just as harmful as demolishing the building. Also although additional land take is unlikely to be significant, consideration should be given to the potential removal of important features such as mature trees or ponds which could harbour protected species. We would recommend householders consider at least commissioning scoping surveys for protected species in such cases; perhaps it would be useful to provide some guidance on what to look for within the SPD.</p>
Transport for London	<p>Thank you for consulting Transport for London (TfL). Given the subject of the consultation I can confirm that TfL has no comments</p>
Ash Parish Council	<p>Thank you for your email of 3 May 2018 regarding the above. Please find below the Ash Parish Council comments which were agreed by our Planning Committee last night.</p> <p><u>Presentation Style</u></p> <p>On the whole the document is very good and an improvement on the document it is seeking to replace. The presentation is professional looking and the inclusion of illustrative diagrams and pictures are a bonus as they help illustrate what may or may not be regarded as acceptable.</p> <p><u>1.2 Status and Policy Context (page 4)</u></p> <p>This section contains a list of Guildford Local Plan Policies 2003. The draft says that the Guide should be read alongside these policies as well any Neighbourhood Plans and other design guidance.</p>

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The listed policies all fall within the General Policies part of the LP2003. Of the 10 listed 7 – i.e. G1 (1); G1 (3); G1 (12); G5 (1); G5 (2); G5 (3) and G5 (7) - have been superseded by the proposed new Local Plan.

The other policies referred to in the table i.e. G5 (4); G5 (6) and G5 (8), remain extant and according to the notes in the Guildford Borough Submission Local Plan - Strategy and Sites document (Appendix E: Superseded Policies) will be reviewed through the second part of the Local Plan – Development Management Policies.

Consideration will need to be given to the Planning Inspector’s ongoing examination of the draft Local Plan currently underway. Once the examination has been finalised this table may need extensive amendment to direct users to the new relevant policies. Whilst we have no problem with reference to specific policies, the new information provided in the document should be as up to date as possible at time of going to print. As it is, the situation is in a period of flux dependent on the outcome of the Inspector’s examination. When exactly is it planned for the new SPD to be issued? If before the Inspector’s examination has been concluded should a “health warning” be included in the narrative that whatever is included in that version will need to be updated in due course.

In the “old” SPD policies the descriptive introduction to H8 and H9 of LP 2003 were quoted in full. These referred to extensions to dwellings in urban areas and in countryside areas respectively. H9 has also been superseded by the new Local Plan but H8 still remains extant. If the old G policies referred to above are to be shown in the new SPD then the continued existence of H8 should also be mentioned.

#### 2.1 Impact on the Street (page 11)

“Generally creating and maintaining a meaningful gap between properties of one meter or more will help to reduce terracing effect.....” The wording could be tightened up a bit more to make it a **requirement** for at least a one meter gap to apply in any proposal. At the moment the wording could just be read as a suggestion.

#### 2.2 Impact on Neighbours (page 13)

It is suggested that the applicant should discuss any proposal with neighbours. In the “old” SPD it specifically states: “You will need your neighbours’ permission if foundations or guttering encroach onto their land or if an extension overhangs or attaches to their property. For further information please see Party Wall Act 1996.....” we’re not sure if this requirement still applies but if it does shouldn’t it be included in the SPD?

#### Finally 2 other small points:

	<p>2.1 Impact on the Street, page 11 - Typo in second paragraph of sub section headed “Character and impact on street scene” – “whist” should be “whilst”.</p> <p>3.4 Decking, Terraces, Patios + Balconies, page 31 - Page number to be entered in the brackets at the end of the first sentence of the guidelines relating to raised platforms. Currently shown as (page xx)</p>
	<p>The consultation document, in its on-line form, is most unhelpful. Its about the most unhelpful I have seen recently. The entry problem is that the print for significant areas is grey on grey ground or blue on blue ground, and however it shows up in hard copy, is pretty unreadable on a computer screen. The pagination I do not follow, and will try to see a hard copy to see what was intended. At the moment it is necessary to enlarge each page so that it become readable and then scroll from side to side.</p> <p>Regrettably, the blue type on blue ground seems to have become standard for GBC documents, although we are now expected to read on-line. It's a broader issue than the technical content of this document, and perhaps I should take it up at a higher level?</p> <p>As for the technical content of this consultation document, it seems broadly to be helpful, but when I have managed to read it properly, I anticipate returning to comment, as one or two points seem obscure.</p>
Surrey Wildlife Trust	<p>Within Chapter <b>1.4 Other Consents &amp; Regulations</b>; an informative should be added regarding legally protected wildlife species that could be impacted by building extensions and alterations. These would include species protected through the <i>Conservation of Habitats &amp; Species Regulations 2017</i> and the <i>Wildlife &amp; Countryside Act 1981</i> (as amended). Such species would include bats (all species) and some birds, where their nests are protected from wilful destruction during the breeding season. The latter would include, for example, House martin, Swift, Swallow, Starling and House sparrow. Your guidance should, as a minimum, cover the need for vigilance on behalf of would-be applicants and the use of specialist professional surveyors where relevant.</p>
	<p>Dear Sir/Madam Page 21/22 front and side extensions section - the draft side extensions section says that at least one metre should be left between the edge of an extension and side boundary. One metre is insufficient.</p>
Grillo LLP	<p>Dear Sirs Draft Residential Extensions and Alterations Supplementary Planning Document (SPD) I refer to this document. I have in front of me pages 1 – 43. My comments will be headed with the page number and reference. Page 3 Introduction “Why Design Quality Matters” These paragraphs say that</p>

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good design matters, but it does not say who judges what is “good design” and later it says “we” are investing in good design. Again, who are the we? Presumably it is Guildford Borough Council, but that needs clarification. Good design is a very subjective matter. I think there should be some reference to either the RICS or the RIBA and others as custodians of good design. Page 4 1.2 Status and policy context It would be helpful to draw peoples’ attention to the requirement to get an Award under the Party Wall etc Act. This affects most side extensions and the requirements of the Act can influence the design. It is much better that this is considered at an early stage rather than having to alter the design just as the applicant thinks he is about to be able to start work. Page 6 “Pre-application advice” It is not made clear that pre-application advice given to an applicant is available to everybody who asks about that property. This means that what should really be a private matter is available to the world at large without the applicant knowing who has been viewing his or her correspondence with GBC. It should also make clear that pre-application advice is charged for. Page 8 There is an item that reads “Installation of satellite dishes on a wall fronting a highway, any chimney or building more than 15 metres in height.” This is not at all clear. Does it mean that satellite dishes can be fitted below 15metres high or how else should it be interpreted? Green Belt There are lines which read “..... Disproportionate additions which constitute inappropriate development in the Green Belt”. There is no definition of disproportionate or definition of inappropriate. At the very least it should say that these will be provided in the Green Belt SPD when it is provided. Otherwise who judges the standards of inappropriate and disproportionate. Item 2 Design Principals Again, there is no indication of who judges what high standards of design might be. Pages 11 & 12 You propose that any extension should not be closer than 1metre to the adjoining property. The purpose of this is to avoid a “terracing effect” with which I concur. However, if there is already a neighbouring house which has its side wall on the boundary, you end up with two houses only 1meter apart. This could undoubtedly create a terracing effect which you wish to prevent, but relying on the strength of your document an applicant might win a successful appeal. In any event I think 1metre is too narrow a gap to prevent a terracing effect, two big houses 1metre apart may as well be joined. I would like you to consider whether you ought to be saying that the wall of any new building should not be less than 2.5metres from the side wall of a neighbouring house. My rationale for this is that both owners together would be capable of agreeing, that by taking down any fences and other garden features a large vehicle might pass between the two buildings allowing suitable construction vehicles into the back gardens to build substantial extensions near on one house or the other or both. Also in this area, you mention “Group value” to keep houses of a similar style together. Occasionally it is appropriate for a house of totally different external appearance to be built in an otherwise similar street. How and who should judge such designs? Page 14 Guide applied to windows serving habitable rooms. Now this refers to only habitable rooms at the rear of the properties. It is not infrequent that the only window to a habitable room will be in the side of the house. The construction of a new dwelling within 4metres of that would seriously interfere with comfortable enjoyment of that living room. Page 15 2.3 Relationship with existing property You say “the height of an extension should normally be lower than the height of the original building”. It would be appropriate to add here “but not with a flat roof”. Your diagram on Page 16 illustrates how dreadful that might look. Page 21 Other detailing. What are your views on sunpipes? Page 23 3.2 Rear Extensions This section does not appear to consider the outlook from properties to the rear. With relatively shallow gardens the view from a house in the road behind can be seriously damaged by a two storey extension and indeed the privacy of the ground close to the back of the neighbouring house can be seriously be reduced. In the matter of conservatories for the prevention of the spread of fire, a conservatory on the side of the house close to an adjoining property should have a solid side wall. Page 27 3.3 Roof and basement conversions An Item C should be added – Party Wall Act considerations. It is very much better that this is considered now and not when work is on the point of being started. The same applies to roof conversions. With semi-detached houses they invariably involve work with a party wall. Also as a matter of design the Party Wall Act allows people to raise the party wall. This can be so much better than

	<p>having a dormer window a matter of 100mm or so from the line of junction. If both houses do that, as they would be permitted to by your guidance notes, one is left with a very unsatisfactory narrow slot between the vertical side of two dormers. Page 30 Basement Conversions Here the applicant's attention should be drawn to the need for Building Regulations which require freedom from dampness, suitable ventilation and daylight. Also, basement conversions may very well involve Party Wall considerations with the adjoining property. All these things should be thought about before getting Planning Permission. Page 33 3.5 Garages and Parking Parking spaces 2.4metres by 4.8metres is much too small for most modern cars, and absolutely too small for 4x4 cross country vehicles beloved by school mums. Page 37 3.7 Boundary Treatment You say that a rural fence should not be more than 2metres in height anywhere on your property except where it adjoins a road or footpath. That omits the possibility of there being a footpath without a highway as one frequently finds running up the side of and between the gardens of two properties. Here surely one ought to be allowed to have a wall or fence 2 metre high without having to get planning permission.</p>
<p>Merrow Residents Association</p>	<p>Dear sirs As a Residents' Association, we are very interested in the subject matter GBC presented in an email and invited comments upon. Many developments and house extensions in the past few years have been monitored by us and some objected to. We find the SPD very welcome. We would comment on the draft as follows:- 2.1. Impact on the Street 2.2. Impact on Neighbours 2.3. Relationship with the Existing Property All the points illustrated, are those which we and our members are concerned about and we are pleased to know will be considered properly now and replace the "Residential Extensions Guide (2004)". We would question what you describe as Sufficient and Adequate in terms of parking provision. This is a wholly subjective requirement, both for the applicant and GBC Planning Services and therefore likely to cause difficulties. We suggest a reference to defined parking standards (while accepting that some existing buildings do not and cannot meet these). Please see comment below regarding adequacy of existing GBC parking standards. 3.5. Garages + Parking We welcome the measurements for parking and building style of garages, but are not happy that parking standards within Guildford are so outdated. For example a 3 bed house requires parking for 1.5 cars. This is no longer appropriate or realistic. In conclusion, the draft SPD has addressed many areas of previously ambiguous guidance. The added problem of "retrospective planning applications" often has confused the process and decision making.</p>
<p>Holy Trinity Amenity Group</p>	<p>HOLY TRINITY AMENITY GROUP Draft Residential Extensions and Alterations Supplementary Planning Document (SPD) We were rather taken aback by the unexpected appearance of this revised policy document. However, we welcome the opportunity to better control extensions. Until fairly recently they were rare and modest. Now they are ubiquitous and large and are causing major problems to residents and the quality of the area. A particular problem is that conditions are no longer applied to control builders' operations in established residential areas; they have caused great nuisance to neighbours and passers-by, and the wellbeing of residents has been jeopardised. This revision could be part of the solution. This has been the subject of discussion with Officers, but the expected proposals are still awaited. Some of the general problems are recognised in this document, but we believe that much stricter planning control is needed to address this ever-growing activity. 1. Current Problems. The main problems are: 1.1. Loss of front gardens and greenery that is crucial to the quality and character of the area. 1.2. Domination of the street frontage by parked cars, with new surfaced parking areas created right adjacent to the highway. 1.3. Creation of additional pavement crossovers to serve front parking; instead of the traditional single access crossover there are now often two, three or even four, making a long stretch of sloping footway, and allowing a row of cars to be parked up to the footway. 1.4. Lack of visibility splays to ensure exiting drivers can see approaching pedestrians; these are of crucial importance for their safety, particularly where the footway is part of an important walking route to school. However, additional measures are needed, as most drivers</p>

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back out from their parking place, in contravention of the Highway Code and the conditions under which crossovers are given. 1.5. Huge extensions that enlarge the house excessively and reduce the stock of modest houses that the town desperately needs. 1.6. Repeated, incremental extensions, that create a building much larger than the original, and of jumbled appearance – some dwellings have been doubled in size, and the original character is lost. 1.7. Major demolition of part of the original house to prepare for extensions; this is wasteful and not sustainable, and the constrained working area causes severe nuisance to neighbours. 1.8. Addition of basements, or rear extensions into upward sloping land, that require major excavation that can be right against a neighbour's boundary. The necessary retaining walls are often not included in the planning application. 1.9. Excessively large rear ground floor extensions, often with flat roofs, some obtained under the present relaxation of permitted development for up to 8m depth. These are usually ugly and in view for several neighbours, and sometimes in distant public views. They result in the loss of significant green garden space. 1.10. Failure to control demolition and building operations, so that neighbours and users of the Highway suffer unacceptable nuisance and hazard (subject of ongoing discussion with Officers). 1.11. Terracing effect caused by side extensions. 1.12. Overlong time from start to completion of work; this can sometimes extend to several years with the associated nuisance lasting this long. 1.13. Large, long dormer extensions with flat roofs, prominent in public views even though at the rear. 1.14. Extensions being used merely as a good financial investment. Planning permissions are being obtained to raise the sale price of a house, and the opportunity to extend is often promoted by sales agents. 1.15. Vehicles parked in front of house space protruding over the footway. 1.16. The “copycat” culture is causing proliferation of extensions. No doubt residents believe that the only way to prevent their property losing value, because of a neighbour's extension, is to have a similar one themselves.

2. General Comments: 2.1. Unacceptable format of document. For detailed scrutiny of policy documents like this it must be accepted that they will be printed off in A4 size. The landscape arrangement makes the document difficult to handle and file. The extreme LH edge with page and item number is lost because the margin is too small for the printer. The print at A4 size is so small as to be almost illegible – particularly when set against a grey or coloured background. 2.2. Increasingly good houses in established areas are being demolished to be replaced by much larger ones. This is detrimental to everybody except the owner. We believe that a policy is needed to prohibit this except in exceptional circumstances. The practice is more akin to extension of existing dwellings than building on a new site, and so this might be included in this document. However, it could be added to the second Borough Plan DPD, or a revision to the Residential Design Guide, but we have no idea what the plans for these documents are. 2.3. The document is somewhat verbose and rambling and is unnecessarily large. This discourages scrutiny and makes its application more difficult. It should not quote from other policy documents. It needs to be much more concise. 2.4. The policy sometimes appears to be promoting extensions; it should not do this, but simply state the rules. Extensions do not benefit the Borough; they tend to divert resources away from the provision of the new dwellings that the town has to provide. The original design of a house should have been fully optimised for the site and area. 2.5. We ask that it be made a requirement that implementation of a scheme be carried out in accordance with normal good practice conditions, wither applied in detail for each scheme or provided as an enforceable code of practice; our proposed list of conditions is given in the appendix. 2.6. Work to be completed within eighteen months; if not a reapplication will be needed. 2.7. Add a requirement that if it is thought that an extension might raise the Council Tax band of the property the owner must apply for a revaluation. 2.8. Avoid photographs as illustrations. This is a policy defining document, not a guide to good practice, and applicants may use photos to justify their schemes.

3. Specific Comments. Suggested new wording is in italics. 3.1. The Foreword is very general. All that is needed is a statement that the SPD will be a material consideration in determining applications. 3.2. P3. Purpose of Guidance, 1.1. Delete second sentence and replace by “However, extensions inevitably compromise the original design, can spoil the environment for neighbours and the character and quality of the area, and reduce the stock of the modest and small homes that are most needed”. Suggest delete the

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following two paragraphs which add little. Delete “(Good design) ...adds positive wider social, physical and environmental benefits to the street, place and people who live there”. Extensions never do this. Perhaps say Good design minimises the degrading impact of extensions to neighbours and the area. A dwelling will always be a better design as optimised for the original size required. “Who is the guide for ?” add Neighbours. P4. The “status” refers only to the current 2003 plan, whose related policies are stated. Cannot a statement be made that the policy is part of the current 2003 Borough Plan and will become part of the New Borough Plan when this is adopted? Otherwise another revision will be needed quite soon. There should not be anything in it that conflicts with the new plan; it is never a good idea to tie one policy to other policy documents, as this means an update to one document then requires updates to all. 5. Design Principles, presume Ps 9 – 10. Add (Impact on the street) and the area. This will be judged on the basis of the effect if everybody made a similar extension. Impact on housing stock – the extension must ensure that the dwelling is suitable and attractive for future occupants. 6. P11. Impact on the street, considerations. Add – Any loss of front garden, increased front of house parking, increased number of pavement crossovers, loss of light and privacy to neighbours, amount extension protrudes beyond neighbours at the rear. Local examples – qualify with: However, precedents are not a material consideration, and some extensions may have been created under obsolete planning rules. Terracing effect: gap between properties of one meter or more. We believe this should be two metres. One metre is normally the distance required from a dwelling to its boundary, to allow access to the rear, especially for emergency purposes, and to allow maintenance of the sides of both buildings; this appears to be the figure stated elsewhere in the draft. Add: Where expansive views created by local topography can only be seen by the public through gaps between houses the maintenance of a larger gap may be considered necessary. 7. P13. Impact on Neighbours. Add Potential nuisance, disturbance and risk, during demolition, excavation, spoil removal, and building; this also applies to users of the street. “Loss of privacy by..” add balconies, patios and elevated walkways. P14. The 45deg rule. Add Where side windows of a neighbouring house provide significant light to a habitable room, and where these were originally provided because there was a large distance to the neighbouring building, the 45deg rule may be applied here, as well as to rear windows. Amenity; extensions, particularly rear and side, must not be ugly in views from neighbouring dwellings. 8. P15. Extensions must be considered in relation to the original form of the house. Therefore, replace all “existing” prefixes with original. Add : Where previous extensions have been made the cumulative effect of these with the new extension is the impact on character that will be considered. Add: normally a cumulative expansion of more than one third of the original volume will not be allowed. Access etc, last sentence “The loss of 100% parking will be resisted” replace 100% by any and add: extra on-site parking should be provided to cater for any increase in number of residents expected. 9. P21. Side extensions. The limitation to half the width of the existing frontage is over generous, suggest reduce to 40%. 10. P23. Rear extension etc. Add Rear extensions should not result in the loss of more than one third of the rear garden. “Rear extensions to terraced houses can extend...” add and semi-detached Add Flat roofs should generally be avoided. 11. P27. Roof extensions. Because of their height in the building dormer windows will often be in public view at the rear, as well as the front, of a house, particularly where the location is on a hill. Add to guidelines, “should be positioned to the rear of the property” providing they would not be in significant public view. On “Dormer roof extensions on the front of semi-detached and terraced housing....” Add “They will also not be acceptable at the rear if they would be in significant public view”. 12. P30. Basement Conversions. Suggest reword as Basement creation or extension. Add: The basement created must not be more than 60% of the house footprint. Implementation requiring excavation can create much nuisance to neighbours and passers by. If large this may be considered a reason for refusal of an application. 13. P31. Decking, Terraces and Patios. Replace last para by Decking elevated above ground level spoils local topography and the setting for neighbours’ gardens. This is particularly so when it is arranged to provide a flat area on falling ground. In general, no part of a decked area should rise more than 30cm above

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the natural ground level. Erection of a high fence to ensure a raised patio etc does not infringe neighbours privacy is not acceptable. P32 Balconies. This requires clarification. It is presumed that the 7m separation from a neighbours boundary to avoid installation of side walls applies to the side neighbours. However overlooking problems can arise with rear neighbours particularly when the neighbour's dwelling is already at a lower level. We suggest that rear balconies are not allowed if the rear neighbour's boundary is closer than 20m. P34. Parking. If the parking space adjoins the highway, the 4.8m length should be increased to 5.6m to ensure there is never any protrusion over the footway. (Per some Highways standards). Add: Multiple pavement crossovers will not normally be allowed. On site turning space must be provided if on an A-road. On other roads if no on-site turning space is available cars must always back in to park; the required visibility splays to allow approaching pedestrians to be seen must be obtained. P37. Boundary treatment. Siting plus height. 2m high fencing can unnecessarily enclose gardens, particularly small ones, and some will prefer the traditional 4ft fence or hedge. Replace second para by Privacy screens or other boundary treatment are important to minimise overlooking of neighbours' gardens from house windows or outdoor seating areas. (Appendix of Conditions on Implementation is as previously used in various correspondence.) END.

RESIDENTIAL EXTENSIONS AND ALTERATIONS Draft Supplementary Planning Document (SPD) 2018 Consultation Response by Jennifer Kyte

This draft Supplementary Planning Document is very welcome and helpful at a time when so many extensions to houses are being built. Below are a few comments:

2.1 Impact on the Street An addition to this section, or a complementary section, needs to be added to cover the impact of extensions, not only on the streetscape, but their impact on public views.

- The impact on views from the AONB should be an important consideration in the SPD. In particular residential areas with gardens with much greenery, hedges and trees, provide a semi-rural background of greenery to the AONB and AGLV (such as Pewley Down and the Chantries). They enable the landscape and views from these designated areas to merge into the town in an environmentally attractive way.
- Over-dominant, over high extensions often with a large window expanse, above the height of surrounding houses, or extensions out of character in views from the countryside, impact upon and spoil such views. (Inappropriate extensions have already had a detrimental impact on the Chantries, an Area of Outstanding Natural Beauty).
- Care needs to be taken to ensure that over dominant and inappropriate extensions on houses, built on the hills rising up on either side of the River Wey, do not spoil the views from the river as it leaves the town centre and enters the countryside.
- Replacement houses which are over-large, over-high and out of keeping with the street scene, and detrimental to views from the AONB/AGLV, if not included in this SPD, need to be covered by a separate SPD.

2.1 Impact on the Street & 2.3 Relationship with the Existing Property In the Residential Extensions Guide 2003 under No.2.2, it is written that "original roof features such as chimneys, gables and dormers can make a valuable contribution to the skyline." Guildford is losing chimneys through extensions and replacement houses, which is changing the original character of the roofscape and streetscape in residential areas. The roofscape of residential houses, in or near the town centre, in particular need protecting.

2.2 Impact on Neighbours The impact of noise on surrounding neighbours during the construction of extensions which last several years should be included in this section. The building of extensions which create much noise and impact upon neighbours should be constructed during working hours. In particular those householders who undertake to build large extensions themselves, or through an ongoing series of smaller extensions, should adhere to working hours. Continual construction noise, sometimes lasting for years, carrying on through evenings seven days a week (including Saturday afternoons and Sundays), lowers the quality of life of neighbours, destroying the enjoyment of their properties. The length of time of construction by householders building their own extensions should also be restricted, so that such extensions are built within a reasonable time, lessening the impact on neighbours.

3.3 Dormer Windows and Rooflights Rooflights On roofscapes where windows fit flush with the slope of the roof, when blinds are often not used, an eyesore can be created in both short and long distance views, when bright lights shine through the window in the evenings and at night time. Also

	<p>reflections from sunlight on the windows can impact on views in the daytime. Dormer windows in the right place can be more attractive than windows which fit flush to the roof. 3.4 Decking, Terraces, Patios + Balconies Where decking, terrace or patio exceeds the 0.3 metre permitted height, it is recommended that the “privacy of neighbours should be maintained by installing screening at 1.8 metres above ground level (such as a hedge, fence etc).” Account should be taken of rising ground levels, gardens on hills, etc. A neighbour may apply for planning permission for raised decking to enhance a shared outlook with their neighbour which, at the time of the application, is shared without impinging on the privacy of either. The raised decking, terrace or patio could not only intrude upon the privacy of a neighbour, but the mitigation of screening with a high fence of up 1.8 metres or a hedge of similar height, could have a devastating impact on a neighbour’s garden. It could completely knock out a shared outlook, destroy the openness of a garden, block out sunlight and impact upon air ventilation, and in some cases make a garden dark and damp, or give a canyon effect to a narrow garden. Leylandii hedges, for example, though fast growing are disliked by many and will need, as with other high hedges, continual maintenance, whereas a high fence of 1.8 metres could be an ugly eyesore and overbearing in some gardens. It is written in the Residential Extensions Guide 2003 under 2.3 that “It is important to make sure that your extension does not unacceptably affect the amenities of you neighbours. This includes privacy, sunlight and daylight, and outlook.” The above words written in the 2003 Guide cover the above concerns. It is important not to destroy a neighbour’s privacy and affect their amenities of sunlight, daylight and outlook, or impose mitigation measures, such as a high fence or hedge, which can also destroy these amenities. General Comment It would be helpful if consultation and final documents could be formatted so that each page can be printed full size on A4 sheets.</p>
Direct Design	<p>Side extensions - I believe that they should be judged on their merits. It is not always necessary to set back an extension if the house is individual and the extension could be seamless. Given the housing stock in Guildford, half the width of the original seems a bit restrictive and leaving a 1.0m gap to the boundary at ground floor level is too stringent and will prevent development. 45 degree line from centre of window - this rule is far too readily applied &amp; restrictive. It is considered at a national level that a 3.0m deep single storey extension will not seriously affect the light to a property. This should take preference over the 45 degree light line. Some Local Authorities consider up to 4.0m to be acceptable.</p>
Surrey County Council	<p>Thank you for consulting Surrey County Council on the Draft Residential Extensions and Alterations Supplementary Planning Document (SPD). We have no comments to make in response to this consultation, although we would make the suggestion that the document might benefit from the addition of a short section to demonstrate that the council encourages residential extensions to incorporate energy and water efficiency measures and takes a ‘whole house’ approach. Building an extension can be an ideal time to make wider improvements to the existing house, during the disruption. This could include, for example a more efficient boiler, loft insulation in the existing roof, solar PV, etc. This would of course be in addition to having to comply with Building Regulations Part L for the energy efficiency of the extension section specifically. Links could be added to the following webpages to direct householders to further advice and guidance; <a href="https://www.actionsurrey.org/">https://www.actionsurrey.org/</a> and <a href="http://www.superhomes.org.uk/">http://www.superhomes.org.uk/</a>. It may be worth noting that other councils, such as Solihull, have included a section on sustainable design for householders within their residential extension SPD; <a href="http://www.solihull.gov.uk/Portals/0/Planning/SPD%20House%20Extension%20Guide.pdf">http://www.solihull.gov.uk/Portals/0/Planning/SPD%20House%20Extension%20Guide.pdf</a> The suggestions made above will complement the Guildford Borough Council Sustainable Design and Construction SPD, which is not written for householders.</p>

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