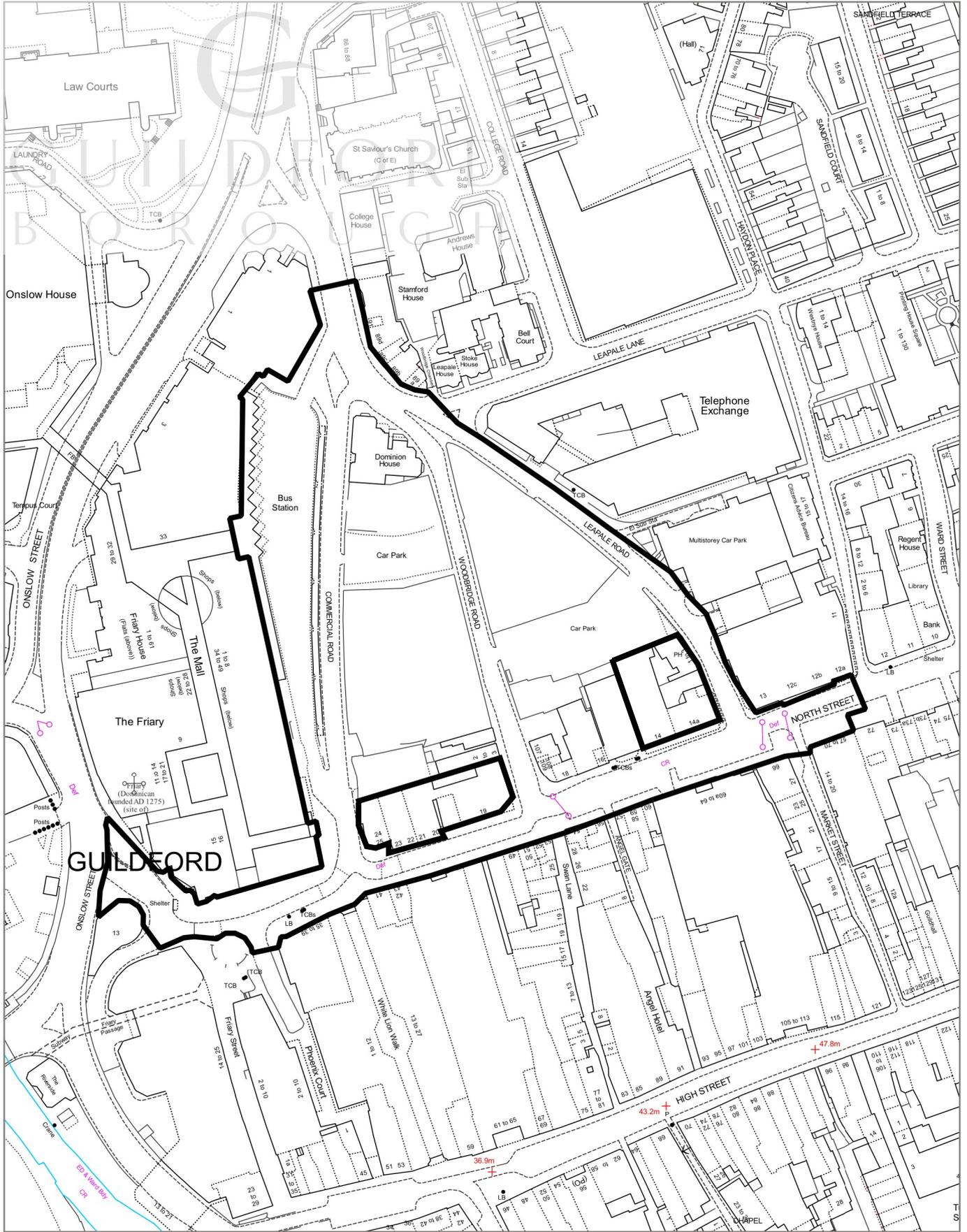


22/P/01336 - Land Bounded By The Friary Centre Bus Station, North Street And Leapale Road, Guildford



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Print Date: 16/12/2022



Not to Scale



GUILDFORD
BOROUGH

**22/P/01336 - Land bounded by the Friary Centre Bus Station,
North Street and Leapale Road, Guildford, GU1**



Not to scale



App No: 22/P/01336
Appn Type: Full Application
Case Officer: John Busher

8 Wk Deadline: 13/01/2023

Parish: Friary & St. Nicolas
Agent : Mr. Robert Steele
Savills Guildford
244-246 High Street
Guildford
GU1 3JF

Ward: Friary & St. Nicolas
Applicant: Mr. Robert Packham
St Edward Homes Ltd c/o
Agent

Location: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, GU1

Proposal: A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:

- Demolition of existing buildings;
- A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding;
- Erection of buildings ranging from 4 to 13 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with;
- Hard and soft landscaped areas to form pedestrianised streets and public spaces;
- Associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Rd) and associated infrastructure;
- The stopping up of adopted highway (including Commercial Road and Woodbridge Road);
- Alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

Executive Summary

Reason for referral

This application has been referred to the Planning Committee because more than 20 letters of objection have been received, contrary to the Officer's recommendation.

Key information

The application site is an assembly of a large number of plots and buildings which are located to the north of North Street in Guildford town centre. The site has an area of 2.69 hectares - its western boundary is formed of The Friary shopping centre, its eastern boundary by Leapale Road, the southern boundary by North Street and the northern boundary is situated at the junction of Commercial Road, Woodbridge Road and Leapale Road.

The site is located within the urban area of Guildford and within the town centre boundary. It is opposite (north of and not within) Guildford Town Centre Conservation Area and within an Area of High Archaeological Importance. The site includes a Grade II listed building (All Bar One) and is opposite Stoke House on Leapale Lane which is Grade II listed. Numbers 41-43 North Street, which is to the south of the site is locally listed. Most of the street frontages around the site are defined as being part of the town centre's Secondary Shopping Frontage.

The application site forms part of a larger allocation in the Local Plan under policy A5. The specific requirements of policy A5 will be set out in detail below, but in summary, the allocation is for: a comprehensive mixed use redevelopment with:

- approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies
- approximately 6,000 sq m food and drink (A3) and drinking establishments (A4)
- approximately 400 homes (C3)
- provision of 1 gym (D2)

The application is for a mixed use redevelopment comprising:

- demolition of existing buildings;
- a new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding;
- erection of buildings ranging from four to 13 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with;
- hard and soft landscaped areas to form pedestrianised streets and public spaces;
- associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Road) and associated infrastructure;
- the stopping up of adopted highway (including Commercial Road and Woodbridge Road); and
- alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

In total 473 dwellings are proposed, along with 2,358sqm of Class E floorspace.

It is noted that since submission, the proposal has been amended at the request of Officers, and following the consultation responses. The main changes that have been secured are the reduction in the overall height of block E by 2.2 metres (including the rooftop frame). However, taking into account the removal of the previously proposed lift overrun, the reduction in the height of built form (excluding the rooftop frame) would be greater at approximately four metres. In addition to this, the setback floor has been removed from building C2. To compensate for the loss of units, an additional floor has been added to block B1 (above Astor Lane). The Local Planning Authority carried out a full 21-day consultation on the amended plans.

Summary of considerations and constraints

The application site forms a large portion of an important town centre allocation for a mixed used development including residential accommodation and commercial floorspace. The delivery of the scheme, and therefore a large portion of the allocation, is an important aspect of the proposal.

It will be concluded in the report that the development would be compliant with the requirements of the allocation. While a reduced quantum of commercial floorspace is provided, this is allowed through the policy and has been tested by independently appointed experts. Given the current environment the commercial floorspace envisaged by the allocation is no longer realistic. The now residential led development would bring a significant number of new homes to the town centre. These would be located in a highly sustainable location, close to transport routes, jobs and shops and services. The residential units would also make a material and meaningful contribution to the Council's housing supply. While the scheme has been confirmed to be unviable with zero affordable housing, through negotiation with Officers, the applicant has now offered at least 20 on-site shared ownership units, with the possibility of achieving 28 more (subject to external funding).

It is noted that the site is in a sensitive town centre location and is close to listed buildings and conservation areas. While it is acknowledged that the proposal has a modern appearance and would have its own character, it still reflects and has references to the surrounding built environment. The Council's Urban Design Officer is of the opinion that the proposal complies with the relevant design policies of the Local Plan. In addition, while harm to heritage assets has been identified by both the Council's Conservation Officer and Historic England, the public benefit balance that has been carried out by Officers concludes that the public benefits of the proposal clearly and demonstrably outweigh this.

The proposal would result in long-lasting and diverse benefits to the town. The site has been derelict for a considerable period of time and this proposal would act as a catalyst for its regeneration. The associated public realm works and the pedestrianisation of North Street would transform this part of the town centre and would materially improve its appearance and character. The pedestrianisation and the modifications to the bus station would also remove bus traffic from the western end of North Street which would improve the safety and environment for pedestrians. Other benefits have been set out in the report and include beyond policy requirement carbon reduction measures and biodiversity net gain. The proposal would also result in significant economic benefits from both the construction of the scheme as well as the proposed commercial units and introducing a significant residential population into the area.

It is acknowledged that Surrey County Council have objected to the proposal, based mainly on the proposed changes to the bus station and the resulting impact on bus journey times, amongst other matters. However, two independent reviews of the highways situation have been undertaken, as well as the Transport Assessment submitted with the application. All three of these reports conclude that the proposal is acceptable in highways and public transport terms. While the comments from Surrey County Council have been carefully considered, in this instance it is concluded that they cannot be adopted by the Local Planning Authority. Notwithstanding SCC's position, their without prejudice conditions have been included and in addition, a contribution of £1.5m towards bus service priority improvements has been agreed by the applicant. While this does not remove the highways objections, it will help to offset the concerns of the County Council.

As well as the heritage harm, harm has also been found to be caused to the amenity of some residential dwellings. The applicant is also failing to fully mitigate the impact of the scheme on open space.

A detailed planning balance has been undertaken and in summary, the benefits of the proposal are so significant and are of such importance that they do clearly and demonstrably outweigh the harm which has been identified (even when giving substantial weight and great importance to the heritage harm).

RECOMMENDATION:

(i) That a s.106 agreement be entered into to secure:

- provision of a unit within the scheme which may be used by the NHS as a health or medical care facility or in lieu of this a primary healthcare contribution;
- education contribution;
- police contribution;
- contribution towards the off-site provision of children's playspace;
- management and future maintenance of all open space (private and public) and the public realm within the site (with the exception of the North Street pedestrianisation);
- that all areas of public realm remain publicly accessible twenty four hours per day except for identified reasons, in perpetuity where they replace the width and alignment of Woodbridge Road and Commercial Road, and for the lifetime of the development in all other locations;
- contribution towards bus service priority improvements;
- the provision of a minimum of three car club vehicles for a minimum of five years; £50 worth of free travel for car club vehicles for each residential unit and three year's free membership of the car club for all initial occupants of the residential units;
- provide each dwelling with a combined cycle/bus voucher of £250, at a total cost of £118,250;
- SANG (Suitable Alternative Natural Green Space) and SAMM (Strategic Access Management and Monitoring) contributions;
- that the bus station improvements (as approved through this application), North Street Square, North Street pedestrianisation and Friary Square to be commenced as part of phase one of the development and completed in full prior to occupation of an agreed number of dwellings within phase one, or by a date to be agreed, whichever is the sooner;
- that the applicant must undertake an early stage viability review if the scheme does not commence within 18 months of the full grant of planning permission. The applicant will cover the Council's costs of independently assessing the review;
- the provision of either (a) 20 on-site shared-ownership dwellings delivered in phase one of the development and that the applicant uses reasonable endeavours to deliver a further 28 on-site shared-ownership dwellings, subject to receiving funding from Homes England, OR (b) securing a late stage viability review (as set out in the report option (a) is Officer's recommended approach); and
- the completion of the remaining public realm works within set timescales to be agreed.

If the terms of the s.106 or wording of the planning conditions are materially amended as part of ongoing s.106 or planning condition(s) negotiations, any changes shall be agreed in consultation with the Chairman of the Planning Committee and lead Ward Member.

(ii) That upon completion of the above, the application be determined by the Executive Head of Planning Development / Joint Strategic Director Place. The recommendation is to approve planning permission, subject to conditions.

(iii) If, after 12 months has elapsed since the resolution of the Planning Committee to grant planning permission, the s.106 agreement is not completed then the application may be refused on the basis that the necessary mitigations to offset the impact of the development cannot be secured.

Approve - subject to the following condition(s) and reason(s) :-

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans:

Site Location Plan	1653-JTP-ES-RF-DR-A-000 1	P1
Demolition Site Sections (5 sheets)	1 of 5: 01653-JTP-ES-XX-DR-A-0008 2 of 5: 01653-JTP-ES-XX-DR-A-0009 3 of 5: 01653-JTP-ES-XX-DR-A-0010 4 of 5: 01653-JTP-ES-XX-DR-A-0011 5 of 5: 01653-JTP-ES-UG-DR-A-0012	P1
Proposed Elevation Plans (12 sheets)	1 of 12: 01653-JTP-BA-ZZ-DR-A-0500 2 of 12: 01653-JTP-BB-ZZ-DR-A-0501 3 of 12: 01653-JTP-BB-ZZ-DR-A-0502 4 of 12: 01653-JTP-BC-ZZ-DR-A-0503 5 of 12: 01653-JTP-BC-ZZ-DR-A-0504 6 of 12: 01653-JTP-BC-ZZ-DR-A-0505 7 of 12:	P2

	01653-JTP-BD-ZZ-DR-A-05 06 8 of 12: 01653-JTP-BD-ZZ-DR-A-05 07 9 of 12: 01653-JTP-BD-ZZ-DR-A-05 08 10 of 12: 01653-JTP-BD-ZZ-DR-A-05 09 11 of 12: 01653-JTP-BE-ZZ-DR-A-05 10 12 of 12: 01653-JTP-BE-ZZ-DR-A-05 11	
Proposed Site Plans (various levels) (16 sheets)	1 of 16: 01653-JTP-MP-LG-DR-A-0 200 2 of 16: 01653-JTP-MP-UG-DR-A-0 201 3 of 16: 01653-JTP-MP-01-DR-A-02 02 4 of 16: 01653-JTP-MP-02-DR-A-02 03 5 of 16: 01653-JTP-MP-03-DR-A-02 04 6 of 16: 01653-JTP-MP-04-DR-A-02 05 7 of 16: 01653-JTP-MP-05-DR-A-02 06 8 of 16: 01653-JTP-MP-06-DR-A-02 07 9 of 16: 01653-JTP-MP-07-DR-A-02 08 10 of 16: 01653-JTP-MP-08-DR-A-02 09 11 of 16: 01653-JTP-MP-09-DR-A-02 10 12 of 16: 01653-JTP-MP-10-DR-A-02 11	P2

	13 of 16: 01653-JTP-MP-11-DR-A-02 12 14 of 16: 01653-JTP-MP-12-DR-A-02 13 15 of 16: 01653-JTP-MP-13-DR-A-02 14 16 of 16: 01653-JTP-MP-RF-DR-A-0 215	
Proposed Roof Plan	01653-JTP-MP-RF-DR-A-0 101	P2
Ground Floor Demolition Plan (bus station)	19602-SBR-ZZ-00-DR-A-02 100	A
Existing and Proposed Elevation Plans (bus station)	19602-SBR-ZZ-ZZ-DR-A-11 100	A
Proposed Ground Floor Plan (bus station)	19602-SBR-ZZ-00-DR-A-10 100	A
Proposed Roof Plan (bus station)	19602-SBR-ZZ-RF-DR-A-1 0101	A
Proposed Block Plan (various levels) (41 sheets)	1 of 41: 01653-JTP-BA-GF-DR-A-03 00	P2
	2 of 41: 01653-JTP-BA-ZZ-DR-A-03 01	P2
	3 of 41: 01653-JTP-BB-UG-DR-A-0 305	P2
	4 of 41: 01653-JTP-BB-01-DR-A-03 06	P2
	5 of 41: 01653-JTP-BB-02-DR-A-03 07	P2
	6 of 41: 01653-JTP-BB-03-DR-A-03 08	P2
	7 of 41: 01653-JTP-BB-04-DR-A-03 09	P2
	8 of 41: 01653-JTP-BB-05-DR-A-03 10	P2
	9 of 41: 01653-JTP-BB-06-DR-A-03 11	P2
		P2

	10 of 41: 01653-JTP-BB-07-DR-A-03 12	
	11 of 41: 01653-JTP-BC-UG-DR-A-0 310	P2
	12 of 41: 01653-JTP-BC-01-DR-A-03 11	P2
	13 of 41: 01653-JTP-BC-02-DR-A-03 12	P2
	14 of 41: 01653-JTP-BC-03-DR-A-03 13	P2
	15 of 41: 01653-JTP-BC-04-DR-A-03 14	P2
	16 of 41: 01653-JTP-BC-05-DR-A-03 15	P2
	17 of 41: 01653-JTP-BC-06-DR-A-03 16	P2
	18 of 41: 01653-JTP-BC-07-DR-A-03 17	P2
	19 of 41: 01653-JTP-BC-08-DR-A-03 18	P2
	20 of 41: 01653-JTP-BC-09-DR-A-03 19	P2
	21 of 41: 01653-JTP-BC-RF-DR-A-03 20	P2
	22 of 41: 01653-JTP-BD-LG-DR-A-03 21	P2
	23 of 41: 01653-JTP-BD-UG-DR-A-0 322	P2
	24 of 41: 01653-JTP-BD-01-DR-A-03 23	P2
	25 of 41: 01653-JTP-BD-02-DR-A-03 24	P2
	26 of 41: 01653-JTP-BD-03-DR-A-03 25	P2
		P2

	27 of 41: 01653-JTP-BD-04-DR-A-03 26	
	28 of 41: 01653-JTP-BD-05-DR-A-03 27	P2
	29 of 41: 01653-JTP-BD-06-DR-A-03 28	P2
	30 of 41: 01653-JTP-BD-07-DR-A-03 29	P2
	31 of 41: 01653-JTP-BD-08-DR-A-03 30	P2
	32 of 41: 01653-JTP-BD-09-DR-A-03 31	P2
	33 of 41: 01653-JTP-BD-10-DR-A-03 32	P2
	34 of 41: 01653-JTP-BE-00-DR-A-03 38	P2
	35 of 41: 01653-JTP-BE-ZZ-DR-A-03 39	P2
	36 of 41: 01653-JTP-BE-ZZ-DR-A-03 40	P2
	37 of 41: 01653-JTP-BE-ZZ-DR-A-03 41	P2
	38 of 41: 01653-JTP-BE-ZZ-DR-A-03 42	P2
	39 of 41: 01653-JTP-BE-ZZ-DR-A-03 43	P2
	40 of 41: 01653-JTP-BE-ZZ-DR-A-03 44	P2
	41 of 41: 01653-JTP-BE-RP-DR-A-03 45	P2
Masterplan – Proposed Site Sections (with Adjoining elevations of neighbouring buildings - see street scenes North Street and Leapale Road) (4	1 of 4: 01653-JTP-MP-ZZ-DR-A-04 00 2 of 4: 01653-JTP-MP-ZZ-DR-A-04 01 3 of 4: 01653-JTP-MP-ZZ-DR-A-04	P2

sheets)	02 4 of 4: 01653-JTP-MP-ZZ-DR-A-04 03	
Combined coloured masterplan layout		A
Existing Elevations Plans	1 of 4: 01653-JTP-ES-XX-DR-A-00 04 2 of 4: 01653-JTP-ES-XX-DR-A-00 05 3 of 4: 01653-JTP-ES-XX-DR-A-00 06 4 of 4: 01653-JTP-ES-XX-DR-A-00 07	P1
Existing Topographical Survey (Levels)	01653-JTP-ES-RF-DR-A-00 02	P1
Existing Site Sections	01653-JTP-ES-XX-DR-A-00 03 01653-JTP-ES-XX-DR-A-00 04 01653-JTP-ES-XX-DR-A-00 05 01653-JTP-ES-XX-DR-A-00 06 01653-JTP-ES-XX-DR-A-00 07	P1
Landscape Masterplan (All Levels)	1599-020A	A
Site Levels Strategy Plan (2 sheets)	01653-JTP-MP-RF-DR-A-0 102 01653-JTP-MP-RF-DR-A-0 103	P2
Proposed Bus Station Arrangement (Accessibility Assessment)	19-T110-82	C
Existing VS Proposed Bus Station Arrangement	19-T110-121	A

Reason: To ensure that the development is carried out in accordance with the approved plans and in the interests of proper planning.

3. No above ground works (with the exception of site clearance, demolition and ground works) shall take place on a particular block until details and samples of the proposed external facing and roofing materials for the given block, including colour and finish, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the external appearance of the buildings are satisfactory.

4. No above ground works (with the exception of site clearance, demolition and ground works) shall take place on a particular block until a sample panel for the given block which includes all proposed external wall finishes (size of not less than one metre square, showing proposed brick, brick bond, pointing and / or paint finish), have been constructed on site and approved in writing by the Local Planning Authority. Once approved the panel(s) shall remain on site for inspection until the completion of that block for comparison. The development shall only be carried out in accordance with the approved sample panel(s).

Reason: To ensure that the external appearance of the buildings are satisfactory.

5. No above ground works (with the exception of site clearance, demolition and ground works) shall take place on a particular block until details of the design, construction and material of the balconies, Juliet balconies, windows and doors for the given block have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include the depth of reveal, method of opening, details of head, side casing and cills. The development shall only be carried out in accordance with the approved details.

Reason: To ensure that the external appearance of the buildings are satisfactory.

6. No above ground works (with the exception of site clearance, demolition and ground works) shall take place on a particular block until details and drawings of all proposed vents, flues, downpipes, satellite dishes, all roof plant and machinery and lift over-runs for the given block have been submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the agreed details.

Reason: To ensure that the external appearance of the buildings are satisfactory.

7. No above ground works (excluding operations including site preparation, demolition, excavation and enabling works) shall take place on the approved bus station until details and samples of the proposed external facing and roofing materials including colour and finish, which shall be in general accordance with the information provided in the submitted Design and Access Statement, have been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and samples.

Reason: To ensure that the external appearance of the bus station is satisfactory.

8. Before any of the approved commercial units are first occupied, a Shopfront and Advertisement Strategy, which includes all commercial units within the scheme, shall be submitted to and agreed in writing by the Local Planning Authority. The Strategy shall set out a consistent framework for how shopfronts and advertisements will be detailed as part of the scheme. Subsequent to the approval of the Strategy, the development, fit-out and completion of the commercial units shall comply with the approved details.

Reason: To ensure that the external appearance of the commercial premises are satisfactory.

9. No above ground works (excluding operations including site preparation, demolition, excavation and enabling works) shall take place until a Public Realm Strategy has been submitted to and approved in writing by the Local Planning Authority for each of the public realm areas (including pedestrian routes) and North Street pedestrianisation. The Strategy shall include details, drawings and samples (where required) of the hard landscaping, site signage, all street furniture, lighting and any boundary treatments. The proposals shall also include details of containers, planting pits and planting trenches, roof and podium planting build up, solar grow lights (where required), water harvesting, irrigation and drainage. The proposals shall also include exact details and drawings of all street tree planting pits showing how trees will be planted in within the public realm to ensure that they have adequate room to grow and thrive within the development. The Strategy shall include a phasing plan for the delivery of the agreed works. The development shall only be carried out in full accordance with the agreed details, including the agreed phasing plan.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

10. Before the commercial units are first occupied an Outdoor Seating Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall clearly indicate where outdoor seating associated with the commercial units can be located. The development shall only be carried out in full accordance with the agreed details.

Reason: To protect the character and appearance of the development and to ensure that adequate space is provided for pedestrians.

11. The residential blocks hereby approved shall not be occupied until full details, of both hard and soft landscape proposals for the private residential amenity spaces and roof gardens for each block, including a schedule of landscape maintenance for a minimum period of ten years, have been submitted to and approved in writing by the Local Planning Authority. The proposals shall include details of containers, planting pits and planting trenches, roof and podium planting build up, solar grow lights (where required), water harvesting, irrigation and drainage. The proposals shall also include exact details and drawings of all tree planting pits showing how trees will be planted to ensure that they have adequate room to grow and thrive within the development. The approved landscape scheme (with the exception of planting, seeding and turfing) shall be implemented and made available for use prior to the occupation of the relevant block and retained thereafter.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

12. All planting, seeding or turfing approved (for the whole scheme) shall be carried out in the first planting and seeding season following the occupation of each block or the completion of the development, whichever is the sooner. Any trees or plants which, within a period of ten years after planting, are removed, die or become seriously damaged or diseased in the opinion of the Local Planning Authority, shall be replaced in the next available planting sooner with others of similar size, species and number, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the provision, establishment and maintenance of an appropriate landscape scheme in the interests of the visual amenities of the locality.

13. Before the first residential occupation of the development, a Public Art Strategy for the site shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall include a timetable for the delivery of the agreed public art. The development shall only be carried out in full accordance with the agreed details.

Reason: To ensure that the development is delivered with public art for the benefit of the character and appearance of the site and wider area.

14. Before the occupation of the 450th dwelling of the development a certificate demonstrating that Secured by Design (physical security) in accordance with the Secured by Design Homes 2019 Version 2, March 2019 or as amended, has been successfully achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development is acceptable in terms of crime and safety.

15. Before the first occupation of a particular residential block which includes children's playspace, a Children's Playspace Design shall be submitted to and approved in writing by the Local Planning Authority for the given block. This shall include details of the play equipment used within the private residential amenity areas and details of how the equipment will be maintained for the lifetime of the development. The agreed details shall be implemented before the first occupation of the residential units within the relevant block and shall be retained in perpetuity.

Reason: To ensure that the development includes areas for children's play.

16. Before the commencement (excluding operations including site preparation, demolition, excavation and enabling works) of the 'Friary Square' public realm works, details and plans of the children's play features to be incorporated within the 'Friary Square' landscaping as well as a maintenance schedule shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented in full before 'Friary Square' is made available for public use and shall be retained for the lifetime of the development.

Reason: To ensure that children's playspace is provided as part of the development.

17. Before the commencement (excluding operations including site preparation, demolition, excavation and enabling works) of the 'North Street Square' public realm works, full detailed drawings and specifications and a maintenance strategy for the water feature within the 'North Street Square' shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the agreed details and the water feature shall be installed and made operational before the first occupation of the commercial unit which fronts onto North Street Square. The water feature shall be retained in full working order for the lifetime of the development.

Reason: To ensure that the public realm is of a high quality.

18. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non- Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) the results of infiltration testing completed in accordance with BRE Digest: 365 and confirmation of groundwater levels.
- b) evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+45% allowance for climate change) storm events, during all stages of the development. The final solution should follow the principles set out in the approved drainage strategy. If infiltration is deemed unfeasible, associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 6.4 l/s.
- c) detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any

- flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- d) a plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.
 - e) details of drainage management responsibilities and maintenance regimes for the drainage system.
 - f) details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

19. Prior to the first occupation of each block or area of public realm of the development, a verification report for that block / area of public realm, carried out by a qualified drainage engineer, shall be submitted to and approved in writing by the Local Planning Authority. This must demonstrate that the surface water drainage system for that block / area of public realm has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is constructed to the National Non-Statutory Technical Standards for SuDS.

20. Works on the pedestrianisation of North Street shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The design must seek opportunities for amenity, and biodiversity enhancements through the use of SuDS, to reduce existing surface water flows and downstream impacts, as indicatively set out in drawing number 3500 (showing areas to be considered for works within the public highway to deal with the existing surface water flow route) and Section 1.9 of the 'Highways Drainage Strategy' (which is contained in the 'Rainwater Drainage (SuDS) Strategy (Drainage Strategy)' (reference WSL-ZZ-XX-RP-P-00001 D, November 2022)) which sets out the principles to be followed through to detailed design. The scheme shall also set out a phasing plan for the implementation of the agreed details. The development shall only be constructed in accordance with the agreed details.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site whilst seeking opportunities to reduce overall surface water flood risk.

21. The development hereby approved shall only be carried out in full accordance with the submitted Energy Statement (dated July 2022, prepared by Hodkinson, version v.3), Sustainability Statement (dated July 2022, prepared by Hodkinson, version v.4) and email from agent dated 21.09.22 (timed 15:59).

Reason: To reduce carbon emissions and incorporate sustainable energy as part of the development.

22. The residential development hereby permitted must comply with regulation 36 paragraph 2(b) of the Building Regulations 2010 (as amended) to achieve a water efficiency of 110 litres per occupant per day (described in part G2 of the Approved Documents 2015). Before the first occupation of each residential block, a copy of the wholesome water consumption calculation notice (described at regulation 37 (1) of the Building Regulations 2010 (as amended)) which demonstrate that this condition has been met shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To improve water efficiency throughout the development.

23. Before the development hereby approved is commenced a Site Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Management Plan shall demonstrate how waste generated from construction and excavation activities will be dealt with in accordance with the waste hierarchy. The Site Waste Management Plan will subsequently be kept up-to-date throughout the development process in accordance with the established methodology.

Reason: To ensure that the development takes waste hierarchy into account to manage waste. It is considered necessary for this to be a pre-commencement condition because waste will begin to be generated as soon as any development commences on the site.

24. The development shall only take place in accordance with a written programme of archaeological work including a Written Scheme of Investigation that has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include the following elements:

1. the programme and methodology of site investigation and recording
2. the programme for post investigation assessment
3. provision to be made for analysis of the site investigation and recording
4. provision to be made for publication and dissemination of the analysis and records of the site investigation
5. provision to be made for archive deposition of the analysis and records of the site investigation
6. nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation
7. provision of an appropriate programme of public benefit and information.

Reason: To ensure that any archaeological remains that are present on the site are identified and recorded to appropriate professional standards and the results assessed, analysed and disseminated in accordance with the requirements of the National Planning Policy Framework.

25. Prior to the commencement of the development hereby approved, a Landscape and Ecological Management Plan (covering a 30 year period in accordance with Biodiversity Net Gain) which shall include (but not limited to) details of the schedule of works, habitat creation, number and location of bat and bird boxes, number and location of bee bricks, location and details of habitat piles, shall be submitted to and approved in writing by the Local Planning Authority. All approved details shall then be implemented in full and in accordance with the agreed timings and details.

Reason: To safeguard protected species and ecology.

26. The mitigation and enhancement measures identified within section 6 of the Ecological Appraisal report (Aspect Ecology, July 2022) shall be implemented in full and in accordance with a timetable which shall be submitted to and approved in writing by the Local Planning Authority before the commencement of the development hereby approved.

Reason: *To safeguard protected species, to increase the biodiversity of the site and mitigate any impact from the development.*

27. Before the commenced of any block which contains residential units, a Wind Mitigation Strategy (including any necessary mitigation measures) shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall demonstrate that the proposal achieves a safe and comfortable wind environment throughout the development. The development shall only be carried out in full accordance with the agreed details which shall be retained in perpetuity.

Reason: To ensure that a safe and comfortable wind environment is achieved as part of the development.

28. Except for site clearance and demolition works, no other operations shall be commenced until a Highway Works Construction Delivery Plan has been submitted to and approved in writing by the Local Planning Authority. Such Plan shall detail the programming, sequencing timing and delivery of the required highway works listed at paragraphs (a) to (f) below including the decommissioning and Stopping Up of the existing highways at Woodbridge Road and Commercial Road:

- a) the construction of the proposed vehicular access to Leapale Road including visibility zones in general accordance with the approved plans. Once constructed the vehicular and pedestrian visibility zones shall be kept permanently clear of any obstruction over 0.6m high.
- b) the proposed alterations to the highways of North Street, Woodbridge Road, Leapale Road, Commercial Road in general accordance with the approved plans and the associated Traffic Regulation Orders as broadly illustrated on the Hierarchy Plan.
- c) the installation of the proposed physical barrier on North Street and ancillary works to prevent vehicular access during restricted hours. Such details to include a proposed North Street Operational Management Strategy which once approved shall be implemented and operated in accordance with the approved details.
- d) the creation of an emergency bus access route, refuse vehicle access route and delivery vehicle access route through the new Friary Square from North

- Street in accordance with details to be included within the North Street Operational Management Strategy.
- e) the widening and alteration of the existing bus lane on Woodbridge Road at both the bus station exit and at its junction with Onslow Street, in general accordance with the approved plans.
 - f) the proposed public realm works in North Street and Commercial Road in accordance with details to be submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority. Such works to include:
 - i. good quality materials, street furniture, wayfinding signage and sustainable drainage features as may be required by the County Highway Authority,
 - ii. details to provide for the safe and efficient movement of cyclists through the pedestrianised area.

Once the Highway Works Construction Delivery Plan is approved, the required highway works shall be constructed at the applicant's expense and in general accordance with the approved plans under the terms of a S278 Highways Agreement to be entered into between the applicant and the County Highway Authority. Implementation shall be in strict accordance with the timescales and details specified in the agreed Plan (unless otherwise agreed in writing), and in further compliance with the County Highway Authority's Technical Approval and Road Safety Audit requirements.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users and to ensure that the agreed highways and public realm works are completed to a high standard.

29. The development hereby approved shall not be first occupied unless and until a Vehicle and Parking Occupation Strategy Plan has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall include a timetable for the setting out of parking and turning spaces within the site, in accordance with the approved plans, so that vehicles can be parked and for vehicles to turn so that they may enter and leave the site in forward gear. The development shall only be constructed in full accordance with the agreed Strategy. Thereafter the parking and turning areas shall be permanently retained and maintained for their designated purposes.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

30. The residential units hereby approved shall not be first occupied unless and until a scheme for the provision of electric vehicle charging points for all of the proposed parking spaces has been submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate that all of the charging points are provided with a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply). The approved scheme shall be implemented and installed in accordance with the Vehicle and Parking Occupation Strategy agreed through condition 29. Thereafter the approved scheme shall be retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To encourage the use of electric cars in order to reduce carbon emissions.

31. Blocks D and E shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for:
- a) the secure parking of a minimum of 529 bicycles within the residential development site,
 - b) the secure parking of a minimum of 473 e-bike charging points within the residential development site,
 - c) the secure parking of a minimum of 109 bicycles for non-residential land uses within the development site in locations to be agreed with the County Highway Authority,
 - d) 20% of the e-bike charging points shall be provided within secure lockers which have internal electrical sockets for the charging of removable e-bike batteries,
 - e) 5% of available cycle parking provided in communal cycle storage shall be provided as disabled spaces,
 - f) space to be provided for the parking of adaptive cycles in communal cycle storage,
 - g) facilities within the development site, other than for the residential uses, for cyclists to change into and out of cyclist equipment / shower, and
 - h) facilities within the development site, other than for the residential uses, for cyclists to store cyclist equipment.

Thereafter the approved facilities shall be provided, permanently retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To ensure that satisfactory facilities for the parking of cycles are provided and to travel by means other than private motor vehicles.

32. No development shall commence until a Construction Transport Management Plan, to include details of:
- a) parking for vehicles of site personnel, operatives and visitors
 - b) loading and unloading of plant and materials
 - c) storage of plant and materials
 - d) programme of works (including measures for traffic management)
 - e) provision of boundary hoarding behind any visibility zones
 - f) HGV deliveries and hours of operation
 - g) construction vehicle routing
 - h) measures to prevent the deposit of materials on the highway
 - i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
 - j) on-site turning for construction vehicles
 - k) demonstrate how the existing public car parks on the site can safely operate during construction works (if appropriate)

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

33. Before any dwelling hereby approved is first occupied, a Travel Statement shall be submitted to and approved in writing by the Local Planning Authority. The Statement shall include details of an information / welcome pack to be provided to residents / staff / visitors regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs. The Travel Statement shall be implemented in full upon the first occupation of the development. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.

Reason: To encourage travel by means other than private motor vehicles.

34. The residential dwellings in Blocks B and C shall not be first occupied unless and until the proposed three oversailing balconies on Leapale Road are provided with a s.177 licence under the terms of the Highways Act 1980 and in accordance with the requirements of the County Highway Authority.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

35. The proposed works to the reconfigured Bus Station shall not be commenced unless and until an Access and Management Strategy for the Bus Station has been submitted to and approved in writing by the Local Planning Authority. The agreed Strategy shall be implemented at all times upon first use of the reconfigured bus station.

Reason: In order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

36. No part of the reconfigured Bus Station shall be brought into use unless and until the developer has funded and installed the following in accordance with a scheme to be first submitted to and approved in writing by the Local Planning Authority:

- a) the provision of raised kerbing (to a height of 140mm) to ensure level access onto / off buses for those with mobility issues,
- b) the provision of:
 - i) good quality bus shelters serving 14,15 and 16.
 - ii) real Time Passenger Information for every bus stop, and
 - iii) good quality arrival/departure boards that have a Content Management System installed.

All to be provided in accordance with SCC's approved suppliers.

- a) details of a Bus Station Operational, Maintenance and Management Plan, and
- b) the provision of an improved bus station incorporating seating, lighting, wayfinding information and ancillary infrastructure.

Reason: To encourage travel by means other than private motor vehicles.

37. No development shall be occupied until confirmation has been provided that either:- 1. foul water capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed in writing with the Local Planning Authority. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development.

38. No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed in writing by the Local Planning Authority. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development.

39. There shall be no occupation beyond the 50th dwelling until confirmation has been submitted to and agreed in writing by the Local Planning Authority that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

40. The development shall only be operated in full accordance with the Operational Waste Management Plan (dated October 2022, reference 60683623, prepared by AECOM).

Reason: To ensure that waste generated by the development is effectively managed, stored and collected.

41. No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the Local Planning Authority. This should be carried out by a competent person in line with paragraph 183 of the National Planning Policy Framework. This strategy will include the following components:
1. a preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a fully justified conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site
 2. a site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
 3. the results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 4. a verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution.

42. Prior to any part of the permitted development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete.

43. The development hereby permitted shall not commence until a monitoring and maintenance plan in respect of contamination, including a timetable of monitoring and submission of reports to the Local Planning Authority, has been submitted to, and approved in writing by, the Local Planning Authority. Reports as specified in the approved plan, including details of any necessary contingency action arising from the monitoring, shall be submitted to, and approved in writing by, the Local Planning Authority. The development shall only be carried out in accordance with the agreed details.

Reason: No groundwater quality monitoring data has been provided. Groundwater monitoring data is needed to show the current seasonal variation in groundwater quality and to enable the assessment of the likely impact on groundwater quality of the development. This is required to ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long-term remediation measures.

44. Piling using penetrative methods shall not be carried out other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: Piling using penetrative methods can result in risks to potable supplies, for example, pollution/turbidity, risk of mobilising contamination, drilling through different aquifers/sub-aquifers and creating preferential pathways. This condition seeks to ensure that the proposed piling option does not harm groundwater resources.

45. In the event that piling works are necessary, no piling works shall begin until a scheme for limiting the noise, that is in accordance with BS 5228 (Parts 1 and 4) for noise control, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall specify the proposed piling method and the reason for its selection. This shall take into account the ground conditions of the proposed development site and the proximity of residential properties. The development shall only be carried out in full accordance with the agreed details.

Reason: In the interests of protecting the local residents from unreasonable noise levels which would be detrimental to the residential character of the area.

46. Works related to the construction of the development hereby permitted, including works of demolition or preparation prior to building operations, shall not take place other than between the hours of 0730 and 1800 Mondays to Fridays and between 0800 and 1330 Saturdays and at no time on Sundays or Bank or National Holidays.

Reason: To protect the neighbours from noise and disturbance outside the permitted hours during the construction period.

47. No individual Class E commercial unit which requires ventilation or extraction associated with food preparation shall be first or subsequently occupied until a scheme for the fitting of suitable ventilation and filtration equipment for that unit has been submitted to and approved in writing by the Local Planning Authority. Such a scheme shall include details of:

- the equipment to suppress and control all fumes / smoke / grease / steam / odour from the use so as to prevent an impact in existing and proposed sensitive receptors;
- charcoal filters shall be included and a flue discharge one metre above eaves level is recommended;
- no street level discharges will be permitted;
- a scaled plan showing the internal arrangement of the premises and the dimensions/location of the ventilation system;
- the location of all filters, fans and ducting must be clearly marked; and
- where the location of a filter is shown, the type must be clearly identified and cross-referenced to the detail product specification.

The approved equipment shall be installed before the use of the individual units commence and thereafter they shall be operated and maintained in full working order in accordance with manufacturer's instructions throughout the proposed use.

Reason: To protect adjoining premises/residential amenities.

48. The applicant should ensure that any air handling plant, fixed, mechanical, electrical or hydraulic equipment etc, installed and operated at any time in connection with the carrying out of this permission should not produce broadband noise that is clearly audible at the boundary of any noise sensitive premises. Noise from operating plant shall therefore not exceed the existing background noise level (LA90) at any time. At no time should there be any tonal or acoustic features of the operating machinery that will increase the existing residual noise level so as to be clearly audible at the boundary of any nearby noise sensitive premises. A regular and routine maintenance programme should be employed to ensure operational plant does not increase noise output due to mechanical wear or defect that will result in any unit failing to meet the above noise criteria.

Reason: In order to protect residential amenity.

49. No above ground works (excluding operations including site preparation, demolition, excavation and enabling works) shall take place on a particular block which contains residential accommodation until a scheme for the given block protecting the proposed dwellings from noise from traffic on the adjacent road(s), the bus station and areas of public realm has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details before any permitted dwelling within the relevant block is occupied unless an alternative period is agreed in writing by the Local Planning Authority.

Reason: As occupiers of the development, without such a scheme, are likely to suffer from noise.

50. Notwithstanding the drawings approved by Condition 2, prior to any above ground construction of the units specified in Informative 6, details of revised internal layouts and any associated amendments to fenestration and external door placement of the specified units shall be submitted to and approved in writing by the Local Planning Authority. The submitted details will have the objective of securing an increase in BRE Guidelines 2011 ADF percentage values for 'truncated living / dining rooms'. The apartment layouts shall be implemented as approved and thereafter retained.

Reason: In the interests of achieving satisfactory residential amenity for the dwellings hereby approved.

51. The commercial premises hereby approved shall be used for no other purposes than set out in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended), (or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification).

Reason: The Local Planning Authority wishes to retain control over the change of use of the commercial units in order to protect the vitality and viability of the scheme and wider area and to protect the amenity of residential properties.

52. Before the occupation of the first residential unit in each block, a plan showing the location of the Building Regulations 'accessible and adaptable dwellings M4(2) (433 in total across the site) and the Building Regulations M4(3) (24 in total across the site) wheelchair user dwellings shall be submitted to and approved in writing by the Local Planning Authority. The development shall only be carried out in accordance with the approved details.

Reason: In order to provide a flexible housing stock to meet a wide range of accommodation needs.

Informatives:

1. If you need any advice regarding Building Regulations please do not hesitate to contact Guildford Borough Council Building Control on 01483 444545 or buildingcontrol@guildford.gov.uk.
2. This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:
 - Offering a pre application advice service
 - Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application
 - Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process

However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.

In this case pre-application advice was sought and provided which addressed initial issues and the application was submitted in accordance with that advice. However, further issues were identified during the consultation stage of the application. Officers have worked with the applicant to overcome these issues and the amended application is now deemed to be acceptable.

3. Environmental Health Informatives:

The applicant is reminded of the need for the development to comply with the requirements of the Food Safety Act 1990, The Food Safety and Hygiene (England) Regulations 2013, EC Regulations: 852/2004. No 178/2002 and is advised to consult with the Regulatory Services Manager.

The applicant should provide suitable and sufficient refuse bins for customers' litter and regular litter pick-ups should be carried out during and at the end of trading.

The plans do not contain sufficient detail for me to comment on the internal arrangements of the kitchen. The applicant is therefore advised to contact Regulatory Services so that the requirements of the Acts and Regulations can be discussed at an early stage.

The applicant is reminded of the need for food business to register with the Local Authority 28 days prior to opening and is advised to contact the Regulatory Services Manager.

The applicant is reminded of the need for the development to comply with the requirements of the Health and Safety at Work etc. Act 1974.

The applicant is advised to consult with Regulatory Services with regards to compliance with Licensing requirements.

The applicant and any associated contractor is recommended to seek Prior Consent (section 61 Control of Pollution Act 1974) approvals to control noise/vibration levels and hours noisy construction for the various phases of the development. This matter will be dealt with outside of the planning process and currently exists with the Head of Environment and Regulatory Services

Silent piling is the preferred option and only in extreme cases will noisy methods, such as driven piles, be permitted.

4. County Highway Authority Informatives:

1. The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the County Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the

classification of the road. Please see:

www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see

www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

2. The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.

3. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the County Highway Authority Local Highways Service.

4. All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980.

5. Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.

6. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2022. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.

7. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).

8. No operations involving the bulk movement of [earthworks] materials to or from the development site shall commence unless and until facilities have been provided in accordance with [the approved plans / a scheme to be submitted to and approved in writing by the Local Planning Authority] to so far as is reasonably practicable prevent the creation of dangerous conditions for road users on the public highway. The approved scheme shall thereafter be retained and used whenever the said operations are undertaken.

9. The scheme to implement waiting restrictions or other relevant works to regulate or restrict the operation of the highway shall first require a Traffic Regulation Order or Notice prior to use. The alteration of the Traffic Regulation Order or creation of a new Order or Notice is a separate statutory procedure which must be processed at the applicant's expense prior to any alterations being made. In the event that the implementation of waiting restrictions or other works requiring an Order or Notice is not successful due to unresolved objections the applicant shall submit an alternative scheme to the Local Planning Authority for its approval prior to first occupation of the development. Any alternative scheme or works shall be implemented prior to the occupation of any dwellings to the satisfaction of the Local Planning Authority.

10. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.

11. The provision of the new high quality bus shelters serving 14,15 and 16, Real Time Passenger Information for every bus stop and high quality arrival/departure boards that have a Content Management System installed (as secured by condition) shall be provided in accordance with SCC's approved suppliers.

5. Lead Local Flood Authority Informative:

If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards. Sub ground structures should be designed so they do not have an adverse effect on groundwater. If there are any further queries please contact the Flood Risk, Planning, and Consenting Team via SUDS@surreycc.gov.uk. Please use our reference number in any future correspondence.

6. Local Planning Authority Informative:

Apartment
B2 UG 01
B2 UG 03
B2 01 04
B2 01 05
B1 01 05
B2 04 06
B2 05 05
C1 UG 01
C1 UG 02
C1 01 04

C2 01 09
C1 01 03
C2 02 07
C2 03 07
C2 04 07
C2 05 07
D4 UG 01
D4 UG 02
D4 UG 03
D4 UG 04
D3 UG 01
D2 UG 01
D2 UG 02
D4 01 01
D4 01 04
D4 02 01
D3 02 04
D2 02 06
D2 02 05
D2 02 03
D4 03 01
D3 03 01
D2 03 01
D2 03 05
D4 04 01
D3 04 01
D3 04 02
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D3 05 01
D2 05 01

Officer's Report

Site description

The application site is an assembly of a large number of plots and buildings which are located to the north of North Street in Guildford town centre. The site has an area of 2.69 hectares - its western boundary is formed of The Friary shopping centre, its eastern boundary by Leapale Road, the southern boundary by North Street and the northern boundary is situated at the junction of Commercial Road, Woodbridge Road and Leapale Road. The site currently includes a number of land uses which include Guildford bus station, Council operated surface level car parks and the land between Commercial Road and Woodbridge Road which is currently vacant. In terms of buildings, the largest on the site is known as Dominion House which is a four storey office block which currently partly occupied. The site also includes the two storey retail property on the western side of Woodbridge Road which is known as 'Rugmart' and a part two, part single storey building which occupies the corner of North Street and Woodbridge Road which is also in various retail uses. On North Street, the site also includes the bar/restaurant known as All Bar One, Guildford Cobblers and 15 North Street which is currently vacant.

The site falls in height from south to north and from east to west. The lowest point is in the vicinity of Dominion House. The site is devoid of any notable vegetation or trees.

In terms of constraints, the site is located within the urban area of Guildford and within the town centre boundary. It is opposite (north of and not within) Guildford Town Centre Conservation Area and within an Area of High Archaeological Importance. The site includes a Grade II listed building (All Bar One) and is opposite Stoke House on Leapale Lane which is Grade II listed. Numbers 41-43 North Street, which is to the south of the site is locally listed. Most of the street frontages around the site are defined as being part of the town centre's Secondary Shopping Frontage.

In terms of the surrounding land uses it is noted that the southern boundary of the site fronts onto North Street which is characterised mainly by retail, commercial and office uses. The upper end of North Street hosts the on-street market and the lower end includes The Friary shopping centre and Friary Street which is one of the main restaurant areas in the town centre. The eastern boundary of the site runs along Leapale Road. Opposite the site on Leapale Road is a Council owned and operated multi-storey car park which is set over 12 levels of parking and the Telephone Exchange building which has a maximum height which is broadly equivalent to seven storeys. The northern end of the site is around the junction of Commercial Road, Woodbridge Road, Leapale Road and Leapale Lane. This contains Dominion House (which would be demolished as part of the development), as well as a number of two and three storey commercial and retail premises. As noted above, to the west of the site is The Friary shopping centre and closer to Onslow Street are a number of large scale office buildings.

The application site forms part of a larger allocation in the Local Plan under policy A5. The specific requirements of policy A5 will be set out in detail below, but in summary, the allocation is for: a comprehensive mixed use redevelopment with:

1. approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies
2. approximately 6,000 sq m food and drink (A3) and drinking establishments (A4)
3. approximately 400 homes (C3)
4. provision of 1 gym (D2)

Proposal

A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:

- demolition of existing buildings;
- a new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding;
- erection of buildings ranging from four to 13 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with;
- hard and soft landscaped areas to form pedestrianised streets and public spaces;
- associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Road) and associated infrastructure;
- the stopping up of adopted highway (including Commercial Road and Woodbridge Road); and
- alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

As noted above, the application site includes a portion of a wider allocated site (the triangular piece of land between the Friary shopping centre, Leapale Road and North Street) in the Local Plan (policy A5). It involves the regeneration of the currently mainly vacant land with a residential led development, with a large quantum of Class E floorspace (retail, commercial, restaurants, cafes etc) mainly on the ground floors. The proposal also includes the renovation of Guildford bus station with new access provisions as well as public realm improvements such as the provision of a new public square on North Street, the part pedestrianisation of North Street and a range of new areas of public open space.

In terms of the proposed layout it is noted that both Commercial Road and Woodbridge Road would be stopped up as part of the development. A new pedestrian only route would run through the middle of the site, roughly on the same line as the existing Woodbridge Road. This would run from the new public square on North Street to the junction of Commercial Road, Woodbridge Road and Leapale Road. This new route would be maintained as part of the development and at ground floor level it would be fronted by Class E uses along its southern half and by residential units along its northern half. Roughly halfway along the new Woodbridge Road would be a new area of open space which the applicant refers to as 'The Dial'. At 'The Dial', the new Woodbridge Road would intersect with a new east/west route which links Leapale Road to the eastern (side) entrance to The Friary Centre. This new route would again comprise of a mix of Class E and residential uses. Due to the site levels, the northern end of the new Woodbridge Road would include a staircase and public lift to take users from the upper ground level to lower ground level which at this point would be at grade with the existing junction of Commercial Road, Woodbridge Road and Leapale Road. New buildings would also be erected along both the existing Commercial Road and Leapale Road which would be mainly residential in use, with some Class E uses also on the ground floor of the buildings, fronting onto the street. On North Street, the two buildings on the corner of Woodbridge Road and North Street are to be demolished. These would make way for the wider regeneration and would allow the creation of the new public square. Further to the east, number 15 North Street would also be demolished. This was formerly a furniture store, but has been vacant for a number of years. This would be replaced with a new building with residential apartments over Class E uses on the ground floor. All other existing buildings along North Street would remain.

The other main element of the development is the refurbishment of the existing Guildford bus station. Works include the provision of a new enclosed canopy which would cover the area along the eastern side of The Friary Centre. It would also extend further to the south and across the existing Commercial Road. This would provide a new seating area which could be used by both bus passengers and the general public. The existing arrangements for bus access would also be altered. Buses would now enter and exit the station from the north via an amended junction. This means that the section of Commercial Road between The Friary Centre and the former Burger King fast food restaurant would be turned into a new pedestrianised open space area with landscaping and seating.

As noted above, the proposal also involves the part pedestrianisation of North Street from roughly Leapale Road in the east to the area in front of the main (southern) entrance into the Friary Centre. The pedestrianisation will include changes to vehicle movements along North Street which vehicles are only able to travel east along this section (during the hours when it is open to vehicles). Along the pedestrianised section, a single carriageway is provided, which allows for the widening of the pavement along both sides of North Street. This will include new paving, tree planting and opportunities for seating. More exact details of the pedestrianisation works will be set out in the main body of this report. In addition, Leapale Road would now become two-way for vehicular traffic and the carriageway and pavements would be widened as part of the development. New planting would also be provided.

In terms of the buildings themselves, heights generally increase from south to north which reflects the current land levels. The infill buildings on North Street would be set over four storeys. The rest of the buildings are larger to reflect their location within the development site and range from four to 13 storeys. The marker building at the very northern tip of the site, at the junction of Commercial Road, Woodbridge Road and Leapale Road, would be the tallest building with 13 storeys. The majority of the buildings would be finished with flat, green roofs.

Finally, the proposal would include works to the western side elevation of 16-17 North Street (All Bar One) which is a Grade II listed building. This would include the exposure of its western side elevation and works to the existing chimneys.

Summary of proposal

Total number of on-site car parking spaces: 136

Total number of on-site cycle parking spaces: 638

Total number of dwellings (market and affordable): 473 (mix of one-bed x 214; two-bed x 204 and three-bed x 55)

Total number of affordable dwellings: 20 shared-ownership (with the possibility of 28 additional shared-ownership units if the applicant gains Homes England funding)

Total proposed Class E floorspace: 2,358sqm

[Officer Note: It is noted that since submission, the proposal has been amended at the request of Officers, and following the consultation responses. For the avoidance of doubt, the description of the development above reflects the amended scheme. The main changes that have been secured are the reduction in the overall height of block E by 2.2 metres (including the rooftop frame). However, taking into account the removal of the previously proposed lift overrun, the reduction in the height of built form (excluding the rooftop frame) would be greater at approximately four metres. In addition to this, the setback floor has been removed from building C2. To compensate for the loss of units, an additional floor has been added to block B1 (above Astor Lane). As a result, the number of units remains the same, although there is a very slight change to the mix, which will be set out below. Other changes to the buildings include removing some areas of render and its replacement with brickwork and improving the detailing of the setback top floors. In addition to the physical changes to the buildings the applicant has

submitted additional information on the proposed servicing and refuse collection arrangements. Further information has also been submitted regarding highways and the operation and design of the bus station. These will be set out in detail below. The Local Planning Authority carried out a full 21-day consultation on the amended plans. In addition, the applicant has now offered to provide 20 on-site affordable dwellings, with the possibility of delivering a further 28, subject to gaining Homes England funding].

Relevant planning history

Reference:	Description:	Decision Summary:	Appeal:
22/P/01337	Listed Building Consent for works to 17 North Street associated with detailed application (22/P/01336) for a mixed use redevelopment at North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford.	Reported elsewhere on this agenda.	N/A
09/P/02043	Application to extend the time limit for the implementation of 04/P/00090 approved 23/12/2004 for outline application for comprehensive mixed use redevelopment of land bounded by North Street, Friary Centre/Commercial Road and Leapale Road to provide up to a maximum of 170 residential units, shops (Class A1), professional and financial units (Class A2), restaurants and cafes (Class A3), community space (Class D1), replacement bus station, a public square, residential car parking, servicing, plant, the refurbishment of existing Friary Centre and ancillary works.	Approved October 2010	N/A
06/P/00028	Reserved matters application pursuant to outline application 04/P/0090 for design, external appearance and landscaping only in respect of residential (use class C3), shops (use class A1), financial and professional services (use class A2), restaurants and cafes, drinking establishments and hot food takeaway (use classes A3-A5), community use (use class D1), leisure (use class D2), bus station and refurbishment of part of existing Friary Centre. (As amended by plans received on 24 February 2006 detailing confirmation of reconstituted stone for building 3, changes to buildings 1, 4, 5 and 7 and to elements	Approved March 2006	N/A

of public realm; a drop off point introduced along Leapale Road to improve integration with the bus station and disabled access; greater detail provided on the bus station; design of the shop fronts now included; Yorkstone sets introduced along the main alley by building 3 and along the route from the Square to Leapale Road; indicative public art proposals and update perspectives).

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|------------|--|----------------------------------|-------------|
| 04/P/00040 | Outline application for comprehensive mixed use redevelopment of land bounded by North Street, Friary Centre/Commercial Road and Leapale Road to provide up to a maximum of 170 residential units, shops (Class A1), professional and financial units (Class A2), restaurants and cafes (Class A3), community space (Class D1), replacement bus station, a public square, residential car parking, servicing, plant, the refurbishment of existing Friary Centre and ancillary works. | A p p r o v e d
December 2004 | N/A |
| 01/P/02222 | Redevelopment of land bounded by North Street, Friary Centre/Commercial Road and Leapale Road to provide an extension (26,112m ²) to existing Friary Centre. The mixed use development will include shop units (class A1), professional and financial units (class A2), restaurants and cafes (class A3), community space (class D1), covered bus station, pedestrian footbridge over Leapale Road, servicing, plant, the refurbishment of existing Friary Centre and ancillary works. | R e f u s e d
September 2002 | N/A |
| 00/P/00918 | Redevelopment to provide a new bus station, retail development (26,640 sq metres - Class A1 shops and Class A3 restaurants and cafes) including an arcade; associated highway works and landscaping; and the change of use (Class A1 to Class A2) and re-cladding of the Post Office building at 15 North Street. | Withdrawn
2001 | July
N/A |

Consultations

Statutory consultees

National Highways: No objections raised.

County Highway Authority, Surrey County Council: The County Highway Authority (CHA) object to the application. Three reasons for refusal have been suggested which all relate to the proposed bus interchange. The three suggested reasons for refusal are:

- The proposed development leads to an increase in bus journey times, particularly those arriving from the south and the west, specifically all bus services travelling into Guildford along the A281, A3100, A31 and from the University/RSCH, resulting in increased passenger delays and reduced customer satisfaction levels. Despite the emergency access route provided from the south via North Street, it has not been demonstrated that the proposed entrance and exit to the bus station would provide satisfactory levels of operational efficiency and resilience. The failure of which would result in increased passenger delays and reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of Surrey County Council's (SCC) Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).
1. The proposed development results in a reduction in the number of bus stands and layover spaces, and it has not been satisfactorily demonstrated that this reduction can accommodate the planned future growth, which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan (LTP4), the DfT Bus Back Better- National Bus Strategy for England (2021), Guildford Local Plan (Site allocations A25, A26 and A35) and the NPPF (2021).
 2. It has not been demonstrated that the proposed bus station is accessible for all users. The failure of which is prejudicial to vulnerable users and would lead to reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).

These will be discussed in greater detail in the main body of the report.

While the CHA have objected to the proposal, it is noted that they have provided conditions, informatives and the s.106 requirements, should the Local Planning Authority be minded to approve the application. These are provided on a without prejudice basis and it should be acknowledged that the conditions would not overcome the CHA's three reasons for refusal.

The CHA also note that 'notwithstanding the above recommended reasons for refusal, the County Highway Authority very much support the principal of redevelopment of this site and remain committed to working with the applicant and Guildford Borough Council to deliver a fit for purpose high quality development to serve Guildford's long term future needs. We recognise the value that a redevelopment would add to this part of the town, which could comprise a much-needed refurbishment of the existing bus station and pedestrianisation of North Street. Whilst we support the principal of redevelopment, it must be able to meet Guildford's future transport needs...'. No objections have been raised on highway safety grounds, overall highway capacity or the parking or servicing requirements of the development. Again, the other highways aspects of the development will be discussed in greater detail in the main body of the report. It is

also noted that the CHA's full comments are appended to the report, so that they can be considered as a whole.

County Archaeologist, Surrey County Council: The County Archaeologist notes that The Environmental Statement (ES) Chapter confirms that the archaeological interest of the site lies with the potential for remains associated with the medieval Dominican Friary and the later development of the site in the post medieval period. An assessment of historic mapping suggests that the site has been subject to extensive post nineteenth century development which will have caused truncation of earlier deposits and this has been confirmed by the trial trench evaluation which suggest that the site has been terraced and that archaeological survival in the western part of the site will be limited to deeper archaeological features such as pits and cellar and possibly graves, although the area is at some distance to the Friary cemeteries that were recorded during excavations of the Friary Church in advance of redevelopment of the brewery site in the 1970s. The eastern area of the site demonstrated a higher degree of survival, albeit with some deep areas of modern truncation, and of particular note was the recording of masonry of probable medieval date that may be part of the eastern gate into the Friary on the current Woodbridge Road. The ES assesses the archaeological resource as being of medium significance and that the development is likely to result on the loss of much of the surviving archaeology. The report therefore suggests that a programme of archaeological work will be required to mitigate this loss, which will take the form of a programme of a watching brief on the lower western area and detailed archaeological excavation of the of the eastern part of the site with which would be supplemented with an associated programme of public benefit that could comprise information boards on the construction hoardings, local school trips, further research by volunteers of the history and daily life of the Dominican Friary by volunteers. The County Archaeologist states that he is in agreement that these measures once enacted would provide an appropriate mitigation response to compensate against the loss of the archaeological resource and advise that it would be appropriate to secure the necessary works by the use of a planning condition. Subject to this condition, no objections are raised by the County Archaeologist.

Environment Agency: No objections raised. A number of conditions have been suggested which deal with contamination and piling works.

Natural England: The application is within 5km and over 400m from the Thames Basin Heaths SPA and will lead to a net increase in residential accommodation. Subject to the financial contribution as required through the local policies you [Guildford Borough Council] have in place, Natural England is satisfied that the applicant has mitigated against the potential adverse effects of the development on the integrity of the European site(s). Therefore Natural England raises no objection to the application.

Health and Safety Executive (HSE): The HSE is satisfied with the information provided with the application.

Historic England: Historic England (HE) raises concerns about the impact of the proposal on heritage grounds because it would cause harm to a number of designated heritage assets. They note that harm to heritage assets could be avoided or minimised through improvements to the design and they recommend that the Council seeks amendments to the scheme to achieve this. It is noted that the main issues appear to stem from block E which, from a range of views, appears out of scale or visually challenging within the townscape and would cause harm to the historic environment. The mass and scale of the proposals would also appear harmful to the conservation area in some longer-range views. HE consider that the harm from the scheme could be minimised through reductions in the height of the scheme, in particular block E. Regarding external architectural detailing of the scheme, HE strongly encourage that those buildings fronting onto North Street receive further refinement to ensure a really high-quality elevation. HE are content to leave the details of the listed building consent to the Council's conservation officer.

[Officer Note: Both HE's comments and those from the Council's Conservation Officer are appended to this report in full].

It is noted that HE were also consulted on the amended plans. They note the amendments to block E are not sufficient to make a marked difference to the impact the block would have on historic Guildford from the wide range of vantage points highlighted in their original comments. It is noted that the other changes to building C2 would not address the concerns HE raised principally about block E. Therefore, HE state that they remain of the opinion that the proposals would cause harm to a number of heritage assets, largely due to the height, mass and colour of block E, which from a range of views appears out of scale or visually challenging within the townscape. They confirm that they have judged this harm to be at the lower end of less than substantial to the Town Centre and Wey Navigation Conservation Areas, St Saviours Church, Guildford Cathedral and the scheduled Castle. As per their earlier advice, they continue to state that harm from the scheme could be minimised through greater reductions in the height of the scheme, in particular block E.

In summary, HE note that they have concerns regarding the application on heritage grounds. They consider that the issues and safeguards outlined in their advice need to be addressed in order for the application to meet the requirements of the NPPF, in particular paragraph 195.

Head of Environmental Health and Licensing: No objections raised. Conditions have been recommended to control / mitigate contamination, ventilation (particularly for food and beverage premises), noise and air quality. Specific comments have also been made regarding the relationship of the site to the existing public house known as 'Five and Lime'. It is noted that due to the site clearance in the surrounding area, this premises has operated with loud music for the last number of years. If this continued, there would be a risk of noise impacts to the new residents of the development. To address this point the applicant has offered a range of mitigation measures for the residential units. This matter will be discussed in more detail in the main body of the report.

Thames Water: No objections raised. It has been noted that there are water supply constraints in the area and a condition has been recommended that restricts the occupation of the development until water supply can be ensured. Other standard conditions are also recommended.

Lead Local Flood Authority, Surrey County Council: No objections raised, subject to conditions which include providing further details of the design of a surface water drainage scheme to be implemented as part of the highway works.

Internal consultees

Parks and Countryside: The proposal does not deliver the required amount of on-site open space. Financial contributions are required to off-set the under provision.

Environment and Regulatory Services (Licensing and Community Safety): The following comments are noted:

3. taxis are a vital form of transport and having well defined and managed taxi rank locations is beneficial for the taxi trade and travelling public. The rank at the Friary Centre is the principal taxi rank in Guildford and is a well-known location to be able to hail a taxi both during the day and at night...Any changes to this rank, even temporarily, will have a huge impact on how customers leave the town at night, which will potentially lead to an increase in disorder and have considerable safety implications as customers attempt to find a taxi service from another location. This will have significant impact on both the Council's and Police resources, and potentially risk our status as a Purple Flag town. This management should include, but not limited to, the identification of a replacement rank facility with the equivalent capacity,

provision of signage/promotional material to notify taxis/customers, provision of marshals to assist with the management of the new location and associated resourcing to ensure staff time spent on this project can be recovered corporately and not via licence fees;

- the proposal also seeks to remove the designated taxi rank spaces (approx. six spaces) on North Street outside Marks and Spencer. These spaces have become increasingly used over the past couple of years and the removal of this rank will leave an absence of rank provision in this immediate area of town and potentially cause difficulties for vulnerable users who rely on taxis during the day and for patrons of the leisure offering in the new development seeking a taxi home after a night out. Request that additional rank space is identified in the town centre in order to mitigate the loss of the spaces on North Street;
- emerging issue on North Street of [food] delivery drivers parking and behaving inappropriately and dangerously which detracts from the area, and would likely to continue to impact residents of the new development if not managed properly, reducing the appeal as a place to want to live. Examples include parking issues but also there have been complaints about the behaviour of drivers such as being aggressive when asked not to park in a location, littering, urinating in public and gathering in groups being rowdy. The application proposes changes to the access and configuration of North Street which if considered could help alleviate and improve the management of this issue. This would improve safety in the area and assist businesses wishing to offer goods for delivery;
- North Street is to become pedestrianised during the day and open to traffic at night as the current arrangement of the High Street allows. Pedestrianisation is to be welcomed as it will improve the perception and appeal of the area and potentially allow a greater number of hospitality venues in the area to place tables and chairs outside, contributing to the café/alfresco culture of North Street. However, the High Street when opening during evening hours completely detracts from the appeal of the area by becoming nothing more than a car park with vehicles parked on both sides of the road creating a narrow street which increased the risk of pedestrian/vehicle conflict. If the same arrangement were to be allowed in North Street it would detract from the area as there is plenty of car parking available in town and subsequently no need to create a similar environment to the High Street. Furthermore there are going to be many residential properties facing onto North Street which are likely to suffer from unwanted noise by customers returning to their cars late at night if the scheme allows cars to be parked on North Street. It is recommend that access and parking on North Street is limited as much as possible to improve safety and perception in the area;
- North Street has some Council owned CCTV however this is likely to be altered and existing cameras rendered useless by the new development as the configuration of North Street changes and new public realm areas are introduced. Consideration needs to be given to incorporating Council/Police CCTV cameras within/covering the relevant areas of the development (such as the new public realm and leisure offering). A review of CCTV needs to be undertaken to identify new coverage required due to the development;
- North Street currently holds a Friday and Saturday market which is very popular however will likely need to be relocated during works. Both locations will need to be carefully considered as the location of the market may impact on existing properties/amenities. Complaints are regularly received about the impact of markets on existing businesses, particularly with respect of blocking frontages. The redeveloped North Street public realm will include an improved market facility. Whilst this will likely be popular with stall holders utilising the market on a Friday/Saturday, this is also likely to be popular with other sellers who may seek to use the facilities outside of the market times either with or without permission. This will require the involvement of licensing staff to manage, and it is important that this area is covered by CCTV so that potential offences can be investigated effectively;
- consideration needs to be given to ensuring the right mix of commercial premises to cater for both day and night time economy in order to ensure the appeal of Guildford as a destination for a night out is improved; and

- there currently are a few late night licensed premises in the area of the proposed development, All Bar One and Five and Lime. Five and Lime in particular is a popular venue which has been trading for some time without complaint. The venue does emit a certain degree of noise from both patrons and amplified music, however there have not been any complaints received as there are currently no residential premises who may be affected by the noise to complain. As we have seen with other development in the town, where residential properties are built close to licensed premises this will inevitably cause complaints about noise which for the Local Authority responding under the Licensing Act will be very difficult to deal with. It is also worth noting that the Council as the Licensing Authority has adopted the 'Agent of Change' principle in its Licensing Act 2003 Statement of Licensing Policy and as such should the residents of the new development complain about the premises, it is unlikely that the Licensing Authority would be in a position to offer any resolution to their complaints.

Non-statutory consultees

Education Authority, Surrey County Council: No objections subject to securing financial contributions to mitigate the impacts of the development on the education system. The contributions requested total £1,506,762 and would be used towards early years, primary and secondary education.

Farnborough Airport: No objections raised.

Gatwick Airport: No objections raised.

National Air Traffic Services (NATS): No objections raised.

Surrey Police (s106 requests): Surrey Police raise no objection to the proposal, subject to a financial contribution to mitigate the impact of the development on policing.

Surrey Heartlands Health and Care Partnership: No objections raised. It is requested that to mitigate the impacts of the development, that either a unit is secured within the development for a possible future healthcare facility or a financial contribution is secured. Both of these can be secured through the legal agreement (either / or - not both). This matter will be discussed further in the main body of the report.

Amenity groups / Residents associations

Holy Trinity Amenity Group (HTAG): Raise an objection. The following concerns are noted:

- the scheme has been 'over-promoted' by the applicant in the submission. Examples include using wide angled photomontages and claiming that North Street is being pedestrianised when this is only true for a section of it;
- the direct dwelling density would be 175dph, but allowing approximately for the non-residential component of 2,358sqm this would increase to the equivalent of 188dph. To achieve such a dense development requires high buildings, narrow streets and little open space; this development would not match the established centre in these respects;
- the height of the buildings is more than those of the adjacent historic and established town centre, and therefore do not merge well with that existing;
- the 'landmark' building will be prominent in views over the town. Of particular interest to HTAG is the intrusion into the view from Bright Hill. This building will dominate the roofscape of the centre and compete with the Cathedral in the view [Officer Note: The scheme has been amended since these comments were submitted and some buildings, including the marker building have been reduced in height. This has a corresponding impact on some of the views from around the town centre. This matter will be discussed in detail in the main body of the report];

- unacceptable ratio of cumulative building footprint to genuine site 'open space'. Very little genuine open ground level would remain;
- development includes narrow, chasm-like, streets [Officer Note: As a general point, the issues raised by HTAG and other amenity groups regarding design, scale etc will be addressed in the main body of the report];
- the claim that the scheme will provide 'a modern, striking new bus interchange' is not correct. The scheme would only be a refurbishment, a cosmetic one, of a scaled down version of the present bus station (present 22 stands reduced to 16). A modern bus station, which we need and as many towns now have, would have toilets, be fully enclosed and heated, have an information / enquiry desk, and have a spacious seating area from which all boarding places can be observed; the proposed scheme has none of these. The scheme would probably prevent Guildford from having a proper bus station for decades;
- both Commercial Road, and the included stretch of Woodbridge Road, would be 'stopped up' and the replacement Woodbridge and Astor streets would not be adopted by the Highways Authority. These would therefore be under private, not Council, control, with no legal right of public access or use; many public controls such as those for street trading, consumption of alcohol, advertising, pavement cafes etc would not apply. In this respect the development would not be fully integrated with the existing town centre, which is almost completely genuine public realm [Officer Note: Public access to and through the areas of public realm would be secured through the legal agreement];
- no affordable housing (40% required by the Local Plan) is to be provided; the developer has claimed that the planning gain being provided will be worth £10m, and viability considerations mean that affordable housing cannot also be included. HTAG note whether some 'planning gain' such as refurbishment of the bus station and resurfacing of part of North Street, could not be exchanged for this [Officer Note: The refurbishment of the bus station and the pedestrianisation of North Street are elements of the planning application. Members will be required to base their decision on what is before them. The removal of the bus station and pedestrianisation from the plans is not an option which Members have before them. In addition, it is noted that the proposal does now include an element of affordable housing which will be discussed further below]; and
- the future prosperity of town centres is uncertain; there are still many empty premises in the existing town centre. The promotion of the scheme in the application as 'an exciting new destination for Guildford with high quality architecture providing spaces to eat shop visit meet and play' is worrying. If implemented HTAG hope that most of the ground floor non-residential component of the scheme could be easily transferred to residential use unless the need for increased non-residential use is confirmed [Officer Note: The Local Planning Authority has sought independent advice on the level of commercial floorspace being provided and no objections have been raised. The change of use of the commercial units to uses which are outside of Class E (i.e. residential) would require the benefit of planning permission, as a condition is recommended to remove the right to change uses].

Guildford Society: Raise an objection. The following concerns are noted:

- the Society is supportive that a serious proposal by St Edward has now been brought forward for determination, and also commends the developers on the engagement they have had on developing the proposals. The proposed development has many attractive aspects including: the retention of basic road layout in the form of pedestrianised areas; flexible multi-use space on the ground floor to allow for development of active frontages; new public areas; proposals to make North Street more attractive through pedestrianisation and sustainable heating and ventilation;
- has the applicant's Retail Planning Statement been adopted by the Council as a correct view of the retail environment. If this has been adopted, it is a useful document as background for other town centre sites proposing new or reduced retail space [Officer Note: This matter will be discussed in detail in the main body of the report. As noted above, the Local Planning Authority has sought independent advice relating to this matter];

- policy allocation A5 also proposed an additional 400 dwellings across the whole site. This now appears to have been allocated exclusively to the eastern sector of the site, with an uplift of 73 units partially in compensation for the shopping area having been substantially reduced. It would be useful for this major site that the Council updated the Policy A5 to describe the aspirations for the site which informs the parameters within which the applicant is now operating [Officer Note: It is not possible to update the Local Plan on an ad-hoc basis. However, any non-compliances with policy A5 will be addressed in the main body of the report];
- the plan area now covers a substantial portion of North Street. The Society are not against revising North Street but believe it should be planned. Should a local SPD be developed to provide a strategic view for the street with details on mass and scale of buildings, use of buildings etc [Officer Note: The submitted application should be assessed against the development plan which is in place at the time of determination. There is currently no SPD in place for North Street. This is a matter which the Society would need to address with other departments within the Council];
- concerned that like other developers St Edward have been using a highly dubious 'Like Button' on their website this can give a false positive when consultation comments are concerned;
- disappointed that VU City modelling has not as yet been used to inform the public on how the development will look [Officer Note: The Council's VU City subscription is not available for the public to use. However, it has been used extensively by Officers to test the impact of the proposal and Members have been given the opportunity to 'request' other views that may have been of interest. Furthermore, the application is submitted with a full Townscape and Visual Impact Assessment (TVIA) which tests the proposal in a range of views around the town centre];
- the Society is happy to see the town evolve, as it must, but they believe the mass and scale of the development, together with its architectural treatment is an issue. The Society contends that the proposed mass and scale of the proposed development is fundamentally out of character with the town;
- in addition to concerns expressed by Design South East about certain views, the Society also has concerns about views from Pewley Hill, the Hogs Back, Stag Hill, The Bars, Leapale Road and Woodbridge Road [Officer Note: As noted above, the amendments which have been secured improve some of these views];
- already seen Solum [the redevelopment of Guildford Station] used as a precedent for higher buildings in the town centre. The proposed Block E sets an even higher precedent [Officer Note: Each application is determined on its own individual merits. The approval of this application would not set a precedent for further 'taller' buildings];
- the Society believes the views demonstrate a major impact on the town and surroundings and in particular the height of the buildings needs addressing. The lack of any simple building height policies in the town centre is an issue;
- the Society believes more understanding is needed on the impact on heritage assets in the town [Officer Note: The application is accompanied with a Heritage Impact Statement and the Local Planning Authority has received comments from Historic England and the Council's Conservation Officer. Sufficient information exists to assess the impact of the development on heritage assets];
- the Society considers the density is exceptionally high and completely out of character with the rest of the town centre;
- the Society notes that the proposal does not meet the design and character requirements of policy A5;
- the Society notes that Block E does not meet the design principles set out in the National Model Design Code;

- the Society notes that bus operators have raised concerns regarding the changes to the bus station and that Surrey County Council have outstanding issues which need to be addressed. The Society claim that the submitted transport modelling is limited and does not cover a number of issues. It is noted that there is a loss of town centre parking;
- the lack of affordable dwellings needs to be fully determined [Officer Note: This matter is fully detailed in the main body of the report and it is noted that an element of affordable housing is now provided];
- as the proposed development is going to be in situ for a considerable time it is unclear what consideration has been given to longer-term refurbishment and improvement, potentially involving retrofitting and rearrangement of dwellings. The frame of the proposed building is going to be a concrete frame. The use of concrete needs to be considered as it is a very heavy source of carbon. More consideration needs to be given to the long-term sustainability of the development;
- concerns that the changes proposed for Leapale Road will not work. Leapale Road although being widened is still a narrow road with high buildings on both sides rising to eight storeys. As an urban realm it could be very forbidding and unpleasant, compounded by an awkward SE/NE alignment;
- note that The Plaza site, Solum [Guildford Station redevelopment], North Street, and St Mary's [former Debenhams site] will all be selling units at the same time. Although the developments are different to a degree Guildford town centre will have a large number of single and double bed units coming to market at a similar time. The Society fears that developers will slow their programmes so that a limited number of units only are "released" in order to avoid flooding the market and depressing prices. A greater range of housing type would avoid this;
- the proposed plans have poor links east and west; and
- the Society is pleased that ground floors are being constructed on the basis that flexibility is critical as the use may vary over the design life of the development.

Merrow Residents Association: Raise an objection. The following concerns are noted:

- the proposal is out of keeping with the existing elements of the town and will do nothing to enhance an area that is overdue for development;
- appreciate that Guildford Borough Council have tried strenuously to bring forward an acceptable development but they have failed even though there has been a very significant level of public consultation and dialogue which is ongoing;
- real efforts have been made to retain a bus station which is applauded. Also appreciate the number of new homes that the development would deliver;
- on the other hand very disappointed that there are no affordable homes. On that basis alone the application should be withdrawn for further consideration [Officer Note: A reduced quantum of affordable homes (including no provision) can be acceptable if a viability argument is agreed. However, it is noted that an element of affordable housing is now provided by the applicant];
- the allocation (policy A5) has been ignored by the developers. The requirements section of this policy states that the development must respond to the context set by the surrounding street pattern and historic environment...through the need for high quality design with particular care of massing heights and roofscapes. What is proposed is a mass of high buildings with narrow uninteresting streets and with no eye catching quality designs to enhance the centre of town;
- the buildings in the development are uninspiring and unattractive. They do not meet the criteria in policy A5 that they should be of high quality;
- the heights of the buildings are far too high. The site is packed and that there is only limited space between some buildings;

- struck by the impact of the 14 storey building from a number of vantage points. An examination of the development across town from Dapdune Wharf, Pewley Hill, Stag Hill, Woodbridge Road, Farnham Road, and the Barrs has drawn the Association to the conclusion that the development will dominate the landscape in a totally unacceptable manner [Officer Note: As noted above the scheme has since been amended to reduce some building heights and this results in improvements to some of the views noted above];
- the 14 storey building is not only too high but has no redeeming features at all {Officer Note: The marker building is now to be 13 storeys in height}; and
- it is the Associations hope that North Street will be developed as it is long overdue but these plans need to be withdrawn and amended to reduce the height of the buildings and to make the buildings less overbearing.

St Catherines Village Residents Association: Raise an objection. The following concerns are noted:

- the excessive mass and scale damages several protected views, which are one of the planning authority's principal planks for controlling building height and preventing excessive development [Officer Note: It is assumed that the Association are referencing the views contained within the Council's Town Centre Views SPD. This SPD contains guidance for managing changes to key views in Guildford. It helps planners, developers, and designers to maintain Guildford's character; appreciate key heritage assets and understand the relationship between Guildford and its landscape setting. The SPD does not necessarily seek to control or limit the height of buildings or to prevent excessive development];
- the Association raises specific concerns about view four (from the Hogs Back), view three (from St Catherines), view five (from Farnham Road) and view 11 (from the gyratory). It is noted that the development would appear at odds with the surroundings and would mask views of the countryside. It is also noted that the proposal would be visible in views including from St Catherines [Officer Note: See response to similar concerns above];
- the design does not respond to the local street pattern and historic environment contrary to policy A5 paragraph 2; the roofscape is not at all varied and has a major impact on the skyline;
- the proposed height is completely out of character;
- this design produces a forest of rectangular blocks all with stuck-on balconies that would transform the character of Guildford from a historic market town that has developed in a controlled way into something dominated at its core by a huge monolithic housing estate [Officer Note: The proposal has a mix of external balconies which are affixed to the elevations and balconies which are built into the buildings];
- the mass of protruding high-level balconies is completely alien within Guildford and imposes the character of an inner-city suburb;
- the token setbacks on the top floor do nothing to reduce the massing and just look silly - they shout out that this is a very poorly negotiated planning consent; [Officer Note: This application has not yet been consented];
- the monolithic nature of the proposal will overwhelm the town centre and prevent its integration into the town. Common practice on a scheme of this magnitude is to have the individual buildings designed by separate architects under the overall direction of a master planner in order to create a harmonised variety, typical of good organic growth; [Officer Note: There are no policies in place to force the use of different architects on larger schemes. Despite the comments, Officers would note that it is not unusual or unacceptable to have one architect work on a scheme of this size];
- the design should be revised to avoid the current uniformity. The design is unimaginative and is a copy of a sudden fashion for framed buildings clad in brick slips and prefabricated brick panels that do not look convincing as they are too high;

- the compromised design is in part due to the excessive density. The excessive height would create a canyoning effect on Leapale Road, exacerbated by the linking of the units with access through something akin to a pedestrian subway tunnel. It results in buildings being very close to one another inside the scheme;
- some of the CGIs show the space between two opposing balconies as being little more than the depth of a balcony, meaning a complete loss of privacy when using a balcony, but also making it very likely that with the patio doors open there would be sound transmission between units across the narrow street;
- the developers claim the narrow streets are based on local examples such as Swan Lane. This is completely disingenuous since the current streets are lined by buildings of two storeys rather than eight, the latter producing a sense of claustrophobia and creating a noise nuisance, due not just to the enclosed nature of the space that will be created, but also due to the sheer number of people forced to live in such close proximity to one another;
- the density is excessive, completely out of character with the area and will result in poor living conditions;
- concern that the smaller bus station will in the medium term prove too small for the increased number of passengers and buses that will be required to achieve modal shift and enable the council to meet its low carbon targets;
- the partial pedestrianisation of North Street is largely welcome but much of these improvements are long overdue and their funding should be independent of this scheme;
- the necessity of remodelling North Street should not be the excuse for excessive development on a nearby site;
- provision for taxis and disabled persons' parking have yet to be properly resolved and must be adequately provided for;
- the viability study has been signed off as a sales and marketing report, probably with an extract from such a study. The viability study should be produced by an RICS registered valuer and a crucial missing element is the Sensitivity Analysis which will show that a range of values can be produced, and the commentary around that, which will emphasise that there is a wide range of possibilities dependent upon the various assumptions adopted. The document submitted is therefore incomplete and misleading: It is not credible that a scheme of this magnitude, in one of the most affluent parts of the southeast, could not be viable as the developer is arguing. It is possible to agree for a future clawback towards social housing in the event that the scheme is ultimately profitable and consent should not be given without this [Officer Note: The applicant's viability assessment is being independently assessed by a Council appointed expert. The viability situation is discussed in greater detail below];
- given that GBC has, or had, a material financial interest in the site, the size of which is directly proportionate to the amount of development permitted, it needs to ensure full transparency around its negotiations with the developer. It needs to ensure that there is no suggestion that it has permitted over development to maximise the land value to its financial benefit [Officer Note: As the report below will demonstrate, the proposal has been assessed against relevant national and local planning policies. The negotiations which took place between the Council as landowner and the developer are not a matter of concern for the Local Planning Authority];
- the public consultation was flawed in that some of the supporting material contained images that were a long way from what is proposed; and
- the Association is fully aware that this site has lain vacant for an unacceptably long time. But that cannot mean accepting a scheme that is simply attempting to cram on too much; that would negatively impact Guildford's character; be out of scale both as a homogenous scheme and at the level of individual buildings relative to their surroundings.

Guildford Residents Association: Raise an objection. The following concerns are noted (these cover a number of separate letters received from the Association):

- overdevelopment;
- excessive height including an inappropriate landmark building;
- the compromised design is in part due to the excessive density;
- impact on views;
- narrow streets;
- built form (height, bulk, massing and ground levels) obscures the rise and fall of the land characterising Guildford's town centre, and dwarfs historical town centre buildings;
- cramped bus station layout with inadequate access to routes;
- design of the bus station is appalling;
- design based on London not Guildford;
- should be adequate provision for buses to/from all directions;
- the excessive mass and scale damages several protected views, which are one of the planning authority's principal planks for controlling building height and preventing excessive development [Officer Note: The Council does not have any formally protected views];
- The impact on representative view 4 would be dramatic as this photograph of the relevant section demonstrates. The new development would mask all the currently visible urban area that lies behind it. This much lower area recedes into the distance and blurs the town into the wider landscape;
- regarding representative view 3 the fact that the proposal can, unlike the rest of the town centre, be seen from this point confirms that it will dominate the town's skyline and that, importantly, this will be evident from many points that have not been used for a representative view [Officer Note: The amended scheme improves the view from St Catherines Hill];
- regarding representative view 5 it is noted that the excessive scale of the buildings relative to the domestic buildings from where the photograph was taken (and the streets off Farnham road on either side), and to the commercial buildings in the background is apparent
- overbearing unbroken tunnel effect along Leapale Road;
- regarding representative view 11 it is noted that this shows how the scheme would tower above the existing blocks of town centre flats. The view shows about nine floors of flats above the roof line of a relatively tall modern (1970/80) block which serves to emphasise the excessive height and out of character scale of the scheme from this gateway viewpoint;
- the design does not respond to the local street pattern and historic environment contrary to policy A5 paragraph 2;
- the roofscape is not at all varied and has a major impact on the skyline contrary to policy A5 paragraph 5. Recent nearby redevelopment for flats in Guildford town centre is typically four storey;
- common practice on a scheme of this magnitude is to have the individual buildings designed by separate architects under the overall direction of a master planner in order to create a harmonised variety, typical of good organic growth [Officer Note: There is no policy requirement for this];
- insufficient access for potential users and occupants including deliveries, drop off, disabled access;
- impact on York Road, a conservation area with schools sensitive to pollution (N02 exceedance) generated by vehicles;
- an inadequate, incomplete non-RICS compliant viability assessment that lacks a sensitivity analysis, or reference to a scheme compliant with planning objectives;
- a viability study cannot be used to justify the extent of a development. Its purpose is to minimise the developers social housing contribution. The figures submitted are not therefore objective and even if a compromise results following a review by the Council's consultant it cannot be definitive as there will always be a valuation variation and the decision-maker needs to understand this;

- with a deficit of £60m it is not credible that the developer would wish to proceed if he believed his own figures. In such a scenario the developer would need to undertake what are euphemistically called value engineering adjustments ;
- the benchmark land value (BLV) is one of the most crucial inputs in determining viability. This is presented as an absolute with no explanation;
- the assessment of existing use values need full justification;
- find it disconcerting that so much prior discussion about viability has been allowed to take place when the posted documents omit the vital elements that would enable an informed understanding of the issues. We therefore believe that granting consent with this argument in mind would be unsound;
- cannot allow an ill informed debate around a very theoretical value, which the developer seems unwilling even to try and justify, to dictate buildings three times the height of other modern flats in Guildford town centre. What if this huge overdevelopment were approved, only to find that when built a cheaper method is employed. Are we to suffer the additional storeys simply because we are unable to challenge the addition applied to the benchmark land value;
- the north street viability assessment use costs 50% above the BCIS median;
- could a lower scheme of five storeys be viable given the lower costs;
- a scheme of half the size would appear to be viable;
- GBC should instruct its consultants to use the more sophisticated software it has to explore lower forms of development with less extravagant specifications in the belief that they are likely to be perfectly viable;
- the BNP report that the Council has commissioned at 4.2 proposes an average sales price for the flats of £750 per square foot comparing to a scheme called Alvaston situated adjacent to London Road station which they say is achieving this. This compares to £712 per square foot used for the Debenhams site;
- the extra value in the sales prices adopted is very conservative.
- the precise terms of the review, what is and what is not excluded, and whether it starts from a neutral position or from a negative position if the final viability assessment produces one, are crucial in determining what benefits might accrue to the community for affordable housing or other things;
- it is not necessary to build above five storeys to create something viable. A scheme based on family housing using a modern approach to terraced housing, as occurs in many other towns in the UK and Europe, is perfectly possible [Officer Note: Members should use caution when considering this comment. The viability situation for this specific scheme will be set out in detail in the main body of the report];
- concern that the smaller bus station will in the medium term prove too small for the increased number of passengers and buses that will be required to achieve modal shift and enable the council to meet its low carbon targets;
- partial pedestrianisation of North Street is largely welcome but much of these improvements are long overdue and their funding should be independent of this scheme;
- in terms of North Street practicalities, provision for taxis and disabled persons' parking have yet to be properly resolved and must be adequately provided for; and
- concerns about public consultation carried out by the applicant.

For completeness, it is noted that the Residents Association welcomes three aspects of this proposal:

- shift from retail to residential – something actively argued for at the Local Plan Examination in Public and in previous consultations;
- retention of low rise buildings along the North Street frontage (largely outside application site); and
- bus station to be on its existing site.

Third party comments

51 letters of representation have been received raising objections and concerns. The following points are a summary of the stated concerns - the representations can be read in full on the Council's website.

- the proposal conflicts with the requirement two of policy A5 of the Local Plan which states that 'development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes'. The proposed building heights and roofscape is inappropriate;
- the proposal would overwhelm the townscape;
- at fourteen storeys, the development is far too tall and will set a very dangerous precedent in Guildford leading to other tall developments which in time will overwhelm and destroy the character of Guildford [Officer Note: Please see Officer Notes above relating to design, height etc];
- the site is overdeveloped having a density far in excess of that which was envisaged in policy A5 in the approved Local Plan and is in excess of many similar mixed developments London;
- bearing in mind the importance of this site at the heart of Guildford, the quality of architecture is disappointing and bland. It is stated that Guildford deserves better;
- scale and height of this development is not in keeping with the nature of Guildford's skyline;
- no affordable housing is being proposed [Officer Note: An element of affordable housing is now proposed. This will be discussed below];
- the proposals for bus access to the new bus interchange will adversely affect the viability, attractiveness and effectiveness of Guildford's local bus network and its potential to achieve 'modal shift', address traffic congestion, improve air quality and social inclusivity in the town;
- the ARUP [Guildford Bus Station] report commissioned by Surrey County Council has not been considered;
- the capacity of the proposed new bus interchange will not adequately allow for the expected future expansion of Guildford's bus services;
- the applicant has not adequately demonstrated that the proposals for bus navigation within the proposed new bus interchange are workable and that bus operators have not been given the requested opportunity to test the design in terms of 'real-world' operability and, if necessary, recommend changes to the proposed design;
- the applicant has not included proposals to increase priority for buses on the town centre road network necessary to make the proposed smaller bus interchange work;
- the applicant has not adequately demonstrated how the reduced number of departure stands and bus circulation space will cope with 'real world' operating scenarios;
- detailed plans concerning the design and facilities on the bus interchange concourse and associated adjacent areas have not been included in the application documents. These must be included in the application and approved by local bus operators before any permission is granted;
- if the making of comprehensive improvements to bus customer facilities could affect the overall viability of the proposed scheme, it is essential that a financial solution to these issues be agreed and included in the application before any permission is granted;
- bus station is poorly designed and raises safety concerns when buses will be manoeuvring;
- the bus station fails to deliver the improvements that are needed which makes this application a lost opportunity;
- no information is provided concerning the future upkeep, management and financing of the bus interchange facility and that, as a consequence, the quality of the refurbished facility is likely to degrade fairly quickly;
- this application asks for 473 residential units. The current Local Plan stipulates 400 dwellings. This is more than doubling the 170 units allowed under previous consents for the site;

- it is questionable whether one, two and three bedroom flats without much storage or private outdoor space provision is what is required in Guildford rather than family homes;
- proposal does not comply with vehicle parking standards;
- removal of a large number of existing surface car parking spaces close to the centre of town will only increase pressure on the sites that are available;
- the applicant proposes providing 136 parking places for these dwellings, a ratio of just 0.287 spaces per dwelling. There is not enough parking provided [Officer Note: The on-site parking provision is in line with the Council's maximum standards];
- no public parking to support the new Class E uses;
- the application has nothing for the people of Guildford - no public building such as a new museum, art centre or tourist information centre, no public open space of any size;
- is it necessary to demolish a perfectly serviceable building in order to construct another. The carbon impact has seemingly not been taken into account with this demolish and new build strategy;
- concerns about the blockiness and over-development of the site. Whole areas of sky are going to disappear with this development, whether the view is from the bus station, from Angel Gate or any part of North Street. It is very out of keeping with other town centre buildings;
- too much residential development;
- the proposal will result in the loss of existing public car parks;
- the healthcare facility should be given to the NHS fully fitted out and at a peppercorn rent;
- the height along with the density of the structures has a detrimental effect on views, topography, skylines, landscape setting and character. The proposed concentration of tower blocks dominates the skyline and views through the valley, and is not consistent with Guildford's historical and architectural character;
- the proposal has a generic, homogenous design;
- the number of objections received in no way represents the real level of concern in the general public. It is intimidating to the average person to comment on the huge number of complex documents presented with a large project like this;
- the s.106 offer is very vague [Officer Note: The s.106 have now been further detailed in this report];
- harm to the amenity of surrounding residents including overlooking, overshadowing, loss of light and privacy;
- the proposal does not improve cycle links through the town;
- the additional supply of commercial and retail space is creating an oversupply and can lead to anti-social behaviour and a negative effect on already struggling vacant units and the town centre in general;
- the 'warehouse' design theme is ugly and fails to be either reflective of finer architecture from the past nor what I would prefer which is a modern design reflecting the future of our town rather than 'aping' Industrial Revolution buildings;
- concerns about misleading consultation documents;
- the impact of the scheme on local and wider views would be destructive and transformative;
- concerns regarding the submitted Viability Assessment and its accuracy;
- poor levels of internal amenity for the new residential units;
- if consent were granted for anything like the height proposed for the tall block adjoining Sanofi House, this would be a very dangerous precedent given that there are proposals to add excessive storeys to that block already. And there would probably soon be proposals for 15 storey blocks of flats throughout the borough [Officer Note: Each application is considered on its own merits];

- Guildford Borough Council has a conflict of interest in so far as it is, or was, an owner of a large part of the site, and clearly wants to maximise the amount at which it is sold, but this is entirely dependent upon how much can be built [Officer Note: The application is being assessed by the Local Planning Authority and this process is independent of the Council's 'corporate' function. The final decision on the planning application will be made by the Council's elected Planning Committee, who will base their decision on the planning merits of the case only];
- concerns regarding whether there is adequate school capacity in the area to cater for the development;
- the proposed material are out of keeping with historic Guildford;
- the scheme should have been designed by a range of architects;
- the proposed pedestrianisation of North Street would affect access to North Street which in turn affects access to the existing servicing in Commercial Road and Friary Street. Concerns about whether there would be access for servicing vehicles to these locations throughout the day and what is the proposed routes for this;
- no provision for food delivery drivers;
- the c. 24,000 sqft of commercial is unlikely to draw the mix of businesses proposed by the developer. It will either lay empty or encourage existing businesses away from either end of the high street;
- public realm plans should have a greater proportion of soft landscaping / grass;
- the proposal will result in traffic congestion and 'tailbacks' in the area [Officer Note: No concerns have been raised by the County Highway Authority with regard to highway capacity];
- severe reservations about the bus station (interchange) proposals. Concerned about the single entrance off Leapale Road which will not only extend journeys on some routes but may well also cause congestion on the York Road roundabout;
- concerned that the smaller size, down from 22 to 16 stands, whilst it could manage the current temporarily reduced level of service will not be large enough to deal with a return to pre-Covid levels of service and any increases over and above that eg for new housing developments in the borough and the desired improvement in frequency to combat climate change and congestion in the borough; and
- the passenger circulating area is even smaller than the current inadequate size so could not accommodate significant passenger growth. Also, the current adjacent indoor spaces eg cafe, former travel shops and staff mess areas, which are part of the Friary shopping centre, have not been considered. As a minimum an inspector's office, cafe, toilets and staff mess room need to be part of any plan.

After the amended plans were received, the Council undertook a full 21-day re-consultation. The following comments were received during or after this consultation period. Please note that duplicate comments, which have already been summarised above, will not be repeated below:

- the Bus Station Questionnaire organised by Berkeley / St Edward is not statistically significant given the numbers of customers using the bus station on a daily basis;
- the survey was conducted deep in the August holiday period which does not reflect typical bus ridership. These factors invalidate the survey results;
- concerns noting that some of the questions may have been leading a specific answer;
- the changes are not substantially different to the original application;
- there is not sufficient outside space for the use of the (many) people in the housing development;
- the landscaping is only decorative and there is too much hard landscaping. There should be no claim of increasing biodiversity;
- the reduction by one floor to Block E with the reduction in residential units being accommodated by adding back and giving extra height to other blocks does not alter the inappropriate high density of the proposals and excessive height of the development adversely effecting the character of the town centre;

- do not believe these changes will improve the impact on the key views;
- the proposed smaller bus interchange and revised access arrangements will not work unless extensive and effective bus priority is provided throughout Guildford town centre;
- welcome much needed investment in town centre bus facilities, but continue to believe that better solutions are available and that we are at risk of missing a once-in-a-generation opportunity to radically improve bus-based sustainable transport;
- pedestrianisation of North Street would be a good idea but how would residents access these new buildings;
- not enough local facilities to cater for increased demand (i.e. schools, healthcare etc);
- leave the high-rise to Woking and restore Guildford as a beautiful historical town, correcting the architectural disasters of the last 50 years;
- the amended scheme is still too high, too dense and architecturally inappropriate;
- not enough family homes provided;
- no demand for new shops and offices; and
- no cycle access provided.

58 letters of support have been received outlining the following positive comments:

- the proposals will transform this town centre derelict brownfield site, which has stood vacant for some time and become an eye sore, into a well and sympathetically designed multi use area, which is predominantly pedestrian;
- the new homes will add much needed footfall back to North Street and the High Street, which will aid and assist the retail and hospitality owners, and will ensure that Guildford remains a vibrant place to visit;
- pleased about the pedestrianised aspect of the plans. You can see the benefit this has added to the Tunsgate area (i.e. sitting, dining and relaxing outside). The same benefits could happen here;
- less cars in the busy town centre shopping areas is far safer for parents with young children;
- planting 120 new trees and creating a new water feature is a welcome addition to the scheme, and will really create a sense of place, which many town centre developments lack;
- the proposal includes 473 highly sustainable new homes, suitable for a range of users from first time buyers to downsizers;
- the proposed buildings are beautiful;
- the proposal provides a new bus interchange, providing a much improved environment for bus users and visitors;
- the proposal would deliver the pedestrianisation of North Street, improving air quality by 10% and creating a safe, pleasant, car free environment for residents, visitors and workers;
- 100% of all car parking will have electric vehicle charging points;
- the proposal includes c.24,000 sqft of ground floor mixed uses, including al-fresco dining, leisure uses and bars;
- the proposal safeguards a new medical space within the development;
- three new public squares, a water feature, a dedicated public art strategy and a total of 1.6 acres of public realm would be provided;
- the planting of 120 new trees and creating a biodiversity net gain of 201% to the site, reconnecting the built form and putting it back in touch with nature;
- the proposal includes an all-electric energy system, minimising the impact and reliance on unsustainable energy sources;
- 72% reduction in CO2 from the 2013 baseline, which is significantly above local targets;
- delighted at the development proposed which is much needed in Guildford;
- strongly welcome the greater height of buildings to increase density where land is so precious;
- the additional residential space is welcome as well as other facilities in this town which is so lacking in variety;

- urge the Council to ignore the requests of complainants who pull out boiler plate excuses, such as 'not in keeping', or overlooking other properties;
- the plans as proposed are consistent with plans proposed by the Borough Council for the regeneration of Guildford town centre and, most importantly, bring those plans to life;
- the development as a whole would have a positive economic and community benefit to the town;
- the occupants of the housing will bring increased footfall and spend to the town centre, helping local retail, leisure and cultural organisations who have struggled to rebuild post pandemic as visitor numbers to the town have decreased;
- welcomes the consideration the developers have given to the reduction of CO2 within the project and the minimal reliance on unsustainable energy sources and the inclusion of green spaces within the layout of the project; and
- the pedestrianisation of North Street will greatly improve this area of the town, creating a pleasant aspect, enjoyable for residents and attractive to visitors who are critical to town centre businesses.

One letter has been received which neither object to or support the proposal. The following comments have been noted:

- pleased this grim brown-field site will be re-developed;
- concerns about the height as this sets a precedent and seems likely to adversely impact on the town's singular historic character, views, and unique appeal;
- would like to see plenty of permeability throughout the site for pedestrians, and plenty of trees.
- would also like to see bike storage on the site for other town centre residents,
- the developer should contribute to substantial highways upgrades for the town, with the aim of increasing pedestrian safety and decreasing congestion; and
- this is a very significant town-centre development and it needs to be pleasant to look at, of good quality.

Planning policies

National Planning Policy Framework (NPPF):

Chapter 1. Building a strong, competitive economy

Chapter 2. Achieving sustainable development

Chapter 3. Plan-making

Chapter 4. Decision-making

Chapter 5. Delivering a sufficient supply of homes

Chapter 7. Ensuring the vitality of town centres

Chapter 8. Promoting healthy and safe communities

Chapter 9. Promoting sustainable transport

Chapter 11. Making effective use of land

Chapter 12. Achieving well-designed places

Chapter 14. Meeting the challenge of climate change, flooding and coastal change

Chapter 15. Conserving and enhancing the natural environment

Chapter 16. Conserving and enhancing the historic environment

South East Plan 2009:

Policy NRM6 Thames Basin Heath Special Protection Area

Guildford Borough Local Plan: Strategy and Sites 2015-2034:

The policies considered relevant to this proposal are set out below.

Policy S1 Presumption in favour of sustainable development
Policy S2 Planning for the borough - our spatial strategy
Policy S3 Delivery of development and regeneration within Guildford Town Centre
Policy H1 Homes for all
Policy H2 Affordable homes
Policy P4 Flooding, flood risk and groundwater protection zones
Policy P5 Thames Basin Heaths Special Protection Area
Policy D1 Place shaping
Policy D2 Sustainable design, construction and energy
Policy D3 Historic Environment
Policy ID3 Sustainable transport for new developments
Policy ID4 Green and blue infrastructure

Site allocation A5: North Street redevelopment, Guildford

Guildford Borough (Submission) Local Plan: Development Management Policies (June 2022):

The National Planning Policy Framework provides the following advice at paragraph 48, 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

The Council's Local Plan Development Management Policies (LPDMP) can now be considered to be at an advanced stage in production. The hearing sessions have been completed and the Inspector has reached a conclusion that, subject to main modifications, the plan can be found sound. The main modifications he considers necessary are currently out for consultation. Those policies / parts of policies that are not subject to any proposed main modifications should now be afforded considerable weight. Where specific parts of a policy are subject to main modifications, then further consideration should be given as to the extent to which those modifications would, if accepted, impact upon the assessment of the proposal. If it would result in a different conclusion being reached then these specific parts of the policies should be given moderate weight given the level of uncertainty that these will still be recommended by the Inspector in his final report. The weight for individual policies will be set out in the main body of the report where they are referred to.

Policy H7 Review mechanisms
Policy H8 First Homes
Policy P6/P7: Biodiversity in new developments
Policy P10: Land affected by contamination
Policy P11: Air quality and Air Quality Management Areas
Policy P12: Water quality, waterbodies and riparian corridors
Policy P13: Sustainable surface water management
Policy D4: Achieving high quality design and respecting local distinctiveness
Policy D5: Protection of amenity and provision of amenity space
Policy D5a: External servicing features and stores
Policy D6: Shopfront design and security
Policy D7: Advertisements, hanging signs and illumination

Policy D8: Public realm
Policy D9: Residential infill development
Policy D10: Noise impacts
Policy D10a: Light impacts and dark skies
Policy D12: Sustainable and low impact development
Policy D13: Climate change adaptation
Policy D14: Carbon emissions from buildings
Policy D15: Renewable and low carbon energy generation and storage
Policy D16: Designated heritage assets
Policy D17: Listed buildings
Policy D18: Conservation areas
Policy D19: Scheduled monuments
Policy D19a: Registered parks and gardens
Policy D20: Non-designated heritage assets
Policy ID6: Open space in new developments
Policy ID8: Community facilities
Policy ID10: Achieving a comprehensive Guildford Borough cycle network
Policy ID11: Parking standards

Guildford Borough Local Plan 2003 (as saved by CLG Direction 24 September 2007):

Policy G1 General standards of development
Policy G5 Design code
Policy H4 Housing in urban areas
Policy HE4 New development which affects the setting of a listed building
Policy HE10 New development which affects the setting of a conservation area
Policy R2 Recreational open space provision in relation to large residential developments
Policy NE4 Species protection

Supplementary planning documents:

Thames Basin Heaths Special Protection Area Avoidance Strategy SPD
Climate Change, Sustainable Design, Construction and Energy SPD 2020
Planning Contributions SPD
Vehicle Parking Standards SPD
Residential Design SPG

Planning considerations

The main planning considerations in this case are:

- EIA development
- the principle of development
- loss of retail floorspace and secondary frontages
- housing need and supply
- affordable housing
- the impact on the townscape and the surrounding area
- the impact on heritage assets
- archaeology
- the impact on neighbouring amenity
- amenity of future occupants / living environment
- daylight and sunlight
- highway / parking considerations
- flooding and surface water drainage
- environmental health matters
- ecology

- sustainable design and construction
- the impact on the Thames Basin Heaths Special Protection Area
- s.106 considerations
- planning balance and conclusion

EIA development

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 determines whether there is a requirement for an EIA based on whether the development in question is EIA development, as defined by the 2017 Regulations. This proposal comprises an urban development project which would include more than 150 dwellings. Therefore, the proposal falls within category 10 (b)(ii) of Schedule 2. The applicant has concluded that the potential for likely significant environmental effects as a result of the proposed development cannot be entirely ruled out. On this basis the applicant has undertaken an EIA and has submitted an Environmental Statement (ES) as part of this planning application. The ES provides an important part of the environmental information that the Local Planning Authority must consider in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 when determining the planning application. It informs the decision maker of the likely significant environmental effects of the proposed development, both during construction and on completion, and identifies any measures to prevent, reduce or offset any significant effects on the environment, along with representations from consultation bodies and the public.

The submitted Environmental Statement was independently reviewed by an EIA expert who has been appointed by the Local Planning Authority. This identified a number of areas which required further clarification. The comments provided by the Council's expert have been addressed by the applicant within the 'ES Review Clarification Responses' document . It is important to note that the Council did not issue a formal Regulation 25 request for further information and therefore, a full 30-day re-consultation has not been triggered. However, the Local Planning Authority has carried out a shorter 21-day consultation which is considered to be proportionate to the level of information which has been submitted.

Following the submission of the additional information set out above, the Council's EIA expert has advised that following the applicant's responses to a list of issues raised they have concluded that sufficient information has been provided on the environmental effects of the proposed development. The conclusion reached by the Council's EIA expert is summarised as 'a number of clarifications were needed following the initial review but there were no significant material omissions that required further information to be provided under Regulation 25 of the EIA regulations. The responses and additional information provided by the applicant are generally considered sufficient to close out the issues raised. The only issue requiring further work is the testing of additional mitigation measures to address wind effects. It is noted that the Local Planning Authority is prepared to agree to this work being conditioned on the basis it is unlikely to result in any significant changes to the scheme design. Notwithstanding the limitations of this review i.e. no detailed technical review of the topic assessments being carried out, overall the ES is considered to generally fulfil the requirements of the EIA Regulations and meets the standard of quality set out in the IEMA ES Review Criteria'. For completeness, the Council's EIA expert has also confirmed that the Statement of Conformity submitted with the amendments adequately reports on the likely impacts arising from the amended proposals and that there will be no material changes to those reported in the original ES. As such, no clarifications or further information are required.

Therefore, the Local Planning Authority is satisfied that the submitted ES is now acceptable. The environmental information contained in the ES has been considered in assessing the application and this report reflects that assessment.

The principle of development

This is a brownfield site located in the town centre that has been mostly vacant for considerable period of time. The NPPF, at paragraph 119, promotes the effective use of land by reusing land that has been previously developed. Paragraph 120 states that both planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'. The proposed redevelopment of the site is therefore supported by the NPPF.

Notwithstanding this, the site also forms part of a wider allocation in the adopted Local Plan (allocation A5) which allows for a comprehensive mixed-use redevelopment to potentially accommodate:

- approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies
- approximately 6,000 sq m food and drink (A3) and drinking establishments (A4)
- approximately 400 homes (C3)
- provision of 1 gym (D2)

The Local Plan 'requirements' for the proposal include the following

Office provision

(1) a minimum of 5,500 sq m of existing office (B1a) floorspace will be retained.

Design, vitality and connectivity

(2) development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes

(3) if demonstrated through the Design and Access Statement that providing the proposed scale of development on site is not consistent with good design then the proposed residential quantum should be reduced so that retail needs are met

(4) design to enhance and respond to the existing historic shopping core and;

(a) improve connectivity with High Street and lanes, and

(b) improve underused areas, and

(c) improve the public realm

(5) provide a varied roofscape, minimising the impact on the skyline to protect views in and out of the site

(6) mix day and night-time uses to add to vitality of area

(7) 24-hour access to public streets and squares

Bus interchange

(8) bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site

(9) if alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment

Transport

- (10) stopping up and/or Traffic Regulation Orders to restrict certain vehicle types on Commercial Road and Woodbridge Road (between North Street and Leapale Road)
- (11) mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses

Flood risk

- (12) achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA
- (13) avoid development of more or highly vulnerable uses in flood zone 2 (medium risk) and flood zone 3 (high risk)

The following 'opportunities' and 'key considerations' are also set out in the allocation.

Opportunities

- (1) this site offers a major opportunity to reinforce Guildford's comparison retail offer, provide town centre housing, to create new squares and streets, and to improve the appearance of North Street
- (2) help to reduce flood risk in the local area

Key considerations

- (1) design, vitality and pedestrian connectivity
- (2) maintaining suitable bus interchange facilities in Guildford town centre
- (3) listed building at 17 North Street, Guildford
- (4) adjacent to Town Centre Conservation area
- (5) flood risk
- (6) within a district heat priority area
- (7) if the forecast requirements for retail and leisure uses in the latest Retail and Leisure Study are updated in future either by the Council or by a study agreed by the Council then the balance of allocated uses for this site will be adjusted accordingly

The NPPF makes clear that in taking decisions on planning applications, Local Planning Authorities should apply a presumption in favour of sustainable development. It further advises that, for decision-making, this means; approving development proposals that accord with the development plan without delay; and where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole or where specific policies in the Framework indicate development should be restricted.

While the proposal does not deliver all of the additional uses which are set out in Policy A5, it needs to be borne in mind that the application site only includes a portion of the wider allocation. The rest of the allocation which is not included as part of this application predominately includes the Friary Centre which lies to the west of the site and would be directly accessible from the proposed development. It is also noted that the application site does not include some existing buildings such as Barclays Bank and Norwich House which are also included within the allocation.

With this in mind, it is noted that the part of the allocation which includes the application site would, through this proposal, deliver 473 dwellings and approximately 2,358 sqm of flexible Class E commercial floorspace (which could include retail, office, food and drink and drinking establishments). This will be assessed against the allocation below.

Housing provision

It is noted that although this site forms only a portion of the wider A5 allocation, it would potentially deliver 74 more residential units than the allocation envisages (474 proposed v 400 allocated). It should also be noted that further additional dwellings are possible on the Norwich House site (which is also in the allocation) which has planning permission and prior approval for proposals varying between five and eight units. While this is the case, it is firstly noted that the requirements of the allocation are approximate figures only and they should not be taken as either a ceiling or a floor. There is no objection in principle to a greater number of residential dwellings being provided as part of any one allocation, so long as it can be demonstrated that this would not result in any fundamental harm to the surrounding area. This will be discussed in greater detail below.

Retail and food and drink provision

As noted above, the allocation has separate requirements for each of the above units which are approximately 41,000 sqm of comparison retail floorspace, 6,000 sqm of food and drink floorspace and the provision of one gym. However, it is noted that since the adoption of the Local Plan the Government introduced a wide ranging reorganisation of the planning use classes. It is noted that when the Local Plan was adopted retail, office and food and drink establishments were recognised as individual classes. However, since the reorganisation in 2020, all of these uses now fall within a new Class E which now broadly covers uses of a commercial, business and service interest. As such, whereas the Local Plan requires 47,000 sqm of new Class E floorspace (plus a gym), the proposal would only deliver a total of 2,358 sqm of Class E floorspace which could ultimately be used for retail, commercial or food and drink uses. Notwithstanding the fact that the application site only forms a portion of the wider A5 allocation, this provision is significantly below that envisaged by the Local Plan.

When considering this matter in greater detail it is noted that the allocation does allow for some potential flexibility in the floorspace (particularly retail floorspace) requirement. Policy A5 states that 'approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies' (emphasis added). Further clarification on this is provided under the 'Key Considerations', (point (7)) which states that 'if the forecast requirements for retail and leisure uses in the latest Retail and Leisure Study are updated in future either by the Council or by a study agreed by the Council then the balance of allocated uses for this site will be adjusted accordingly'. This clearly allows for an update which has not necessarily been prepared by the Council, as is the case here. As part of the application, the developer has submitted a Retail Planning Statement (RPS) and this has been independently reviewed by an economic regeneration consultant (Lambert Smith Hampton) appointed by the Local Planning Authority, as well as the Council's Planning Policy team.

The applicant's RPS is available to view on the Council's website in full, however, in summary it offers the following conclusions regarding the retail and commercial environment in the borough.

'The assessment included within the RPS demonstrates that the level of town centre use floorspace within Use Class E of the Town and Country Use Classes Order 1987 (as amended) that is proposed as part of the proposed development is appropriate and that the proposal accords with the development plan on this matter. In particular, it demonstrate that:

- *there is a limited level of capacity for additional comparison goods retail floorspace within Guildford town centre;*
- *whilst the town centre is vital and viable, it does have some poor indicators of health including higher than national average levels of vacancy and higher proportions of comparison goods floorspace;*

- *is it therefore not appropriate to deliver the quantum of comparison goods floorspace that was initially envisaged by the Retail Study at the site. That figure of 'need' has now substantially reduced owing to structural factors within the way that people choose to shop (i.e. online shopping);*
- *the level of town centre use floorspace proposed as part of the development is therefore appropriate and will not have a detrimental impact on existing retail provision within the centre given the substantially reduced need for comparison goods retail floorspace;*
- *it follows that by not absorbing all of the capacity the proposal provides the opportunity to ensure that town centre use floorspace at other allocated sites and sites promoted in the masterplan can have the best opportunity to be let and contribute to the town centre's overall vitality and viability; and*
- *the level of food and drink provision at the site is appropriate.*

Accordingly, we conclude that the level of town centre use floorspace proposed as part of the application accords with Policy A5 of the LPSS, which has a flexible approach built into it to ensure that a robust evidenced based level of town centre use floorspace is proposed as part of any development of the site, which itself is a long-term strategic ambition for the site that the application will realise'.

The assessment provided by Lambert Smith Hampton (LSH) (which is also available in full on the Council's planning portal) approaches the current retail demand in Guildford in three separate steps. A summary of each and the conclusion reached is set out below.

Step 1: What is the up to date level of capacity for additional comparison goods retail floorspace within Guildford town centre?

LSH note that the updated capacity assessment has identified that forecast need for new comparison retail floorspace is significantly less than what was assessed in the Retail Study. The findings are comparable to the capacity results for many other local authority evidence bases due to changes within the retail market and shopper preferences, notably in respect to growth in online shopping. The updated capacity results also take account of changes in the rate of expenditure growth and higher rates of productivity growth for existing retailers which ultimately reduce the level of residual retail expenditure to support new floorspace. Whilst Savills' updated capacity assessment identifies need for new retail floorspace in the longer term (from 2030), it is considered that these capacity forecasts over estimate need as the market shares used to inform capacity will not take account of significant growth in online market share. As such, capacity forecasts are likely to be even lower if the assessment was informed by an up to date household survey.

Step 2: Is it therefore appropriate to deliver the quantum of comparison goods floorspace that was initially envisaged by the Retail Study?

Savills' updated assessment provides the justification that the additional 41,000 sqm gross of comparison floorspace allocated within Policy A5 could not be supported on a quantitative basis. From a market perspective, comparison retailers are retreating from high streets and it is unlikely that the site could support the level of additional comparison retail that is allocated in Policy A5. The speculative development of comparison goods retail at this level would not only struggle to attract sufficient anchors, but as Savills highlight, could impact on the viability of retailers in neighbouring areas, such as the Friary Centre. Putting aside the comments that capacity is over estimated, it is considered that Savills updated capacity assessment forecasts (3,875 sqm gross by 2030 then reducing to 1,506 sqm gross by 2034) can be met from the delivery of other site allocations that provide for retail accommodation and the reoccupation of vacant units in the town centre. Therefore, it is not considered that it is necessary for the North Street site to accommodate all of the revised forecast need for comparison goods retail.

Step 3: *Would it be appropriate for the proposed development to provide 6,000 sqm of food and drink floorspace as envisaged by Policy A5?*

Savills' updated assessment demonstrates that food and beverage (F&B) forecasts in the Retail Study are no longer valid in line with the findings on comparison goods retail capacity. The updated assessment identified a need for 226 sqm and 301 sqm by 2034, a considerable difference from the additional 6,000 sqm identified for Policy A5. It is highlighted that the F&B market is volatile and opportunities are led by specific site and centre requirements rather than quantitative estimates. There is currently limited demand for new outlets in Guildford Town Centre based on published requirements, which adds weight to the argument that the allocation for F&B floorspace in Policy A5 is unrealistic and would not be delivered from a market perspective.

LSH conclude that the applicant has provided suitable evidence to justify the proposal to deviate from floorspace requirements set out in the Policy A5 site allocation and instead to provide up to 2,358 sqm (GIA) of flexible commercial floorspace to support town centre uses.

The Council's Planning Policy Team have reviewed both the applicant's evidence and the LSH review commissioned by the Local Planning Authority. On the provision of retail floor space within the scheme they note that considering the LPSS flexibility regarding comparison retail floorspace provision, the planning policy view is that this new evidence (the applicant's submission and LSH review) provides a firm basis for justifying the reduced provision of retail floorspace proposed. They go on to note that it is accepted that some comparison retail floorspace could be accommodated as a proportion of the proposed flexible E-use class floorspace. However, it is not suggested that any potential planning conditions be sought which might seek to limit any of the proposed E use class floorspace to comparison retail use only. This is as there is no immediate need for comparison retail floorspace, and to do so may impact negatively on other sites in the town centre. Further, there are opportunities for reoccupation of vacant units in the town centre in the shorter term, and in the long term there are opportunities to explore meeting any future need in town centre locations, including on the remaining portion of the site allocation and other sites.

On the provision of F&B the Council's Planning Policy Team note that considering the LPSS provisions regarding food and drink and drinking establishments uses, the planning policy view is that the new evidence (the applicant's submission and LSH review) provides a firm basis for justifying the reduced provision of associated additional floorspace proposed. It is accepted that some food and drink floorspace could be accommodated as a proportion of the proposed flexible E-use class floorspace. As with retail uses, it is not suggested that any potential planning conditions be sought which might seek to limit any of the proposed E Use Class floorspace to food and drink use only. This is as there appears limited quantitative evidence to do so and the flexibility offered by Use Class E is likely to improve the prospects of the site supporting vitality of the town centre. There are also other opportunities to provide this type of use in the town centre in the future.

The overall conclusion reached by the Planning Policy Team is set out below:

'The application has been reviewed in light of its proposals for non-residential uses and associated floorspace within the planning policy context, including that set by the LPSS site allocation A5.

In this regard, it is considered that the proposal accords with the site allocation policy in terms of the retail and food and drink floorspace proposed. This conclusion is reached in light of the updated capacity figures provided by the applicant; their subsequent review for the Council as reflected in the LSH review (which indicates that even the RPS figures are likely to overestimate need); and the associated flexibility in the level of provision offered by the LPSS.

Even if this is wrong and there were to be grounds for a case that LPSS site allocation is in some way breached in relation to the level of comparison retail / food and drink floorspace provision, it is considered that the evidence available in relation to the application provides firm justification for deviating from the LPSS floorspace allocations to the extent proposed.

Furthermore, from a policy perspective, it is not considered necessary to seek to limit any of the proposed floorspace within Use Class E to any particular quantum of the comparison retail or food and drink floorspace. This would not appear to be justified by the evidence on need. Enabling flexibility in this case would appear to support the contribution of the site to the wider vitality of the town centre.

Overall, it is considered that the proposal would contribute to the wider regeneration of the town centre according with LPSS Policy S3.

There is undoubtedly a significant change in the need for particular types of floorspace since previous retail and leisure evidence (dated 2017) was compiled to support the LPSS. This is most evident in relation to comparison retail needs, confirmed by levels of local shop vacancies and the adjusted quantitative projections produced. On the other hand, there are opportunities for different town centre uses to support regeneration. In the context of current circumstances, it is considered that the proposal responds to these changing dynamics. It proposes to accommodate town centre uses (under flexible Use Class E), without closing down opportunities (by excessive provision) for other sites to meet changing demands for such uses, including in relation to leisure, food and beverage, community uses and respond to future dynamics that may not yet be fully anticipated'.

It is noted that policy A5 includes the provision of large increases in retail and food and beverage capacity in this area of the town centre. It is firstly noted that although this proposal would deliver a very small percentage of what is allocated, the application site forms only a portion of the wider A5 allocation. Further retail and food and beverage floorspace could be delivered on the remainder of the allocated site. However, notwithstanding this, it is also noted that policy A5 states that the final floor space figures could be those which are 'consistent with subsequent updates to the Guildford Retail and Leisure studies'. As noted above, the supporting text to policy A5 allows for an update to be provided to the Council, so long as it is agreed. As has been set out above, the developer has submitted a Retail Planning Statement which attempts to demonstrate that the reduced floor space provided by the development is acceptable in the current environment. This conclusion has been accepted by both the Local Planning Authority's independent consultant, as well as the Council's Planning Policy Team. As such, although the retail and food and beverage floor space provision is lower than required by the allocation, it has been robustly justified. The proposal is therefore deemed to be compliant with policy A5 in this regard.

Office retention

Policy A5 requires that a minimum of 5,500 sqm of existing office floorspace will be retained through the redevelopment of the wider allocation. It is noted that this issue has added complexity in the sense that office accommodation is now grouped within the more flexible family of Class E commercial, retail and service uses. As such, the Local Planning Authority has significantly less power to prevent the change of use of town centre offices into other uses which also fall within Class E. However, be that as it may, it is acknowledged that the proposal would result in the demolition of Dominion House (which is currently in office use), as well as 15 North Street, part of which was formally in office use. While the development proposes flexible Class E uses (which could theoretically include office accommodation), the applicant does not expect that any office space will be provided as part of the scheme.

However, it is noted that outside of the application site, but still within the allocation are large office buildings which include 1 Onslow Street and Norwich House. It is noted that 1 Onslow House is currently vacant, however, it is currently in office use. An application (21/P/00539 refers) is currently being assessed by the Local Planning Authority for the extension and refurbishment of 1 Onslow Street which, if approved would increase its office (or Class E) floor area from 9,077 sqm to 12,700 sqm. The Planning Statement submitted with 21/P/00539 clearly indicates that the continued use of the building as office accommodation is envisaged. While that application has yet to be determined by the Local Planning Authority, from the above, it is reasonable to assume that the building will remain in office use into the future and therefore although office accommodation is being lost through the subject planning application, it is highly likely that even just considering 1 Onslow Street, more than 5,500 sqm of existing office floorspace will be retained through the redevelopment of the wider allocation.

The Council's Planning Policy Team similarly note that 'in this context, it is necessary to consider the site allocation as a whole in relation to the policy requirement above. Existing office floorspace forming part of the site allocation is in excess of 5,500 sqm. This includes 1 Onslow Street which is an occupied office building of over 5,700 sqm, which is located beyond the application site, but within the site allocation boundary. When considering that further office floorspace exists as part of the application site (albeit largely vacant) it appears to follow that the LPSS site allocation envisaged the potential for some loss of office floorspace as part of the North Street redevelopment. Further, with regard to 1 Onslow Street, there is no indication that this floorspace is under threat of loss – it is an occupied office building. This view is strengthened by the submission of an as yet un-determined planning application (21/P/00539) which proposes an addition 3,600 sqm of office space in three new storeys. Whilst the planning application has not been determined and so there is no certainty that the extension will be constructed, the application confirms the intent to retain the building for office use. Thus, whilst there will be a loss of (albeit largely vacant) office floorspace as a result of the proposed development, it is considered that this will not compromise the LPSS site allocation policy requirement (1). Further, as the site is allocated for uses as per Policy A5, it is considered that there is in any case little basis for resisting the proposed loss of employment floorspace in line with Policy E3(12). The proposed development is thus considered not to breach Policy E3 in terms of the protection offered to employment floorspace'.

On the above basis, it is considered that the proposal is acceptable in this regard.

Gym

Policy A5 includes the provision of a gym within the allocation.

Gyms now fall within Use Class E and could be accommodated within the proposed non-residential floorspace. Further, it is understood that the proposal does include an on-site gym, albeit, one which may be restricted to the occupants of the residential accommodation only. The Council's Planning Policy Team note that it is not considered that the proposal would breach the site allocation policy requirement for provision of a gym.

Conclusion on the principle of the development

It has been concluded above, through the assessment of the various technical reports submitted with the application, that the various elements of the proposed development are consistent with the allocation. As such, the proposal is therefore considered to be acceptable in principle.

While there is no objection to the principle of what the application seeks to deliver in terms of the individual uses and their quantum it is still acknowledged that Policy A5 also includes a number of more subjective design and character requirements etc. These matters will be assessed in detail in the rest of the report.

Loss of retail floorspace and secondary frontages

Policy E7 of the LPSS includes protection against the loss of shopping areas / uses along shopping frontages (see paragraph 4 of E7 in relation to secondary frontages) and within the Primary Shopping Area (PSA) at paragraph 5.

The site is within the PSA and North Street is a secondary frontage as are sections of Commercial, Leapale and Woodbridge Roads (as per the Local Plan Policies Map).

The proposal would include the net loss of non-residential floorspace. Although it is noted that the ground floor retail component lost along North Street (including 15 North Street which despite being vacant is acknowledged as of poor quality, a negative contributor to the streetscape and out of date) may be re-provided, albeit under the flexibility offered by Class E. Furthermore, new commercial uses are proposed along parts of the Commercial, Leapale and Woodbridge Road frontages.

The Council's Planning policy Team note that there is no certainty that the re-provided unit/s on the North Street frontage will be in retail/shop use (former A1 Use Class). Even if they were not provided as a shopping unit/s it does not appear that Policy E7 would necessarily be breached. In any case, even if there were to be a breach of E7(4), Use Class E permits flexibility and further the proposal will add greater vibrancy and vitality to this frontage. Further, the proposal will improve the appearance and function of the frontage. In this regard, is it considered that the proposal conforms with LPSS Policy E7.

In relation to secondary frontages along Commercial, Leapale and Woodbridge Roads most of the land parcels along these frontages are currently used for parking or are derelict. Considering the retail evidence provided with the application and the (limited) scope for further retail uses on site, it is considered that the proposal reflects the extent of commercial (with the potential for retail) use along these frontages that might be expected. The proposal will contribute to activating these frontages and promoting vitality of the Guildford town centre. It is considered that there is no conflict with Policy E7 in this regard.

As such, the proposal is deemed to be consistent with Policy E7 of the LPSS.

Housing need and supply

Paragraph 60 of the NPPF states that 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'. Paragraph 62 goes on to note that 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disability, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)'.

The Guilford Borough Local Plan: Strategy and Sites (LPSS) was adopted by the Council on 25 April 2019. The Plan is up-to-date and carries full weight as part of the Council's Development Plan. The Local Plan 2003 policies that are not superseded are retained and continue to form part of the development plan (see Appendix 8 of the Local Plan: strategy and sites for superseded Local Plan 2003 policies). In addition, and as noted above, the Council's Local Plan Development Management Policies (LPDMP) can now be considered to be at an advanced stage in production. The hearing sessions have been completed and the Inspector has reached a conclusion that, subject to main modifications, the plan can be found sound. The main modifications he considers necessary are currently out for consultation. Those policies / parts of policies that are not subject to any proposed main modifications should now be afforded considerable weight. Where specific parts of a policy are subject to main modifications, then further consideration should be given as to the extent to which those modifications would, if accepted, impact upon the assessment of the proposal. If it would result in a different conclusion being reached then these specific parts of the policies should be given moderate weight given the level of uncertainty that these will still be recommended by the Inspector in his final report.

The Council is able to demonstrate a five year housing land supply with an appropriate buffer. This supply is assessed as being 6.5 years based on most recent evidence as reflected in the GBC LAA (2022). In addition to this, the Government's recently published Housing Delivery Test indicates that Guildford's 2021 measurement is 144%. For the purposes of NPPF footnote 8, this is therefore greater than the threshold set out in paragraph 215 (75%). Therefore, the Plan and its policies are regarded as up-to-date in terms of paragraph 11 of the NPPF.

As the site forms part of the allocation under policy A5, the proposal will make an important contribution to meeting the housing requirement which is identified in the Local Plan.

Dwelling mix

Policy H1 of the LPSS states that 'new residential development is required to deliver a wide choice of homes to meet a range of accommodation needs as set out in the latest Strategic Housing Market Assessment (SHMA). New development should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location'. The proposed dwelling mix for the development, as well as the SHMA requirement, is provided below.

Overall Housing Mix	No.	SHMA % Req	Provided %
1 bed	214	20	45
2 bed	204	30	43
3 bed	55	35	12
4 bed	0	15	0
Total	473		

It can be seen from the table above that the dwellings being provided by the development are skewed towards smaller units. Almost 90% of the units are either one or two bedrooms. No four bedroom units are proposed and it is also noted that the mix is entirely made up of apartments. While this could be seen as a concern, the context of the site and the requirements of the allocation (policy A5) need to be borne in mind. The application site is within the town centre, beside a bus station and a five to ten minute walk from the mainline railway station. The future residential units would have a range of retail, commercial, entertainment and leisure facilities on their doorstep. In such a sustainable location, it is important that any application makes the most efficient use of the land and the provision of mainly one and two bedroom apartments ensures that would be the case. Traditional family style houses on this site would not achieve the 400 units expected through the allocation and would not be appropriate given the surrounding uses and the fact that the development requires a relatively large amount of commercial space at ground floor level. In addition, it is noted that traditional family homes are being approved and delivered in more appropriate areas of the borough, so this element of Guildford's need is well catered for.

Furthermore, it is noted that in the Inspector's Final Report (paragraph 48) on the LPSS examination he stated '*as regards housing mix, the policy is not prescriptive but seeks a mix of tenure, types and sizes of dwelling, which the text indicates will be guided by the strategic housing market assessment. The policy also seeks an appropriate amount of accessible and adaptable dwellings and wheelchair user dwellings*'. While the proposed mix varies from the SHMA guidance, it is noted that the SHMA mix is to be achieved over the whole of the housing market area and over the lifetime of the plan. It is not feasible or practical to require every site to rigidly meet the identified mix in the SHMA and this is reflected in the Inspector's comments noted above. The flexibility set out in the policy must be used to achieve an acceptable mix across the borough.

The proposal is not likely to cause any material harm to the Council's ability to deliver a compliant SHMA mix on a wider basis and overall, the proposed mix is deemed to be acceptable.

Accessible units

Policy H1 of the LPSS requires that 'on residential development sites of 25 homes or more 10% of new homes will be required to meet Building Regulations M4(2) category 2 standard 'accessible and adaptable dwellings' and 5% of new homes will be required to meet Building Regulations M4(3)(b) category 3 wheelchair user accessible dwellings standard'.

The applicant has confirmed compliance with the above requirements and are providing 443 accessible and adaptable dwellings and 24 wheelchair user accessible dwellings. This provision either meets or exceeds the Council's requirements and will be secured by condition.

Affordable housing

Policy H2 of the LPSS seeks at least 40 per cent of the homes on application sites to be affordable, with the mix in tenures being the same as set out above. Policy H2 also states that 'the tenure and number of bedrooms of the affordable homes provided on each qualifying site must contribute, to the Council's satisfaction, towards meeting the mix of affordable housing needs identified in the Strategic Housing Market Assessment 2015, or subsequent affordable housing needs evidence'. The proposal generates a requirement for 189 affordable properties on the site.

When originally submitted, the application included zero affordable dwellings as part of the proposal. The Viability Appraisal submitted with the application noted that the scheme was significantly in deficit and that therefore, the provision of affordable housing was not viable.

It is noted that issues of viability, if satisfactorily demonstrated, can form part of the planning process and become a material consideration. This is set out in both local and national planning policy.

The reasoned justification which accompanies policy H2 (but does not form part of it) notes that 'land values and property prices are generally high across the borough, although with considerable variation. Our viability evidence shows that the vast majority of housing developments in most locations in the borough are viable providing an affordable housing contribution of 40 per cent. Bearing in mind that viability assessment was undertaken in preparation of the Local Plan, the impact of policies on development viability have been considered and are regarded as realistic. The need for a viability assessment at planning application stage will thus need clear justification by the applicant in line with paragraph 57 [now paragraph 58] of the NPPF. Should this need be accepted, the Council will need to weigh the outcomes and implications of the viability assessment against all circumstances relating to the case as part of considering the acceptability of the proposal. We will expect developments to provide the required amount of affordable housing in accordance with this policy and Guildford Planning Contributions SPD. In considering viability, developers will be expected to have taken into account the costs of meeting policy requirements, including the provision of affordable housing and infrastructure requirements, in the price paid for a site. Where we consider that these requirements have not been satisfactorily taken into account in the purchase of land or of an option, we will not accept a lower rate of provision. Where developers raise viability concerns with providing the required proportion of affordable housing, they will be expected to meet the costs of the Council's financial appraisals as well as their own'.

Policy H2(6) of the LPSS states that 'if developers satisfactorily demonstrate that providing the amount of affordable housing required by this policy would not be economically viable, the Council will consider the following to assist with delivering a scheme: (a) varying the tenure mix of the affordable housing (for example, more intermediate housing and less rented housing), size, and/or type of homes to be provided; and/or (b) reducing the overall number of affordable homes'. Although published before the adoption of the LPSS, the Council's Planning Contributions SPD notes the following 'applicants who consider their proposal will be unviable with all the required planning contributions must be able to support their case with detailed evidence of development viability in the form of a detailed financial viability assessment. This should use the "standard" viability appraisal toolkit recommended by the Council. The development appraisal will be scrutinised by external experts appointed by the Council. The Council will expect the developer to fund the costs incurred through the employment of its external experts'.

A regards national policy, paragraph 58 of the NPPF states that 'where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up-to-date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available'.

The applicant's Viability Appraisal has been independently assessed by a consultant appointed by the Local Planning Authority. Following discussions between the parties, it has been agreed by both sides that the proposal would be significantly in deficit. The Council's viability expert has calculated the scheme deficit as being £9.29m. The deficit has been increased from earlier iterations of the expert's comments due to an agreed reduction to construction costs of circa 4.5%; a marginal increase in sales values; and other changes. It is acknowledged that the proposed scheme includes a host of expensive works which raise the quality of the proposal and the benefits that it will bring to the wider town centre. For example, the costs of the bus station improvements and pedestrianisation of North Street are both considerable.

It is noted that the Council's expert has also carried out a sensitivity analysis of their conclusions. It is noted that if values grew by 6% (double the cumulative increase forecast) and costs remained unchanged, the residual land value would still be lower than the benchmark land value. However, in actual fact, it is noted that costs are forecast to increase by 13.32% over the five year period to 2027, which would result in negative residual land values both if sales values remain unchanged, or if values increased by 6%. It is noted that significant growth of 20% would be required to generate a residual land value exceeding the benchmark land value. The Council's expert notes that in the context of current forecasts, the prospects of growth at these levels materialising is very remote.

While it is acknowledged that the applicant's claimed scheme deficit, at £53.96m, is significantly greater than that concluded by the Council's expert (£9.29m), overall it is common ground between both sides that the scheme as presented is unviable and can therefore not support any affordable housing provision, either on-site or a contribution in lieu.

Notwithstanding the above, following discussions between Officers and the applicant, the following offer has been made in an attempt to at least recognise the importance of providing affordable housing as part of the scheme and the large demand for such units that exists across the borough. The applicant has therefore offered: (i) the provision of 20 shared-ownership properties which would be delivered in phase one of the development and (ii) the possibility that a further 28 shared-ownership units could be delivered, if the applicant can secure funding from Homes England. The additional 28 units would also be delivered in the first phase of residential development. Although Officers have attempted to negotiate a higher figure, the above represents the applicant's best and final offer.

It is noted that the 28 units which are subject to Homes England funding are not guaranteed, so therefore, the weight that can be given to these potential affordable homes is limited. However, as a minimum the scheme would now deliver 20 on-site shared-ownership units. This represents a 4.2% provision of affordable housing. If funding was secured from Homes England, the rate would increase to 10.1%, however, as stressed above, this is not guaranteed.

While the proposal does not provide the required level of affordable housing as set out in policy H2 of the LPSS, this has been fully demonstrated through viability assessments. Importantly, the Council's independent viability expert has concluded that the scheme is not viable, even with zero affordable units. The applicant's offer of at least some on-site affordable units, goes some way to offsetting this matter. However, as policy H2 of the LPSS allows for viability arguments to be taken into account, when considered as a whole, the proposal is considered to be compliant with the Local Plan and NPPF in this regard.

In such a situation, it is noted that the Council would normally require the imposition of a late stage review mechanism. With this, the applicant would submit a revised viability appraisal at an agreed point in the scheme which would have the benefit of actual build costs and sales values. On this, it is noted that policy H7 of the LPDMP provides a route whereby the Council can secure a late stage review of a scheme where it has been established that viability is an issue. It is noted that policy H7 is subject to a main modification by the Inspector which is now known and out to consultation. The amended wording for policy H7 states that 'if a reduced contribution to affordable housing than that which is required by the Local Plan is proposed and justified on viability grounds, the Council will normally, require a viability review mechanism to be secured' (emphasis added). As regards the weight that should be afforded to policy H7 it is noted that the examining Inspector has altered the Council's original wording to delete 'where it considers appropriate' and to replace this with 'normally' (as set out above). Although the LPDMP is now at re-consultation, it is considered that the Inspector's modification does not materially alter the requirements of the policy. Therefore, at this stage, the Local Planning Authority affords considerable weight to it.

It is noted that some of the reasoned justifications for policy H7 have also been modified. Relevant to this case are paragraphs 2.32 (unmodified) and 2.33 (modified) which state:

Paragraph 2.32 notes that 'the weight given to such a viability assessment is a matter for the Council. However, as part of decision-making, Policy H2 (6) allows for the Council to consider certain mechanisms to assist with delivering a scheme in cases where developers satisfactorily demonstrate that providing affordable housing in line with the policy would not be economically viable. This may include reducing the overall number of affordable homes'. Paragraph 2.33, as modified, goes on to state that 'any departure from the requirement for a viability review mechanism will be dealt with on a case-by-case basis but would require substantial and robust justification by the applicant that the potential for additional contributions is limited by the circumstances of the case. This could include cases involving smaller scale development where an increased contribution is unlikely'.

In this case Officers have attempted to negotiate with the applicant that both their offer of on-site affordable (20 units guaranteed and 28 units subject to Homes England funding) and a late stage review be secured. However, this has been rejected. As such, the applicant has offered either the on-site affordable units (as set out above), or a late stage review, not both.

The Local Planning Authority has discussed this matter with the Council's viability expert. They note the following 'despite the outcome of the Applicant's viability assessment, they have offered to provide 20 affordable housing units plus additional units if an allocation of grant funding can be secured. However, this offer is contingent on there being no review mechanism. On this scheme, our analysis of medium term sales values growth and forecast build cost inflation indicates that a review is very unlikely to result in an improved outcome in comparison to the Applicant's offer'. As such, given the deficit which has been identified, the conclusion reached by the Council's expert is that it is very unlikely that a late stage review would yield more affordable units than are currently being offered by the applicant. In fact, if a late stage review is pursued, then there would be the possibility that no on-site affordable units would be secured as part of the development.

As such, it is Officer's view that in this very unique situation, the applicant's offer of on-site affordable units should be preferred to the imposition of a late stage review. Officers believe that in this case, the viability position has been robustly tested and given the unique set of circumstances with this case, and the infrastructure which is being delivered as part of the application, substantial and robust justification has been provided (and which has been verified independently) which demonstrates that the potential for additional contributions is limited by the circumstances of the case. As such, there is not considered to be any conflict with policy H7 of the LPDMP in this regard.

Notwithstanding the above, if Members do wish for a late stage review to be secured, this is something which could be secured as part of the legal agreement. However, this would result in forfeiting the guaranteed 20 units and the 28 units which are subject to Homes England funding. This either or scenario is set out in the Heads of Terms at the start of this report. However, for the avoidance of doubt, the professional advice before the Committee is that the applicant's offer of on-site units is accepted.

Either way, the applicant has offered an early stage viability review which will be undertaken if the scheme is not commenced within 12 months of any resolution to approve planning permission. This early stage review would re-run the viability assessment, but including up-to-date costs and sales values. This could be secured through the legal agreement.

Finally on this point it is acknowledged that the applicant's claimed deficit at £53.96m is considerable. On this matter, the Council's viability expert has stated that 'the Applicant's report indicates that the proposed development generates a deficit of £53.96 million, which raises significant doubt as to its deliverability, notwithstanding the applicant's stated intentions'. On this point, there are a number of matters to consider.

Firstly, although the applicant disagrees, the Council's viability expert notes that many of the key inputs to the applicant's appraisal are not supported by evidence and taking into account available evidence they have predicted a much lower deficit of £9.29m. While still a large deficit, it is considerably smaller than that suggested by the applicant. Secondly, it is noted that the applicant has provided a letter to the Local Planning Authority which addresses this point in more detail. They note that 'whilst the current economic environment is challenging, we are a developer who takes informed risks on projects of this nature and we take a long term view of market conditions. Whilst Guildford is a desirable investment opportunity for a residential developer, we are completely reliant on market conditions improving for us to generate a reasonable return on this development. The length and depth of the recession we find ourselves in is still an unknown. We do not yet know what will happen to property prices, or when inflation will lessen and whether

build costs will return to normal levels. These macro-economic factors will affect any developer's ability to deliver projects such as these. Notwithstanding the above, we are standing by our commitment to delivering these improvements and we would like to go one step further and offer to commit to delivering the bus station, the pedestrianisation and the new North Street town square in the early phases of the development, unlocking a significant and important piece of public benefit for the community early in the project. We share your desire to see this development commence and progress. We are therefore prepared to accept an Early Stage Viability Review Mechanism within the Section 106 agreement, which is triggered if we have not reached substantial implementation within a reasonable period of time from obtaining planning permission'. On this basis, it is not felt that the Local Planning Authority could raise an objection on deliverability.

As regards policy H8 of the LPDMP (First Homes) there is a requirement that 'a minimum of 25% of affordable homes provided either on-site or off-site or as a financial contribution in lieu of on-site provision in line with the Council's adopted affordable housing requirements are expected to be First Homes'. It is noted above that the scheme is not viable and the applicant has made a bespoke offer. This does not include any First Homes. Given that the policy (as modified by the Inspector) states that the provision is only 'expected' in this instance and given the specific and unique circumstances of the case, the lack of First Homes is not objectionable.

The layout and appearance of the development in relation to the surrounding area

The NPPF in chapter 12 promotes 'achieving well designed places'. Paragraph 130 is applicable and states that planning decisions should ensure that developments:

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 134 requires significant weight be given to:

- (a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents which use visual tools such as design guides and codes; and/or
- (b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

Policy S3(5) of the LPSS is also relevant and it requires new development to have regard to, inter alia, policy D1, historic environment, street pattern, topography and views within the town centre of important historic buildings. S3(6) expects developments to contribute to achieving mixed uses with active ground floor uses, defined public and private spaces, an attractive and safe public realm, legible routes and improved access and views to the River Wey.

Policy D1(1) seeks to ensure that all new developments achieve high quality design that responds to distinctive local character, creating places with a clear identity, easy to navigate, with natural security and attractive overlooked streets and spaces. Saved policy G5 of the 2003 Local Plan is a broad design code which has ten sub-sections many of which are relevant to consideration for this scheme.

Policy D4 of the LPDMP is also relevant and it provides further detailed design guidance. Amongst other things, it notes that development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to:

- a. the history of a place;
- b. significant views (to and from);
- c. surrounding context;
- d. built and natural features of interest;
- e. prevailing character;
- f. landscape; and
- g. topography.

Policy D4 goes on to note that development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:

- a) layout - settlement pattern of roads, paths, spaces and buildings, urban grain, plot sizes, building patterns, rhythms and lines
- b) form and scale of buildings and spaces - height, bulk, massing, proportions, profile and roofscapes
- c) appearance
- d) landscape - landform and drainage, hard landscape and soft landscape
- e) materials
- f) detailing

Development proposals are also required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including: a) the site size, characteristics and location; b) the urban grain of the area and appropriate building forms, heights and sizes for the site; and c) the context and local character of the area. Development proposals are expected to make efficient use of land and increased densities may be appropriate if it would not have a detrimental impact on an area's prevailing character and setting.

The requirements of the allocation have already been set out above, but in summary the proposed requirements are:

- respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes

- if demonstrated through the Design and Access Statement that providing the proposed scale of development on site is not consistent with good design then the proposed residential quantum should be reduced so that retail needs are met
- design to enhance and respond to the existing historic shopping core and;
- improve connectivity with High Street and lanes, and
- improve underused areas, and
- improve the public realm
- provide a varied roofscape, minimising the impact on the skyline to protect views in and out of the site
- mix day and night time uses to add to vitality of area
- 24 hour access to public streets and squares

Policy D8 of the LPDMP relates to public realm and states (inter alia) that it is required to be designed as an integral part of new development and its future care and maintenance secured. High quality new or improved public realm proposals are required to demonstrate that:

- they are informed by their context, including the landscape, townscape, important views and historic character;
- the design responds to the character, location and function of the spaces and surrounding buildings, and creates a sense of identity;
- it contains and reveals focal points and landmarks to enable ease of movement and legibility
- it creates attractive, safe and, where appropriate, lively streets with visual interest at pedestrian level;
- it maximises opportunities for activity and enjoyment, and encourages social interaction and community cohesion;
- it maximises opportunities to incorporate soft landscaping including trees, hedges and other planting, appropriate to both the scale of buildings and the space available;
- all new streets are tree-lined unless there are clear, justifiable and compelling reasons why this would be inappropriate, and their long-term maintenance is secured;
- the materials are sustainable, durable and long-lasting; and help create and reinforce local distinctiveness; and
- it takes a coordinated approach with adjacent sites/phases in terms of the palette of materials, and the design and siting of street furniture, boundary treatments, lighting and signage.

Aspects of the scheme relating to the wider townscape impact, permeability, and heritage impact are considered in separate sections later in this report. The place and architectural character that would be created by the layout and design of the scheme are examined below.

Architectural design, bulk, scale and massing of the scheme

It is noted that while the town centre in general is characterised by low scale, individual buildings, there are a number of larger properties in the immediate vicinity of the application site. These include The Friary Centre, the telephone exchange, Dominion House, the multi-storey car park on Leapale Road, as well as the office and commercial buildings on Onslow Street. The Surrey Police headquarters and House of Fraser department store are also close to the site. As such, it must be recognised that the immediate surroundings consist of a wide mix of building sizes and heights.

In general, the proposed scheme increases in height from south to north. The buildings fronting onto the more sensitive North Street end of the site are lower in height, scale and massing. They include a new building to the west of the existing All Bar One which would be set over four storeys and a replacement of 15 North Street which would also be four storeys in height. These infill buildings are considered to be in keeping with, and sympathetic to, the scale and height of

existing buildings along the northern side of North Street. The buildings then gradually increase in height towards the tallest building on the site which would be roughly in the same position as the existing Dominion House. The new Woodbridge Road which would run through the centre of the site would be flanked by buildings which would be between four and 11 storeys in height. The Leapale Road and Commercial Road frontages would be set with buildings of between four and 11 storeys. It is also noted that the proposed buildings would be large structures, with significant footprints. Apart from the larger buildings referred to above, the proposal would appear as a rather large incursion into the existing townscape.

On the development layout and block structure, the Council's Urban Design Officer has noted that 'the scheme would be well ordered with a clear arrangement of streets, spaces and buildings. Woodbridge Road would form the spine of the development with frontages containing a pedestrianised street. In addition, Astor Lane and the northern gateway would provide east-west permeability across the site. Public spaces would be located at key gateways and junctions... The development either side of Woodbridge Road would frame views to the spire of St Saviour's Church. Built form would generally comprise a structure of perimeter blocks establishing public realm frontages and private rear courtyards. Building heights would reflect the immediate context of the site with a slender tall building marking the sites northern gateway, stepping down to the North Street buildings. Within this general arrangement there would be variation in height to reflect the fine grain and varied roofscape of the historic town centre. Silhouette and gateway buildings would step up in height with lower storey 'link' buildings completing the street scene. Special 'placemaker' buildings would be used to help define key spaces and locations within the site'.

Design South East (DSE) made the following comments (before the latest amendments were submitted 'the massing has improved, particularly the change in block C which opens up the centre of the scheme and avoids the previous overshadowing issues. The scale of the different blocks works well in relation to each other, including the marker block building, which is sufficiently different in height to the blocks that surround it to be distinctive and create an accent in height at this strategic location'.

It is also acknowledged that a number of concerns have been raised by the public with regard to the height of the proposal and the resulting impact on the townscape. It is claimed that due to the height and bulk of the buildings they would not be in keeping with the existing character and scale of Guildford town centre.

As a reminder, the allocation states that the scheme should 'respond to the context set by the surrounding street pattern and historic environment, including the adjacent conservation area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes'. While it is acknowledged that some of the proposed buildings are taller and bulkier than others in the surroundings, it could be said that the design does respond to the context of the site and that particular care has been given to massing and heights. The taller buildings are situated away from the more sensitive, historic end of the site where it fronts onto North Street. As described above, here the bulk, scale and massing of the proposal is reflective of the existing buildings. The taller buildings would be set in a context of mainly large structures (as referred to above) and are sited in the least sensitive part of the site and where 'height' is more likely to be accommodated with reduced harm.

It is noted that Block E (marker building), if approved, would become one of the tallest buildings in the town centre. DSE in their second report on the proposal noted that 'the scale of the different blocks works well in relation to each other, including the marker block building, which is sufficiently different in height to the blocks that surround it to be distinctive and create an accent in height at this strategic location'. The Council's Urban Design Officer describes Block E as an 'elegant marker..building'. As noted above, the applicant has chosen the most appropriate

location on the site on which to position a taller marker building. The building would act as the northern gateway into the town centre and would mark the beginning of the retail and commercial centre. In urban design and townscape terms, the positioning of a taller building in this location is a rationale design choice. It is also noted that the Block E would be positioned at the lowest part of the site, also making it the most logical position for a taller building.

While it is acknowledged that some of the proposed buildings would be larger than the ones they would be surrounded by, they would not be so incongruous or out of place in their context that material harm would be caused. It is noted that paragraph 130 of the NPPF seeks development that is sympathetic to the surrounding environment, but it is noted that this should not discourage appropriate innovation or change (such as increased densities). The proposed scale and size of the buildings allows for an effective use of a highly sustainable, brownfield site located in the centre of the market town of Surrey.

In terms of the architecture, the Council's Urban Design Officer notes that 'the architectural approach set out in the DAS would draw upon the character of Guildford through: the primary use of various tones of red brick; special materials to act as a counter point to brick through texture and colour; largely simple, repetitive and ordered elevations; detail focused upon the basis and tops of buildings; special characteristics such as ground floor colonnades and inviting openings; and colour to aid wayfinding and indicate special public spaces'. DSE in their second letter on the proposed scheme also note that 'overall, there is a clear and rational approach to materials and detailing. The analysis and use of colour, the differentiation of the base middle and top on the different buildings, and the use of colour as wayfinding are all strong. The special elements such as the archways and written signage also work well. It is important that high quality materials are used for the signage - their boldness is a positive, but any reduction in the quality of materials, given their prominence, could have a significant negative impact. The elevations work well overall. The architecture is fragmented and organic although there is a relatively regular grid of wall and fenestration. On the bigger buildings, a slightly looser, less orthogonal approach could fit better with the overall master plan approach, by giving greater variation and a more informal appearance...!'

While the proposed buildings share a consistent theme, they are differentiated through their materials and the use of glazing etc. In addition, the landscaping, public open spaces and features such as the glazed arch onto Leapale Road all help to enrich and raise the architectural quality of the scheme as a whole. All of the buildings would have a strong base which would front onto existing streets in the case of the North Street buildings and the proposed streets for the rest. At street level, the proposal would provide active frontages which have interest, articulation and in places an element of fun in their finish and design. The architecture of the pedestrian environment would therefore be of very high quality, creating spaces where people will want to occupy and enjoy. The interventions on North Street have been designed to fit in with their neighbours and are respectful in terms of the fenestration arrangement and architectural order. In the case of 15 North Street, the proposed building would be of a much better quality than the one it would replace.

In terms of materials, in the main, bricks are to be used as the primary material across the majority of the proposed scheme. The texture, tone and colour of the bricks used are to vary, but they predominantly have a red base tone. The purpose for this is to avoid homogeneity across the development, but equally, to ensure that the scheme successfully harmonises with the varied red colours and tones that currently prevail as these are the dominant material in the town centre. There are also instances within the scheme of special bricks (white/light grey/dark/blue) being used. The design rationale for the use of these contrasting materials is principally to distinguish the key placemaking buildings (Dial building (Block C2) and marker building (Block E) within the scheme, thereby aiding with legibility, and providing design interest to the scheme as a whole.

In addition to the use of brick, the proposed material strategy also includes the use of contrasting coloured materials, such as standing seam cladding (brown/green), coloured concrete (green/teal/grey), reconstituted stone (white) render (white) and glazed tiles/bricks (red/green). The use of these alternative materials has been used strategically, typically at the base or tops of the proposed buildings, in order to provide architectural relief and animation, to enliven and enhance the streetscenes. There are also instances where the use of these alternative accent materials are being purposefully used as key placemaking and wayfinding devices within the designed public realm, this include at the proposed Astor Lane Arch (linking the Dial to Leapale Road) and at the Dial.

The materials would all be controlled by planning condition, but nevertheless, the material strategy as set out for the proposed scheme is considered to be well considered and complementary to the prevailing palette observed both immediate to the site and more broadly throughout Guildford, but equally contribute markedly towards creating a well-designed scheme which has a positive and coherent identity.

Success of the layout of the scheme in creating a sense of place

At present, the existing site is comprised of a number of derelict and vacant sites. It presents very poorly to the townscape and detracts significantly from this area of the town centre.

The proposal would provide the complete regeneration of this part of North Street and would add a new commercial and residential area to the town centre. While it is acknowledged that the scheme would have its own distinct character and design, which would be clearly distinguishable from the rest of North Street, efforts have been made to help the proposal integrate with the existing town centre. Pedestrians travelling from the High Street to the proposed site would be drawn to the new public space areas which are to be provided beside the All Bar One building and also in the former Commercial Road, between The Friary and what is now Black Sheep Coffee. Public spaces of this quality are lacking from the town centre and they would help to knit the site allocation with the existing town centre in an understated way. As noted above, the new infill buildings on North Street have been designed to reflect the existing height and arrangement of existing buildings on the street and they would help to provide a more 'gentle' entrance into the site when approaching from the High Street.

The spaces within the scheme have clearly been carefully considered by the applicant. The main route through the scheme would be the re-modelled Woodbridge Road. This road would be stopped up as part of the proposal and would become a pedestrianised space. The Council's Urban Design Officer notes that 'this new pedestrian street would retain the historic alignment of Woodbridge Road. The width of the street and height of the buildings are well proportioned with a ratio of around 1:2. It would form a vista with framed views extending to the spire of St Saviour's Church. High quality paving with a central channel would emphasise the linearity of the street. The southern and northern sections of the street would have contrasting characteristics. To the south, the street would have a lively feel with restaurants, bars, opportunities for al-fresco seating and catenary lighting. To the north, the street would be residential in character with front doors and a defensible landscaped front garden space. At upper floor levels apartment windows and strategically located balconies would also enliven the street and provide passive surveillance. Along the length of the street architectural interest would be provided by brick and metalwork detailing at ground floor level'. This new route would provide a much more desirable walking route from the town centre in the direction of Woodbridge Road and is likely to quickly become part of residents everyday use that they utilise to move around the town.

Half way along the pedestrianised and remodelled Woodbridge Road would be a new public open space named the Dial which would be fronted by commercial properties and the main entrance into the concierge for the apartments within the scheme. The Urban Design Officer notes that the Dial 'would form a new public space at the heart of the development. The buildings and their uses would define this space with a relatively simple approach to landscaping. The space would be punctuated by a placemaker building with special materials and detailing including: a ribbed teal concrete base; white brick upper floors; an elegant white brick frame structure; and bronze metal effect window frames. The north-eastern corner of the Dial would be landscaped with raised planters, seating and three semi-mature Pin Oak trees. The planting would help soften the space and provide shade and shelter'. The Dial would be a new high quality area of open space which would offer a new amenity for the town, but which provide relief to the linearity of the built form and provide interest and variation to the way pedestrians will experience the scheme.

As noted above, the southern end of the new Woodbridge Road would terminate at the proposed North Street Square. The square would replace 18 North Street and 108-109 Woodbridge Road which are to be demolished as part of the proposal. The space would be framed with a new red brick building which would include a decorative colonnade to its south and west facades. The square would serve as a public realm gateway to the development and a breakout space to North Street. It would be framed by six semi-mature trees and seating with a central water feature. The benches shaded by trees would create an attractive dwell space to rest and enjoy the activity of the square and the street. The central water would provide interest and an opportunity for informal play. DSE note that 'the new square on North Street works very well and is a great addition to the proposal. The colonnaded area is particularly successful. The water feature is a good idea and contributes to the play provision of the scheme'.

Away from the new Woodbridge Road, a new area of open space is also proposed in the former Commercial Road which is also to be stopped up as part of the development. This new public space would form an important link between the new residential and commercial quarter, the bus station, the Friary Centre and North Street. Movement through this space would be emphasised by water flowing through a linear rain garden. The rain garden would encourage children and adults to stop and dwell with playful features such as bridges, boulders and artwork. Tree planting would include semi-mature Pine, Pin Oak, Red Oak and multi stem Birch, which together with understorey planting would provide layers of seasonal texture and colour. The square would also incorporate flexible break out space that could be used for al-fresco dining and street performers.

In addition to all of the above, the proposal also includes the part pedestrianisation of North Street from outside the main entrance to the Friary Centre to the junction of North Street and Leapale Road. The exact details of the pedestrianisation will be discussed later in the report, but in physical terms it will involve the re-paving of the pavements and the carriageway to create a mostly level surface between the southern and northern sides of North Street. The pedestrianisation works would also include new street furniture, lighting and seating. These works would positively transform this part of North Street and together with the other aspects of the development would help it integrate with the existing town centre. These works will be described in greater detail below.

The creation of new pedestrian north-south and east-west routes through the site would also help to improve town centre permeability. The use of narrow lanes and broader streets is a deliberate design feature which replicates the High Street / North Street and the narrow alleys and laneways which link the two. This feature also helps the scheme integrate into its surroundings.

In all, through the layout, the provision of new areas of open space and the architecture and detailing, the proposed scheme would create its own strong sense of place, whilst also successfully integrating with the existing town centre. The quality of the proposed public realm, including the detailed hard and soft landscaping, street furniture, public art and play spaces would be secured by condition.

Bus station

The existing bus station offers a very poor environment for its users. Its design is of its time and is in need of renewal. The proposal would involve the demolition of the existing concourse which run along the eastern edge of the Friary Centre. The new concourse would be located in broadly the same position but housed in a new, purpose built, modern structure. The concourse would include 14 new bus stands into the buses, with an additional 2 set-down areas (on the opposite side of the concourse), areas of seating, information displays etc and would be covered with a new bespoke geometric designed sectional cantilevered canopy roof which together with the application of a 3.5-metre-high vertical glazed screen (toughened glass), would create a dry and sheltered waiting area for users.

The design and materiality of the roof is certainly key to the design of this facility. The profile of the primary canopy (northern section which covers stands 1-13) is relatively slender in geometric form and has been designed to have streamlined nosing which wraps underneath the canopy edge which would be formed from PPC, anodising profiled panelling or a similar material. Care has been taken to ensure that where the proposed canopy adjoins the Friary Centre that the zig-zag profile of the existing concrete slabs are clearly expressed, although it is proposed that these are enhanced by means of a painted finish.

The secondary canopy (southern section which covers stand 14 through to Friary Square) is essentially a flat roof construction to match the primary canopy, but is differentiated by an angular form and nosing detail. It has been designed to overlap the primary canopy at lower level and will engage with the Friary Centre in a more simplified way, as there is no zig-zag profile to address. At its southern end, the canopy breaks out and into Friary Square, and as such will be supported structurally by a number of up-right minimalistic columns. Both canopies benefit from cut-out glazed top lights to provide additional natural lighting.

The floor finish is cited to be a high-quality non-slip paving system in a mid-grey tone. The exact detail of this, together with the slab dimensions and layout/bond pattern would be finalised through conditions, as would the painted finish for the rear wall of the concourse, which is formed from the existing face of the Friary Centre.

The Urban Design Officer notes that 'the proposed bus station would be an improved passenger facility with shelter, seating and signage. A canopy would extend into Friary Square forming a welcoming entranceway to the bus station concourse'.

The design of the new concourse is not objectionable and would be a welcome improvement over the current situation.

In addition to the above, it is also proposed to revise the vehicular access to the site in such a manner that buses can only enter and exit the facility from the north (Leapale Road). This action represents a fairly radical change; however, it enables a more condensed and efficient bus station facility to be delivered, and furthermore, creates a significant opportunity to enhance and transform the surrounding public realm through the provision of more pedestrianised public spaces, including the proposed Friary Square and pedestrianisation of the North Street, the attributes and benefits of which have been discussed above. A knock on to all of this is that it also enables the proposed residential and commercial development (Blocks A-E) to integrate

more successfully with the surrounding townscape. Therefore, from an urban design perspective the revised access is also seen as a welcomed improvement.

Commercial properties

It is noted that policy D6 (considerable weight) of the LPDMP provides the requirements that are expected in relation to the design of shopfronts. It states that (inter alia) shopfronts are required to be designed to a high quality, including being responsive to, and where possible enhancing the character and appearance of their surrounding context and the building it forms part of. Development proposals are also required to contribute to the continued preservation or enhancement of the Borough's heritage assets, with their design having been informed by relevant national and local design guidance. All new and alterations to shopfronts are expected to use high quality sustainable materials and to be of a design that retains, or relates well to the proportion, scale, detailing, period and character of the host building as a whole, as well as the wider street scene. Unless the architecture of the building indicates otherwise, new and replacement shopfronts are required to include as a minimum the following features within their design:

- a) fascia
- b) pilasters
- c) cornice
- d) stall riser(s)
- e) retail window(s)
- f) doorway

Policy D6 goes on to note that shopfronts that contribute positively to the established character and appearance of the building they form part of, the surrounding context or which are identified as being of architectural or historic interest must be retained or restored.

As regards advertisements, it is noted that individual advertisement consent applications will be required by each unit (where consent is required). Policy D7 (considerable weight) of the LPDMP provides the requirements for the design and location of advertisements.

It is noted that the design of the shopfronts and commercial advertisements and signage within the scheme will to a large extent depend on the final occupiers. As such, this information is not available at present. While the applicant has provided some broad designs of the shopfronts, these will most probably be altered as occupants are found. To ensure that the shopfronts and the signage associated with the commercial premises are of a high standard and display a consistent theme throughout the development, the applicant will be required to submit a Shopfront and Advertisement Strategy before works on the units begin. This will be secured by condition. As such, it is considered that the requirements of policies D6 and D7 can be met through the condition.

Conclusion on urban design

While it is acknowledged that the proposal is large in terms of its height, bulk and massing, it has been sensitively designed to reflect the nature and character of its surroundings. Higher buildings have been placed where they would reflect the scale and massing of existing larger scale buildings and where they can make a positive contribution to the surrounding context. The marker building, which is located at the northern end of the side, close to Onslow Street, would aid legibility and provide a gateway structure, in an area which is already characterised by larger buildings. As such, this element of the proposal would not appear out of place in this context. The impact on wider views will be considered in the next section of the report.

Other elements of the proposal also include bulky buildings which would transform Leapale Road and the former Commercial Road. However, the quality of the architecture, the detailing of the buildings, as well as the public realm improvements will help the structures to assimilate into their surroundings. While the proposed buildings are large, overall, in urban design and townscape terms, they reflect the scale of existing built form in the surroundings. As such, this element of the proposal would not result in harm to the character or appearance of the surroundings.

As such, the proposal is deemed to be compliant with policies A5, S3 and D1 of the LPSS and policy D4 of the LPDMP.

Impact on wider townscape

NPPF Chapter 12 paragraph 130 noted above is also relevant to consideration of the townscape impact of a development. In particular, it seeks to ensure at (c) a sympathetic approach to local character and history, the surrounding built environment and landscape setting.

LPSS Policy S3(5) requires new development to have regard to (c) important views into and out of the town centre from the surrounding landscape, and (d) views within the town centre of important historic buildings.

Policy P1 (3) advises that great weight will be given to the conservation and enhancement of the natural beauty of the Surrey Hills AONB and development proposals must have regard to protecting the setting. The AONB includes the wooded hilltops either side of the valley in which the Town Centre is located.

Policy D1(1) requires new developments to respond to distinctive local character, (including landscape character); and (4) to take account of SPDs.

The Guildford Town Centre Views SPD 2019 provides guidance in implementing LPSS policy, in particular S3 and D1. It covers how to manage change in key views with the aim to retain the character of Guildford, including the ability to appreciate key heritage assets and to understand the relationship of the town with its landscape setting. It identifies 16 key landmark buildings which are noted as focal points in key views. These have informed the list of 15 viewpoints, relating to the river corridor, approaches to the town, and the town centre that are deemed to be important in the context of Policy S3. However, it is noted that these do not preclude other views being valued and a material consideration in respect of specific planning applications.

The specialist assessment of impact on heritage assets is addressed under a separate heading below, but here the impact of the scheme on selected viewpoints towards the site from within and beyond the town centre is examined. This includes views in which the wooded hilltops towards the Surrey Hills AONB, either side of the town can currently be seen.

The application is supported by a Townscape and Visual Impact Assessment (TVIA) which has also been updated to reflect the amendments which have been made to the scheme. This examines the impact of the scheme from 21 viewpoints which were agreed with Council Officers at pre-application stage. The viewpoints selection has been informed by a theoretical 'Zone of Visual Influence' study (which showed where a building of a defined height is likely to be seen), taking into account views identified by the Council as significant, (e.g. in the Town Centre Views SPG), other sensitive locations such as the setting of listed buildings and from conservation areas, 'representative' locations from where the development would be seen, and locations where there is extensive open space between the view and the site so that it would be prominent rather than obscured by foreground buildings. The viewpoints covered the range of points of the compass from which the development would be visible, a range of distances, and different types of townscape area. The photographs used to produce the images, whether 'fully rendered' or

'wireline' are 'verified', to ensure that they are accurate representations. In addition, the images created are required to include the cumulative effect of other approved large schemes, so that the proposal can be appreciated in the context of the emerging townscape.

Officers consider the TVIA as important in assessing the wider impact of the proposed as now proposed on Guildford. However, it is stressed that any such view is, literally, a 'snapshot', and that buildings are experienced in their settings in a dynamic manner, as the observer moves around. Thus, whilst a key view could be adversely impacted by a proposal, it is important to appreciate that a slight repositioning of the viewpoint could have a very different result. Accordingly, it would be inappropriate to judge the townscape impact of a proposed development solely via the TVIA process.

The original TVIA submitted with the application concludes that for the completed development:

'The proposed development would have a moderate and beneficial effect on 'TCA2: North Guildford Historic Fringe', due to the proposed development's building typologies responding to the local context's buildings. Also, its parcels and new public realm improving pedestrian permeability through the site. The uses at ground floor would activate the proposed development's elevation and provide natural surveillance onto the surrounding streets. The proposed development's Block A and B1 building address North Street and along with the public realm enhancements would have a moderate to minor and beneficial effect on 'TCA1: Guildford Historic Core'. Partial to glimpsed views are likely to be possible from 'TCA3: River Wey Corridor', 'TCA4: Northern residential suburbs and 'TCA5: Western Guildford Historic Fringe' to the proposed development's buildings and it would have an indirect minor and beneficial effect on TCA4: Northern residential suburbs and 'TCA5: Western Guildford Historic Fringe' and a moderate to minor and beneficial effect on 'TCA3: River Wey Corridor'. Long distance glimpsed views are likely to be possible from the open space areas and roads within 'TCA6: University of Surrey', 'TCA7: Western Residential Suburbs' and 'TCA8: Raised Southern Residential Suburbs', resulting in a minor and neutral effect on 'TCA8: Raised Southern Residential Suburbs' and a negligible and neutral effect on 'TCA6: University of Surrey' and 'TCA7: Western Residential Suburbs'.

On the amended plans, the TVIA Addendum noted that 'overall, this resulted in limited, positive, localised changes to the townscape character and visual situation previously assessed and would not give rise to any new or materially different residual effects than those set out within the July 2022 TVIA'.

Officers have appraised the TVIA assessment. The Urban Design Officer has considered the change in view from a selection of the viewpoint locations that have been assessed within the TVIA. The comments on these views are summarised as follows:

View 1. Dapdune Wharf – The existing skyline view composition includes town centre buildings filtered by intervening riverside trees. These include the monolithic nine storey Surrey Police Station, seven storey Onslow House and the spire of the Church of St Saviour. The TVIA shows how most of the development would sit behind existing town centre buildings with the northern marker and gateway buildings visible. The reduction in height of the marker building to 13 storeys and the gateway building to nine storeys would reduce the schemes overall visibility. The removal of the upper inset floor of the gateway building increases the visible silhouette of the Church of St. Saviour's spire. The TVIA addendum concludes that the effect of the completed scheme from this viewpoint would be beneficial. The urban design officer notes that whilst the tall building is a positive waymarking feature, elements of the view would conflict with the Town Centre Views SPD Guidance. On balance, the Urban Design officer has concluded the effect of the completed scheme upon this representative view is considered neutral.

View 2: Pewley Hill – Guildford Cathedral and the treed skyline is the focus of this elevated view. The town centre sits below the skyline and includes large-scale modern buildings such as House of Fraser. The TVIA concludes that, '[the proposal] provides carefully articulated buildings that would provide visual interest...'. The Urban Design Officer notes that in this mid-distance view, the detailed articulation of the buildings is likely to be difficult to read. The Urban Design Officer does not consider that the scale and mass of the development would be incongruous with other modern commercial buildings, which are visible. In addition it is noted that the development would not break the skyline or detract from views of the Guildford Cathedral. The development would not be the focus of the view. On balance, the Urban Design officer concludes that the proposal would have a neutral effect on this view.

View 3: St Catherines Hill – In this view Guildford Castle Keep, the cupolas of Abbots Hospital and Holy Trinity Church tower form the focus of the skyline. In the view to the left the skyline is largely treed. With the reduction in height the proposals would sit behind the evergreen trees. The buildings would be indiscernible within the view and not detract from the group of legacy landmarks. The Urban Design officer concurs with the judgement of the TVIA that the effect upon completion would be neutral.

View 4: Hogs Back - This is a distant view, in which the development would form a relatively small part of the wider panorama. The TVIA concludes that '[the development] provides carefully articulated buildings that would provide visual interest...'. The Urban Design Officer notes that in this distant view, the articulation of the buildings would be more difficult to read. The overall scale and mass is likely to be an incongruous feature within the prevailing pattern of townscape. However, it is noted that the development would not impact on the prominence of Guildford Cathedral or break the wooded skyline. On balance, the Urban Design Officer concludes that the proposal would have a neutral effect on this view.

View 5: Farnham Road – This is a linear view framed by residential properties. Centrally in the background of the view, as the landform drops down to the valley floor, the town centre is visible. The development would be seen within the valley as part of the wider town centre view. The Urban Design officer concurs with the judgement of the TVIA that the effect upon completion would be neutral.

View 6: Bright Hill – In this view, the town centre is seen beyond Bright Hill surface car park. The Cathedral tower is visible on the skyline, and the tower of Holy Trinity Church breaks the skyline in the middle distance. The reduced 13 storey marker building would sit just below the skyline, reflecting the Town Centre Views SPD guidance. The Urban Design officer concurs with the judgement of the TVIA that the effect upon completion would be neutral.

View 7: Castle Motte – The foreground of this view takes in the historic core around Quarry Street, modern commercial buildings are visible in the middle ground and the cathedral is the focal point in the background. In this view the proposals would effectively step up to the House of Fraser Building with the marker building seen beyond. The red brick and muted tones would reflect the materiality of Guildford, whilst the slender white brick marker would be consistent with the lighter tones that punctuate the view. In the view, the development would form part of the existing grouping of modern buildings. The viewers appreciation of the Cathedral on top of Stag Hill would not be diminished. The Urban Design Officer notes that the proposed development fits comfortably within the view but does not enhance it, however, neither would it be a prominent feature of the view. It is noted that it would add to the bulk and mass of existing large scale buildings in the middle distance. On balance, the Urban Design Officer concluded that upon completion the proposal would have a neutral effect upon this view.

View 8: Stag Hill – The foreground of this open view is dominated by grassland with mature trees and hedgerows around its edges. The vegetation frames views of the town centre. In this view the scheme would be seen in the context of other development within the town centre. In the summer months, its visibility would be reduced by intervening vegetation. On balance, the Urban Design Officer's judgment is that upon completion the effect upon this view would be neutral.

View 10: Woodbridge Road – In this view the spire of St. Saviour's Church is a prominent landmark. The composition of buildings also includes the modern nine storey police station and the five storey Dominion House office building. The urban design officer notes that, 'the proposed marker building would sit behind and to the right of the spire. By virtue of its location within the composition the spire would rise above the marker building. The building, which would identify a main gateway into the town centre would be broken up and articulated with three slender elements. The stacked windows and recessed balconies provide vertical expression, emphasised by vertical white brick panels – consistent with the design approach taken to the Dial building. The stacked windows and recessed balconies provide vertical expression...' To the left of the marker building the northernmost gateway building would be seen over Dominion House. The TVIA addendum photomontage demonstrates how the amended scheme would sit more comfortably in the existing streetscape. In particular removing the inset top floor of the gateway building reduces its prominence. The reduced height of the marker building and lighter tone of inset balconies would also soften the overall appearance. The TVIA concludes that, 'It would provide a positive addition to the townscape and aids with orientation to the new bus interchange.' On balance the Urban Design officer accepts the conclusion of the TVIA that upon completion the proposal would result in a beneficial effect upon this view.

View 14: Angel Gate – Existing views down this narrow alley extend to the Listed 17 North Street that sits within the site. Elements of the development would be seen behind 17 North Street. The urban design officer notes that to make this composition more recessive to the focal 17 North Street design amendments include amending façade treatments, additional fenestration and reducing the height of the taller gateway building. On balance, the urban design officer has concluded that the design amendments contribute to a layered view where 17 North Street can be read separately. However, the imposition of the additional bulk and mass of development behind number 17 detracts from its role as a focal point at the end of the lane. Overall, the effect upon the townscape upon completion of the scheme, from this specific view is likely to be adverse.

View 15: Swan Lane – Existing views along this alley look towards the buildings on the corner of Woodbridge Road and North Street, which is the focus of this view. To the left distant views extend to the Spire of St Saviour's Church. The proposals would see North Street square and the new focal marker building would terminate this view. The façade and materials of the building respond well to the townscape and would be softened by tree planting within the square. The new composition would be a positive addition to the public realm. The urban design officer concurs with the TVIA's conclusion that, 'Overall, it is considered that the Proposed Development responds to and improves the townscape resulting in a beneficial effect within the view from this viewpoint' (TVIA, paragraph D.187)

View 17: North Street – The existing view includes 'Burger King' (now Black Sheep Coffee), which marks the corner of North Street and Commercial Road. Beyond this building, the frontage to Commercial Road is undefined. Views extend beyond the existing derelict site to Leapale Road. In the foreground the street scene is cluttered with signage and lighting. The existing emphasis of the carriageway is to Commercial Road rather than straight up North Street. The proposal has the potential to significantly improve the street scene by re-establishing frontage development to Commercial Road, rationalising the street layout, adding street trees and removing road signage. The proposed semi pedestrianised carriageway would continue straight up North Street rather than bearing left to Commercial Road. The urban design officer agrees

with the TVIA's conclusion that, 'The proposed development responds to and improves the townscape resulting in a beneficial effect within the view from this viewpoint.' (TVIA, paragraph D.210)

View 18: Leapale Lane – This view extends down Leapale Lane to the indistinct Dominion House at the junction with Leapale Road, Woodbridge Road and Commercial Road. The proposed tall marker building would identify the northern corner of the site and pedestrian route to the town centre shops and amenities. The slender and well detailed building will add character to the view and create a new wayfinding landmark for Guildford. The urban design officer agrees with the TVIA's conclusion that, 'The articulation and façade treatment to Block E provides visual interest to the view resulting in a beneficial effect'.

Thus, of the 13 viewpoints appraised by the Urban Design Officer, upon completion only one view is considered to result in harm. This would be from Angel Gate where the larger bulk of the scheme would be visible over the lower 17 North Street. As mentioned in the section above, the Council's Urban Design Officer raises no objection to the proposal and is of the opinion that overall, the proposed scheme reflects the requirements of the NPPF paragraph 130 and the design requirements of the adopted Local Plan policies and guidance.

Pedestrianisation of North Street and stopping up

As noted above the proposal includes the pedestrianisation of North Street between the Friary Centre and its junction with Leapale Road. The highways implications of this will be discussed below, but in summary, vehicles will be prohibited from using the pedestrianised section between the hours of 10am to 6pm Monday to Sunday. Deliveries would be restricted to the hours of 6pm to 10am daily. It is noted that these details are indicative only. The final arrangements for the pedestrianisation will need to be agreed by both Guildford Borough Council and Surrey County Council.

The submitted Design and Access Statement states that 'the proposed improvements to the highways are aimed at improving the pedestrian environment and will include narrowing of the carriageway, introduction of flush block work raised tables and the removal of parking, with associated widening of the footways'. The plans show that the current carriageway would be finished with a mix of block paving where pedestrian traffic would be high, with areas of tarmac in between. The pavements would also be re-paved. This means that pedestrians coming from the High Street using Angel Gate, Swan Lane or White Lion Walk would be able to access the development at grade across flush areas of new paving.

The proposal also includes the addition of traffic gates to the east and west will allow access by traffic to be controlled within agreed hours. Details of their exact design will be controlled by condition and will be subject to further approvals from both Guildford Borough Council and Surrey County Council. The proposal would also include opportunities for new street trees and other planting.

It is noted that the use of high quality, durable materials will be an important factor in the success of this element of the scheme. Officers note that the materials can be controlled by condition and this will ensure that a high-quality finish can be secured. It is noted that the applicant has committed to delivering the pedestrianisation as part of their first phase of works. This is an important element and will be secured through the legal agreement.

It is noted that the proposal also includes the stopping up of both Commercial Road and Woodbridge Road. This means that both of these roads would be removed from the public highway and put to private use to facilitate the development and ensure its permeability. The proposal includes a new street through the development which would be generally on the

alignment of Woodbridge Road. As noted in the preceding section of the report, this new street would be fully pedestrianised and would be accessible 24 hours a day. As such, pedestrian permeability through the site would be significantly improved. The impact of the closure on vehicular traffic will be assessed in the highways section of the report. Commercial Road would also be closed as part of the proposal. It would be replaced in part with the re-modelled bus station and in part with a new area of public open space which the applicant calls Friary Square. As noted above, this new area of public realm would provide a valuable area of open space in the heart of the town centre and would also provide a safer and more attractive pedestrian route from North Street to the bus station. Again, the stopping up of Commercial Road would have many accessibility benefits for pedestrians as well as the obvious townscape benefits that would be achieved.

As such, overall the proposed stopping up of both Commercial Road and Woodbridge Road is seen as an overall benefit, in the terms set out above. This work facilitates the creation of the high-quality and extensive areas of public realm which are to be delivered by the scheme. As noted, the highways impacts of the closures will be discussed later in the report.

Finally, it is noted that the pedestrianisation works would impact on a number of existing arrangements including the taxi rank outside of Marks and Spencer and the outdoor market which operates from North Street. In terms of the taxi rank, it is noted that this would have to be relocated elsewhere in the town centre. The County Highway Authority raise no objections to this and it will be the responsibility of other departments of Guildford Borough Council to plan for and organise any relocation if this application is approved. In terms of the market it is noted that the newly pedestrianised section of North Street could accommodate the market in the future. This would provide a much more convenient space for stalls and traders, with more space, better facilities and the possibility of a more efficient layout. Again, the relocation of the market would be the responsibility of other departments within the Council. It is understood that alternative locations for the market during construction works are currently being considered by other colleagues and will be reported to Members through other routes, where necessary.

The impact on heritage assets

As noted above, the application site includes one listed building (All Bar One) which is Grade II listed. It is noted that this building is being retained, with some minor external alterations proposed to the side elevation and chimney. Apart from that, due to the scale of the proposal, it has the potential to impact on a number of listed buildings which are located across the town. These will be specified in detail below and include Stoke House (Grade II listed) which is opposite the site to the north-east and the Church of St Saviour (Grade II listed) which is located to the north of the site on Woodbridge Road. In addition 41-43 North Street is a locally listed building and this is situated opposite the site on the other side of North Street.

Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' It is noted that as the site is not located within a conservation the duty under Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 does not apply to this proposal.

Case-law has confirmed that, when concerned with developments that would cause adverse impacts to the significance of designated heritage assets (including through impacts on their setting) then this is a factor which must be given considerable importance and weight in any balancing exercise.

Turning to policy, Chapter 16 of the National Planning Policy Framework sets out the framework for decision making in planning applications relating to heritage assets and this application takes account of the relevant considerations in these paragraphs. Paragraph 195 sets out that 'local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal'.

Paragraph 199 of the NPPF applies to designated heritage assets. It states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. This policy reflects the statutory duty in section 66(1). Paragraph 200 goes on to note that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.

Policy D3 of the LPSS is generally reflective of the NPPF and it states:

- the historic environment will be conserved and enhanced in a manner appropriate to its significance. Development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough's heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported; and
- the impact of development proposals on the significance of heritage assets and their settings will be considered in accordance with case law, legislation and the NPPF.

The D policies in the LPDMP are not subject to main modifications and therefore, they now carry considerable weight in the assessment of this application. Policy D16 concerns designated heritage assets and it emphasises the requirements in the NPPF as regards the assessment of applications concerning heritage assets. Policy D17 relates to listed buildings and it notes that (inter alia)

- development proposals are expected to conserve, enhance and where appropriate better reveal the significance of listed buildings and their settings. Where harm to significance is identified this will be considered against Policy D16(3).
- repairs, alterations or extensions, that directly, indirectly or cumulatively affect the special interest of a statutory listed or curtilage listed building, or development affecting their settings are expected to: a) be of an appropriate scale, form, height, massing and design which respects the host building and its setting; b) have regard to the historic internal layout as well as the architectural and historic integrity that form part of the special interest of the building; c) reinforce the intrinsic character of the building through the use of appropriate materials, details and building techniques; and d) respect the setting of the listed building including inward and outward views.
- development proposals for the demolition/removal of objects or structures fixed to the building or within the curtilage of a Listed Building are required to demonstrate that they are: a) incapable of repair for beneficial use or enjoyment; or b) not of special architectural or historic interest as an ancillary structure to the principal Listed Building.

Policy D18 relates to development within or in the setting of a conservation area. It notes that:

- development proposals within or which would affect the setting of a Conservation Area are expected to preserve or enhance its special character and appearance. Where harm to/loss of significance is identified this will be considered against Policy D16(3): Designated Heritage Assets.
- development proposals are required to show how they respect and respond to the history of place, the surrounding context and the preservation or enhancement of the Conservation Area's special character and local distinctiveness, by having regard to: a) the retention of buildings, groups of buildings, existing street patterns of the area, building lines and ground surfaces, and the impact on significant open spaces; b) the retention of architectural details and features of interest that contribute positively to the character and appearance of the area, such as windows, doors, and boundary treatments; c) the protection, and where appropriate, the enhancement of key views and vistas, to, from and through a Conservation Area; and d) the protection of trees and landscape that contribute positively towards the character and appearance of the area.
- development proposals within or which would affect the setting of a Conservation Area are required to be of a high-quality design and are expected to take the opportunity to enhance the special interest of the area. They are required to reinforce or complement the character and local distinctiveness and characterisation of the Conservation Area, including having regard to: a) size, height, bulk, massing, scale, layout, landscape and appearance; b) the use of good quality sustainable building materials and detailing, appropriate to the locality and sympathetic in colour, profile and texture; and c) maximising opportunities to mitigate and adapt to climate change through energy efficiency improvements.

Policies D19 (scheduled monuments), D19a (registered parks and gardens) and P20 (non-designated heritage assets) are also relevant.

Heritage assets

Although the proposed site is not located in a conservation area, due to its scale, it has the potential to impact on a number of heritage assets which are located both in the immediate vicinity of the site and further beyond. Having read through the supporting documents the Council's Conservation Officer notes that there are a vast number of heritage assets that have been identified in the study area which will not be impacted by the proposed development, as either there is no or very limited intervisibility between the asset and the site, or the way in which the asset is experienced or understood will not be impacted by the proposed development. Therefore, the Conservation Officer has focused on the assets which are affected by the proposal. These being:

- *Listed buildings:*
 1. Church of St Saviour - Grade II
 2. 17 North Street - Grade II
 3. Stoke House - Grade II
 4. Cathedral Church of the Holy Spirit, Stag Hill - Grade II*
 5. Guildford Castle Keep - Grade I
 6. St Catherine's Chapel - Grade I
 7. Treadwheel Crane - Grade II*
 8. St Mary's Church - Grade I
 9. St Nicholas Church - Grade II*
 10. Church of Holy Trinity - Grade I

- *Registered Park and Garden:*

11. Jellico Roof Garden, High Street - Grade II

- *Conservation areas:*

12. Town Centre Conservation Area
13. Wey and Godalming Conservation Area
14. Bridge Street Conservation Area
15. Stoke Fields Conservation Area

- *Locally listed :*

16. 41, 42 and 43 North Street
17. 67 to 71 North Street
18. 72 North Street
19. 12 North Street
20. 17-21 Market Street
21. 18 Market Street

Historic England have also commented on the application, but it is noted that their remit is not as wide as that of the Council's Conservation Officer. The assessment of each asset below will include comments made by Historic England, where they have provided them.

Assessment of impact on significance - listed buildings

1. Church of St Saviour - Grade II

The church was originally built on the garden belonging to a large house, which historic mapping indicates was named as The Elms. This original early setting was composed of a terrace row of small cottages, together with a public house facing on to Woodbridge Road, immediately to the south of the church, with more terraced housing to its east and north. The land on the opposite side of Woodbridge Road (west) at the time of the Church's consecration had recently been developed (1896) as the new home of Guildford's cattle market and corn exchange, which had been relocated from North Street. Little of this original setting remains. The cattle market and corn exchange have long since been replaced by a civic campus consisting of the town's magistrate court and police station, whilst other modern development has also been constructed within the immediate setting, such as 1 Onslow Street and Onslow House. Another significant change to the setting is the road and road junctions immediate to the site, all of which are heavily engineered and are detractive. As a consequence, the setting of the church is impinged by activity, movement and noise.

Conservation Officer Assessment: This asset is located close to the northern end of the application site, on Woodbridge Road and was purposefully designed to be prominent in local views thanks to the height and reach of its thin needle spire. It has been identified that the proposed development by virtue of the scale of Blocks C2 and E and some of the design articulation would challenge the design intent of this particular heritage asset. This concern is particularly apparent in Townscape and Visual Impact Assessment (TVIA) viewpoint 10 (Woodbridge Road). This view focuses on St Saviours from the junction of Woodbridge Road and Leas Road, north of both the asset and the application site. In this view Block E replaces Dominion House and essentially terminates this linear view. Whilst acknowledging that Block E has been designed and sculpted carefully with consideration to providing visual interest as well as minimising its impact upon the asset and its significance, there is still a concern that the resulting structure presents a challenge to the heritage asset as a result of its height, but also by virtue of

the contrasting materiality (dark brick) proposed for the inset balconies. The concern is that the height and material treatment is such that they undermine one's ability to appreciate and experience the asset's designed prominence and scale, and equally, that it shifts the visual focus away from the church and onto Block E, thus diminishing and harming its significance.

In addition to the identified harm from Block E, the asset's significance and setting would be challenged further by the presence of the upper two floors of Block C2, which would be visible to the east of the church's spire. In isolation, the presence and impact of the upper storeys of Block C2 upon the significance of the church in TVIA view 10 (Woodbridge Road) is considered to be limited, however, when one looks at the scheme holistically, the cumulative impact of Blocks C2 and E together starts to overwhelm and encroach into the spire's existing unconstrained setting, thereby resulting in harm. In terms of wider views, the impact of Block C2 upon the setting of the St Saviours spire is much greater. For example, in TVIA viewpoint 1 (Dapdune Wharf) the spire's silhouette would be diluted by the presence of the upper storeys of Block C2, which would sit behind it. This is clearly contrary to the guidance set out in the Guildford Town Centre Views SPD, which states that development should not compete with St Saviours Church spire for prominence.

However, it is noted that the amendments secured to the scheme have slightly reduced these impacts. The Conservation Officers comments on the amended design notes that the reduction in the height of Block E together with the materiality changes are both strongly welcomed, and it is noted that they are both positive action which would assist in minimising harm across a number of heritage assets. Most pertinently St Saviour Church. TVIA viewpoint 10 (Woodbridge Road) demonstrates that the proposed changes would result in this component of the development having a slightly more comfortable relationship with heritage asset of St Saviours, although there is no denying that harm would remain as the scale of the proposed development would remain at a quantum that would, to some extent, visibly challenge the intentional scale and prominence of the church within the hierarchy of the town. In relation to the changes to Block C2 the Conservation Officer notes that the removal of the setback floor is strongly welcomed from a heritage perspective as it lessens the challenge placed by the proposed development upon the visible silhouette of the Church of St Saviours spire, as confirmed by many of the views presented in the TVIA addendum document. TVIA viewpoint 1 (Dapdune Wharf) is a view where the loss is perhaps most noticeable and most beneficial as Block C2 is no longer in the view, thus allowing the spire to remain unimpeded or unchallenged, thereby complying with the guidance set out in the Guildford Town Centre Views SPD. In the case of TVIA viewpoint 10 (Woodbridge Road) the change made would still mean that Block C2 would still be discernible, however the perceived height, bulk and massing is much reduced as is the impact and challenge to the heritage asset.

Historic England assessment: Historic England (HE) notes that St Saviours is a church with spire, designed to be a landmark and an eyecatcher. The building is prominent to make salvation easy to find. With a large building nearby this will draw the eye from the church and diminish the message that those who designed and commissioned the building were trying to convey. Views along Woodbridge Road that currently allow one to see the spire against the sky would be compromised by the height, massing, colour and detailing of the residential block. HE note that through negative change to the setting of the church one's ability to appreciate its designed prominence and scale, would be harmed.

Although changes to Block E and C2 have been secured, HE confirm that they do not address the concerns that they raised in their original response to the application (as set out above).

Harm to significance: Given the amendments which have been secured, the Council's Conservation Officer is of the opinion that the proposal would result in a low level of less than substantial harm to the significance of the Church of St Saviour. The same conclusion has been reached by HE.

2. 17 North Street - Grade II

This asset directly adjoins the application site on its southern boundary. The building is set over three storeys and is an early 19th century shop, that has been converted into a bar (All Bar One), with accommodation above. The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function. North Street is a street that has undergone considerable change during the 20th century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Office, and which continues to change into the 21st century. Its current built character is composed of a varied mix of ages, architectural styles and material palette. As regards the significance of the building, it is noted that it is of special interest due to its brick tone which is not local to Guildford and thus indicates that it was imported to the town. The transportation of this material at the time of construction would have been at great cost, therefore indicating that whoever commissioned its construction was relatively wealthy. It also illustrates early 19th century domestic and commercial detailing and design.

Conservation Officer assessment: In this case, the Council's Conservation Officer has highlighted two main considerations which need to be assessed. These are (i) the impact of the demolition of 18 North Street and 108-109 Woodbridge Road upon the asset's fabric and setting and (ii) the impact of the proposed development scheme upon setting.

As regards point (i) it is noted that it is proposed to demolish 18 North Street which adjoins directly on to this heritage asset (17 North Street). This property has been identified as a non-designated heritage asset and thus the principal of the loss of this building from that particular perspective is considered and dealt with further on in this report. Nevertheless, it is recognised that its removal has the potential to have a physical impact upon 17 North Street, as well as an impact upon its setting. Starting with setting, it is acknowledged that the architectural and historic interest of 18 North Street contributes positively to the setting of this heritage asset and thus its demolition would result in further removal of its historic setting and therefore some erosion of the asset's significance. However, there is recognition that the alteration to this setting is somewhat offset by the creation of a new public square in its place, which has been designed sympathetically using what appears to be an appropriate material palette - natural aggregate flag paving (light grey) and natural aggregate block paving (terracotta blend) - that is considerate to the surrounding historic environment.

In terms of the physical impact upon 17 North Street, there is a reasonable chance that the process of removal and/or making good could have an influence upon the asset's structure and fabric, however to what extent is currently uncertain, as there are still a number of unknowns. Nevertheless, the methodology currently set out in the supporting document appears to be sensitively considered and appears appropriate for the context of the works. In particular, the provision of a further method statement that is to be presented to the Local Planning Authority before the commencement of works is welcomed.

As regards (ii) the Conservation Officer notes that the impact on 17 North Street's setting is mixed, with some positive identified as well as some negatives. As regards the positive aspects it is noted that the provision of a new public square, one which has been designed sympathetically using a sensitive material palette is certainly viewed as a transformational enhancement to the assets setting, as is the proposed pedestrianisation of North Street, both of which would enable better appreciation of it. The replacement of 15 North Street, which is

currently seen as a negative detractor, with a building (Block A) that is of a more complementary and improved design, is an action that would further enhance this listed building's setting, by virtue of it improving the North Street streetscape. Nevertheless, despite some significant enhancements to the asset's setting there is a concern with the visual challenge that the cumulation of Blocks B1, B2, C1 and C2 and the resultant incongruous layering that is placed upon its scale and setting. This is most apparent from Angel Gate as demonstrated in TVIA viewpoint 14 (Angel Gate). There is also a concern with the use of a stark white render on Block B2's elevation. Whilst I appreciate that the designed contrast was intended to ensure that the frontage of the listed building could be read separately, the concern is that the resultant contrast is too harsh and actually draws a viewers focus away from the principal asset.

As regards the amendments which have been secured, the Conservation Officer notes that as corroborated by TVIA viewpoint 14 (Angel Gate), the removal of the setback floor of Block C2 is beneficial to the setting of 17 North Street as well as views from the Guildford Town Centre Conservation Area, by virtue of it helping to mitigate the visual challenge posed by the cumulation of Blocks B1, B2, C1 and C2 and its incongruous layering. The amendments to Block A and B are also helpful with regard to the setting of 17 North Street.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: Although amendments have been secured which impact on the setting of 17 North Street, the Council's Conservation Officer has concluded that the harm to significance would be at the lower end of less than substantial.

3. Stoke House - Grade II

This asset is situated obliquely to the north of the application site and at the closest point the distance between the site and the asset measures approximately 20 metres. Stoke House is a brown/red brick faced, town house whose origins date back to the 17th century, but which was rebuilt in the mid-18th century and further extended in the 19th and 20th centuries (to the left and rear respectively).

Much of the property's original 18th century setting has been removed and replaced by more contemporary development, this includes a modern development, known as Bell Court, to its rear and eastern side, which dates to the late 1980's, early 1990's. Also, the large telephone exchange building opposite, which was constructed in 1937, and the large expanse of cleared land that forms the application site. Despite experiencing all of this change, what has remained relatively consistent in terms of this asset's setting has been the road layout. Despite its modern engineering and scale, much of the layout that currently existing is historic. Nevertheless, the activity, movement and noise arising from the use of this infrastructure does influence how one experience this asset.

In terms of the significance of the asset it is noted that it is of historic interest as a survival of an early house outside of the main town but also provides legibility and understanding to the town's northern expansion. The use of vernacular material and traditional building techniques in its construction and its 18th and 19th century domestic detailing and design is also of importance.

Conservation Officer assessment: The Council's Conservation Officer notes that this asset is best appreciated from the junction of Leapale Lane and Leapale Road. From this position one can recognise that its setting is entirely modern, and the assessment reached in the supporting Heritage Assessment, that the building relies on its inherent historic and architecture interest for its significance rather than its setting is agreed. Nevertheless, this does not signal that its setting is insignificant. Development still must have regard towards preserving a setting that is of significance, but equally in instances where a setting has suffered from inappropriate past

development actions there is an opportunity to seek enhancement.

It has been identified that the change to the asset's setting will be considerable by virtue of the scale, mass and quantum of development being proposed. TVIA viewpoint 18 (Leapale Lane) is one view which illustrates the relationship between the proposed development and the heritage asset and the likely magnitude of change to the setting. In this view Block E will replace the current five storey Dominion House in terminating the view. The Conservation Officer notes full agreement with the assessment reached in the supporting heritage statements that this block dominates the view, but equally would also agree that it has been designed and sculpted adeptly to avoid or limit the imposition of a harsh, monolithic intrusion by using varying heights, setbacks and building lines. These design elements, together with the use of a contrasting white brick palette and articulated elevations which provide visual interest, does help to form a legible piece of high-quality piece 21st century architecture for the town, that would represent an enhancement to the existing Dominion House.

However, in terms of the proposed developments impact upon this particular heritage asset, while the sculpted and considered design of Block E does go some way towards reducing and mitigating the perceived mass and volume of this structure, nevertheless it still places a sizable challenge to the assets more domestic scale, as does the scale and massing of the other nearby blocks (Blocks C2 and D4) which are also considered to influence this setting and are of a considerable scale and mass. Notwithstanding the above, there is recognition that the proposed development does provide area of public realm directly opposite which is certainly seen as being a positive to the setting of this heritage asset. This area is known in the scheme as The Northern Gateway and is an important pedestrian entry point into the proposed scheme from the north. This piece of public realm is of an intimate scale and its layout has been rationally designed with the purpose of facilitating pedestrian movement, but still offers areas of planting which would help to soften, not only the floor scape, but would aid in softening the immediate setting of Blocks E, C2 and D4, as well as Leapale Road. A further positive to the setting is the full pedestrianisation of Woodbridge Road and the rationalisation of the existing road junction.

As regards the proposed amended plans, it is noted that the changes made to Blocks E and C do result in a discernible improvement to the setting of Stoke House.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: Even taking into account the amendments, the Conservation Officer concludes that there is some harm to the setting of Stoke House by virtue of the visual challenge the proposal places upon the prevailing human scale of the surrounding townscape. The resultant harm in this instance would be qualified at less than substantial at the lower end of the spectrum.

4. Cathedral Church of the Holy Spirit, Stag Hill - Grade II*

This asset is situated approximately one kilometre km to the north-west of the application site. Guildford Cathedral was designed by Edward Maufe in 1932/3, the building was the result of a competition to design a cathedral for the newly formed diocese of Guildford on land gifted for the building by the Onslow family.

Today the Cathedral is a visually prominent landmark of Guildford and can be seen for miles around sitting on top of the green verdant mound of Stag Hill. The building has a commanding presence in many views around the town and at night, when the floodlit building is seen against the dark cushion of Stag Hill, the silhouette is particularly dramatic. It is seen as a single monumental entity on top of a green hill. Its elevated position also provides a vantage point over the town centre where a number of landmark structures and assets can be identified in view,

such as Guildford Castle and Holy Trinity Church. In this view the dramatic valley, in which the town sits, is easily identifiable as is the relationship between the town and its landscape setting. A comprehensive plan for landscaping the setting of the cathedral was never produced, so Maufe's design focuses on the two approaches to the landmark, from the south and west. Local views along these approaches also contribute to the appreciation of this heritage asset. Its local setting now includes the post war buildings of the University Surrey on the north hillside.

In terms of its significance it is noted that the building is one of only three Anglican cathedrals built in England since the 17th century. Its association with Sir Edward Maufe, known for his work on places of worship and memorials, including the Air Forces Memorial at Egham is also of significance, as well as the glass work and windows and statues that are present in the building.

Conservation Officer assessment: The Council's Conservation Officer notes that the visual prominence was a key factor in the siting of this heritage asset on Stag Hill, not least for symbolic reasons. The architectural design emphasis is that of prominence through its enormously impressive scale including its imposing mass and height. The solid materiality, simple fenestration and massive central tower present an imposing silhouette that can be appreciated across the historic town from most angles. An important element of the setting and relationship between the cathedral and the town is the visual interplay with the other church towers that form important elements of the historic townscape, as well as the ability to be able to appreciate the visual relationship with the castle.

Due to its landmark status and its visual prominence, the asset features in a number of the key views identified in the Guildford Town Centre Views SPD, and thus has been captured in multiple TVIA viewpoints supporting the application, including TVIA viewpoint 2 (Pewley Hill), viewpoint 4 (Hogs Back), viewpoint 6 (Bright Hill), viewpoint 7 (Castle Motte) and viewpoint 8 (Stag Hill). It should be noted that views of the proposed development are not possible directly from the cathedral at ground floor level, due to the topography of the site and the existing vegetative screening which encloses the Seeds of Hope Children's Garden, located at the east end of the Cathedral's grounds. The closest location where views are possible is best represented by TVIA viewpoint 8 (Stag Hill) which is taken from the east facing slope of Stag Hill, over 100m from the cathedral itself. It is a view which is characterised by the grassland and mature trees and hedgerows that forms the setting to cathedral at its eastern end. The view also demonstrates the visual relationship between Stag Hill and Pewley Hill and reveals the distinctive topography of the town. Key valued features in this view include legacy landmark features, Guildford Castle Keep and Holy Trinity Church. Helpfully, the supporting wireline and modelling confirms that the introduction of the proposed development would not obscure or cause challenge to the legacy landmark features, thereby not affecting the intervisibility between these assets, a quality of the Cathedral's significance. Equally, the taller elements of the proposed development which would be seen, specifically Blocks D4 and E, take a position in this view that benefits from partial screening arising from the existing vegetation within the foreground, thereby, helping to mitigate their overall visibility.

Nevertheless, there is a concern that the scale and prominence of Block E, despite being partially screened, could still appear as an incongruous addition against the more domestic and historic scale of the town from this outlook, and thereby would result in harm to the asset. In terms of returning views of the asset these are captured in TVIA viewpoint 2 (Pewley Hill), viewpoint 4 (Hogs Back), viewpoint 6 (Bright Hill), and viewpoint 7 (Castle Motte). In all instances the Conservation Officer is satisfied that the proposed development would not present a direct prejudicial challenge to the significance or prominence of the Cathedral, however it is recognised that in these views the scale of Block E would appear at odds with the scale and grain of Guildford's prevailing townscape, thereby undermining the Cathedral's wider setting. In the case of TVIA viewpoint 6 (Bright Hill) the height of Block E does begin to encroach over the crest of Stag Hill, which is contrary to the guidance set out in the Guildford Town Centre Views SPD.

Whilst the scheme, for the large part, does not present a concern, some harm to the asset's significance has been identified.

The changes made to the scheme do not fundamentally alter the views expressed above.

Historic England assessment: Historic England notes that Guildford Cathedral occupies a commanding position on the western hill of the town. It can be seen for miles around: a prominent landmark of Guildford. It is perhaps the best-known work by Sir Edward Maufe, combining restrained Gothic architecture with Scandinavian influences. It is one of only three post war Anglican Cathedrals including the earlier Liverpool Cathedral by Sir Gilbert Scott, also in the neo-Gothic tradition, and Sir Basil Spence's post war Cathedral at Coventry. Archive plans indicate that Maufe took full advantage of the elevated position and the open landscape setting of Stag Hill in his designs for the Cathedral complex, feasibly with input from Jellicoe, then working on behalf of Guildford Borough Council to develop a strategic town plan. The response is a building of monumental scale, with a substantial central tower and tripartite west end. Today, although the context of the Cathedral is changed, it remains the most dominant building for miles around, sitting atop its green mound above the town.

Viewpoint 2 (Pewley Hill) in the TVIA shows a wireline of the proposals and it appears that block E in particular would appear unfortunately prominent in the view that takes in Guildford town, the landscaping around the cathedral and the building itself sitting majestically on Stag Hill. Block E would appear out of scale with the predominant scale of buildings within Guildford and would appear likely to perpetuate the issues set out within the Town Centre Views SPD that 'detractors present within the view are the House of Fraser building (formerly Army and Navy department store), which appears bulky and prominent, and other relatively large-scale modern commercial buildings which obscure views or glimpses of the more modest historic buildings and fine-grained roofscape within the historic core'.

Although changes to Block E and C2 have been secured, HE confirm that they do not address the concerns that they raised in their original response to the application (as set out above).

Harm to significance: Given the amendments which have been secured, the Council's Conservation Officer is of the opinion that the proposal would result in a low level of less than substantial harm to the significance of the cathedral. While HE noted in their original comments that the harm to this asset would be 'below the mid-range of than less than substantial', this has been recalibrated in their most recent response where they also afford harm 'at the lower end of less than substantial'. As such, the Council's Conservation Officer and HE agree on the degree of harm to this asset.

5. Guildford Castle Keep - Grade I and Scheduled Ancient Monument

This asset is situated approximately 270m to the south of the application site on high ground overlooking the River Wey, as well as the ford crossing it. This asset is recognised to be the remains of the Guildford Castle's tower keep which dates from the mid-12th century and first mentioned in written record in 1173. The structure was subject to a partial rebuild, following a fire in the 13th century. It was converted to a house for Francis Carter, a Guildford merchant in the 17th century who had bought the castle and its grounds from King James I.

Locally, the assets setting comprises of the castle grounds and the remains of other parts of the castle complex such as the ruins of the Shell Keep and the private apartments. The complex is self-contained which is articulated by a combination of the surrounding townscape as well as the immediate Victorian park landscape. Nevertheless, the site's elevated position and graduating topography does allow for wide reaching views looking north, west and south, especially from the Castle Keep motte. Views to the north overlook the High Street, North Street and the town's

northern suburbs; those to the west overlook Quarry Street and down over towards the lower river area around Millbrook and across over to The Mount; view to the south takes in the southern extremities of the town as well as St. Catherine's Chapel.

The topography of Guildford plays a pivotal role in the contribution made by the setting of the castle to its significance and an understanding of that significance. What is noted in views out from this asset is the visual prominence of the important ecclesiastical buildings of Guildford, with the stone towers of St Mary's and St Nicholas rising above the tile and slate roofscape below. There is also very strong visual link to the mighty brick tower of the Cathedral which crowns Stag Hill beyond the compact historic core of the town, which is reciprocated back. Equally, there is also an appreciation of the wooded surroundings of Guildford and its position with the natural valley topography which helps to illustrate and provide an understanding of the reasons for the town's origins and evolution, as well as why it looks the way it does. The River and Town Bridge are also aspects of its wider setting that contribute to its significant not least as this relates back to the military aspect of this heritage asset.

The Conservation Officer has summarised the significance of the building as:

- ruinous structure of exceptional interest, reflected by its Grade I listing and Schedule Monument status
- surviving ruin of a royal castle dating to at least the 1170s
- town landmark
- tangible link to the early settlement of Guildford as a site of fortification
- used as a prison by the end of the 12th century up until 16th century, when it was moved to Southwark
- strong group value with other castle remains
- associated with King Henry II who used the castle as a hunting lodge and King Henry III, who turned Guildford Castle into one of the most luxurious palaces in England and oversaw the rebuilding works following the 13th century fire
- referenced in art and literature over the centuries including '*South West Prospect of Guildford in The County of Surrey*', engraved by Samuel and Nathaniel Buck, 1738
- John Darborne became guardian of the castle in 1544
- rare survival and valuable resource which illustrates how the defensive complex was organised, operated and evolved
- importance and dominance of the castle expressed through its materials, including expensively worked stone
- the intended visual prominence and sense of scale which contrasts with the finer grain and smaller scale of the historic town
- high status residence with traces of ornate stonework still extant
- architectural relationship between the castle and St Mary's and St Nicholas as important civic buildings, sharing similar materials and deliberately prominent architectural scale
- represents the grim official architecture of Henry II built in memory of the recent civil war and before the new ideas of castle building were brought back from the Crusades' Nairn and Pevsner (*The Buildings of England – Surrey*)
- evidence of medieval graffiti on some of the chalk walls

Conservation Officer assessment: The Council's Conservation Officer notes that as a Grade I listed structure as well as Scheduled Monument this is an asset of high significance. The castle's raised elevation and prominence allows for views to the town and surrounding landscape and thus is considered to have a wide-reaching setting which includes the proposed development site. The consequence of this is that the asset appears in a number of the key views identified in the Guildford Town Centre Views SPD, and thus has been captured in multiple TVIA viewpoints supporting the application, including TVIA viewpoint 3 (St Catherine's Hill), viewpoint 4 (Hogs Back), viewpoint 5 (Farnham Road), viewpoint 7 (Castle Motte) and viewpoint 8 (Stag Hill).

The most immediate of the viewpoints is TVIA viewpoint 7 (Castle Motte). This illustrates the view that is to be gained of the proposed development directly from the Castle and its immediate setting. In this view Blocks B1, C2, D1, D2, D3, D4 and E can be seen rising gradually back from North Street and continuing the prevailing townscape layering. Generally speaking, it is felt that in this view the graduating heights of the scheme are successful in achieving a compatible grading of built form that would not appear uncomfortably out of scale with, or incongruous to the prevailing historic townscape. The exception to this is Block E, which due to its height projects and towers above the graded townscape. Whilst the placemaking reasons for this contrast are acknowledged and in the main agreed with, it is still concluded that from a heritage perspective the resultant urban form would appear noticeably incongruous and would also hinder onward views from the asset, thus diminishing a part of the asset significance and causing harm.

In terms of returning views of the asset these are captured in TVIA viewpoint 3 (St Catherine's Hill), viewpoint 4 (Hogs Back), viewpoint 5 (Farnham Road) and viewpoint 8 (Stag Hill). In all instances the Conservation Officer is satisfied that the proposed development would not present a challenge to the asset. For instances, in the case of TVIA viewpoint 8 (Stag Hill), the supporting wireline and modelling confirms that views of the Castle Keep would be maintained and remain prominent from this position, as it is separated sufficiently enough from the proposed development not to obscure or challenge it, thus not affecting the intervisibility between the castle and the cathedral. Equally, the taller elements of the proposed development which would be seen, specifically Blocks D4 and E, take a position in this view that benefits from partial screening arising from the existing vegetation within the foreground, thereby, helping to mitigate their overall visibility. Nevertheless, the concern noted above, that the height and scale of Block E would appear noticeably incongruous, are still equally relevant from this perspective. With regards to TVIA viewpoint 3 (St Catherine's Hill) this verified view confirms that the small area which is likely to be observed would sit subtly above a belt of coniferous trees that form the central part of the middle distance of this view, and thus helping to limit and restricts its visual prominence, but more significantly demonstrates that the proposed development would not conceal, interfere or detract from the group of legacy landmarks that can be observed in this view including Guildford Castle.

On the amended plans, the Conservation Officer does acknowledge that the reduced height of Block E helps to positively strengthen the scheme's proportionable and consistent townscape grading, by sitting more comfortably with Blocks B, C and D. Nevertheless, there is still an acknowledgement that the Block E would continue to be of a scale which would restrict onward northward views from the asset, thereby diminishing the Castle's historic strategic role in terms of controlling the River Wey bridging point. However, the Conservation Officer cites that these views outwards to the north, that would have historically been an important aid in helping to control the bridging point, have already been substantially compromised by existing large-scale development, such as House of Fraser, 1 Onslow St and Onslow House (EA Games), and as such, the asset's significance, in terms of this northwards outlook and onward views has already been completely lost.

Historic England assessment: HE note that the TVIA viewpoint 7 clearly illustrates how the scheme will appear in views from the Castle Motte. The castle was sited to control the crossing point over the River Wey and is on high ground so an enemy can be seen when approaching from north or south. While Guildford has expanded greatly since medieval times the generally low scale of relatively modern development has allowed this aspect of the Castle's role to remain readily appreciable. The carefully stepped building heights cross the scheme helps to achieve a general grading of the built form such that the scheme would not (with the exception of block E), as a whole appear uncomfortably out of scale and thus disruptively visible when appreciating the historic townscape in this view. However, this view does show that the taller building (block E) would protrude out above this general graded form and appear quite incongruous and

conspicuous. In addition, views to the landscape beyond the town will be obscured, which causes harm to the historical purpose of the castle and thus its significance.

The proposed light colour for the external treatment of this taller tower has been chosen to reduce its visibility against light grey skies, however HE note that they are concerned that it will in fact be very clearly seen and cause clear harm to the appreciation of historic town and the Castle views. HE consider the impact of the scheme as seen from here would cause harm to the scheduled monument of the Castle. They have confirmed that amended plans do not alter this view.

Harm to significance: Taking into account the amended plans, the Council's Conservation Officer does not believe that the proposal would result in harm to the setting of this asset as it does not directly or indirectly prejudice the architectural or historic significance of the asset, particularly in terms of its historical strategic function within the town. However, HE maintain the view that harm is caused and that this would be in the lower range of less than substantial.

6. St Catherine's Chapel - Grade I

This asset is situated 1.3km south of the application site and has been included in the assessment as it forms the subject of a key view in the Guildford Town Centre Views SPD. This ruined and roofless chapel structure dates to the 14th century. It was erected by Richard de Wauncey, Rector of St Nicholas (one of Guildford's ancient parish churches) on the site of an earlier chapel.

The chapel sits perched on a steeply sided hilltop overlooking the River Wey, which is 100m to its east. Whilst there has been development to the north, its setting is largely rural. It has commanding views over the countryside (east, south and west) as well as towards the town centre (North), and affords views to Guildford Castle, the cupolas of Abbots Hospital and Holy Trinity Church's tower all of which are key landmark legacy buildings, as well as being heritage assets in their own right. It is the northern outlook (towards the town centre) which has been identified in the Guildford Town Centre Views SPD (viewpoint 5) as being an important view which helps to reveal/illustrate Guildford's development and evolution, and the importance of its relationship with the countryside beyond.

The Council's Conservation Officer has summarised the significance of this asset as being:

- Chapel of exceptional interest, reflected by its Grade I listing status and its Schedule Monument status.
- its age and surviving medieval undisturbed upstanding fabric illustrates important information about the nature and date of its use up to its abandonment, as well as illustrating methods of craftsmanship, building techniques and use/application of materials
- area around the chapel is likely to contain important archaeological and environmental information relating the use and history of the site
- the chapel and its setting are the subject of a number of works by the artist J M W Turner (1775-1851), some of which are displayed in the Tate Gallery. It also formed the subject of a pieces of work by other artists such as Samuel Palmer (1805-1881) and Percy Robertson (1868-1934)
- formed the location of the St Catherine's Fair which began in the 14th century - some of the artwork by Turner and Palmer depict this event

Conservation Officer assessment: It is noted that the Conservation Officer agrees with the supporting heritage assessment which concludes that the impact of the proposed development would not sufficiently alter the setting to cause harm to this heritage asset. It is noted that a small section of the upper floors of the development are likely to be observed from this asset's location,

the most likely of which would be Block E, as clarified in modelling and verified views, particularly TVIA viewpoint 3 (St Catherine's Hill). This verified view confirms that the small area which is likely to be observed would sit subtly above a belt of coniferous trees that form the central part of the middle distance of this view, and thus helping to limit and restrict its visual prominence. Equally and more importantly, the verified view also confirms that the proposed development would not conceal, interfere or detract from the group of legacy landmarks that can be observed in this view (Guildford Castle, cupolas of Abbots Hospital and Holy Trinity Church tower.) Also contributing positively is the chosen material palette. The use of a light colour material treatment for Block E will help to further reduce and restrain the developments visibility from this position, as a lighter material will blend more subtly against the sky backdrop. As such, the Conservation Officer is satisfied that the proportion of the proposed development which would be visible, together with the 1.3km distance between the site and the chapel will not change its setting sufficiently enough to cause harm.

As regards the amendments, the Conservation Officer notes that although no harm was identified with the original submission, the amendments have now reduced the height of Block E. TVIA viewpoint 3 (St Catherine's Hill) confirms that the scheme would not now be visible at all from this position.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that the proposal would not harm the significance of this asset.

7. Treadwheel Crane - Grade II* and Scheduled Ancient Monument

This asset is situated approximately 140m to the south-west of the application site. Situated on the east side of the River Wey navigation, the Treadwheel Crane structure dates from the late 17th century / early 18th century. It consists of a wooden slewing crane and timber framed structure of two bays that is wrapped in timber weatherboard cladding (black) and covered over by a plain tiled roof. The southern bay is open whilst the northern bay is enclosed, it is this enclosed section which houses a suspended timber treadwheel which is approximately 5m in diameter and 1.5m wide. The crane, which sits to the west side of the structure is formed of timber baulks rotating between top and bottom bearings, its hausting hook is linked to the treadwheel by the means of a chain. The crane is a rare survival and is believed to have been the last working example in Great Britain.

Although relocated, the structure remains alongside the Navigation with which it has a historical functional relationship. It is sited on the east bank in an area of public open space, which is contained by the river to the west, Millbrook, which is situated at an elevated level, to the east as well as the gyratory to the North. Being situated so close to Millbrook and the Gyratory its siting is one which is associated with a lot of activity, movement and noise. One of the best ways to experience the setting of the crane is via the navigation itself taking the route that formally would have been used for the transport of goods and now used primarily for leisure. It can also be appreciated from the Town Bridge looking north, where it can be seen in relation to the Navigation and the industrial and commercial buildings on the south side of Bridge Street, as well as from Friary Bridge where it can be viewed against the backdrop of the protrusion of the post-war Friary Court development, and the existing department store.

The Conservation Officer summarises the significance of the asset as:

- it is a particularly important building of more than special interest reflected by its Grade II* listing and Schedule Monument status

- believed to be the last working example in Great Britain – very rare survival of a former industrial structure with technological interest.
- serves as a reminder of the importance of the River Wey to the successful development and growth of Guildford as an industrial and commercial centre
- illustrates the River Wey's history as a working river and the transportation of goods to London, including coal, grain and timber

Conservation Officer assessment: It is noted that the proposed development site does not form part of this asset's setting and there are very limited opportunities in which the site and the asset could be read together. The main, and probably only location in which both sites could be appreciated is from Park Street, looking north-east across the surface car park. This is a view which does not form part of the TVIA study, however, the Conservation Officer has been able to assess the impact using the Council's townscape modelling software. The conclusion reached is that whilst the upper storeys of Blocks Block E, D3 and D4 can be viewed, they would read as background layering to the Friary Centre and Friary Court development, which are more immediate to the crane's riverside setting. The Conservation Officer is therefore satisfied that its impact would be negligible.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that the proposal would not harm the significance of this asset.

8. St Mary's Church - Grade I

This asset is situated to the south of the application site and at the closest point the distance between the site and the asset measures approximately 200m. St Mary's Church is one of Surrey's most important medieval churches, containing an outstanding amount of historic fabric spanning over 1000 years. It stands at the junction of Quarry Street and Mill Lane, close to the centre of Guildford, on raised ground overlooking the River Wey to the west and is one of the three ancient parishes of the borough of Guildford, with St Nicholas' and Holy Trinity being the other two. The origins of the present church dates back to the 10th / 11th century with the tower being recognised as the oldest surviving piece of architecture in Guildford.

The church sits relatively centrally within its plot. Forming its immediate setting to all but its eastern flank is the churchyard which is typical in its character (presences of headstones, tombs (including Miles Tomb, discussed separately) and managed landscape). It is one of the few open spaces within the centre of Guildford and is still used for the burial of ashes and as place of reflection. The church is very much a focal point for Quarry Street and Mill Lane, contributing positively to the townscape. It is surrounded by a mix of low density commercial and residential buildings, many of which are individually of historic significance (most being listed themselves), and which exhibit a wide range of ages and style, from medieval to the early 20th century, revealing the many layers of development of the town. Although over 60 feet tall the church is not considered to be a dominant feature on the skyline of Guildford due to the graduating topography of the area. Nevertheless, it is identified as a key landmark legacy building within the Guildford Town Centre Views SPD. Long or medium range views of the Church's tower are extremely limited, but restricted glimpsed views, predominantly in the winter months are achievable from higher ground, such as the Castle Keep and grounds as well as from Guildford Cathedral / Stag Hill. Restricted short-ranged views are possible from the valley bottom in places such as Park Street. The relationship of St Mary's Church to the river is important. Whilst its visual connection with the river has been lost with the introduction of development between the church and the river, historic mapping does show that the church and the river, up until relatively recently (relative to the age of the church) had a visual connection.

The Council's Conservation Officer summarises the significance of the building as:

- Church of exceptional interest, reflected by its Grade I listing status
- its age, Saxon origins and pre-conquest fabric make it particularly significant, together with the later work over the centuries from the mediaeval to the modern
- location and setting forms a pivotal part of the historic landscape of central Guildford with its early settlement focused around the immediate area around St Mary's - one of the three ancient parishes of the Borough of Guildford, there has been a church on the same site since at least the 7th century
- culturally significant in that it has been at the centre of life for the settlement of Guildford for over 1000 years
- place of royal worship in the 12th and 13th centuries
- important landmark in the street scene
- records show that Reverend Charles Lutwidge Dodgson, who is better known by his pen name Lewis Carroll, preached at the church whilst staying at the family home, The Chestnuts on Castle Street.
- referenced in art and literature over the centuries including '*South West Prospect of Guildford in The County of Surrey*', engraved by Samuel and Nathaniel Buck, 1738
- the building is a reflection of evolving ecclesiastical building traditions and styles
- use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town.
- Gothic style of the mid-13th century is unusual for Surrey
- survival of the late Saxon town, built solely of flint and chalk rubble with no reinforcing quoins. The tower originally was situated at the church's western end, but due to the church's growth and expansion it is now positioned more centrally within the structure's composition. Survival of such a tower is of exceptional importance.
- survival of the 12th and 13th century east end of chancel and chapels
- survival of the 12th century nave arcades
- survival of the 15th century roofs (in general) and possible pre-15th century chancel roof structure
- outstanding collection of late medieval (15th century) stone roof corbels in the north and south aisles
- quality of internal aesthetics recognised by Pevsner – "almost the only attractive town church interior in Surrey"
- the graduated raising of the internal floor levels eastwards signifies and heightens the importance of the east end
- survival of 15th century screen between the Chapel of St Mary and the south aisle
- small fragments visible of the extensive decorative scheme of murals that once existed in the St John's Chapel. Suggestions have been made that this work is by William Florentine circa 1240, who was working at Guildford Castle for Henry III at the same time
- Royal coat of arms in the north aisle are to Queen Anne, dated 1707
- ring of eight bells cast in 1754 but rehung by Mears and Stainbrook of London - the ring is one of the oldest and most complete in Surrey

Conservation Officer assessment: The Conservation Officer is satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as TVIA viewpoint 4 (Hog's Back) and viewpoint 8 (Stag Hill). Equally, through the townscape modelling software, together with the TVIA, it has been concluded that proposed development would not prejudice the significant visual interplay between the Cathedral and this historic town church. The Conservation Officer therefore concludes that the proposed development would not harm any element of setting that contributes to this heritage assets significance.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that the proposal would not harm the significance of this asset.

9. St Nicholas Church - Grade II*

This asset is situated to the south-west of the application site and at the closest point the distance between the site and the asset measures approximately 225m. Situated on the western bank of the River Wey the present St Nicholas' church is a Grade II* listed building which happens to be the third church on the site. The current church dates from the 15th century, although the only surviving section from this period is the Loseley Chapel.

St Nicholas Church sits in a prominent location at the end of the High Street, on the south side, between Bury Street and Millmead. In terms of the role of the building in the streetscape, it occupies an important location within the western end of the High Street, beyond Millbrook and the River Wey with one being able to appreciate its value and significance as a town landmark in short, medium and long-range views from across the town as well as the surrounding hills. Its tall tower and scale contrasts sharply with that of the surrounding historic townscape to the south, west and east, and its physical prominence is especially noticeable in views down the High Street and along the river. The church is also very much visible from around the gyratory, which sits to its north. From this perspective one sees that this context is characterised by fragmented townscape of island blocks and large surface car parking as well as busy main roads with a significant degree of activity and noise.

The Council's Conservation Officer summarises the significance of the building as:

- is a particularly important building of more than special interest reflected by its Grade II* listing status
- St Nicholas parish is one of the three ancient parishes of the Borough of Guildford
- important landmark in the street scene
- the connection between the chapel and the original church, together with its association with Loseley House and the More (later More-Molyneux) family who have lived there for over 500 years, gives heightened significance to the Chapel
- Loseley Manuscripts, now housed partly in the Surrey History Centre and partly in the Folger Shakespeare Library in Washington DC highlight the significant literary and cultural links with the lives of people remembered in the Chapel, enabling a remarkable insight into Tudor and Stuart Surrey, the More family and their connections with the royal court
- constructed by Ewan Christian, a leading Victorian architect, best known for the National Portrait Gallery in London
- it is a reflection of evolving ecclesiastical building traditions and styles
- use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town.
- survival, albeit much altered of the 15th Century Loseley Chapel – it is the only surviving part of the original medieval church
- the church contains the work of artists of national significance, Thomas Earp and Joseph Aloysius Pippett – these bodies of work are recognised to be good examples of their craft on ecclesiastical art of the period. The works include
- the West Wall – painted in 1893 (Pippett)
- alabaster pulpit and font (Earp)

- stain glass and wall mosaics of St George and St Helena in the north aisle manufactured by Clayton and Bell, one of the most prolific and proficient English workshops of stained glass in the late 19th and early 20th century.
- strong representation of work of locally based craftsmen, including:
- statue of St Nicholas in the chancel by Tom Wren of Watts Studio
- font designed by Grafham-based Henry Woodyer
- statues of Our Lady and St George by Blacking and Webb – made in their Flower Walk studios which was located beside St Nicholas' Rectory.

Conservation Officer assessment: The Conservation Officer is satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as TVIA viewpoint 4 (Hog's Back) and viewpoint 8 (Stag Hill). Equally, through the townscape modelling software, together with the submitted TVIA's, the Conservation Officer notes that the proposed development would not prejudice the significant visual interplay between the Cathedral and this historic town church. It has therefore been concluded that the proposed development will not harm any element of setting that contributes to this heritage assets significance.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that the proposal would not harm the significance of this asset.

10. Church of Holy Trinity - Grade I

This asset is situated approximate 230m to the south-east of the application site. Occupying a prominent site on the High Street, Holy Trinity Church also known as the 'Upper Church' is a mid-18th century church that replaced an earlier medieval church. It is of the Palladian style which was popular at the time of its construction. It is set back from the footpath and is elevated several meters above all neighbouring buildings on the High Street, thereby requiring steps and a ramp to access the west front.

Holy Trinity sits in a prominent location on the High Street which is quite an open and wide public space that has been enhanced by the pedestrian scheme, which restricts vehicular traffic throughout the day. The church itself sits to the front of its fairly generous plot and is nestled in between the historic properties fronting on to the High Street. Its status in the streetscape is reinforced by the fact that the structure is set back a little from the prevailing building line, but also by its elevated position. The church is very much one of the focal points for the High Street, particularly towards the upper section contributing positively to the townscape. As mentioned, it is surrounded by a mix of low density commercial and residential buildings, many of whom are individually of historic significance (most being listed themselves), and which exhibit a wide range of ages and style, from medieval to the early 20th century, revealing the many layers of development of the town. Forming its immediate setting to the south is the churchyard which is typical in its character (presences of headstones, tombs (including Miles Tomb, discussed separately) and managed landscape). It is one of the few open spaces within the centre of Guildford and is used as place of reflection and pause. Also experienced in the assets immediate context are features such as the Grade II listed church boundary walls and railing which surround it, as well the memorial to Major Geoffery Brooke Parnell, and Elkin Vault, which provide group value. Enclosing the churchyard on two side are terraces of historic residential development and the Trinity Centre. The square crenelated tower acts as dominant feature on the skyline of Guildford due to the graduating topography of the area. It is identified as a key landmark legacy building 10 within the Guildford Town Centre Views SPD. Long or medium range views of the Church's tower are visible from a number of aspects around the town and are more pronounced

in the winter months. Those of particular significance include the view from Guildford Cathedral at Stag Hill, which enables a wider appreciation of the Church in relation to the Castle and those from The Mount.

The Council's Conservation Officer summarises the significance of the building as:

- Church of exceptional interest, reflected by its Grade I listing status
- Holy Trinity parish is one of the three ancient parishes of the Borough of Guildford
- important landmark in the street scene
- focal point in views along the high street
- Nairn and Pevsner identify the church as '*Surrey's only big C18 church, handsome and pedestrian at the same time*'
- apsidal east end and transepts by Sir A.W Blomfield
- Weston Chapel built by Richard Weston¹² of nearby Sutton Place
- referenced in art and literature over the Centuries including '*South West Prospect of Guildford in The County of Surrey*', engraved by Samuel and Nathaniel Buck, 1728
- tomb and memorial to George Abbot (Archbishop of Canterbury 1611-33)
- tomb of Sir Robert Parkhurst (Lord Mayor of London, d.1637)
- memorial to Arthur Onslow (Speaker of the House of Commons 1728-1761)
- war memorials to the Queen's Royal West Surrey Regiment (WW I)
- survival, albeit much altered of the 16th century Weston Chapel – it is the only surviving part of the original medieval church
- use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town.
- c.1770 pulpit built in the style of Wren

Conservation Officer assessment: The Conservation Officer is satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as TVIA viewpoint 3 (St Catherine's Hill), viewpoint 4 (Hog's Back), viewpoint 5 (Farnham Road) and viewpoint 8 (Stag Hill). Equally through the townscape modelling software, together with the submitted TVIA it is noted that the proposed development would not prejudice the significant visual interplay between the Cathedral and this historic town church. It has therefore been concluded that the proposed development will not harm any element of setting that contributes to this heritage assets significance.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that the proposal would not harm the significance of this asset.

Assessment of impact on significance - Registered Park and Garden:

11. Jellico Roof Garden, High Street - Grade II

This asset is situated directly to the south of the application site on the opposite side of North Street. The garden of c 770 sqm is situated above the former Harvey's department store (now House of Fraser), which is a five-storey building on the north side of Guildford High Street. The Sir Geoffrey Jellicoe designed garden occupies one of the roofs of the building and is surrounded to the south, east, and west by plain cast-iron railings (circa 1m high). The garden has an L-shaped floor plan following the outline of the underlying roof. Its main component is a shallow lily pool, which forms a large sheet of water covering the entire roof space, except for the site of

the former cafe, in which various flower beds and viewing platforms are set, connected by steppingstones.

The main attributes of setting that contribute to this heritage assets significance are principally the department store itself, which includes 105-111 High Street, as well as the extensive views out over Guildford and the surrounding countryside, which provide a sense of connection between the asset and its wider surroundings

The Conservation Officer summarises its significance as

- association with Sir Geoffrey Jellicoe, one of the 20th century's most celebrated landscaped architects
- designed to symbolise the flight of the first sputnik
- the circular shapes in the design 'embody the idea of planets spinning through space' (Architectural Review 1957)
- Jellicoe said that it was '*...primarily a sky garden... the underlying idea has been to unite heaven and earth the sensation is one of being poised between the two*'.

Conservation Officer assessment: It is noted that the garden was designed to use the town of Guildford as its setting and currently from this vantage point one is able to observe and appreciate the fine urban grain and human scale of the town, as well as take in the dramatic valley topography and tree lined back drop which adds to the towns distinctive character and provides a narrative to its existence and evolution. The townscape modelling software has confirmed that the proposed development would be readily viewed from this unique vantage point by virtue of its, scale, height, massing and extent. This is likely to be most acute from the northern end of the garden with many of the development's core blocks being evident. However as the viewer moves more centrally within the garden the development's visibility is moderately diminished, reduced to just the upper floors of Blocks C1, C2, D3, D4 and E. The proposed development becomes even less apparent as one moves into the southern section of the garden behind the café, to the extent that its completely removed from view. The introduction of the proposed development would undoubtedly challenge this outlook, by virtue of the exaggerated, and contrary scale and massing of some of the built components such as Blocks C2, D4 and E, appearing incongruous to the prevailing townscape and severing views out across the town towards the north-west. However, it is noted that views from the garden of the town's most significant landmarks, such as Guildford Castle and Guildford Cathedral will remain unaffected.

Historic England do not provide specific comments in relation to this asset.

Harm to significance: The Conservation Officer concludes that when giving consideration to the asset's uniqueness, particularly in terms of its outlook, and Jellicoe's vision that the idea of the garden was '*to unite heaven and earth the sensation is one of being poised between the two*' the resultant harm is categorised as being less than substantial at the low end of the spectrum.

Assessment of impact on significance - conservation areas

As noted above, the site is not located within a conservation area. However, it has the potential to impact on the setting of a number which exist in and around the town centre. These will be assessed below.

12. Town Centre Conservation Area

This conservation area is located directly to the south of the application site with its boundary line being drawn down the centre of North Street, thereby including properties on North Street's southern side. It was designated in 1969 and is one of the Borough's conservation areas which benefits from a character appraisal (adopted 2006). The focus of this large Conservation Area is Guildford's historic town centre, which takes in Guildford Castle, the High Street and a mix of commercial, residential and civic areas. The Conservation Area is bounded to the west by Millbrook and the modern shopping area; to the south by the mediaeval chalk quarries and early 20th century suburbs; and to the east and north by late 19th century residential suburbs. The character appraisal divides the conservation area into four character areas Guildford Castle and the quarries; the High Street; 19th century housing to the south of Sydenham Road; and 19th century and later development to the north of the High Street.

The Guildford castle and the quarries character area sits on a west facing slope that drops down to the River Wey. A mix of uses can be found here; mainly offices, tourism and leisure, and some residential. Its most important buildings are Guildford Castle and St Mary's Church. It is characterised by terrace properties set on the back of pavements, many of which are listed and a number of which date to the 16th and 17th centuries and are timber framed. Roofscape features, such as steeply pitched gables and brick chimneys also contributed to the visual interest in views of and within this area. The High Street is the town's historic commercial corridor that climbs dramatically in an easterly direction from the junction with Millbrook. It is connected to two subsidiary east-west corridors, one lying to its north (North Street) and the other to its south (Castle Street/Sydenham Road) by narrow lanes that run broadly north-south. These 'gates' as the lanes are historically known tended to be owned by inns and taverns and became public routes from the 16th century onwards. Buildings which define this area are of 2 to 3 storeys, a large number of these are former town houses of the 17th 18th and 19th centuries with the ground floors now presenting as shops.

The conservation area's setting is influenced by the character of the adjoining conservation areas of Millmead and Portsmouth Road and Wey and Godalming Navigations to the west, Stoke Fields to the North and Waterden Road and Charlotteville to the east. A further influence are the surrounding hills which offer important elevated views of the town centre enabling one to appreciate the significance of the conservation area and its relationship to the wider town. Views of particular note are from Pewley Hill, St Catherine's Hill; the Hogs Back; Farnham Road and Stag Hill. Equally, there are reciprocal view back out from the conservation area towards the surrounding wooded hills to the west. number of Guildford landmarks can be found in this area including the Guildhall with its projecting clock, Holy Trinity Church and the Jacobean Abbots Hospital. Notable views and vistas within the conservation area include along The High Street and into and out of the Castle Grounds, focusing on the Norman Keep.

The Council's Conservation Officer summaries the significance of the conservation area as

- origins as a Saxon settlement focused on the High Street, Guildford Castle and Quarry Street
- survival of its medieval plan
- development and growth over the centuries – becoming the County town of Surrey
- the importance of the River Wey Navigation and later the arrival of the railway
- reference in art and literature over the years
- rich townscape of early defensive, civic, domestic, educational and religious buildings
- many landmarks are important contributors to the identity of the town

Conservation Officer assessment: The Town Centre Conservation Area has a close relationship with application, the most immediate of which is the shared a boundary along North Street, but equally the site's eastern edge lies not too far from the boundary along Haydon Place. The dense urban grain which characterises a significant proportion of the designated area means that the proposed development will not be visible from many areas, this includes High Street and Quarry Street, which are areas with the highest concentration of designated heritage assets and therefore of greatest significance. Assessments have concluded that the proposed development has most potential for impact in the following locations: (i) the conservation area's northern edge (North Street, Angel Gate and Swan Lane) (referred to as Character Area 2) and between Haydon Place and Stoke Road / Chertsey Street (referred to as Character Area 4).

Character Area 2 (Angel Gate and Swan Lane) -

Swan Lane and Angel Gate are two pedestrian alleyways that run north/south, connecting the High Street with North Street, in which views of the proposed development would be possible, particularly towards their northern ends. The views along these linking routeways are identified in the Town Centre Conservation Area Appraisal as being of significance to the character of the designated area.

In the case of Swan Lane, the introduction of the proposed scheme would represent as significant visual change, as signalled in TVIA viewpoint 15 (Swan Lane), which demonstrates that Block B1 would be prominently visible having replaced 18 North Street and 108-109 Woodbridge Road and consequently curtail onward views towards the spire of the Church of St Saviour. Also apparent in this view, to vary extents, would be Blocks D2, D3, D4 and E. The visual impact of the proposed changes, whilst considerable, is not necessarily considered to be to the detriment of this view or to the character of this part of the conservation area, as the development's scale, design, layered composition and material palette are all successfully responsive to the surrounding context. While it is acknowledged that the proposed scheme would result in the loss of onward views towards St Saviours spire, which is regrettable, the significance of this part of the conservation area is dependent on having intervisibility with the spire, and as such, the Conservation Officer is not 'overly concerned with this loss'. In fact, an argument could be made that a terminated view is more characteristic of Guildford's narrow alleys.

Angel Gate is a narrow pedestrian lane and is formed of the yards of the Angel Hotel, which fronts on to the High Street. This narrow linear lane is framed with small to medium foot printed red-brick buildings and is terminated at its northern end by the elevation of 17 North Street (Grade II). Above this, in the distances one is able to appreciate the pinnacle of the Church of St Saviours spire. TVIA viewpoint 14 (Angel Gate) is a representative view of the proposals impact from Angel Gate, and it is a view where the proposed development does present a concern, by virtue of the visual challenge the cumulation of Blocks B1, B2, C1 and C2 and the resultant incongruous layering places upon the scale and setting of 17 North Street (Grade II), as well as appearing discordant with the general low scale character of the Conservation Area. The resultant effect, in the Conservation Officer's opinion is one which harmfully prejudices the setting of both the listed building and the conservation area.

Character Area 4 (Haydon Place and Stoke Road / Chertsey Street) -

This character area, which is situated to the east of the site, is an area characterised by late 19th century suburban terraced housing. The visual relationship between the application site and the character area is extremely limited, a consequence of the interceding large scale development (Leapale multi-storey car park and Guildford Telephone Exchange), and thus views toward the site are restricted to locations such as The Bars and Martyr Road. Both of these locations are represented in the supporting TVIA, however the most concerning of these is verified viewpoint from The Bars TVIA viewpoint 12 (The Bars). TVIA viewpoint 12 (The Bars) illustrates clearly that

there would be a significant change to this view, with Block E of the proposed development punctuating and terminating this linear view, thus resulting with it becoming a dominant visual feature in views out from the conservation area at this point. Whilst its impact is somewhat mitigated by its design and angled positioning all of which are welcomed positively, the scale and height of Block E still presents a conflict to the scale of the surrounding prevailing townscape, appearing as an incongruous form, and thereby challenging the setting of this conservation area.

In addition to the above the proposed developments height, scale and mass are also considered to present a challenge to the character and setting of the Town Centre Conservation Area, particularly in those wider views where one can appreciate the richness of Guildford's historic townscape within its unique context, TVIA viewpoint 6 (Sydenham Road/Bright Hill) and viewpoint 11 (Castle Motte). It is appreciated that the application site is situated at the periphery of the town centre in an area that is largely characterised by larger scaled 20th century building and is beyond the extent of the homogeneous historic core. Nevertheless, it is an area which has been identified in the Town Centre Views SPD as containing structures of a scale and mass which competes with the fine grained, domestic scaled townscape of the conservation area. Therefore, the concern here is that the proposed changes to the host building's height, scale and massing could perpetuate this concern and disrupt the sense of scale and character that defines the Town Centre Conservation Area, by appearing more noticeably incongruous within its setting.

The Council's Conservation Officer notes that the amendments made to Blocks A, B, C, D and E all help to improve the scheme and lessen its impacts on the Town Centre Conservation Area. In particular, the reduction in the height of Blocks E and C and their resultant more modest bulk, scale and massing are noted as being particularly welcome.

Historic England assessment: HE note that the qualities and characteristics of the Town Centre Conservation Area lie in its historical built form, of low height buildings clustered around a few streets and the main cobbled High Street that dips down to the river below. The view from the Castle Motte is one place where one can read the general extent of the medieval Saxon burgh as it guards a strategic gap in the Downs. In addition, the roofscape seen from this high point is especially pretty taking in the variety and layering of the pitched, predominantly clay tile roofs with the backdrop of the hills and landscape beyond. There are very few things that disrupt these historical impressions within the conservation area (the main ones being the two towers on the western slopes of the town, and which demonstrate how damaging tall buildings can be to the character of the town). The proposed development, and block E in particular, will be visible in a number of views which would disrupt the sense of scale and character that makes up the conservation area, appearing incongruous and large. A number of viewpoints illustrate this well, including viewpoints 10, 12, 14 and 15.

As noted above, HE do not believe that the amendments are successful in reducing the harm caused by the proposal.

Harm to significance: The Conservation Officer concluded that the original scheme resulted in low to medium level less than substantial harm to the Town Centre Conservation Area. However, taking into account the amendments, this has now been reduced to low level less than substantial harm. HE note that combined, the harm to the Town Centre conservation area would be less than substantial in the lower half of the spectrum. As such, the level of harm is agreed between the Council's Conservation Area and HE.

13. Wey and Godalming Navigations Conservation Area

This conservation area was designated in 2002 as part of a joint strategy with Waverley, Woking, Runnymede and Elmbridge councils. In total, the conservation area runs for 20 miles (from the River Thames at Weybridge to the Town Bridge at Godalming). It specifically covers the long and sinuous Wey and Godalming Navigation channel throughout the borough, however, it is slightly fragmented within the town centre as a result of other transecting conservation areas, such as the Bridge Street Conservation Area. The section of conservation area immediately to the north of the Bridge Street Conservation Area includes Dapdune Wharf and its listed buildings, whilst the sections to the south of the Bridge Street Conservation Area contains the schedule monument and listed Treadwheel Crane and the site of the Town Wharf. The navigation is characterised by the river corridor and open spaces and vegetation fronting it. The river corridor itself is a long narrow space lined by the towpath and crossed by bridges. It is well enclosed by development within the town centre and this tapers down as you progress out to the north and south. Relative to the application site, this conservation area is situated directly to the west.

The setting of the conservation area is extensive and varied. In the section between Dapdune Wharf and Onslow Bridge, the setting is characterised by a significant amount of recent development, adjacent to both sides of the vegetated riverbank, some of which is large in terms of footprint and / or scale.

The Conservation Officer summarises the significance of the conservation area as:

- one of the earliest waterways in Britain to be made navigable - linking Guildford to the River Thames
- locally important and environmentally sensitive corridor through Surrey, linking heavily populated and commercially developed suburban areas with open countryside.
- development and use of the navigation has significantly influenced local history townscape and landscape through the Wey valley, and has supported Guildford's growth from the late 17th century until the arrival of the railways in the mid-19th century
- offers unique opportunities for informal recreational enjoyment, educational development and historical enrichment
- there is group value from structures associated with both its function (e.g. locks and lock keepers cottages) and use as a working waterway (e.g. mills and wharfs)

Conservation Officer assessment: The significance of this conservation area lies in its importance in the industrial history of Guildford and the historic buildings and landscapes that form its setting. The Conservation Officer notes that the intervisibility between the proposed development and the conservation area would be limited thanks to the screening provided by the intervening built context. Nevertheless, it is recognised that there would be the occasional opportunity for glimpsed views where, for the most part, the proposed development would be viewed subtly in conjunction with the existing built form. That said, there is one identified view where the resultant development would be more conspicuous, this is at Dapdune Wharf. In this view Block E and the upper floor of Block C2 would be visible from the conservation area, as illustrated in TVIA viewpoint 1 (Dapdune Wharf), which demonstrates Block E appears strikingly evident above Surrey Police Station, and the upper floor set back of Block C2 emerging behind the spire of St Saviours. Yet, whilst the proposed development is likely to be noticeable from limited locations within the conservation area, the Conservation Officer is satisfied that its introduction would not affect one's ability to appreciate this heritage asset's significance. In terms of the impact on setting, it is acknowledged that the proposed development would compete with the spire of St Saviours Church, firstly, as its silhouette would be diluted by the presence of the upper storeys of Block C2 which would sit behind it, and secondly, as a consequence of the cumulative impact of Blocks C2 and E together. As such, the Conservation Officer agrees with the supporting heritage assessment that this would facilitate in eroding the connection between the river and the town

centre, albeit to a fairly limited extent.

Taking into account the amendments, the Conservation Officer notes that The removal of the setback floor to Block C2 is strongly welcomed from a heritage perspective as it lessens the challenge placed by the proposed development upon the visible silhouette of the Church of St Saviours spire, as confirmed by many of the views presented in the TVIA addendum document. TVIA viewpoint 1 (Dapdune Wharf) is a view where the loss is perhaps most noticeable and most beneficial as Block C2 is no longer in the view, thus allowing the spire to remain unimpeded or unchallenged, thereby complying with the guidance set out in the Guildford Town Centre Views SPD. The reduction in the height of Block E is helpful at mitigating its presence in views such as TVIA viewpoint 1 (Dapdune Wharf), nevertheless the structure does remain visible. However, when taking into account the positive outcome of having Block C2 no longer in this view, and therefore no direct conflict with the spire of St Saviours, the Conservation Officer, has concluded that the actions taken are sufficient to overcome the harm previously identified, particularly when giving consideration to the fact that this is one single, specific, view within, what is, a very extensive and sinuous conservation area.

Historic England assessment: HE note that views from Dapdune Wharf, as seen in TVIA view 1 indicates that the development would be clearly visible above existing office blocks, as a taller element, and would further obscure the remaining small part of the spire of St Saviours that can be seen. The character of the Wey and Godalming Navigations Conservation Area at this point incorporates historical commercial character (low-scale timber wharf buildings) and a view towards the historic town of Guildford. This view is also identified within the Tow Centre Views SPD and this document sets out that the visibility of St Saviours spire 'punctuating the skyline' is clearly one which is important. This view has unfortunately been harmed through developments in the 20th century. Nevertheless, HE would encourage that these harms are not perpetuated through further insensitive development and the SPD is aligned with that.

As noted above, HE do not believe that the amendments are successful in reducing the harm caused by the proposal.

Harm to significance: The Conservation Officer concluded that the original scheme resulted in low level less than substantial harm to the Wey and Godalming Navigations Conservation Area. However, taking into account the amendments, the Conservation Officer is of the opinion that the proposal no longer results in harm to the significance of the Wey and Godalming Navigations Conservation Area. In HE's view the scheme would cause some harm to the character of the conservation area, at the lower end of less than substantial.

14. Bridge Street Conservation Area

This conservation area is located approximately 100m to the west of the application site. It was designated in 2003 and is one of the Borough's conservation area's which benefits from a character appraisal, adopted at the time of the designation. It is focused upon the Grade II listed Onslow Bridge and a small section of the River Wey. This small conservation area retains urban fabric from the late 19th century that is linked to the town's industrial and mercantile expansion. The supporting character appraisal describes the historic interest of the conservation area as '*the hub of late 19th and early 20th century phase of commercial and industrial growth of the town following the arrival of the railway and the subsequent construction of Onslow Bridge, Bridge Street and Onslow Street*'. The area includes the Rodboro buildings (Grade II) which were the first purpose built car factory in Britain, if not the world and the Central Hall Picture Palace, now known as the Casino Nightclub, which was the first cinema in Guildford and among the first to be opened after the introduction of the cinematographic act in 1910. Architecturally the area has a coherent character and similar architectural themes are used throughout the area with many of the newer buildings having been designed to successfully pick up on the established themes but

applying a modern twist. Examples of the architectural themes exhibited include the use of pilasters and pier buttresses; brick and terracotta detailing; non-standard windows and doors; symmetry and the back of pavement building line. A strong sense of enclosure is created by flat elevations usually three or four storeys high. Another aspect of the character of this area is movement with the gyratory serving as a major vehicular route within the town

The main elements of setting that contribute to the significance of this heritage asset are the riverscape and townscape characteristics found in the adjoining conservation areas of the Wey and Navigations and Millmead and Portsmouth Road. Equally, it can be argued that townscape characteristics which define Guildford Town Centre and its conservation area are also big influences. The gyratory and the large-scale buildings fronting it comprise a large, negative component of its setting to its east, south and west (particularly the blank frontages of the Friary Centre).

The Conservation Officer summarises the significance of the conservation area as:

- evidences the town's industrial and mercantile past centred around the growth of the railway
- site of the first purpose-built car factory in Britain – Rodboro Buildings
- town's second river crossing point which was built in 1882. The bridge was required to improve the access to the new station
- bustling and busy environment – both historically and today
- coherent character, particularly with the more historic fabric as this was constructed within a 30-year period
- industrial and commercial character
- lower scale and massing (three-four storeys)
- buildings crowned with pitched roofs, often gable ended to the street
- use of projecting bay windows at first floor

Conservation Officer assessment: This conservation area is screened from the majority of the application site by the Friary Centre, nevertheless the supporting TVIA, together with the Council's townscape modelling software does evidence that visibility of the proposed development would be feasible, both within the conservation area and from its setting. As evidenced in TVIA view 11 (Farnham Road), principally what would be viewed from within and just beyond the conservation area would be the upper floors of Block E, D3 and D4, but there are areas where glimpsed views would be gained to blocks C1 and C2. All of this would all be read as background to the Friary Centre but would appear as a significant change in outward views from the conservation area, given their scale, height and quantum. Nevertheless, this conservation area is one which tends to be utilised as a movement corridor, be it traffic navigating around the gyratory, or pedestrians moving between Guildford train station and the town centre, thus it is an area which is characterised by lots of activity and noise and is not an area where one is encouraged to pause and take in views. Taking account of this, the Conservation Officer has used the townscape model to understand how the development would appear in a more kinetic environment, when moving through the conservation area. This exercise demonstrated that TVIA view 11 is where the visual impact of the proposed development is at its acutest, due the locations rising topography and its more open aspect, however, as one moves eastward along Bridge Street, towards the Friary Centre, the visual impact of the development experienced from the conservation area depreciates, the closer one gets to the Friary Centre, with Blocks C1, C2 and D3 eventually being removed from view. The Conservation Officer agrees with the supporting heritage impact assessments that the proposed development would not change the character or significance of the conservation area, nor would it harm an important element of its setting. However the Conservation Officer is mindful that there still will be a considerable visual change to this asset's setting due the proposals scale, height and quantum. Nevertheless, this change is very dynamic and as a consequence, the resultant impact upon the conservation area does vary across its extent.

HE have not offered comments on this asset.

Harm to significance: The Conservation Officer has concluded that there is some harm to the setting of this conservation area by virtue of the visual challenge and distraction the proposal places upon the prevailing human scale of the surrounding townscape. The resultant harm in this instance would be qualified at less than substantial at the lower end of the spectrum.

15. Stoke Fields Conservation Area

This conservation area is located approximately 275m to the north-east of the application site. It is a small designated area, which is focused upon a road of the same name. It is predominantly characterised by small, semi-detached, 19th century red-brick houses, that front onto the street. It also contains the double fronted Prince Albert Public House on Stoke Road, which is of stone rubble and ashlar construction, and Guildford Nursery School which is a former late 19th / early 20th century school on York Road.

The conservation area is a comprehensive group of buildings which evidences the town's 19th century expansion. It illustrates 19th century domestic building stock – design, scale and material palette.

Conservation Officer assessment: The impact of the proposed development would be negligible. Modelling and verified views, particularly TVIA viewpoint 9 (Stoke Fields), illustrates that a small section of the upper floors of Blocks C1 and C2 would be glimpsed, however the Conservation Officer is satisfied that what would be seen from this heritage asset is extremely limited, but nevertheless would sit comfortably with the existing townscape layering. Equally, the materiality of these sections are considered to sensitively respond to the prevailing materiality, and thus would appear recessive.

HE have not offered comments on this asset.

Harm to significance: The Conservation Officer has concluded that the proposed development would not prejudicially impact upon the setting and significance of this conservation area, and as such no harm has been identified.

Assessment of impact on significance - locally listed buildings

The Conservation Officer has assessed the impact of the proposal against a number of locally listed buildings that are situated on North Street and Market Street.

As regards 41-43 North Street the Conservation Officer notes that this asset is situated at the lower end of North Street, sitting directly at the head of the North Street and Commercial Road junction, and thus has a more immediate relationship with the proposed scheme. Of particular immediacy is the pedestrianisation works of North Street and the development of Friary Square. Both of these particular elements are shown to be undertaken directly in front of this asset and thereby will have a more obvious impact upon the asset's setting. The principal of pedestrianisation is certainly seen as a positive step in terms of improving how the asset and its immediate or wider setting is experienced. It is noted that these works would, by virtue of the removal of traffic and improvements to the quality and materiality of the public realm, result in positive visual, audible and accessibility changes to the setting, all of which are strongly welcomed. From the above assessment, the Council's Conservation Officer confirms that there would be no harm caused to this asset.

As regards the other locally listed buildings, it is noted that these particular assets are situated in positions towards the upper section of North Street, where they are not going to be directly impacted by the proposed scheme, although they are likely to indirectly benefit from the pedestrianisation proposals between Commercial Road and Leapale Road. The principal of pedestrianisation is certainly seen as a positive step in terms of improving how they and their immediate or wider setting are experienced. Such an action will, by virtue of the removal of traffic and improvements to the quality and materiality of the public realm, are likely to result in positive visual, audible and accessibility changes to the setting, all of which are strongly welcomed. Therefore, the Conservation Officer is satisfied that the proposed development would not prejudicially impact upon the setting and significance of the remaining locally listed buildings and as such no harm has been identified.

Assessment of impact on significance - non-designated assets

Policy D20 of the LPDMP concerns non-designated heritage assets. It notes, inter alia, that:

- development proposals affecting Non-designated Heritage Assets and their setting are required to be supported by an evidence-based statement of significance. The level of detail provided within the statement is expected to be proportionate to the asset's importance and sufficient to facilitate an informed assessment of the significance of the asset and its setting, and the impact of the proposed development on that significance.
- development proposals are expected to preserve or enhance the significance of non-designated Heritage Assets, with an expectation that development proposals: a) respond to and respect the special architectural and historical interest of the heritage asset and its local importance; and b) are designed and sited so as to conserve the asset, any features of interest and its setting.
- development proposals which result in harm to, or loss of the significance of a non-designated Heritage Asset, or their contribution to the character of a place will be considered in line with national policy and guidance.

This asset directly adjoins the application site on its southern boundary. It is an early 20th century, two storey development, that is sited on the north-eastern corner of the junction of North Street and Woodbridge Road. It is constructed in red brick and is covered over by a combination of a shallow pitched slate roof (number 18) and flat roof (number 108-109) which is hidden behind a parapet.

The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function. North Street is a street that underwent considerable change during the 20th century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Office, and which continues to change into the 21st century. Its current built character is composed of a varied mix of ages, architectural styles and material palette

The Conservation Officer notes that this is a heritage asset of local importance whose architectural and historic interest contributes positively to the setting of the adjoining listed building (17 North Street) as well as the setting of the Guildford Town Centre Conservation Area. The proposed scheme would require this asset to be completely demolished and for it to be replaced by a new public square at the North Street entrance to the scheme. In terms of the asset as a non-designated heritage asset (NDHA), the act of demolition would result in total loss of its historic and architectural significance, which the Conservation Officer notes as being limited in nature. In weighing applications that affect NDHA's, the NPPF states that a balanced judgement is required, having regard to the scale of any harm or loss and this significance of the heritage asset. Thus, the Conservation Officer concludes the proposal would result in substantial harm, but to an asset of limited significance.

Looking more widely at the impact upon the setting and significance of the adjoining statutory listed building (17 North Street) and the opposite Town Centre Conservation Area. It has been concluded that the removal of 18 North Street and 108-109 Woodbridge Road would contribute to further erosion of their historic setting, but in terms of listed building, also has the potential for physical impacts on the asset, that may require some degree of repair. However, these impacts are somewhat offset by the creation of a new public square in its place which has been designed sympathetically using what appears to be an appropriate material palette that is considerate to the surrounding historic environment.

A number of other non-designated heritage assets have been considered by the Council's Conservation Officer, however, no harm has been identified.

Cumulative heritage harm - taking into account other schemes in the area

In terms of the potential effect of the proposed development in combination with other development proposals, the schemes which are contextually relevant are:

- Guildford Railway Station (14/P/02168) - Approved
- Debenhams (21/P/02232) - Resolution to approve

With regard to the approved applications, these residential schemes are located to the west and south of the application site, with the Guildford Railway Station scheme being approximately 250m away to the west and Debenhams being approximately 155m away to the south. They are visible in a number of key verified views such as TVIA viewpoint 2 (Pewley Hill), viewpoint 4 (Hogs Back), viewpoint 6 (Bright Hill), viewpoint 7 (Castle Motte) and viewpoint 8 (Stag Hill).

The Council's Conservation Officer notes that to some degree, there is agreement with the conclusions reached in the supporting Heritage Assessment (paragraph 9.10.7) that whilst the proposed development and these schemes identified will have an impact on built heritage assets, that because of their locations and distances from each other, the degree of impact would not be too detrimental. Nevertheless, the asset which is likely to be most affected would be Guildford Town Centre Conservation Area, in terms of its wider setting.

An application at 1 Onslow Street (21/P/00539) has also been referenced by the Conservation Officer, however, this is still pending decision and is therefore afforded very limited weight in the assessment of this application. Notwithstanding this, the Conservation Officer notes that following the proposed amendments the degree of challenge that both these schemes collectively place on the upon the setting of the St Saviours Church and its spire would reduce, but only limitedly. In the Conservation Officer's view the revised height and massing of the proposed development is not a significant enough change to reduce the harm to less-than-substantial (low).

Conclusion on heritage harm

The table below provides a summary of the heritage harm which has been identified by both the Conservation Officer and Historic England. Following the amendments which have been made to the scheme, the Conservation Officer identifies that seven designated heritage assets would be impacted by the proposal. The harm allocated to all of them is less than substantial and at the lower end of that scale. Historic England broadly agree with this assessment, but they have found harm to two further assets which has been categorised also as less than substantial and at the lower end of that scale.

Designated heritage asset	Grading (if applicable)	Harm (Conservation Officer)	Harm (Historic England)
Church of St Saviour	II	Less than substantial - low	Less than substantial - low
17 North Street	II	Less than substantial - low	No specific comments
Stoke House	II	Less than substantial - low	No specific comments
Guildford Cathedral	II*	Less than substantial - low	Less than substantial - low
Guildford Castle Keep	I and Scheduled Ancient Monument	No harm caused	Less than substantial - low
Jelicoe Roof Garden	NA	Less than substantial - low	No specific comments
Town Centre Conservation Area	NA	Less than substantial - low	Less than substantial - low
Wey and Godalming Conservation Area	NA	No harm caused	Less than substantial - low
Bridge Street Conservation Area	NA	Less than substantial - low	No specific comments

On the overall cumulative heritage harm resulting from the proposal it is noted that PPG guidance on the Historic Environment, clearly states in paragraph 18a-013-20190723 that 'when assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Given the quantum and calibre of heritage assets that are within the immediate context of the development site a cumulative assessment is considered to be essential.

The Conservation Officer notes that when considering the historic environment as a collective, there remains a resultant cumulative harm from the proposal. However, this has been reduced as result of the amendments to less than substantial in the low to middle range. The Conservation Officer notes that this is a fair assessment when one takes into consideration the following:

the number of heritage assets, together with their degree of significance where harm has been identified; and
the range of harm identified, which is now limited to less than substantial (low) for the majority, as well as a single case of substantial harm (total loss) to an asset of limited significance.

While Historic England do not appear to offer a specific cumulative level of harm, their letter on the amended scheme states that 'we have judged this harm to be at the lower end of less than substantial to the Town Centre and Wey Navigation conservation areas, St Saviours church, Guildford Cathedral and the scheduled Castle'.

It is also noted that harm has been found to a non-designated heritage asset (18 North Street and 108-109 Woodbridge Road). This has been categorised as substantial harm as the asset would be demolished, therefore resulting in a complete loss of significance. On this paragraph 203 of the NPPF states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced

judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'. The Conservation Officer notes that this asset is of low significance and as such, its total loss needs to be calibrated accordingly.

Based on all of the above, the Local Planning Authority concludes that the proposal, overall, would result in less than substantial harm to the surrounding heritage assets. This harm would be at the low - middle range of that scale and it includes the harm to the non-designated asset. The Conservation Officer does add that the harm would be towards the lower limits (of low-middle) on the sliding scale.

Having reached the view that the proposal results in harm to surrounding heritage assets, it is re-emphasised that paragraph 199 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This accords with the duty under section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 200 goes on to note that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'. It is noted that the harm identified includes a Grade I listed building (which is also a Scheduled Ancient Monument) and a Grade II* listed building and the harm to these should be given greater weight again.

In a situation where less than substantial harm is identified, the NPPF at paragraph 202 states that 'this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The applicant has set out a detailed case in this regard and notes that the proposal would result in a range of public benefits. Whether these claimed public benefits outweigh the heritage harm, and the considerable weight and importance that must be afforded to it, will be assessed in the final section of this report.

In terms of the optimum viable use, it is noted that the site is allocated for the uses that are proposed and that a viability report has been submitted which confirms that this quantum of development is required to make the scheme viable. As such, the Local Planning Authority is satisfied that proposal does secure the site's optimum viable use. Paragraph 204 of the NPPF is also acknowledged which states that 'local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred'. This will be considered and secured through the legal agreement and will be discussed in greater detail below.

Archaeology

The application site is within the designated Area of High Archaeological Potential for the centre of Guildford - an area which has been proven to contain important remains relating to the origins and development of the town, as well as earlier material dating to the prehistoric periods. It is noted that part of the site is within the precinct of the Dominican Friary that was established in the thirteenth Century.

The heritage sensitivity of the site is acknowledged in Environmental Statement (Chapter 10) which has been prepared by Museum of London Archaeology and informed by a desk based archaeological assessment and a trial trench evaluation of the site completed in June. The ES chapter confirms that the archaeological interest of the site lies with the potential for remains associated with the medieval Dominican Friary and the later development of the site in the post medieval period. An assessment of historic mapping suggests that the site has been subject to extensive post nineteenth century development which will have caused truncation of earlier

deposits and this has been confirmed by the trial trench evaluation which suggest that the site has been terraced and that archaeological survival in the western part of the site will be limited to deeper archaeological features such as pits and cellar and possibly graves, although the area is at some distance to the Friary cemeteries that were recorded during excavations of the Friary Church in advance of redevelopment of the brewery site in the 1970s. The eastern area of the site demonstrated a higher degree of survival, albeit with some deep areas of modern truncation, and of particular note was the recording of masonry of probable medieval date that may be part of the eastern gate into the Friary on the current Woodbridge Road. It is noted that some of the archaeological remains may be of national importance.

In response to the issue of potential remains of national significance, the evidence from trench nine suggests that the masonry walls that were recorded are part of the Friary eastern gateway. The County Archaeologist notes that this was not unexpected as the trench was located due to the possible presence of a gateway structure in this area as indicated on a 17th century map of the area. The remains of a well-preserved Friary complex would be of national significance but the vast majority of the most significant buildings at Guildford Friary were removed following excavation between 1974-1978 during the comprehensive redevelopment of the area at the time and so that significance now lies in the archaeological archive record rather than the remains of the complex itself. The gatehouse is therefore significant as one of the few remaining elements of the Friary complex, but it has been heavily truncated down to foundation level and is itself not a particular rare survival of its type. Historic England Guidance suggests that it is not of schedulable quality and so in line with the advice given in the NPPF, a balance has to be sought between conserving the heritage asset and the benefits of the wider scheme. The mitigation proposals put forward in the ES allow for full recording of the structure, including provision for public viewing of the archaeological work as well as the full dissemination of the results. The view of the County Archaeologist is that this provides an appropriate response, as due to its current condition and significance, it would not be proportionate to require the basement to be redesigned to enable its preservation and display.

Overall, the ES assesses the archaeological resource as being of medium significance and that the development is likely to result in the loss of much of the surviving archaeology. The report therefore suggests that a programme of archaeological work will be required to mitigate this loss, which will take the form of a programme of a watching brief on the lower western area and detailed archaeological excavation of the of the eastern part of the site with which would be supplemented with an associated programme of public benefit. This could comprise information boards on the construction hoardings, local school trips, further research by volunteers of the history and daily life of the Dominican Friary by volunteers.

The County Archaeologist has reviewed the application no objections are raised. The County Archaeologist agrees that with the measures suggested by the applicant, this would provide an appropriate mitigation response to compensate against the loss of the archaeological resource. A condition is recommended which secures the measures set out by the applicant and agreed by the County Archaeologist.

Taking into account the above, the development is deemed to be compliant with policy D3 of the LPSS and the advice set out in Chapter 16 of the NPPF.

The impact on neighbouring amenity

Saved policy G1(3) of the Local Plan states that the amenities enjoyed by occupants of buildings should be protected from unneighbourly development in terms of privacy, access to sunlight and daylight, noise, vibration, pollution, dust and smell. Policy D5 of the LPDMP also offers protection for residential amenity and it states that development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of:

- a) privacy and overlooking
- b) visual dominance and overbearing effects of a development
- c) access to sunlight and daylight
- d) artificial lighting
- e) noise and vibration
- f) odour, fumes and dust

Although the site is located in the town centre, there are very few residential dwellings in the immediate vicinity. According to the Council's records and in consultation with the Environmental Health Officer the only residential properties which are within a relatively close proximity are two apartments above 16-17 North Street (it is understood that this is staff accommodation associated with All Bar One), an apartment above 3 Leapale Road (Five and Lime public house), as well as a number of apartments at Woodbridge Chambers which is diagonally opposite (to the north-east) of Dominion House.

The impacts on these properties will be assessed below. The impact on access to sunlight and daylight will be considered separately, in the section which follows. It is also important at this stage to note that all of these properties are situated in the town centre where an element of noise, disturbance and overlooking etc is to be anticipated. Urban living cannot be expected to offer the same level of residential amenity as one would get when living in more suburban or rural locations. This needs to be taken into account when considering the amenity of those residential dwellings that already exist in the vicinity.

16-17 North Street:

As noted above, this property contains two residential units which are associated with the public house below (All Bar One). The Council understands that the living accommodation is situated in the upper floors of the listed building. The windows facing onto North Street would not be impacted by the proposal. The windows in the rear elevation already face the more modern two storey extension to the rear of All Bar One, however, the proposed new building to the west (Block B1) would be significantly larger than the one it replaces and would extend a greater distance beyond the existing rear elevation of the listed building. Views from the rear of the listed building would now be of the blank side wall of Block B1 and as such, the proposal would have an adverse overbearing impact on this property.

The level of weight to be afforded to this harm will be discussed later in the report.

3 Leapale Road:

3 Leapale Road is the public house known as 'Five and Lime' and it contains living accommodation within its upper floors. The building shares its northern (side) boundary with the application site.

The building does not contain any windows in its side elevation, however, there are numerous windows in the front and rear elevations, most of which serve the associated living accommodation. It is noted that the amenity of this accommodation will already be compromised by its presence above a public house which does provide entertainment at nighttime and in a busy location off North Street. The closest proposed building to Five and Lime would be Block B2. This would be slightly set back from the front elevation of Five and Lime, but it would project significantly beyond its rear elevation. The windows on the front of Five and Lime would not be impacted by the development, but the windows in the rear would. However, it is noted that the windows closest to Block B2 would be non-habitable and include a landing and bathroom / toilets. The windows further along the rear elevation include a kitchen, and it is understood that all bedroom accommodation is situated to the front of the building overlooking Leapale Road.

In terms of height, the element of Block B2 which would adjoin Five and Lime would be set over four storeys. Due to its projection at the rear it would significantly impact on the upper floor rear windows of Five and Lime, blocking their outlook to the north-west. However, as noted above, the primary impact would be to non-habitable windows. Nonetheless, due to the proximity of the built form, it would have a significant overbearing and dominating impact on the Five and Lime residential accommodation.

When assessing the level of weight that should be afforded to this matter, the current amenity of the living accommodation will need to be considered, as well as the fact that the property is located within the town centre.

Woodbridge Chambers:

Woodbridge Chambers contains a number of apartments in the first and second floors of the building and is diagonally opposite the site. It currently faces onto Dominion House which is four storeys in height and in office use. Dominion House already leads to some overlooking and overshadowing of Woodbridge Chambers.

The apartments on the Woodbridge Road side of Woodbridge Chambers would face the proposed marker building (Block E). The new building would be a mix of commercial uses on the ground floor with residential above. At 14 storeys, it would be the tallest building in the proposed scheme and it would be between 14 and 18 metres away from the southern elevation of Woodbridge Chambers.

It is fully acknowledged that the outlook from the apartments at Woodbridge Chambers would change significantly as a result of the scheme. The proposed building would have a more imposing presence in the streetscene and would result in more windows and balconies facing Woodbridge Chambers. However, due to the distance of separation, any overlooking which would occur would not lead to any material loss of amenity or privacy for the existing residents. While the proposal would dominate Woodbridge Chambers, given the distance of separation and the fact that the site is within a busy urban location, there would not be any material loss of amenity associated with this impact.

Other impacts:

It is acknowledged that the proposal use would result in a higher density of people living in this part of the town centre and additional commercial business, including the possibility of new food and drink establishments. The development is likely to attract more visitors to North Street and will change the routes that pedestrians use through the town. While these are all benefits of the scheme in terms of improving the vitality and viability of the town centre, they will bring with them increased activity, noise and general disturbance in the area. As noted above, there are a limited number of residential properties in the immediate surroundings of the development, however, it is

noted that the prevalence of residential accommodation does increase to the north-east of the site. While the proposal as a whole will change the character of the area, it should be recognised that the site forms an integral part of an important town centre regeneration scheme which has been allocated for redevelopment in the Council's Local Plan. As such, increased activity, noise and disturbance is an inevitable impact of the proposal and given the town centre location, it is not unreasonable.

Due to the impacts on the residential accommodation associated with Five and Lime and All Bar One, overall it is considered that the proposal would fail to comply with policy G1(3) of the Local Plan 2003 and policy D5 of the LPDMP.

Amenity of future occupants / living environment

As already noted above, saved policy G1(3) of the Local Plan 2003 states that the amenities enjoyed by occupants of buildings should be protected from unneighbourly development in terms of privacy, access to sunlight and daylight, noise, vibration, pollution, dust and smell. Paragraph 130 of the NPPF and policy H1 of the LPSS also require the need for conformity with the nationally described space standards (NDSS), as well as creating places with a high standard of amenity for existing and future users. Policy D5 of the LPDMP also states that all new build residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space. In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:

- a) take into account the orientation of the amenity space in relation to the sun at different times of the year;
- b) address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties; and
- c) design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents.

It is further noted that all balconies or terraces provided on new flatted development proposals are required to be designed as an integrated part of the overall design; and be a minimum of four sqm.

Internal space standards:

The applicant has submitted an NDSS compliance table with the application. It is noted that all of the proposed apartments either meet or exceed the standards suggested by the Government. The proposal is compliant with policy H1 of the LPSS.

Private open space:

It is noted that of the 473 apartments in the proposed scheme, a total of 274 would have direct access to a private balcony or garden terrace. As such, the proposal does conflict with the emerging requirements of policy D5 of the LPDMP. However, it is noted that all other apartments would have a Juliet balcony and access to the high quality shared terraces and courtyard gardens which are proposed as part of the development.

On this occasion, it is acknowledged that this scheme has been in design for a considerable period of time and before the weight to the LPDMP policies has increased. In addition, it is noted that the design and elevation treatment of the blocks has been carefully considered by the Council, and in this instance, the provision of balconies for all units, would in at least some instances, result in urban design and townscape concerns. As such, given that full weight is not yet applied to the LPDMP and the points just noted, in this instance the non-compliance with this

element of policy D5 is not considered to be a matter which would warrant the refusal of the application.

Policy D5 also requires that all proposed balconies should be a minimum size of four sqm. The applicant has confirmed that the proposal complies with this requirement.

Open space:

Saved policy R2 of the Local Plan states that new residential developments of 25 or more dwellings, or more than 0.4ha (1 acre) will require new recreational open space according to the following standard:

- 1.6ha (4 acres) of formal playing field space per 1,000 people;
- 0.8ha (2 acres) of children's play space per 1,000 people;
- 0.4ha (1 acres) of amenity space per 1,000 people.

It is acknowledged that policy ID6 (considerable weight) of the LPDMP also deals with the provision of on-site open space as well as a broader requirement for allotments (or a contribution in lieu). It is noted that the policy ID6 requirements are more onerous than those set out in saved policy R2.

It is noted that the proposal does not provide any space for parks and recreation areas. It is considered that for this site, in a highly sustainable location, it would not be appropriate to use valuable land for playing fields and formal urban parks. As such, it is agreed that this provision should not be met on site. In terms of playspace it is noted that the proposal includes some limited provision for ancillary facilities. For example, the water feature in the North Street Square would provide an element of play and fun for children and natural play features would also be built into the landscaping in Friary Square. However, the quantum of these spaces would not meet the standards which are set out in policy ID6.

In terms of on-site amenity it is noted that the proposal provides a range of open space areas as part of the development. These include spaces which will be publicly accessible to all (such as the new North Street square, the Dial and the new Friary Square), as well as private open space areas which would only be accessible to residents of the scheme.

In total, four areas of private open space are proposed which take the form of courtyards which are set within the buildings. These spaces would generally be shared between two blocks and would be accessed directly from the residential building cores or externally via gated, controlled access points from the public streets. Only indicative plans have been provided for the design of the courtyards and they show that they will be finished with areas of landscaping, lawns and doorstep play areas for children. The exact design of these spaces could be controlled by condition. While these spaces are generally small in size, they would provide a valuable private amenity space for future residents.

In addition to the courtyards, two rooftop gardens are also proposed. These would be located on Blocks E and C and provide additional high quality amenity spaces for residents close to homes. Similar to the courtyards at ground floor, the rooftop gardens will be landscaped to include amenity lawns, seating and raised planters with multi-trees and shrub planting selected to provide year-round seasonal interest and value for wildlife. Again, the exact details of these spaces could be controlled by condition. Every resident would have access to at least one private communal open space area.

Based on the requirements of saved policy R2 the proposal should be delivering the following on site: 1.89 hectares of formal playing fields, 0.95 hectares of children's playspace and 0.47 hectares of amenity space.

As noted above, the scheme does not provide any formal playing fields. However, this is not objectionable given that such a use would not be an appropriate use of land in this location. A small amount (0.07 hectares) of children's playspace would also be provided, some of which would only be accessible to residents. This too is under the provision required by the policy. Finally, in terms of amenity space, with the various areas of private communal space provided, along with the new public realm a total of 0.48 hectares would be provided as part of the scheme. This is slightly more than is required.

Although the proposal is deficient in terms of the amount of formal playing field space and children's playspace that is being provided, policy R2 does allow for this to be mitigated as a contribution towards off-site provision. The relevant contributions are set out in the Council's Planning Contributions SPD. The off-site contribution for formal playing fields would amount to £574,511.39. As there is no on-site provision, the full amount would be payable. In terms of children's playspace it is noted that some is being provided on-site and as such, only a proportion of the contribution would be required. This would amount to £433,530.09.

Due to viability reasons the applicant has confirmed that it will not be possible to contribute the amounts noted above. Instead, a contribution of £55,000 has been offered towards off-site improvements to children's playspace. The improvements earmarked are to the existing facilities at Foxenden Quarry. While this contribution could be secured through the legal agreement, the proposal would not mitigate its impacts on open space. As such, the proposal is in conflict with saved policy R2 of the Local Plan.

It is noted that policy ID6 of the LPDMP is even more onerous than policy R2. However, given how long this proposal has been at pre-application stage and that full weight is not yet applied to policy ID6, it is not unreasonable in this instance to apply saved policy R2 instead.

Finally on this point, it is noted that the areas required by policy R2 are calculated based on the likely population of the scheme. The policy clearly shows that one residential unit should equate to 2.5 persons. The applicant disagrees with this approach and instead they advance that the expected population of the development which has been calculated through the EIA process should be used. This would be less than the calculation under saved policy R2 and thus would result in a reduced on-site requirement (and / or financial contribution if it were required). It is Officer's view that saved policy R2 is clear and there is no basis for the applicant's alternative approach.

Other matters:

It is noted that there are a number of instances within the development where residential dwellings would front onto the new streets that are being created. These will hopefully, in time, be well used, public routes which will see activity throughout the day and night. Following earlier concerns raised by Officers, the applicant has now provided landscaping and small areas of defensible space in front of units which would abut public areas. This will help to protect the amenity of these units. In addition, it is noted that some of the residential uses will be in close proximity to new commercial premises, which could be used for restaurants and cafes. While there may be some noise associated with these commercial uses, any residents of a mixed-use town centre scheme should expect some element of disruption. No concerns have been raised by the Council's Environmental Health Officer in this regard. However, notwithstanding this, a condition is recommended which requires the applicant to submit details of the treatment of the properties (windows in particular) to ensure that they have an adequate level of internal amenity.

It is also noted that as there are a number of commercial units proposed in close proximity to residential units, their extraction and filtration systems need to be carefully considered. The applicant has agreed that all vents and flues etc will be provided within the buildings and then vented at roof level to meet relevant standards. This will prevent smells etc from causing a nuisance to the residential dwellings. This will be secured by condition.

Overall, the proposal is compliant with policy H1 of the LPSS and ID6 and D5 of the LPDMP.

Impact on daylight and sunlight - existing and proposed

The three areas for assessment of a development in respect of its impact on daylight and sunlight are:

Issue 1) the internal environment to be created for the proposed dwellings - i.e. the quantum of daylight and sunlight that the dwellings will receive;

Issue 2) the overshadowing effect of the proposed buildings on existing and proposed public realm and residents' communal open spaces;

Issue 3) the impact of the proposed buildings on the quantum of daylight and sunlight received by surrounding properties, especially dwellings;

Applicable to all three issues, paragraph 130 of the NPPF states that planning decisions should ensure that developments create...places that are safe and promote health and well-being, with a high standard of amenity for existing and future users;

Policy H1 of the LPSS also requires creation of places with a high standard of amenity for existing and future users.

Saved policy H4(2), supports residential development in the urban area of Guildford, provided that it has no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of access to sunlight and daylight.

Saved policy G1(3) states that the amenities enjoyed by occupants of buildings should be protected from unneighbourly development in terms of, inter alia, access to sunlight and daylight.

In the LPDMP, policy D5 (a policy now afforded considerable weight) requires development proposals to avoid having an "unacceptable impact" on the living environment of existing residential properties or resulting in "unacceptable living conditions" for new residential properties. The meaning of "unacceptable" is not defined, but Officers interpret the requirement to be the assessment of the impact on both proposed and existing residential accommodation against the BRE Guidelines, which are discussed below.

Further review of the above national and local policies is set out at the head of each of the three subheadings relating to each Issue, below.

The original scheme comprising this application was supported by a "Report on Daylight and Sunlight within the Proposed Dwellings & Sunlight to Proposed Amenity Spaces, Revision A", (July 2022), (the RDS), prepared by consultant surveyors Anstey Horne for the applicants.

The RDS notes that there are no mandatory standards for daylight or sunlight to dwellings, but it lists the publications that offer guidance. It advises that all the daylight and sunlight assessments referred to were undertaken in accordance with the Building Research Establishment (BRE) Report 209: "Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice" 2011, together with the standards contained in the British Standard Code of Practice for Daylighting, BS8206, Part 2, (2008). The RDS explains that *"although there has been a very recent update to the BRE Guide, all of the design work on the proposed development has been completed on the basis of the 2011 methodology. GBC have therefore agreed to us adopting this approach during this transition period between the Guides."* Officers confirm that this was agreed, given the design work that had been undertaken prior to publication of the new guidelines.

However, given that the new BRE Guidelines third edition 2022 was issued in June 2022, Officers have subsequently requested that the applicant provide further commentary in relation to the methodologies adopted in the RDS compared to those recommended in the new guidelines, as far as they relate to the results and conclusions reached within the RDS. Accordingly Anstey Horne have further advised by letter dated 29 November 2022 that *"the BRE Report 209 was updated in June 2022 to incorporate updates from the British Standard for Daylighting in Buildings, (BS EN17037). Whilst the new BRE guidance 2022 does not change the methods of assessing potential light effects to neighbouring properties, it no longer recommends the use of Average Daylight Factor, (ADF) and Annual Probably Sunlight Hours, (APSH) tests in respect of measuring light amenity within new developments. Rather, it is now recommended that either the Target Illuminance (TI) or Daylight Factor, (DF) methods of calculating daylight are undertaken and in terms of sunlight, the Sunlight Exposure, (SE) test has been introduced. Following the publication in June, our discussions with GBC acknowledged that there would be a transition period in respect of applying the updated methods of assessments, as the daylight and sunlight industry working practices and software technologies were updated to implement the new methodologies. As such the established ADF and APSH methodologies were agreed. This is an approach that we have found many local planning authorities have adopted as the industry adapts to the new BRE guidelines. In conclusion, the results contained within the DRS and subsequent conclusions remain valid such that the proposed development will provide future residents with access to good levels of natural light amenity. In our professional opinion, these findings would remain consistent in respect of the recently published BRE Guidelines 2022 methodologies for assessing light within new developments."* On this basis, Officers consider that the RDS report is relevant to use in the assessment of the application scheme.

The BRE Guidelines advise at paragraph 1.6 "the advice is not mandatory, and the guide should not be seen as an instrument of planning policy. Although it gives numerical guidelines, these should be interpreted flexibly, since natural lighting is only one of many factors in site layout design." This reflects NPPF paragraph 125 and is frequently quoted in the daylight / sunlight surveying industry as justification for the need to note that in urban locations, where townscape and urban design issues may influence design considerations, a planning balance in relation to daylight and sunlight effects needs to be found, taking account of a site's location.

The amendments to the scheme submitted in November 2022 included a reduction in height of building C2 by removal of the inset top floor, and a reduction in height of building E by removal of one floor. Neither of these changes are considered by Officers to worsen the impact on daylight and sunlight received by the remaining proposed units, or to reduce the hours of sunlight received in the proposed amenity spaces around the buildings, and accordingly no update of the RDS was considered necessary in order to evaluate the internal available daylight and sunlight in the amended layout.

Issue 1: the amenity of the proposed dwellings

Issue 1 concerns the level of daylight and sunlight that would be received within the proposed dwellings in the scheme. The RDS covers Issue 1 within the first part, reviewed here below, whereas the second part of the RDS relates to Issue 2, which is assessed separately, below this first Issue.

For issue 1, NPPF paragraph 125c) states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site, (as long as the resulting scheme would provide acceptable living conditions)”.

Saved Policy H4 (2), supports residential development in the urban area of Guildford, provided that it has no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of access to sunlight and daylight. This is interpreted by Officers to include the occupants of the proposed buildings as well as existing properties.

LPDMP policy D5 (1) (c) applies the requirements of the policy specifically to ‘access to sunlight and daylight’ to both existing and new residential properties. The reasoned justification advises on this point that “access to daylight and sunlight will depend both on the way new and existing buildings relate to one another as well as the orientation of windows in relation to the path of the sun. In particular, windows that are overshadowed by buildings ... or that are north-facing will receive less light. Solar gain should be optimised to reduce the need for mechanical heating, but with appropriate measures to prevent overheating in line with LPSS policies D2, D12 and D13.”

Assessments of daylight received within rooms are made from the result of calculations of ‘Average Daylight Factor’, (ADF), which is a measure of the overall amount of daylight received within a room, given its extent of a view of the sky. Assessments of sunlight received are made from calculations of ‘Annual Probable Sunlight Hours’ (APSH) for rooms within 90 degrees of due south. This report reviews the ADF results followed by the APSH results.

Daylight – ADF

The BRE Guidelines recommend the following minimum values of ADF in housing:

- 1% for bedrooms
- 1.5% for living rooms
- 2% for kitchens

The BS8206-2 guideline is that combined living rooms and kitchens should use the 2% ADF. However, the RDS notes that the BRE Guide advises that [whilst] non-daylit internal kitchens should be avoided wherever possible, where the layout means they are inevitable, the kitchen should link to a well-lit area. Accordingly, the RDS notes that as the scheme includes a number of open plan living / kitchen /dining rooms, (LKDs), with the kitchen at the back of the room, so less well lit, a supplementary assessment can be used that notionally truncates the room to exclude the kitchen and tests only the living /dining area, using the 1.5% ADF target, (referred to as ‘truncated LKDs). Officers consider that whilst in fact there are a very significant number of LKDs, in the scheme this methodology is a logical application of the flexibility encouraged in NPPF paragraph 125 and the BRE Guide. This is because in contemporary apartment layouts, LKDs are often combined in open-plan form, with the kitchen located to the rear, but provided with ‘task lighting’ over worksurfaces and cooking areas. This arrangement lessens the need for higher daylight levels in kitchens. Bedrooms do not carry the same expectation for natural light, and so are acceptable with lower value results.

LPDMP policy D5 (2) expects all new build residential developments, including flats, to have direct access to private outdoor amenity space. For flats this will often take the form of balconies, which D5(3) requires to be (a) an integrated part of the design, and (b) a minimum of four sqm. The BRE formula used to calculate ADF includes a figure for the angle of visible sky at each window tested, referred to as the Visible Sky Component, (VSC). The extent of visible sky available to a window is substantially impacted by the presence of either an inset balcony serving the unit in question, or a projecting balcony serving the floor above. In both cases, this is an inevitable trade-off between the level of daylight – and sunlight – available to a room, and the required private outdoor amenity space available to the occupants of the apartment or that above, in the form of a balcony. Where balconies are stacked up a building, each room benefiting from a balcony thereby reduces the daylight and sunlight to the room below. In some instances, this can be addressed by staggering balconies, but Officers note that such an approach may not be desirable from a design and massing perspective, which is apparent in this case, where the uncluttered form of stacked balconies is beneficial. Accordingly, the ADF results have to be considered in the context of GBC's emerging policy of considerable weight, which expects balconies, alongside the design objective of creating town centre spaces that are enclosed and urban rather than suburban, which brings buildings closer together.

It is industry practice to test a representative sample of rooms rather than all habitable rooms. However, in this instance, as requested by Officers, the RDS confirms that all 1,191 habitable rooms covering the five proposed blocks were tested. This provides a full picture of the scheme's impact. The naturally obstructing effects of the 'expected' projecting balconies have been included.

The overall ADF assessment results indicate that 895 rooms out of the 1,191 total habitable rooms, (75%) adhere to the ADF targets for the specific rooms tested, and thus will enjoy good levels of daylight in accordance with the BRE guidelines. However, the supplementary assessment which excludes the kitchens from LKDs (truncated LKDs) and tests against the 1.5% ADF guideline for LDs shows that this figure rises to 1,017 rooms, (85%) that adhere to the ADF guidelines for the rooms tested. In the main, the rooms below the guidelines are predominately those below balconies, being examples of the trade-off between daylight and the important private amenity space expected by LPDMP policy D5 (2). Officers have naturally focused on the 15% of rooms that do not adhere to the ADF guidelines, to establish whether there are mitigating circumstances to accept the results, and if not, what can be undertaken to aim to improve their results.

Thus the ADF results, incorporating those for the truncated LKDs, set against BRE Guideline targets, are presented in the RDS for each building as follows:

Block A: 19 out of 24 rooms (79%) adhere to target; and the remaining 5 rooms all record ADF over 1%, which 'could be considered an indicator of adequate daylight', especially as all have private inset south-east facing balconies to provide mitigation to the internal ADF levels;

Block B: 162 out of 204 rooms (79%) adhere to target; a further 25 rooms (12%) of which seven are living rooms, fall within 20% of their respective targets. Thus 17 rooms, (8%), of which seven living rooms (3% of all rooms) are more than 20% below the target, but have direct access to private balconies, some of which face south or west. However, as is explained below, 7 flats are considered further in the context of their sunlight results..

Block C: 211 out of 267 rooms (79%) adhere to target; a further 27 rooms (10%) fall within 20% of guidelines. Thus 29 rooms (11%) are more than 20% below the target but have been assigned for uses where daylight levels can be more constrained, ie bedrooms, with LKDs located to make best use of dual aspects. Officers note that Block C includes apartments facing towards Leapale Road, which therefore have a northeastern outlook towards buildings on higher ground. However, the layout limits the number of single aspect units along that frontage, so that on a typical upper floor, there are four such units. Their presence is a consequence of a masterplan that creates continuous street frontages that complement the surrounding townscape, rather than a series of detached blocks which could result in a suburban layout of inappropriate appearance to the locality. As is explained below, 9 flats are considered further in the context of their sunlight results.

Block D: 482 out of 536 rooms (90%) adhere to target; a further 37 rooms (7%) fall within 20% of the Guidelines, leaving 17 rooms (3%) more than 20% below the target. The RDS notes the reason for this is that most are set beneath overhanging balconies, so the compromise with private open space engages. The layout of Block D in a series of wings will inevitably result in some rooms with more limited aspects, but still with a view over a garden or pedestrian street which would receive sunlight, as covered in Issue 3. However, as with Blocks B and C, when those rooms which significantly fail to achieve the daylight target are considered in the context of sunlight received also, it is apparent that in most of those, there is a need to reconsider the internal layout of those flats, and in this entire Block, 26 flats fall into this category. As set out in the Sunlight section, this is proposed to be achieved via a suitable condition.

Block E: 141 out of 160 rooms (88%) adhere to target; the RDS notes again that the reason for there being 19 rooms (12%) that are below the target is predominantly the presence of overhanging balconies. Officers note that Block E, the 13 storey building, has been the subject of careful design evolution in consultation with officers and the Design Review Panel, whereby the presence of a combination of inset and projecting balconies have been assessed as important in achieving a design that can be supported and a level of amenity for each of the flats it would house. Furthermore, Block E is well separated from other buildings, which would ensure views of considerable distances from all rooms.

In summary, the RDS states that of the 1,191 rooms tested, when using the supplementary assessment that notionally truncates some LKDs to exclude the kitchen areas, and tests the LDs against the 1.5% ADF guideline, then 1,017 rooms (85%) adhere to the guidelines for the individual rooms tested, which is a very high adherence level for a town centre location. In the main, where rooms will be below the guidelines, they predominantly sit behind recessed balconies or beneath projecting balconies, which inevitably blinker the view of the sky, and represent a compromise for the provision of private amenity space, that, as Officers have noted, is expected by LPDMP D5 (2). Accordingly, subject to the condition that is set out in the Sunlight section below, Officers consider that the daylight results do not result in unacceptable living conditions and thus satisfy policy D5 in this regard.

Sunlight – APSH

'Probable sunlight hours' means "the total amount of hours in the year that the sun is expected to shine on unobstructed ground, (including the floor of a room), allowing for average levels of cloudiness for the location." BS8206 recommends that interiors where the occupants expect sunlight should receive at least 25% of annual probable sunlight hours, (APSH), of which, in the winter months, at least 5% of APSH.

In respect of the APSH analysis, the RDS summarises the BRE Guide recommendations concerning sunlight, noting that the main requirement for sunlight is in living rooms; that sensitive layout design will attempt to ensure that each dwelling has at least one living room which can receive a reasonable amount of sunlight, but that for larger developments of flats, especially those with constraints, it may not be possible to have every living room facing within 90 degrees of due south. It advises that APSH values of 25% cannot necessarily be achieved in all situations, particularly city-centre sites where it is necessary to fully optimise housing potential.

The BS8206 advice notes that “the degree of satisfaction is related to the expectation of sunlight. If a room is necessarily north-facing, or if the building is in a densely-built urban area, the absence of sunlight is more acceptable than when its exclusion seems arbitrary”. The BRE Guide notes that in some circumstances, “the designer or planning authority may wish to choose a different target value for hours of sunlight.” The RDS advises that rigid application of the BRE’s standard numerical guidelines may be inappropriate in a built-up urban environment where higher density may be desirable and where there simply cannot be the same expectation of light as in a suburban context. Thus, in setting out the APSH analysis results for each building, below, Officers advise that the guidance on what should be considered acceptable introduces an expectation that the local planning authority should arrive at a view as to whether a lower value than the 25% APSH, including at least 5% APSH in the winter months, is appropriate to the form and type of development and an urban, (eg town centre), location.

The RDS advises that the scheme layout has sought to limit north-facing elevations, but where units do face north, the strategy has been to aim for main living rooms to be located on the corners to provide a dual aspect. All rooms were tested, but the comments were provided for those rooms whose windows face within 90 degrees of due south.

A total of 634 rooms with at least one southerly orientated window were tested, (53% of habitable rooms), with the guidelines focused on main living rooms. Of the total tested, 423 (67%) adhere to the annual guidelines and 437 (69%) adhere to the winter guidelines. However, of those below the guidelines, a further 52 rooms fall within 20% of the annual sunlight guidance, so 475 (75%) achieve a good level of sunlight. The RDS states that this level of adherence shows that the majority of rooms tested achieve a high level of sunlight, and that this is a good result for a town centre location.

The winter sunlight compliance is described in the RDS as inherently difficult because of the sun’s lower positioning and the presence of buildings within and around the scheme, but there are a good number of rooms facing east or west with good morning or afternoon sun.

Officers consider that based on the RDS findings, the sunlight compliance rate for the rooms tested within the scheme, in terms of BRE guidance, is in line with expectation for a large development with inset and projecting balconies, where for good townscape reasons, in some instances the buildings are fairly closely spaced.

It is noted that the layout of the scheme has resulted in 557 of the habitable rooms (46%) not being tested for sunlight because they are not within 90 degrees of due south. In these instances, as well as selected flats within 90 degrees, it is necessary to consider the circumstances of the dwelling in question, along with the room use and the ADF result on daylight received, in all rooms in the flat, in order to assess the overall acceptability of the living conditions in the dwelling and to see whether factors such as outlook or presence of a balcony or terrace compensate for low internal daylight and sunlight results. This assessment has been undertaken by Officers, in the context of the flexibility encouraged by the BRE guidelines. This is how identification of the flats where a condition to require a review of internal layout, so as to explore the potential of increasing the ADF value for the LDs, has been established. The applicant accepts the principle of this condition and the flats that have been identified by Officers to which it should apply, which

are listed in an Informative attached to this Officer Report. Thus, Officers advise as follows:

For Block A, which fronts North Street, on the first floor, there are two flats out of the three which each have at least one window facing north-west. Both flats are dual aspect, with only their two respective bedrooms facing north-west. BRE guidelines do not place emphasis on bedrooms, which in any event, all exceed the ADF guideline for daylight in bedrooms. The limited sunlight in these rooms is not considered an unacceptable living condition for the flats. The two truncated LkDs for these flats have sunlight potential by facing south-east, but their ADF levels are low due to deep recessed balconies, which provide them with large private external areas. The justification for such a compromise has been noted above. The results improve on higher floors. The third flat faces south-east and all rooms exceed their ADF targets for their use. Overall, given daylight results, Officers consider the flats in this building to have acceptable living conditions in respect of sunlight, and thus no need to alter internal layout in any flat.

Block B has two 'L' shaped elements to its footprint.

B1 fronts North St, The Dial and Astor Lane. On the first floor there are four flats out of nine with at least one window facing north-east to north-west. All of these four flats are dual aspect, with one being a studio having a south-east facing window for sunlight. Two others have a living room facing south-east, which each have scope for sunlight although their ADF results are compromised by balconies, the benefits of which have been noted. Thus each of the two flats has only bedrooms facing north-west, of which only one in each case is below the BRE ADF guideline, with at least one other bedroom that exceeds it. The remaining flat has a dual aspect LD facing north-east and north-west which is below the BRE ADF guideline for LDs due to a balcony above, and would not receive significant sunlight despite overlooking a bright sunny area. However, a bedroom in this flat has a better ADF result and consideration should be given to changing the internal layout to improve the LD ADF value. On upper floors, this LD exceeds the BRE target. On this basis, Officers consider that all the flats have acceptable living conditions, although the flat noted should be covered by the condition,.

Block B2 fronts Astor Lane and Leapale Road. The ground floor fronts Astor Lane with three dual aspect flats having a south-east aspect overlooking a communal garden to the rear, and so could receive sunlight or have access to a sunlit garden. The LDs have low ADF figures and face north-west, whereas each has bedrooms with higher ADF values which overlook a landscaped podium open space that will receive sunlight even on March 21, (see Issue 2 below), and so should benefit from a sunlit view. The internal layout of two ground floor flats should be reviewed. On the second floor, which is the lowest full floor, there are seven out of nine flats with at least one window having a north-east or north-west aspect. Of these, four are dual aspect with three having LDs either facing or having second windows facing south-west or south-east, thus receiving sunlight. Only one dual aspect flat has its LD windows facing north-east and north-west, but the LD and bedroom more than meet the ADF targets and so would be well lit. A further three flats are single aspect to the north-east, but with all rooms generally meeting or exceeding the relevant ADF target, they would be well lit. Accordingly, all rooms on the second floor would receive sunlight and / or would be well lit. Some results improve on higher floors..Officers consider the flats in Block B2 would have acceptable living conditions. Nevertheless, Officers consider that there are two flats on the first floor and one each on the fourth and fifth in B2 in which the internal layout should be reviewed to improve the LD ADF value if possible, using the proposed condition.

The eight flats at first floor include four that would have at least one window facing south-west or south-east and thus receiving sunlight. However, all eight only achieve ADF values for LDs slightly below or just above those for bedrooms, and thus would only be adequately lit even where facing north-east. Officers consider that there are two flats on the first floor in which it would be possible for the internal layout to be considered further with the aim to improve the ADF value for the LDs. Additionally, there is one flat on each of the fourth and fifth floors where this again could be possible, using the proposed condition. Overall however, it is noted that since Blocks B, and C are intended to follow the alignment of Leapale Road to create a street scene, they inevitably have street frontages aligned roughly north-east, which will limit their direct sunlight, and, due to the presence of buildings opposite, and some balconies, the daylight received at first floor level and in some other instances above, will be lower than standard BRE targets. Officers stress that the BRE guidelines are to be interpreted with flexibility, and the Council is entitled to set a lower range of targets for dwellings where other considerations such as townscape call for a built frontage. Overall, Officers consider that the flats in B2 would have acceptable living conditions, but that six have limited daylight and sunlight, which should be enhanced if possible via the proposed condition.

Blocks C1 and C2 face Astor Way, Leapale Road and Woodbridge Road. On Astor Way, at ground / first floors, two studio flats and one three bedroom flat achieve low ADF values for their LDs, and whilst they face southeast will receive limited sunlight due to the proximity of Block B1 and B2. Accordingly, they would benefit from internal reorganisation, possibly as two flats with first floor LDs, which would have improved ADF values. Taking the main first floor, eight out of 13 flats have at least one window facing north-east or north-west, of which four are dual aspect. Two of these face south-east or west, and so receive sunlight. The other two face north-east and north-west, but exceed the ADF target for daylight. Three single aspect flats face north-east and also have LDs with ADF levels somewhat below the target, although above that for bedrooms. Thus, as with B2, a compromise with daylight and sunlight at first floor has to be accepted for townscape reasons. From the second floor, which has a full footprint, nine out of 18 flats have at least one window facing north-east to north-west. Of these, five flats are dual aspect, with three having an LD incorporating a window facing south-east for sunlight. They also all exceed the ADF target. The other two dual aspect flats have LDs facing north-east and north-west, but well exceeding the ADF target. The bedrooms in all five dual aspect flats exceed their ADF target. The four single aspect flats facing north-east just meet or exceed the ADF targets for LDs, and comfortably exceed those for bedrooms. The results improve on higher floors. Accordingly, even on the frontage with limited sunlight, the living rooms would receive good access to daylight and be well lit. Officers consider this to be a reasonable compromise given the urban location, the townscape justification for a street frontage noted for Block B2, and the impacts of the balconies that emerging policy expects. Nevertheless, there are a total of 9 flats where higher ADF values are recorded in bedrooms compared to LDs, which, together with internal arrangement possibilities mean that Officers consider that the internal layout of these flats should be reviewed, via the proposed condition. Overall, Officers consider that the flats in C1 and C2 would have acceptable living environments, but that 9 should be enhanced if possible via the proposed condition.

Block D has three wings with linking blocks, made up of four cores.

D1 and D2 form an inverted 'U' shape, and face Commercial Road, Woodbridge Road and Astor Lane. They have a full footprint on the second floor, which has ten out of 13 flats with at least one window facing north-east to north-west. Of these, eight are dual aspect, of which five have an LD window facing south-east to south-west, so in receipt of sunlight. Of the remaining three dual aspect flats, one has an LD and bedroom that exceed their respective ADF targets. The remaining two dual aspect flats and three single aspect flats have LDs facing north-east or north-west that do not meet their targets, because they are under balconies. Four of these benefit from large terraces in compensation. The fifth has an LD value between a bedroom and LD, so of

a reasonable level. All results improve on higher floors, except from third to fifth floors, one flat in D2 which at the second floor is dual aspect, becomes single aspect, facing north-east and with a reduced ADF value falling from 1.44% at second floor, (so virtually meeting the target), down to 0.34%, 0.46% and 0.65% respectively, due to introduction of a deep dual aspect recessed balcony, which would increase amenity at the expense of interior daylight. However, whilst this LD value is not entirely desirable, the associated bedrooms have very good ADF values even for LD use, and therefore Officers consider that the condition to seek to amend the internal layout to ten D2 flats should be imposed, so as to seek to improve the ADF results where appropriate. Accordingly, Officers consider the flats in D1 and D2 would have acceptable living conditions, but that 10 should be enhanced if possible via the proposed condition.

D3 faces the same roads as D1 and D2, forming an inverted 'L' shape and also has a full footprint on the second floor, with eight out of 11 flats having at least one window facing north-east to north-west. Of these, six are dual aspect, of which five have an LD window facing south-east or south-west, thus in receipt of sunlight. The sixth dual aspect flat and the two single aspect flats do not have windows facing south-east to south-west, but all satisfy ADF targets for daylight.

D3 third floor changes the footprint slightly, with one of the dual aspect flats now single aspect facing north-east. As a result, the LD value for ADF falls significantly from 1.44% at second floor (virtually meeting the target), down to 0.47%, increasing to 0.6% and 0.76% at fourth to fifth floors, before comfortably exceeding the target with 2.81% at six floor where it reverts to dual aspect. The reason for the poor outcome is again the introduction of a dual aspect recessed balcony which would nevertheless increase amenity. Again, whilst this is not entirely desirable, the associated bedrooms have higher ADF values, and in total for this wing, Officers consider that the condition could once again seek to secure an amendment to the internal layout of 6 flats in D3 on the relevant floors, to improve the ADF results for LDs. Thus, overall, Officers consider the flats in D3 have acceptable living conditions but that 6 flats should be enhanced if possible via the proposed condition.

D4 faces Commercial Road, Woodbridge Road and towards block E. At upper ground it has eight flats of which seven have at least one window facing west or south, and thus in receipt of sunlight. The other comprises a single aspect flat with an ADF level for the LD of between bedroom and LD targets and for the bedroom exceeding its target. This is adequately lit. However, as with D3, one of the dual aspect flats would likely receive very limited sunlight from the south-east and has an extremely low ADF of 0.04% for the LD, due to the presence of a deep inset balcony, and also in this instance, the ground floor location facing Block C2 with a north-east aspect. Whilst these are reasons to be taken into account in this instance, in fact, this flat has a higher ADF result for the main bedroom, and thus would benefit from an internal layout change between those two rooms, if possible, via the proposed condition..

D4 has a full footprint on the second floor with seven of nine flats incorporating at least one window facing north-east to north-west. Of these five are dual aspect, with three having an LD window facing south-west or west for sunlight, and comfortably exceeding ADF targets for all rooms. The fourth dual aspect flat is oriented north-east and north-west but well exceeds ADF targets for an LD and bedroom, so is very well lit. The fifth dual aspect flat is stacked over the ground floor equivalent unit noted above for a very low ADF value. It has a window facing south-east for sunlight, but as with the ground floor unit, falls well short on the ADF target for the LD at 0.18% because of the inset balcony, a problem which persists until the sixth floor where the room is dual aspect and receives much more daylight as well as sunlight. The associated bedrooms have ADF results either side of their target, so the flat does receive some adequate daylight. The two single aspect flats do not meet ADF targets, but their LDs do exceed ADF targets for bedrooms. Once again, results improve on higher floors. However, Officers consider that the condition to amend the internal layout of a total of 10 flats in D4 could help mitigate this

poor daylight outcome. Thus overall, Officers consider that the flats in D4 also have acceptable living conditions, but that 10 flats should be enhanced if possible via the proposed condition.

Block E stands at the junction of Commercial and Woodbridge Roads, and thus has four aspects. At first floor, the full footprint is occupied by five flats, all dual aspect. Only one has a north-east to northern aspect, but all rooms well exceed their ADF targets and so will be well lit. The other four flats will receive sunlight, and also have ADF values in excess of their targets in all but three rooms. Only one of these rooms is an LD, where daylight is reduced by a balcony over, although the western aspect will provide sunlight. By third floor the equivalent room is virtually meeting the LD target for daylight, and all results improve at higher floors. Accordingly, Officers consider that the flats in Block E achieve sufficient daylight and sunlight, and thus have acceptable living conditions.

The RDS concludes that the orientation of the larger linear blocks north to south means that the majority of rooms face east and west, which gives them access to a good level of sunlight. Furthermore, the very high adherence level for daylight guidelines would compensate where the alignment needed for townscape purposes, and the impact of balconies, reduces the sunlight received. Officers consider that this is a reasonable assertion but that in the case of a total of 42 flats, mostly at lower levels and with LDs facing between northwest and northeast, there would be merit in reviewing the internal layout of the flats to establish whether the LDs could be placed in a different location within the flat which is currently recording higher ADF values for bedrooms. These alterations, including any associated non-material adjustments to window or door positions, would not need any further planning permission, and could therefore be achieved via investigation required by a planning condition.

Summary on issue 1

Officers consider that the levels of compliance with the BRE guidelines demonstrate that for the most part, the new dwellings have been designed to harness natural daylight and sunlight availability to an acceptable level of compliance, taking account of the site location which imposes the need for a town centre character to the overall development, and also making an allowance for the impact of balconies, which do also enhance amenity in accordance with LPDm policy. This reflects the approach set out in the BRE Guidelines and NPPF paragraph 125 (c) which acknowledge the need for flexibility in these assessments, to reflect other planning objectives. However, as explained, there is a need for a condition to secure investigation of an amendment to the internal layouts of 42 flats in Blocks B1, B2, C1, C2, D2, D3 and D4, where ADF daylight levels are very low, and their aspect or other features will preclude meaningful sunlight penetration. This is about 9% of total flats in the scheme, which is small enough to improve by later internal layout change if this proves possible. Accordingly, Officers conclude that overall the scheme satisfies Saved Policy H4(2) and emerging LPDMP policy D5 (1) (c) in the context of NPPF paragraph 125 (c), to achieve acceptable living standards in respect to daylight and sunlight, but that 42 flats, listed in the Informatives, should be subject to a condition to explore whether the ADF values of their LDs can be enhanced by internal layout changes and associated non-material external alterations to windows and doors.

Issue 2: Impact on existing and proposed public and communal open spaces

The policy context imposes a need to evaluate the impact of the scheme on its own proposed amenity areas for public and residents, and also on existing open spaces around the site available to the public, as set out below:

For issue 2, LPSS Policy D1 expects all new developments to (6) create a high-quality public realm, and (7)...include high quality landscaping. The preamble notes that public realm should be designed in a way that contributes to pedestrian friendly environments. Officers consider that these expectations should be interpreted to ensure that public spaces receive a reasonable amount of sunlight both for their use and to enable soft landscaping to thrive.

This interpretation is endorsed by LPDMP D5 (2), which expects all new build residential development proposals to provide direct access to an area of private outdoor amenity space. Furthermore, in providing both private and shared outdoor amenity space, developments are required to (a) take into account the orientation of the amenity space in relation to the sun at different times of the year.

The RDS states that the BRE guide considers open space between buildings to be valuable for a number of reasons, including to provide attractive sunlit views, noting that different types of amenity space can have different sunlighting requirements. The BRE criterion is that for an amenity area to appear adequately sunlit throughout the year, at least half of that space will achieve two hours sunlight on the Spring Equinox, 21 March., the BRE target criterion for 'sun hours on the ground' (SHoG).

All public areas and communal residents' spaces were tested, but this did not include private balconies or terraces, since they are not typically tested as per the BRE guidelines, and were considered to be "yet further access to good daylight and sunlight levels". An additional study was undertaken to consider the sunlight potential of these spaces on 21 June, the rationale being to gain a better understanding of the sunlight availability during the summer months, "when these [outdoor] spaces are most likely to be used and enjoyed." The proportion of each space achieving the two-hour guideline on 21 March and then 21 June is expressed as a percentage of its area, so with 50% as the BRE target.

A total of seven areas in the public realm, forming the proposed pedestrian routes and amenity areas within the site, were assessed, together with five communal amenity spaces for residents. There are no existing public amenity spaces surrounding the development site that needed to be assessed, since it adjoins public highway on Leapale Road to the east, North Street or the rear of commercial buildings fronting North Street to the south, and the bus station and Friary Centre to the west. Notwithstanding the proposed pedestrianisation of North Street, this area was not tested since most of the frontage is taken up by existing buildings that will remain other than block A, which is proposed to replace an existing building of similar height, and block B, which is to be set back, behind the new North Street Square which was tested. Thus without sensitive receptors, this is why sunlight and overshadowing of off-site public realm had been scoped out of the Environmental Impact Assessment.

Public realm areas

The results for the areas tested were as follows:

Public Realm Area	Percentage of area in sunlight for 2 hours or more; 21 March	Percentage of area in sunlight for 2 hours or more; 21 June
Friary Square (Commercial St)	94.39%	95.89%
Planting east of remote bus stops in bus station, west of D3	86.08%	99.61%
Northern Gateway (adjoining E)	20.0%	74.05%
Astor Way west of The Dial	8.08%	85.58%
North St Square and Woodbridge Road (south)	57.12%	82.6%
The Dial and Astor Way (east)	0%	80.13%
Woodbridge Road (north)	5.15%	49.81%

Taking the March 21 results, three areas comfortably exceed the BRE criterion, but the other four fall short. Of those that pass, two are the most important public spaces. First, the new landscaped Friary Square, with 94% of its area meeting the criterion, would provide a large green space for use by shoppers wishing to pause and by those waiting for buses, so it is very beneficial that nearly all this area will be sunny, (although the future of this space is addressed under the Transport section). The second important space is the new North Street Square and southern half of Woodbridge Road, all pedestrianised. In fact the entire square would meet the criterion, which is highly beneficial since the space is intended to be multi-functional, with all year events. In contrast, Woodbridge Road itself would receive between one-two hours sunlight, but since it is a route to pass through the scheme, this is less important. The Northern Gateway would receive mostly one to 1.5 hours sunlight, but some areas would benefit from 1.5 to over two hours, and thus this space would be satisfactory for passing through into the scheme. The least well served by sunlight would be both parts of Astor Way and The Dial, with only the very western end meeting the criterion. For The Dial itself, whilst the assessment result is that none of the area would achieve two hours of sunlight, in fact, much would achieve between one to 1.5 hours sunlight, probably during the middle of the day given the orientation. Although this is not ideal, it would be of some benefit, assisted by the presence of two other new public squares close by in the scheme which would mean that those eating or drinking, or visiting could use alternative sunnier locations at that time of year. The lack of sunlight within Astor Way east is not of significance since it is a passageway rather than a dwelling space, and leads towards a space with at least some sun during the day. Overall, Officers consider that at the recommended date for assessment, the public realm areas would offer ample sunlight where most beneficial and other locations with reasonable scope for sun.

The results for June 21 demonstrate that six of these spaces would be very sunny, with just a few edges with welcome shade. The seventh, the Northern Gateway, would only very narrowly miss the criterion, but not in a material manner, and thus would offer some on-site shade in a public space.

Residents' communal areas

Turning to the residents' communal spaces, the results are as follows:

Residents' Communal Area	Percentage of area in sunlight for 2 hours or more; 21 March	Percentage of area in sunlight for 2 hours or more, 21 June
Blocks A and B ground level	18.77%	65.28%
Block C podium level	92.18%	99.93%
Block C roof garden	95.65%	99.07%
Blocks D1 and D2	83.17%	98.61%
Blocks D3 and D4	66.92%	98.90%

Taking the March 21 results first, four of the five areas very comfortably exceed the BRE criterion. The fifth would still include a small area of adequate sunlight, but given that the Block C podium would be intended for use by all residents, and is close by, with a very high percentage result, there would be adequate alternative provision for that time of year. The June 21 results show a very high level of exceedance of the criterion, even in the block A and B garden.

Overall, Officers consider that the assessment demonstrates that at March 21, both public realm and residents' communal spaces within the scheme would provide adequate sunlight, or some sunlight, with opportunities for visitors and residents to find sunny alternatives if a particular space is not in the sun. There would be very extensive areas of sunlight in all spaces on June 21. Accordingly, the proposals would satisfy LPSS policy D1 (5) and (6) and emerging LPDMP policy D5 (2) (a).

Issue 3: Impact on existing surrounding properties in terms of daylight, sunlight and overshadowing

Issue 3 concerns the impact that the proposal might have on existing buildings surrounding the site.

For issue 3, NPPF paragraph 125c) again applies, stating: "when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight where they would otherwise inhibit making efficient use of a site, (as long as the resulting scheme would provide acceptable living conditions)". (emphasis added).

Saved Policy G1(3) of the Local Plan 2003 states that the amenities enjoyed by occupants of buildings should be protected from unneighbourly development in terms of, inter alia, access to sunlight and daylight. Saved Policy H4 (2), supports residential development in the urban area of Guildford, provided that it has no unacceptable effect on the amenities enjoyed by the occupants of buildings in terms of access to sunlight and daylight. This is interpreted by Officers to include the occupants of existing buildings.

LPDMP policy D5 (1) (c) applies the requirement to avoid an unacceptable impact on the living environment of existing residential properties, specifically to 'access to sunlight and daylight'.

The BRE Guidelines paragraph 1.6 quoted above stress that the advice is not mandatory, the developer or local planning authority may wish to use different target values where a higher degree of obstruction may be unavoidable, and the calculation methods are entirely flexible in this respect, since natural lighting is only one of many factors in site layout design. This reflects NPPF paragraph 125 and is frequently quoted to explain the need for a planning balance in relation to daylight and sunlight effects, taking account of a site's location.

The Environmental Statement Revision A, Submission 2022, (the ES), which supports this planning application was prepared with 'Daylight, Sunlight and Overshadowing' scoped out, as the impacts caused by the proposed development were considered unlikely to result in significant effects on sensitive receptors as shown by the assessments undertaken separately from the ES. Accordingly, this issue has been considered within a stand-alone document, the 'Daylight and Sunlight Report', July 2022, prepared by Anstey Horne, (the DSR).

The DSR acknowledges the applicant's understanding of the need to minimise impact on the light received by neighbouring residential properties, and therefore instructed Anstey Horne to work with the project architect so as to achieve this aim.

The DSR notes that the BRE guidelines make recommendations concerning the impact on daylight and sunlight to existing buildings, stating that local planning authorities are usually only concerned with the impact on dwellings, schools, hospitals and nursing homes, these being buildings that host receptors most sensitive to daylight and sunlight availability and therefore having a greater expectation of natural light. This has been the basis of the assessment, which is accepted as a reasonable approach by Officers, since commercial buildings are noted as generally having greater reliance on supplementary electric lighting. This approach enables suitable assessment as to whether the scheme complies with the requirements of saved Policies G1(3) and H4(2), in respect of existing residential neighbours, leaving the question of whether other uses should be assessed as a judgement informed by the BRE Guidelines. This is now informed by emerging LPDMP policy D5 (1) (c) which is explicitly intended to address residential neighbours, thus endorsing the DSR approach.

On this basis, the DSR indicates that taking account of BRE guidance, it sets out the impact of the proposed development on the daylight and sunlight levels to relevant (main habitable) rooms in the following existing surrounding buildings:

- Woodbridge Chambers – residential
- 3 Leapale Road – 'Five and Lime' pub/nightclub with staff residential accommodation over
- 16 – 17 North Street – 'All Bar One' pub and Cobblers retail with residential over
- Friary House – residential located above Friary Centre

The report specifically excludes Norwich House (14 North Street), and Bell Court, since notwithstanding their respective approvals for permitted development conversion to flats, there is no evidence of implementation.

The main rooms of these buildings were assessed using the methodologies below, which are acknowledged by the BRE to have limitations. For example, the BRE advises that a loss of light will be noticeable if the amount retained will be less than 0.8 times (ie 80% of) its former value, (the BRE 0.8 guideline), but the DSR notes that 'noticeable' does not necessarily equate to 'unacceptable', based on the starting position:

Daylight:

Vertical Sky Component, (VSC) expresses the amount of skylight falling on a vertical wall, or window (the latter being relevant to existing neighbouring buildings with windows. This can be misleading if considered in isolation since it does not measure light inside the room, just the potential conditions in the room, and should be read in conjunction with a test of 'daylight distribution' (DD), which uses a calculation known as the No Sky Line, (NSL), which is the distribution of daylight at the 'working plane' within a room that will have a direct view of the sky, thus taking account of all windows in the room and its dimensions. This allows a judgement as to whether the room will retain light to a reasonable depth.

Sunlight:

Annual Probable Sunlight Hours, (APSH) are calculated for rooms with windows within 90 degrees of due south, to provide a metric of sunlight received at the centre of the outside of the window. Accordingly, windows outside 90 degrees of due south are not tested since they will not receive appreciable sunlight even without the proposed development

Daylight impacts:

Of the total 70 windows assessed in all the buildings listed above around the site, using the VSC test, 45, (64%) adhere to the BRE guidelines. However, of the total 58 rooms assessed in those buildings, using the DD test, 53, (95%) adhere to the guidelines. Where there are results that transgress the BRE 0.8 guideline, these are grouped and summarised below:

- Woodbridge Chambers - residential

This apartment block, is directly to the north of the site. In respect of VSC, ten out of 24 windows tested achieve BRE compliance. Of the remaining 14 windows, ten serve bedrooms, which do not carry the same expectation for natural light. The remaining four windows serve two LKDs. Taking into account the DD test at this point, the results show that all 12 rooms tested achieve strict BRE compliance, including the two LKDs that did not achieve the VSC target. Accordingly, all 12 rooms would be adequately lit.

- Friary House – residential

This apartment block is located above part of the Friary Centre, to the west of the application site. The VSC and DD test results show that all 31 windows and all rooms will meet the strict application of the BRE guidelines. Thus all rooms are adequately lit.

- 3 Leapale Road - 'Five and Lime'

This pub / nightclub with staff accommodation over is located to the southeast of the site. In respect of VSC testing, four out of 13 windows achieve strict BRE compliance, but with all windows retaining at least 18%, which is commensurate with at town centre location. The DD test show the 12 out of 13 rooms will achieve strict BRE compliance. Even the room that would not comply would retain direct access to the sky from 71% of its area, which is good for a town centre location. However the RDS did not identify the use of the rooms, whereas Officers have inspected the building and are aware that not all westward-facing (rear) windows affected serve habitable rooms. Accordingly, Officers consider that the results demonstrate that the upper floor rooms are adequately lit.

- 16 - 17 North Street - 'All Bar One' and Cobblers

VSC testing shows that neither of the two windows facing the site, ie to the north, would meet the strict application of the BRE guidelines, but the retained VSC level of 15% for each window could be considered adequate. The DD assessment shows that neither room will meet the strict BRE guideline, since they will lose their current uninterrupted views over a cleared site. However, despite a loss of light with the development, both rooms would still receive daylight to their rear walls. This is a case of the reduction in light not representing an unacceptable impact. Accordingly, both rooms would remain adequately lit.

Sunlight impact

Of the total 25 rooms assessed, (the remaining 33 not oriented to receive sufficient sunlight to warrant a test), all 25, (100%) adhere to the BRE guidelines for annual sunlight, and 24, (96%) adhere for winter sunlight. Where the results are outside the BRE 0.8 guideline, these are summarised below:

- Woodbridge Chambers

The results for annual sunlight show that all 12 assessed rooms (100%) adhere to the BRE 0.8 guideline, being consistent with the overall results above. For winter sunlight, 11 out of 12 rooms, (92%) adhere. The exception is a first floor bedroom experiencing a reduction of 64% former APSH value. Bedrooms are of less significance in terms of sunlight needs, and given that over the year, this room receives the guideline quantum, the DSR considers that the overall results for this flat remain adequate in terms of sunlight. Officers concur with this view.

Summary of daylight and sunlight

The DSR notes that currently, since the application site is largely vacant, several of the neighbouring properties enjoy uncharacteristically high levels of natural light which then leads to large percentage reductions once massing is proposed in the vicinity. Despite this, as noted, the retained levels of light still remain commensurate with a town centre location, where the BRE guidelines recommend a flexible approach. Officers agree with this assessment, but also add that nevertheless, using the DD test and in terms of sunlight, the results demonstrate that overall, with the majority of neighbouring properties fully adhering to the BRE guidelines, they will not experience significantly reduced daylight or sunlight. Accordingly, Officers consider that the scheme's impact on daylight and sunlight experienced by neighbouring residential properties would comply with the requirements of Saved Policies G1 (3) and H4 (2), as well as emerging LPDMP policy D5 (1) (c).

Highway/parking considerations

The following key transport and highway matters are considered relevant to assess the impact of the proposals, and are examined within this section:

- Issue 1: highway network - including traffic impact, capacity and safety;
- Issue 2: pedestrianisation, servicing and parking;
- Issue 3: bus station operation; and
- Issue 4: impact of construction traffic on the highway network.

The chronology of the three successive versions of the SCC County Highway Authority response which identify its reduction of recommended reasons for refusal concurrently with the addition of s.106 obligation measures, the removal of the stated intention to refuse the necessary stopping up of streets, and the proposed introduction of a planning condition for additional highway works all as mitigation, whilst still maintaining a recommendation to refuse the application on grounds relating to Issue 3 above, in the context of the Council having commissioned two independent transport consultancy assessments to consider the validity of the CHA's position, which has assisted Officers in recommending that the application be accepted in terms of impacts on Issues 1 to 4, despite the CHA's continued recommendation of refusal on three grounds relating to Issue 3

As set out above under Statutory Consultee responses, Surrey County Council (SCC) as County Highway Authority, (CHA), recommends (in its third response dated 12 December 2022), that this application be refused on three grounds, notwithstanding extensive engagement with the applicant commencing with the pre-application stage through to the finalisation of this report. The pre-application stage established, inter alia, the methodologies, study areas and baseline data required for the necessary assessments forming the Transport Assessment, (TA), submitted by the applicant to support the application. This included consideration of alternative scenarios for alteration to the highway network, which resulted in a particular proposal being modelled, which is described below.

The CHA's first formal response to the application, submitted on 17 October 2022, recommended that the application be refused on eight grounds, although an Informative stressed that the CHA 'very much support the principle of redevelopment of this site and remain committed to working with the applicant and GBC to deliver a fit for purpose high quality development to serve Guildford's longterm needs'. Consequently, following further discussions, a TA Addendum, (TAA), containing additional material to elaborate on and justify the modelling and the operation of the new bus station arrangement was submitted by the applicant, such that many of the CHA's previous concerns were able to be addressed. Additionally, where concerns remained, the on-going discussions enabled the CHA to identify potential mitigations for some of these, achievable via amendments to the proposals which have now been made, and via proposed planning conditions, or the proposed s.106 agreement, including financial contributions.

As a result of this extensive process, on 24 November 2022, the CHA was able to re-issue its formal response to the application, this time with the recommendation to refuse the application based on only three grounds, all of which relate to the impact of the changes to the bus station on, briefly, bus route timings, the resilience of the bus station operation, and the accessibility of the new station for the disabled, ie Issue 3 above. The response comprises not only the three recommended reasons for refusal of the application, but also several pages of explanatory text, being 'Notes to case officer' which sets out the reasoning for the on-going concerns notwithstanding support for the principle of redevelopment of the site; the 'Further commentary in support of the above reasons for refusal'; a section titled 'How our objection could be overcome' which lists the concerns that would be addressed by reinstating a southern access into the bus station proposals, (discussed below); and also the 'Fallback position' which, in the event that the Local Planning Authority is minded to approve the application, and in an effort to safeguard all users of, and the functioning of the highway, proposes s.106 requirements for a car club and public transport vouchers, and ten planning conditions.

The CHA's first response did not include a 'Fallback position' section, and thus no suggested conditions. The second response included a Fallback section, with the CHA's own proposed conditions. One condition which has been neither included by the applicant in their highway network modelling, nor has had an opportunity to be the subject of public consultation by the Council as a change to the EIA, is Condition 1(f). This condition, which, even if it were to satisfy EIA Regulation requirements for consultation in the future, is considered by Officers to warrant special attention by Members because as is set out below, the first part is considered by Officers to be unnecessary in terms of highway capacity impacts on bus service timings, and because the alternative option is considered to duplicate one of the obligations of the s.106 agreement proposed now in the third CHA response but in a form that could be insufficiently precise, clear and unambiguous to be enforceable, compared to a s.106 obligation. Additionally, Officers question whether it would meet the tests, given that it is benchmarked against monetary value as opposed to effectiveness on the timing of bus routes. Furthermore, it is considered likely to impact adversely on the scheme viability and thus deliverability. The condition is part of the following requirement:

'except for site clearance and demolition works, no other operations shall be commenced until a Highway Works Construction Delivery Plan has been prepared and submitted to and approved in writing by the local planning authority after consultation with the CHA. Such plan shall detail the programming, sequencing timing and delivery of the required highway works listed at paragraphs 'a' to 'g' below...

(f) the construction of a right turn facility for buses into Woodbridge Road at its junction with Onslow Street, in accordance with details to be submitted to and approved in writing by the LPA after consultation with the CHA;
OR in the event that such works cannot reasonably be delivered, the applicant shall fund other measures of equivalent value aimed at reducing bus journey times and delay in Guildford Town Centre and its approaches

The CHA second response also includes ten informatives, and a further 'Note to case officer' commenting on additional highway matters including those which were at this stage satisfactory to the CHA, (eg residential servicing and deliveries). However, under the heading 'Right turn facility into Woodbridge Road', the CHA seeks to justify Condition 1(f) but without any details of the location or effectiveness of the proposed projects aimed at reducing bus journey times proposed in the condition after "OR", as justification for these "other measures" and without any explanation of why they need to be of "equivalent value" to the proposed Woodbridge Road junction works. The wording only explains the reasoning for the right turn works as follows:

'if the applicant is unwilling to retain and provide the southern access from North Street for buses, some level of mitigation is required to partially offset the predicted increase in bus journey times. Whilst such a provision would not overcome our recommended reason for refusal, a solution that could be explored further would be to provide a right turn facility from Onslow Street into Woodbridge Road. Condition number 1(f) has been included to require this provision in the event that our reasons for refusal are disregarded and planning permission is granted'.

A further matter covered by the Note to case officer under the heading 'Stopping up' advises that:

'Commercial Road, Woodbridge Road and North Street provide a substantial developable area and we recognise that the development can only proceed with SCC's agreement to the stopping up. The critical test being whether SCC feels the roads are surplus to our requirements. In order for us to deem those roads surplus we need to be satisfied that all other transport elements can perform satisfactorily, not just now but also for the future without these two roads. The cumulative issues of bus station capacity and access, re-routing of traffic, amongst other related issues, means that we are currently finding it difficult to deem these roads surplus. At this stage, if we were consulted by the DfT, the CHA's position on this would be to refuse the stopping up, as we do not currently deem this land surplus to requirements'.

Officers advise that without these roads stopped up as proposed, the scheme could not be implemented.

However, discussions between the applicant and CHA continued following the issue of the second CHA response. As a result, a third formal response was issued by the CHA on 12 December 2022. This maintains the recommendation that the application be refused, on the same three grounds all relating to operation of the bus station (Issue 3 above), , which are set out in full in the statutory consultation responses section. This response comes with the same 'Notes to case officer' stressing again that the CHA very much support the principle of redevelopment of this site. The first difference is the omission from these notes of the following sentence:

'achieving the right solution for the Bus Station is not the only area of concern by the CHA and there remain to be [sic] a number of other outstanding matters relating to transport modelling, accessibility, road safety and servicing for which we need to be satisfied'.

Accordingly, it can be noted now that the proposed arrangements for the bus station operation, set out in the three reasons for refusal, which all relate to Issue 3, are the only outstanding areas of concern to the CHA.

The second change is under the 'fallback position' sub-heading of 's106 Agreement', where the following additional requirement has been added:

'Bus Service Priority Improvements: Prior to commencement of development, an index linked financial contribution (calculated from the date of any resolution of grant planning permission) of £1.5 million payable to the CHA for bus service priority and journey time reliability improvements on the Strategic Bus routes entering Guildford Town Centre'.

The CHA has provided GBC with a list of proposed road improvements on which this additional sum of £1.5m could be spent to satisfy the tests of CIL Reg 122. It stresses that 'the £1.5 million is separate from the right turn facility [at Onslow Street / Woodbridge Road junction]. We believe both are required and necessary to partially mitigate the impacts of this development'.

The CHA advise that there are nine bus corridors that need to be improved, which are listed in the s.106 section of this Officer Report. These improvements will include a range of interventions including the following:

- bus friendly traffic management
- bus only lanes (incl camera enforcement)
- bus gates
- intelligent bus priority at traffic signals (IBP)
- redesign of junctions

Notwithstanding the introduction in the CHA third response of this additional £1.5m financial contribution intended to reduce delay to bus services in the town centre and its approaches, it is stressed by Officers that the CHA's Fallback position sub-heading of 'Conditions', would additionally require any planning permission to impose condition 1(f), brought forward unchanged, which is intended to achieve the same objective of reducing bus service delays. Thus, the CHA now seeks £1.5m for works to improve bus service priority and journey time reliability on the strategic bus routes entering Guildford Town Centre in addition to provision of the bus-only right turn facility from Onslow Street to Woodbridge Road, or additional works of equivalent cost to reduce bus journey times and delay in the town centre and approaches should the right turn facility not be deliverable which it sought alone in November 2022. The 'Note to case officer' sub-heading 'Right turn facility into Woodbridge Road' in the third CHA response remains unaltered. Clearly the additional £1.5m is seen by the CHA to provide additional mitigation to address the impact of the changes to the bus station operation, (the only remaining concern), but not of a sufficient scale even with the other mitigating works sought by Condition 1 (f) so as to remove the recommendation to refuse the application.

In respect of these items, Officers have been informed verbally by the applicant that the £1.5m figure was negotiated between the applicant and the CHA and as a result of having to cover this additional sum, the applicants have reduced their offer towards an off-site open space contribution to just under £54,000, the implications of which are covered in the s.106 section of this Officer Report. However the applicant has informally costed the bus-only right turn lane from Onslow Street sought by the CHA in its proposed condition 1(f) as being in excess of £1m, and given that neither the TA nor the TAA indicate that it is required to mitigate the impact of the

scheme on highway capacity, or for efficient operation of the bus station, they do not support the condition. The necessity or otherwise for this condition is considered below by Officers under Issue 1.

A third change in the CHA's December response revisits the 'Note to case officer' sub-heading of 'Stopping up', which now reads:

'Commercial Road, Woodbridge Road and North Street provide a substantial developable area and we recognise that the development can only proceed with the making of a stopping up order by the Secretary of State. The County are consulted in this process, to ensure that the roads are surplus to our requirements as public highways. In order for us to deem these roads surplus we need to be satisfied that the wider network can adequately facilitate any displaced / re-routed traffic. The Transport Assessment has now demonstrated this, so we will not object to the stopping up in the event that Planning Permission is granted despite our recommendation to refuse'.

Officers note that the TA and TAA have not been amended since the second CHA response was issued in November 2022, at which point the CHA indicated that the stopping up would be refused. Accordingly it is noted that the change in circumstances that has precipitated this revised note is the agreed provision of £1.5m for the works to improve priority and journey time reliability on strategic routes entering the town centre, since the prospect of the works sought via condition 1(f) had not itself previously provided the CHA with the confirmation that the roads to be stopped up would be surplus. The CHA's third response thus reverses the advice that stopping up would be refused by the CHA in its responses in October and November as the roads were not considered to be surplus. Accordingly, Officers professional view, informed by independent consultants noted below, is that all the proposed works, including the additional £1.5m s.106 works, will adequately facilitate any displaced / re-routed traffic resulting from the network alterations and the bus station operational changes, not only enabling the stopping up to proceed as now confirmed by the CHA, but also allowing the scheme to be implemented without severe highway impact; and that on this basis, Officers disagree with the CHA's position that the proposed mitigation measures are insufficient to enable the three reasons for refusal to be withdrawn.

Members are thus directed to the two documents from the CHA, dated 24 November and 12 December, (the latter being the CHA's final position on the application), both appended to this report, which need to be fully appreciated in considering the weight to be given to the CHA's position, when assessing the Officers' recommendation that the CHA's three proposed reasons for refusal are, on balance, not justified and that the applicant's position (as independently reviewed by the Council, noted below), is to be preferred. These reasons are set out in the Statutory Consultee response section and are summarised below under Issue 3.

As set out above, it has been evident to the local planning authority for a considerable period that the CHA has at various times held or dropped numerous concerns in respect of the impact of the scheme, covering the issues above, whilst the applicant's transport consultants have consistently expressed disagreement with all the CHA's alternative conclusions of the assessments, in particular in respect of the impact on bus services in Guildford. Accordingly, the Local Planning Authority decided that the extent of disagreement warranted an independent assessment of the transport-related impact of the application, and therefore commissioned transport planning consultants, RGP to undertake a review of the transport documents submitted by Icenit transport consultants on behalf of the applicant, which took the form of a Technical Note, titled 'North St Development review on behalf of GBC', dated October 2022. Subsequently, once SCC had formally responded to the application on 17 October 2022, setting out eight reasons for refusal, RGP were instructed to review that response, and issued a Technical Note titled 'Review of SCC's Response on behalf of GBC' dated October 2022. These both appear on the Council's

website for this application. The second SCC response of 24 November amalgamated the first four reasons for refusal into three, and therefore the Local Planning Authority did not consider there to be a need for a further update by RPG. This report reflects the RPG review of the Icen application material, and Members should consult the appended two CHA documents to appreciate the complete position taken by SCC where it maintains its objection and recommendation to refuse.

In addition to the above independent review for the Local Planning Authority, the corporate arm of the Council decided independently of the Local Planning Authority to commission its own assessment of the application material relating to transport matters. This was provided by Motion, titled 'Review of Friary Quarter Planning Application', dated 20 October 2022. This report was passed by GBC's Corporate Team to the applicant for their information, and the applicant subsequently submitted this document to the Local Planning Authority in support of their application. Accordingly, the Motion report also appears on the GBC website for this application.

Issue 1: Impact on the highway network

Policy context

NPPF Chapter 9 'Promoting Sustainable Transport' expects transport issues to be considered from the earliest stages of development proposals so that:

- the potential impacts of development on transport networks can be addressed;
- opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised;
- opportunities to promote walking, cycling and public transport use are identified and pursued;
- the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and
- patterns of movement...and other transport considerations are integral to the design and contribute to making high quality places.

Paragraph 105 of the NPPF requires that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Paragraph 110 advises that in assessing specific applications for development, it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be taken up given the type of development and location;
- safe and suitable access to the site can be achieved for all users; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Paragraph 111 of the NPPF states 'development should only be prevented or refused on highways grounds if there be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe'.

Paragraph 112 states development should

- give priority to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitate access to high quality public transport, with, inter alia, facilities that encourage public transport use;
- address the needs of people with disabilities and reduced mobility...; and
- create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles...

[Officer Note: The hierarchy clearly places pedestrians first, and safe, attractive places without conflict between pedestrians and vehicles are expected. This is an important policy context in consideration of the application and in particular, the objections which have been raised by the CHA.]

Paragraph 113 of the NPPF requires that all developments that will generate significant amounts of movement should provide a travel plan and be supported by a transport assessment. [Officer Note: The applicant has provided both].

The LPSS contains the following policies relevant to assessment of the impact of the scheme's impact on the highway network:

Policy ID3 – 'Sustainable transport for new developments' covers a number of matters relevant to the highway network, being that it, inter alia:

- requires new development to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport modes of walking, cycling and the use of public and community transport;
- requires new development, in so far as possible, to maximise (d) the provision and improvement of public and community transport;
- requires new development to have regard to the Sustainable Movement Corridor (SMC) Supplementary Planning Document; [Officer Note: This SPD has not been progressed to consultation.]
- requires new development to provide or fund suitable access and transport infrastructure including mitigation of its otherwise adverse impacts, which must maintain the safe operation and performance of the local and strategic road network; and
- requires applications to have regard to the Infrastructure Schedule which sets out the key infrastructure requirements on which the delivery of the Plan depends.

Policy A5 is the allocation for 'North Street redevelopment'. Among its requirements is the heading 'Transport' for which the following is relevant: 'requires mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand and changes to the town centre network for private traffic, deliveries and buses'.

A further document which is a material consideration is the County Council's Local Transport Plan 2022-2032 (LTP4). This identifies Policy Areas to deliver SCC's objectives of 'avoid travel', 'shift travel mode' and 'improve energy and operational efficiency of travel', the latter covering 'efficient network management' as a policy area.

- *Access / egress arrangements for the scheme*

A transport package suitable for the scale of development which focuses on provision of sustainable transport options for future occupiers is proposed. By providing access to these modes of transport, reliance on the private vehicle should be reduced and therefore the predicted additional trips from this site onto the highway network should also be reduced.

During pre-application discussions a total of six access scenarios were considered by the applicant in consultation with the CHA and GBC. The applicant chose to progress option three which is described as follows:

- widening of Leapale Road to facilitate two-way traffic, and new loading lay-bys;
- proposed zebra crossing on Leapale Road;
- proposed reconfiguration of Leapale Road multistorey car park access and egress;
- proposed development car park access from Leapale Road;
- stopping-up of Woodbridge Road between its junction with North Street and its junction with Leapale Road, to enable formation of pedestrian street and squares within the public realm;
- Leapale Road/North Street signal junction upgrade;
- “north in / north out” new bus interchange access/egress and associated capacity and pedestrian improvements to signalised junction of bus station / Leapale Road / Woodbridge Road;
- proposed gyratory exit from western end of North Street;
- North Street to be pedestrianised between Phoenix Court (opposite Friary Centre) and Leapale Road, except for loading and taxis between restricted hours; and
- stopping-up of Commercial Road with southern section of Commercial Road converted to pedestrianised area, except for emergency vehicle access, emergency access to bus station by buses, and for refuse freighter use, to be known as Friary Square, and northern section of Commercial Road to be incorporated into bus station.

The access arrangements to the site would include a new vehicular access from Leapale Road to the basement car park, two long servicing lay-bys along Leapale Road and three on North Street. Pedestrian and cycle access to the new development would be provided from all directions via Woodbridge Road, North Street, Friary Square, the bus station and Leapale Road.

The access arrangements for buses to the reconfigured bus station would be changed from the existing access from the south and egress to the north, to a new access and egress solely at the northern end of the bus station. Currently access to the bus station takes place from the south with buses passing along North Street, either from the east or west, and then all buses using Commercial Road. Egress from the existing bus station is to the north with all buses leaving the main part of the bus station required to turn left into Woodbridge Road and then onto Onslow Street. Those buses with stops on Commercial Road itself may currently turn right onto Leapale Road to the southeast. The proposals would provide an upgraded signalised junction at the northern end of the bus station which would allow access from the north (via Woodbridge Road) and southeast (via Leapale Road, which would be converted to two-way operation). The signalised junction would also permit buses to leave the bus station towards the north / south / west (via Woodbridge Road) and the east (via Leapale Road). Bicycle waiting and turning arrangements at the signal-controlled junction would be provided to enable safe access / egress to the scheme, whilst signal-controlled pedestrian crossings would be provided across all arms at the upgraded signalised junction.

Pedestrian access to the bus station would be afforded from and to the north via the signalised junction with Woodbridge Road, from the east via the proposed ‘Astor Way’ within the scheme, and from the south via the new Friary Square pedestrianised area, and as before, directly from the Friary Centre to the west.

Leapale Road would be widened to allow two-way traffic along its length whilst access to and from the Leapale Road car park would also be altered to suit the proposed two-way nature of Leapale Road. The junction of Leapale Road with North Street would be improved as a traffic signal controlled junction facilitating all permitted movements and pedestrian crossing facilities also. Outside of the restricted times proposed for the pedestrianised section of North Street, this

junction would allow North Street vehicles either left turn and easterly (ahead) movements for taxis whilst service vehicles would be required to continue eastwards along North Street only. Egress from the western end of North Street onto the gyratory would be permitted for all vehicles requiring access including taxis and servicing vehicles to Friary Street and the Phoenix Court / Friary Street servicing area.

The access arrangements and mitigation would need to be subject to Road Safety Audits. They would be implemented through a s.278 agreement and subject to further assessment at the detailed design stage by the CHA's internal Road Safety Team and Engineers. No objections have been raised by the CHA with regard to the proposed access /egress arrangements as part of the reasons for refusal, other than the objection to the bus station access / egress, which is addressed under Item 3 below.

- *Highway capacity*

The traffic impact of the proposal on the highway network has been demonstrated by Icenis as follows: the residential units has been assessed within the Transport Assessment (TA) based on the quantum of parking spaces proposed. This has been identified by the CHA as a reasonable approach. In terms of the car parks currently on the site, the traffic associated with them has been reassigned to other local public car parks. The commercial units are considered to compliment the already wide-ranging offer of retail and other amenities within the town centre. Therefore, trips to the proposed commercial units will be linked from the existing town centre uses, rather than generated by the development proposals. Servicing and delivery trips have also been considered within the TA.

The overall impact and redistribution of traffic has been considered by way of a strategic town centre model and junction specific detailed models.

Strategic model:

A Paramics Discovery microsimulation model has been prepared and built by the applicant to assess the impact of the scheme on the town centre and gyratory traffic flows, supported by a series of traffic surveys which formed the 2019 baseline. The 2019 baseline model was agreed with the CHA prior to assessing the future scenarios, which considered the diversion of traffic associated with the proposed highway mitigation including banned movements and the effects of committed development locally. A further set of nine junctions were agreed to be modelled in further detail using junction specific modelling software (Linsig, Junctions) to assess the impact of the development proposals against the 2019 base.

Detailed modelling:

A total of nine town centre junctions have been assessed in detail (two were combined in one junction assessment) as agreed with the CHA at pre-application stage. Detailed traffic models have been created to assess the impact of the proposals, diverted trips and committed development on the identified junctions during the AM and PM peak hours.

Leapale Road / Bus Station / Woodbridge Road junction:

This junction warrants detailed consideration since it impacts directly on the operation of bus services into and out of the bus station, and is relevant to the need for the CHA's proposed condition 1(f) seeking the introduction of a bus-only right turn lane from Onslow Street into Woodbridge Road.

The CHA December response comments on the operation of the access/egress junction for the bus station as follows:

- it has not been demonstrated that the proposed entrance and exit to the bus station would provide satisfactory levels of operational efficiency and resilience. The failure of which would result in increased passenger delays and reduced customer satisfaction levels;
- for example, if the proposed single point of access suffered congestion due to a concentration of services arriving and departing at the same time, the ability of operators to retain a reliable service in line with published timetables would be compromised;
- in addition to buses being delayed entering and leaving the bus station, queuing buses within the bus station could cause an obstruction to buses wishing to leave stands, or prevent buses arriving at the stands. The increased likelihood of queuing buses will cause unnecessary harm and delays;
- the minor alterations to the bus lane on Woodbridge Road is welcomed, however, whilst this might provide operational benefits, this will not result in improved journey times

RGP advise as follows:

This junction has been modelled with the Onslow Street / Woodbridge Road junction jointly in LinSig. The staging is such that the left turn from the bus station runs in three of the four stages allowing the predominant left turn of buses from the station to regularly exit with over 80 seconds of green time across the 120 second overall cycle. The right turning exiting buses would exit in Stage 3 of the proposed sequence and the results indicate a one vehicle Mean Maximum Queue (MMQ) during the AM and PM peak hour periods. It should be noted that circa 16 buses would turn right out during the peak hour, which is only one every two cycles on average (one every four minutes or so). Therefore, Stage 3 would not need to be called every cycle and as such the junction would operate better, in practice, than the results suggest. An 'all red' pedestrian stage (except left turn out of bus station) is provided in Stage 4 which places pedestrian movement as a priority in its design.

Vehicles travelling southbound on Woodbridge Road, either proceeding along Leapale Road or turning right into the bus station, would experience a mean maximum queue of eight PCUs (passenger car units) in the PM peak hour. This movement, including right turners into the bus station is unopposed by other movements at the junction.

Considering the robustness of the model identified above, and the layout of the adjacent highway, the model confirms that during peak periods there is sufficient queuing space to ensure that it would not cause queuing which would affect Onslow Street. This arm runs unopposed during Stage 2 of the signals which means that the queue can discharge each cycle with the 45 seconds of green time allocated to it within the model during the 120 second overall cycle time.

Overall, the junction operates within its capacity, some queuing is noted on Woodbridge Road and Leapale Road, however the signal staging allows all arms to move unopposed removing any waiting associated with opposing movements. The left turn from the bus station is given over 80 seconds of green signal time from the 120 second cycle time which minimises delays.

The amendment to signal timings and future flows to the Onslow Street southbound arm of the Onslow Street / Woodbridge Road junction do not detrimentally change the queues back to the Onslow Street / York Road roundabout during the peak hours from the observed baseline.

The Motion report addresses the same junction capacity assessment as follows:

'The TA includes junction capacity modelling of the operation of the access junction to the bus station from Woodbridge Road. The junction modelling...indicates that the proposed access junction to the bus station is expected to operate within capacity during the typical weekday morning and evening peak periods and without material queuing or delay. On that basis, no concern is raised with the proposed access arrangements to the bus station with regard capacity and operation of the bus station access'.

Officers therefore advise that both independent transport consultants agree with the Icení modelling findings that the bus station access/egress junction will operate within capacity and without causing problematic queuing into or out of the bus station. Accordingly, Officers do not agree with that aspect of CHA's reason for refusal one.

Officers also stress that the above findings by both RGP's and Motion's reviews of the Icení submission are based on there being no bus-only right turn lane from Onslow Street to Woodbridge Road as sought by SCC. This was not modelled by Icení and yet the network in this vicinity including York Road roundabout is considered by both RGP and Motion to be shown as operating in a satisfactory manner. Accordingly, such a right turn lane cannot be said to be required so as to mitigate any adverse impact of the changes to the bus station access / egress arrangements on network capacity. Therefore the CHA's proposed condition to seek this right turn lane so as to preserve network capacity in light of the bus station access/egress proposals is not considered to satisfy the tests of NPPF paragraph 56 and the CIL Regulations to be, inter alia, necessary and relevant to the development to be permitted. For these reasons, Officers do not recommend the imposition of this condition sought by the CHA.

The other 8 town centre junctions:

The CHA December response only raises concerns over the operation of the bus station, and as noted above, has omitted the previous comment from the 'notes to case officer' relating to concerns over 'a number of other outstanding matters relating to transport modelling...'. Officers consider this to mean that the CHA has no objection to any of the proposed works to these junctions nor any concern in respect of their capacity.

RGP advise as follows:

Generally, the results demonstrate that the impact of the proposals would result in all assessed junctions operating within reasonable capacity limits. The exception is the York Road / Stoke Road traffic signal junction during the AM peak hour. The results, when considering the existing signal timings demonstrate an increase delay of 55 seconds and a practical reserve capacity (PRC) of -15.3%, which means that the junction operates over capacity. It should be noted that the junction operates over capacity during the base scenario also. This junction operates adaptive signal timings which are not modelled through the LinSig programme and as such, when this is considered, the impact is not material.

The Motion report advises:

'The analysis presented within the TA indicates that each of the junctions assessed will operate within capacity with the proposed development in place, and the proposed development will not have a severe impact on the operation of each of the junctions. The assessment of the York Road / Stoke Road junction indicates that...in the 2019 base assessment with committed developments in place, the junction will operate over capacity during the morning peak hour and within capacity during the evening peak hour...The analysis indicates that [with the development in place], through optimisation of signal timings, the junction will operate within theoretical

capacity during both the weekday morning and evening peak hours. In summary, this review has not raised any concerns with the results of the junction capacity modelling presented in the TA'.

Gyratory:

RGP advise that the gyratory in the centre of Guildford is sensitive to changes in traffic, and as a result buses wishing to enter the bus station via North Street at present are often faced with queuing in lane three (right hand side) of Bridge Street in order to turn right, whilst the nearside two lanes are generally more free flowing northwards onto Onslow Street. Thus currently buses arriving from the A31, A3100 and A281 (i.e. from the directions identified as the main concern by SCC) need to weave across two lanes of queuing traffic within a distance of about 150m in the gyratory on Bridge Street to get into the right hand lane so as to be able to turn right. This movement is often heavily congested at peak times which delays the buses, whereas if they were heading to Onslow Street they would have generally clearer lanes. Additionally, the removal of a large number of buses from the congested right turn lane, by the relocation of the bus station entrance to Woodbridge Road, would have a positive effect on the overall operation of the gyratory, which has not been fully considered within the traffic model. The reduced need for weaving in this area by buses would remove the delays caused by buses changing lanes and blocking through traffic behind, which is also not able to be specifically identified in the traffic model.

The CHA has not identified this existing issue which faces bus drivers travelling towards the bus station from the south and west in its consideration and nor is there recognition of the overall benefits to the gyratory of removing buses from this key right turn from Bridge Street manoeuvre.

Onslow Street northbound provides additional road space (two or three lanes) and as such this route operates with increased capacity and more spare capacity during peak time than Bridge Street.

The southbound bus lane on Onslow Street would also be used by fewer buses in the post-development scenario than existing, since buses from the north accessing the bus station would not need to travel along Onslow Street. This would make the bus lane more efficient for those services having just left the bus station travelling towards the south and west, whilst also further reducing the number of buses passing through part of the gyratory, improving its overall operation.

Overall, therefore there would be a significant reduction in the number of buses (>40 buses per peak hour) passing through one of the constraints on the gyratory (i.e. the traffic signals and conflict point between Onslow Street and Bridge Street).

- *Summary of issue 1*

RGP advise that whilst there would be changes in the vehicle movements at various junctions and an increase in vehicle traffic as a result of the development proposals, there is highway capacity to accommodate these changes. Therefore, the residual cumulative traffic impact of the proposals, including redistribution of traffic flows and changes to the junction designs on the local highway network would not be severe, in line with the NPPF paragraph 111. Accordingly, the scheme's impact on the highway network would satisfy NPPF paragraph 110 (d), LPSS policy ID3 (6) and Allocation A5.

Issue 2: pedestrianisation, servicing and parking

Policy context

NPPF Chapter 9 'Promoting Sustainable Transport' expects transport issues to be considered from the earliest stages of development proposals so that:

- opportunities to promote walking, cycling and public transport use are identified and pursued; and
- patterns of movement ...and other transport considerations are integral to the design and contribute to making high quality places.

Paragraph 112 states development should

- give priority to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible – to facilitate access to high quality public transport, with, inter alia, facilities that encourage public transport use;
- address the needs of people with disabilities and reduced mobility...; and
- create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles...

As noted above, the hierarchy clearly places pedestrians first, and that safe, attractive places without conflict between pedestrians and vehicles are expected. This is an important policy context in consideration of the proposed pedestrian enhancements locally.

The LPSS contains the following policies relevant to assessment of the impact of the scheme's bus station and associated Friary Square proposals:

S3(6) requires schemes to demonstrate high quality urban design and contribute wherever possible to (c) an attractive and safe public realm; (d) legible routes that...give priority to pedestrians and cyclists over motor vehicles.

D1(6) requires all new development to ensure...it creates safe and accessible spaces, with particular regard given to maximise opportunities for pedestrian and cycle movement and the creation of a high quality public realm; (9) requires development to be well designed to meet the needs of all users, including in respect to transport infrastructure and public realm.

ID3 – 'Sustainable transport for new developments' covers a number of matters relevant to the configuration of the bus station and its pedestrian and cycling approaches:

- requires new development to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport modes of walking, cycling and the use of public and community transport;
- requires new development, in so far as site size, characteristics and location allow, to maximise (a) high quality, safe and direct walking and cycling routes with priority over vehicular traffic; (c) the improvement of existing cycle and walking routes to local facilities, services, and bus stops, (d) the provision and improvement of public and community transport; (e) opportunities for people with disabilities to access all modes of transport;
- requires new development to have regard to the Sustainable Movement Corridor (SMC) Supplementary Planning Document; [Officer Note: This SPD has not been progressed to consultation]; and
- requires applications to have regard to the Infrastructure Schedule which sets out the key infrastructure requirements on which the delivery of the Plan depends.

The LPDM, now with increased weight as indicated above, includes policy P8 which concerns public realm. This is relevant to the bus station operation and associated Friary Square and it notes:

- high quality new public realm proposals are required to demonstrate that (b) the design responds to the character, location and function of the spaces and surrounding buildings; (d) it creates attractive, safe and where appropriate lively streets with visual interest at pedestrian level; (e) it maximises opportunities for activity and enjoyment, and encourages social interaction and community cohesion; (f) it maximises opportunities to incorporate soft landscaping appropriate to the space available; and
 - expects proposals for public spaces to consider the opportunity to provide (a) flexible multi-use and adaptable community spaces; (b) a mobility hub on its fringes, facilitating access to low carbon and shared modes of transport; (c) public art.
- *Pedestrian improvements:*

The design aspects of the pedestrianisation proposals are addressed under the townscape heading. This section assesses the impacts on connectivity and highways capacity of the pedestrianisation.

The development proposals include the pedestrianisation of existing roads via stopping up and the formation of new pedestrian streets and squares within the scheme, which in combination would create an extensive public realm that is vehicle-free either part of the day, or in other locations, all day. This new area would link to existing pedestrianised streets / passages connecting to the High Street, and also to the closest entrances to the Friary Centre, thereby forming an even larger area with a pedestrian focus.

The new built form layout would create pedestrian-only areas at ground level, with all parking limited to the basement accessed from Leapale Road, and servicing associated with the scheme at its edge, within laybys on Leapale Road. The scheme would create new public squares / spaces at the southern end of the site, adjoining the North Street / Woodbridge Road junction; at its centre, part way along Woodbridge Road at 'The Dial'; at its northern end at the junction of Woodbridge Road and Leapale Road, and also mid-way along the western group of buildings, (blocks D2 and D3) facing the bus station. These would all be linked by the pedestrianised Woodbridge Road and a new pedestrian street aligned east-west.

To address the change in levels in the public realm areas both northwards and westwards, the scheme has been designed to maintain a horizontal plane for the 'upper ground' level, reached step free from North Street and Leapale Road, and to incorporate two internal public lifts, one adjoining the steps down to Woodbridge Road, and one the steps down to the bus station. These will be maintained by the management company of the scheme rather than the Council, which will ensure a permanent arrangement to ensure inclusivity.

Overall, Officers consider the proposals would create a very permeable scheme for pedestrians.

Cyclists would be expected to dismount within the development, encouraged by ground level entrances to the internal cycle stores for residents from Friary Square / bus station pavement and on Leapale Road, and with visitor cycle racks around the edges of the scheme and elsewhere to be agreed by condition. This would avoid conflicts with pedestrians on the streets and squares.

The application also enables and funds the pedestrianisation of North Street between Phoenix Court and Leapale Road resulting in the closure of the western part of North Street to through traffic and the implementation of a fully pedestrianised area between restricted hours, except for those vehicles allowed to access Commercial Road. The southern section of Commercial Road would also form part of the pedestrianised area (at all times, other than for emergency vehicles,

refuse freighters at specified times and buses in an emergency) and would therefore tie into the closure of the access to the bus station from the south (i.e. North Street). The pedestrian improvements of these current public highways would create a well-designed, safe place for pedestrians to enjoy without the risk of conflict with other vehicles, and linking directly to pedestrian streets / passages to the south and the scheme to the north / east.

Achieving sustainable development is based on the three identified objectives at paragraph 8 of the NPPF, namely economic, social and environmental objectives. The social objective identifies the need to ensure that well-designed, beautiful and safe places are provided with accessible services and open spaces to support communities' health, social and cultural well-being and thus promote inclusive social interaction.

The creation of Friary Square in place of Commercial Road, as a pedestrianised landscaped public open space, (only used by emergency vehicles, buses in an emergency and the refuse freighter noted above), with planting and hard landscaping to form an area for sitting, informal children's play and space for entertainers or speakers, therefore meets this key objective for achieving sustainable development, which would not be achieved in this part of the application site by retaining general bus access and additional layover stands and bus stops along Commercial Road, as sought by the CHA. Indeed, Officers believe that in its response to the application justifying its view that the bus station should be served by a southern bus access and extra stops, the CHA understates the conflict that would thereby be created with the extent, appearance and function of this area as a new public open space. Overall, Officers consider that provision of this new open space is important given the necessarily limited extent of open space within the scheme itself, and that it accords with the NPPF and LPSS policies noted above.

The CHA has confirmed that subject to detailed design the pedestrianisation proposals are appropriate. The CHA notes that the pedestrianisation scheme will be subject to detailed design post-planning (Section 278) and this will need to include closure points, method of vehicle control and enforcement, use of materials, street furniture, signage and provision for two-way cycle usage and the eventual design will need to facilitate this, along with way marking signage.

At the request of the CHA the proposals would allow for emergency access and the refuse vehicle serving the refuse store at lower ground floor under Block D1, on a weekly basis only, (outside of restricted hours), through the pedestrianised space, Friary Square, which would also allow access to the bus station if other sections of the local highway network are obstructed in the event of an emergency. The design of Friary Square allows for such access from North Street to the reconfigured bus station via the hard landscape works, without any impact on the soft landscaping. Officers consider that such limited use by vehicles would not result in conflict with the use of the space by pedestrians.

The proposed pedestrianisation of this western section of North Street, between Phoenix Court and Leapale Road, and the southern section of Commercial Road eliminates the existing 'severance' for pedestrians caused by both roads between the Friary Centre and the pedestrianised High Street, via Phoenix Court, White Lion Walk and other passages linking North Street to High Street. This would create a single pedestrianised area linking most of the shops and attractions within the town centre without any conflict between pedestrians and vehicles.

Currently, both southern accesses to the Friary Centre are adjacent to a section of highway used by buses leading into the bus station with the eastern access for the Friary Centre following the bend in alignment that buses take from North Street into the bus station. There are numerous associated risks to pedestrians, many of which include family groups with young children, and all pedestrians need to cross the carriageway in order to travel to other areas of the town centre.

Pedestrian access to the existing bus station from the south is restricted by a narrow footway adjacent to a set down stop only. The proposals would provide a horseshoe arrangement around the southern part of the bus station which would ensure that pedestrians do not need to cross any carriageway when travelling between North Street or the new development and any of the bus stop locations.

Currently mobility impaired individuals travelling between the Friary Centre and High Street are restricted to two locations where they are able to cross the North Street carriageway, giving way to buses at both locations. These locations are not necessarily on the desire line at present. The proposals would therefore eliminate these crossing points and ensure that all desire lines are accessible for mobility impaired pedestrians travelling between High Street and the Friary Centre, which would improve conditions of safety for these road users.

The proposals for pedestrianisation of North Street also offers the opportunity to improve conditions for pedestrians visiting the North Street market which takes place on Friday and Saturdays.

The pedestrianisation works proposed have been incorporated into the highway network modelling that as noted above the CHA has accepted demonstrates a satisfactory impact on the town centre highway network. The CHA has also confirmed in its third response on the application, that it is satisfied that these roads may be stopped up since they are surplus to its needs. Thus, Officers consider, overall, that the proposals to pedestrianise North Street and Commercial Road satisfy Local Plan Policies D1, S3 and ID3 as well as D8 of the LPDMP.

- *Parking:*

The proposal includes a total of 136 parking bays, split between ten disabled parking spaces, with a further ten enlarged bays and 116 standard parking bays. Overall the parking ratio of 0.29 spaces per dwelling is within the maximum standards outlined in Guildford's Parking Standards SPD. Given the town centre location and high level of public transport access, the site is ideally located to encourage walking, cycling and public transport use.

Additionally the CHA has requested and the applicant has agreed to fund an additional three-car extension to car club facilities in the town centre, which reduces the likelihood of residents of the scheme needing to own a car themselves. There are suitable parking spaces that can be converted by the Council to car club spaces nearby on Leapale Lane, easily accessible via the improved pedestrian phase of the signals at the junction to Leapale Road, which would ensure that the additional vehicles are also available to the public. The details of the financial contribution to ensure this is delivered are set out in the s.106 section of the report.

Therefore, there is the strong potential to deliver a development with low car ownership and low traffic generation. The car park access requires a pedestrian inter-visibility splay of 2m x 2m on either side, as set out in condition 7 of the CHA response. This can be provided, and is covered by the proposed conditions.

Policy ID11 of the LPDM sets out the Council's expected parking standards for development within Guildford town centre. While policy ID11 is the subject of a main modification, the changes proposed by the Inspector would not alter the parking provision that is to be provided. The policy states that for non-strategic sites the provision of car parking in new residential development in Guildford town centre or suburban areas, for use by residents themselves, will not exceed the maximum standards set out in the Parking Standards for New Development SPD. The SPDs maximum standards in this location are one space for both one and two bedroom units and 1.5 spaces per three bedroom units. Based on the proposed mix, the maximum parking standard for the site would be 500.5 spaces.

The spaces proposed would be located in the basement area of the development which would be accessed from the northern end of Leapale Road. The proposal would be well below the maximum standards. All of the proposed parking spaces would be for the use of the residential dwellings. No parking is proposed for the commercial uses within the development. The location of the scheme provides a significant opportunity for sustainable travel and there are a number of existing public car parks locally which can be utilised should car travel be required for visitors, for example.

Policy ID11 also notes that the provision of car and motorised vehicle parking at lower than the defined maximum standards must be justified by a coherent package of sustainable transport measures which will be proportionate to the level of reduction sought. It is noted that this site is in a highly sustainable location, adjacent to the bus station and a short walk to the railway station and town centre. The development itself would provide improved pedestrian routes through the site, which in turn improves permeability in the town centre. The new public realm will also help to encourage a greater number of trips on foot. Further to this, the proposal includes the refurbishment of the bus station, generous cycle parking is provided and a car club is being secured by s.106 contribution. As such, the parking provision being provided, which is significantly less than the maximum standards is justified by a comprehensive package of sustainable transport measures.

Wheelchair accessible parking spaces will be provided for 2.1% of dwellings, which equates to ten spaces, with a further ten spaces available should demand require, resulting in an overall maximum provision of Wheelchair accessible parking spaces for 4.2% of dwellings.

It is noted that all of the 136 spaces would have charging facilities in line with the County Council's 'Vehicle, Cycle and Electric Vehicle Parking Guidance for New Development'.

No objections have been raised to the on-site parking provision by the CHA, subject to conditions which are accepted by the applicant and considered by Officers to satisfy the necessary tests.

In terms of cycle provision the SPD requirement is for one space per residential unit, which would generate a requirement for 473 spaces. The proposal would provide 529 residential spaces which would be located within cycle stores at basement level. The store would contain a mix of Sheffield stands and two-tier stacking systems. Five percent of the cycle parking spaces will be able to accommodate larger cycles. Active power sockets will be provided within cycle stores located at intervals to allow users to access cycle charging from long-stay cycle parking spaces. However, it is considered that most cycle charging will be via removable batteries which are charged within individual apartments.

For the retail and commercial units, the SPD requirement is for 41 long-stay spaces and 46 short stay spaces. Long stay (employee) cycle parking will also be required, and the applicant notes that the provision of 30 spaces would be a reasonable figure when considering the different levels of cycle parking with regards to a mix of class uses for the commercial space. This would equate to 117 spaces, but the CHA has indicated that it would be satisfied by 109 spaces, which the applicants have agreed to provide. The Short Stay cycle parking is proposed at the accesses to the upper ground level and at the Dial node. It is proposed to provide these spaces in the form of Sheffield stands and one larger cycle parking space will be provided at each location to allow for cycle deliveries to/from the development. The CHA raise no objection to the cycle provision subject to a condition to provide, inter alia the following:

- the secure parking of a minimum of 529 bicycles within the residential development site,
- the secure parking of a minimum of 473 e-bike charging points within the residential development site,
- the secure parking of a minimum of 109 bicycles for non-residential land uses within the development site in locations to be agreed with the County Highway Authority,
- 20% of available cycle parking provided in communal cycle storage shall be provided with e-bike charging points,
- 5% of available cycle parking provided in communal cycle storage shall be provided as disabled spaces,
- space to be provided for the parking of adaptive cycles in communal cycle storage.

The applicant accepts the above requirements and Officers consider the above condition to be appropriate.

- *Servicing:*

The servicing strategy is outlined in Section 8 of TA and includes two new lay-bys on Leapale Road (33m in total) and four loading bays on North Street (65m in total) which would have time restricted access. Access is also proposed to a single loading bay within the pedestrianised area of Commercial Road which would also have time restricted access, serving the refuse store at lower ground level of block D1, as noted above.

The applicant has considered the future servicing strategy in the context of the existing servicing of commercial units on North Street in particular. The assessment of existing servicing activity indicated a peak period of servicing on North Street at 0600hrs indicating that the precedent is that servicing activity takes place before the local highway network becomes busy with pedestrians and other road users, therefore the timed pedestrianisation (similar to High Street) is unlikely to affect the existing servicing operations, whilst the additional provision on North Street and Commercial Road described below would provide greater availability during the non-restricted times for the proposed commercial and residential units.

The two Leapale Road servicing bays are proposed to accommodate the residential servicing aspect of the proposals, and would be likely to be served mainly by small transit van deliveries. The two loading bays are proposed as 24m and 19m in length, thus providing room for approximately six transit vans to be parked at any one time in these bays (with 0.5m gap between), or three rigid vehicles plus one transit van (four vehicles in total). The applicant states that the Leapale Road laybys could accommodate circa 18-30 deliveries per hour which is accepted and allows for occurrences of poor parking or slightly longer durations of stay over the ten minute average dwell time stated in the TA. Based on the 47 deliveries per day forecast in the TA it is evident that the residential servicing and delivery requirements can be adequately accommodated within the proposed Leapale Road servicing bays.

The proposals also include an additional 65m of servicing bays on North Street which is a significant increase from the existing provision. The provision of these dedicated bays will enable future and existing retailers to make use of these bays during the periods permitted under the time restrictions. These time restrictions are yet to be confirmed but are likely to operate in a similar manner to High Street. A Delivery and Servicing Management Plan (DSMP) is required as a condition to the application.

It has been demonstrated that the existing and future servicing needs in the local area can be accommodated by the proposed loading bays. The CHA is satisfied that adequate provision has been made to serve both the existing and proposed servicing and delivery needs of the area.

Following the Road Safety Audit it is noted that a change has been made which would allow a refuse vehicle only to travel between North Street and the bus station, via the pedestrianised section of Commercial Road, outside of the restricted pedestrianised times. This avoids the need for the refuse freighter to turn around within Friary Square, and given the limited frequency of its presence, which would be outside busy shopping times, Officers do not consider that this would have a detrimental impact on the atmosphere or functionality of Friary Square.

Accordingly, Officers consider that all vehicular and cycle parking arrangements are acceptable in terms of encouraging modal shift from private cars, and enhancing the pedestrian and cycling environment in the town centre, and that the servicing arrangements, are acceptable in terms on impact on network capacity. This accords with the NPPF Chapter 9 policies and LPSS policies S3(6), D1(6) and (9), ID3 (1) and (2) and LPDMP policy P8 (2) and (3).

Issue 3: Bus station operation

Policy context

NPPF Chapter 9 'Promoting Sustainable Transport' expects transport issues to be considered from the earliest stages of development and its provisions relevant to Issue 3 have been set out under Issue 1.

Officers reiterate that the NPPF hierarchy clearly places pedestrians first, and that safe, attractive places without conflict between pedestrians and vehicles are expected. This is an important policy context in consideration of the CHA's objections.

The LPSS policies relevant to assessment of the impact of the scheme's bus station and associated Friary Square proposals have also been set out above, in respect of S3(6), D1(6) and (9), and ID3 (1) and (2).

LPSS Policy A5 is the allocation for 'North Street redevelopment'. Among its requirements is the heading 'Bus interchange', which states:

- bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site.
- if alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment.

For 'Transport' the following is relevant from policy A5: (11) requires mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand and changes to the town centre network for private traffic, deliveries and buses.

The LPDMP includes the following policy relevant to the bus station operation and associated Friary Square.

Policy D8 which relates to public realm states:

- high quality new public realm proposals are required to demonstrate that (b) the design responds to the character, location and function of the spaces and surrounding buildings; (d) it creates attractive, safe and where appropriate lively streets with visual interest at pedestrian level; (e) it maximises opportunities for activity and enjoyment, and encourages social interaction and community cohesion; (f) it maximises opportunities to incorporate soft landscaping appropriate to the space available; and

- expects proposals for public spaces to consider the opportunity to provide (a) flexible multi-use and adaptable community spaces; (b) a mobility hub on its fringes, facilitating access to low carbon and shared modes of transport; (c) public art.

Other documents which are material considerations are:

SCC Bus Service Improvement Plan (BSIP) (October 2021)

The SCC BSIP has been designed to improve bus services in Surrey and been drawn up to deliver on the government's 'Bus Back Better' policy. Two specific targets have been identified for the Guildford area as follows:

- increase in passenger numbers of 7% by 2024/25 compared to 2018/19 levels;
- increase of 5% on average speeds compared to the 2019/20 figures.

SCC Local Transport Plan 2022-2032

- *Existing bus station operation*

The existing bus station currently operates with inbound vehicles accessing the bus stands via North Street and Commercial Road from the south and egressing vehicles exiting via a set of traffic signals onto Woodbridge Road towards the north. The majority of the bus stands are located within the bus station area accessed west of Commercial Road with additional bus stands positioned on the western side of Commercial Road itself on an 'island'.

The bus station has 22 stands plus layover spaces currently. To facilitate access to the Commercial Road stands island (bus stands 17-22) from the south, pedestrians must either cross the bus station access road (from the west) or cross Commercial Road to the east. The crossing point to the west from the Friary Centre side of the bus station requires pedestrians to cross via a substandard zebra crossing which has no tactile paving on the island side, no belisha beacons or associated zig zag lines on the approaches. Pedestrians could also choose to cross to the island from the eastern side of Commercial Road, however no tactile paving exists on either side of the island reducing the accessibility of these stands for bus passengers with vision impairments.

To the north of the bus station, pedestrians wishing to cross to and from the Commercial Road bus stands island must do so across the bus station egress via an uncontrolled crossing. The uncontrolled crossing is characterised by dropped kerbs, tactile paving and a line of markers across the egress.

Pedestrians arriving at the bus station from the north from Leapale Road wishing to use the Commercial Road bus stands are currently directed to cross using three crossings (Commercial Road - uncontrolled, Commercial Road bus egress - controlled at signals and the bus station egress itself - uncontrolled). This is a convoluted arrangement and is a poor existing arrangement. Overall, access to and from these central stands, on Commercial Road is currently sub-standard.

The operation of the proposed Bus Station

The accessibility of the bus station as a whole should be considered when discussing accessibility, this includes (but not limited to) the following aspects:

- access for pedestrians into the bus station from all directions;
- access for a range of users to access the bus station, bus stands and buses;
- legibility of the bus station for users;
- safety of the bus station for all users;

- location of furniture such as seating and ticket machines;
- real time information provision (convenience and legibility);
- gradients of concourses, footways and bus boarding areas;
- lighting design; and
- ease of transfer to other modes such as walking and cycling.

This section assesses the operational impacts of a replacement bus station. The following matters are assessed in other sections of this report:

- the architectural design of the new canopy is addressed under scheme design and townscape;
- the highway implications of the scheme itself on the highway network in terms of capacity and safety, are addressed under Highway Network; and
- the pedestrianisation proposals for North Street and the delivery and servicing arrangements for the scheme and existing businesses on North Street and Leapale Road are addressed under the pedestrianisation, servicing and parking section.

The application proposes the complete rebuilding and re-organisation of Guildford bus station via the following measures:

Physical structures:

- removal and replacement of the existing canopy attached to the Friary Centre eastern external wall;
- erection of secondary and tertiary sections of canopy to provide an additional waiting area with potential for elements of a mobility hub to be provided under cover;
- removal of the existing bus shelter and stops on the 'island' west side of Commercial Road; and
- two new freestanding bus stop shelters on the east side of the bus station adjoining the lower ground floor of blocks D3-D4.

Layout of the bus station:

- reconfiguration of the bus station to form 15 angled bus bays along the western boundary with the Friary Centre, in the same location as existing bus bays; these are all drive-in / reverse-out bays, (DIRO) which locate the bus door adjoining the covered canopy area, except for one parallel bus bay at the southern end;
- two new parallel bus stops on the eastern side served by new freestanding shelters;
- removal of the current bus waiting island on the west side of Commercial Road with its replacement by a narrow carriageway divider, with no requirement for pedestrian access, separating in-coming buses from the bus bays, with space for four layover bus bays on the west side of the divider;
- cessation of the current routing arrangement of only a southern entrance to the bus station and to serve the island bus stops via Commercial Road with all buses exiting only northwards;
- formation of an entrance and exit for buses solely from the north via a reconfigured traffic controlled Leapale Road / Woodbridge Road junction with access from the north and east via Woodbridge Road and Leapale Road respectively via traffic signal control, and egress to both the left and right also via traffic signal control;
- a U turn area at the southern end of the bus station, adjoining the closed Commercial Road; and
- access over a pedestrianised section of North Street and Commercial Road (see below) limited to emergency vehicles and for GBC or commercial refuse freighters serving the western side of the development once per week, and for emergency bus access.

Associated landscape works:

- creation of Friary Square in place of Commercial Road, as a pedestrianised landscaped public open space, (only used by emergency vehicles, buses in an emergency and the refuse freighter noted above), with planting and hard landscaping to form an area for sitting, informal children's play and space for entertainers or speakers;
- low level green planting along the divider within the bus station to break up the hard surfacing;
- areas of planting along the western edge of the scheme at lower ground floor level, to soften the appearance of the building where bicycle and refuse stores are located; and
- resurfacing of the bus station in tarmac.

As noted in the section covering consultation responses, the County Highway Authority recommends that the application be refused on three grounds set out in full above, but which are summarised as follows:

- the proposed development would lead to an increase in bus journey times, resulting in increased passenger delays, reduced customer satisfaction, in addition to unsatisfactory levels of operational efficiency and resilience, thus limiting efficient and effective bus operations supporting sustainable development and passenger growth, contrary to SCC targets;
- the proposed development would reduce the number of bus stands and layover spaces, in respect of which it is not satisfactorily demonstrated that planned future growth can be accommodated contrary to SCC targets; and
- it has not been demonstrated that the bus station would be accessible for all uses which is prejudicial to vulnerable users and lead to reduced customer satisfaction levels; this will limit efficient and effective bus operations contrary to SCC targets.

In respect of reasons one and two, SCC advise that the objection could be overcome in part by 'reinstating' the southern access point on Commercial Road, in addition to introducing the new northern access, so that there are always two points of access, and increasing the number of stands and stops [in the Commercial Road entrance area].

On the basis of these requested reasons for refusal and suggested measures to address them, Officers consider that assessment of the acceptability of the operation of the proposed bus station, (setting aside its architectural treatment) needs to cover the following issues:

- northern access and egress
- Commercial Road – southern access
- bus station capacity
- bus accessibility
- *Northern access and egress:*

The proposals would provide access and egress to the north, however these would be separate points, with no conflict between opposing buses and improved geometry to ensure that the bus lanes, particularly on egress, operate well without obstruction.

The junction modelling within the TA has demonstrated that the proposed new junction at the northern end of the bus station would operate within capacity with no resultant queues having an impact on other sections of the local highway network during peak periods. The junction allows for safe and controlled crossings of pedestrians and improved geometry to ensure that buses are not impeded by other vehicles waiting on the highway. The capacity of this junction as proposed is not the subject of objection by the CHA, but rather the operation of the exit from the bus

station, which both RGP and Motion have found to be acceptable, as noted above under Highway Capacity.

The increased journey time for buses, particularly those arriving at the bus station from the south and west has been identified by the CHA as a concern. The impact on buses, specifically bus journey times has been considered within the Transport Assessment based upon data provided to the applicant from the town centre traffic model. Some services would experience a benefit when compared to the 2019 base with committed development scenario whilst others would experience a delay during peak hours.

The following average bus journey delays would be observed across all services during peak hours only:

- AM Peak Hour – Average increase in journey time of 21 seconds;
- PM Peak Hour – Average reduction in journey time of 3 seconds; and
- Peak Average – Average increase in journey time of 9 seconds.

The CHA has not identified any errors in the model work undertaken and consider that the above results from the model are an accurate assessment of the impact of the proposals.

The more detailed model results demonstrate that the largest average peak benefit to buses is 179 seconds (three minutes reduced journey time), whilst the largest average peak increase delay is 100 seconds. Ten bus routes out of a total of 54 routes assessed have an increased average peak delay in excess of 60 seconds (one minute).

Most services identified as likely to experience delay are those which are diverted from the south and west of Guildford. The diversion of these services would result, as described above, in the removal of bus activity from the right turn from Bridge Street into Onslow Street on the gyratory, which is a movement often heavily congested at peak times and as such the removal of traffic, including a large number of buses, would have a positive effect on the overall operation of the gyratory. RGP advise that when considering whether the increase in bus journey times would lead to reduced customer satisfaction one needs to consider whether an overall average delay of nine seconds is perceptible in the context of bus travel. Whilst there would be some services which may experience increased delay, many others would experience a benefit in journey times which could make bus use from these directions more attractive, especially in the context of a better laid out, accessible and attractive bus station.

Furthermore, as explained above, the CHA has negotiated with the applicant the provision of a payment of £1.5m towards works to strategic road junctions leading towards the town centre, for the purpose of reducing delays to bus services. The types of measures are listed above, and the junctions are set out in the s.106 section. Whilst not modelled, Officers consider that these measures would be related to the impact of the proposals, and thus would be compliant with CIL Regulation 122. Clearly they are intended to mitigate the small increase in average delay noted above, even though the CHA has not removed the first reason for refusal. Officers consider that the modelled impact of the north in / north out arrangement is itself demonstrated to be acceptable, based on assessment by both RGP and Motion, and thus the additional mitigation to be achieved by the £1.5m contribution further reduces the adverse impact of the proposed change to access and egress. Commercial Road – southern access:

It is not clear from the CHA's response why the proposed northern access and egress arrangements would be more likely to be obstructed than the existing arrangement. Currently, there is only one access point and one egress point for the bus station. Access to the bus station from the south (Commercial Road) is reliant upon the operation of the gyratory, specifically the Bridge Street / Onslow Street junction which is known to be sensitive at peak times.

It is noted that the CHA confirms that the emergency access route from the south via North Street / Commercial Road 'would alleviate some of our concerns in the event of an emergency if access became blocked'.

Officers consider that emergency access across the public realm area to be known as Friary Square from North Street, would allow access to the bus station, to the western part of the development and the eastern part of the Friary Centre in an emergency. This would build resilience into the design of the scheme in such emergency situations and is not considered to have any impact on the nature and enjoyment of the pedestrianised area at Friary Square and North Street. An emergency vehicle access through this route would be obvious to any pedestrians and would be an extremely rare occurrence.

The CHA's request to allow full access for buses from the south would necessitate changes to the public realm areas sufficient to accommodate the movement of buses. Despite the fact that the CHA claim in their December response that 'we recognise that a southern access point could be seen to compromise the available space for public realm improvements in the southern end of Commercial Road, However with further analysis we believe that such a provision would not dilute the value of the new public realm to any significance'. The CHA adds that 'the CHA believe that it would be possible to retain an access point from the south, incorporate additional bus stands / stops, which at the same time retaining much of the currently proposed public realm and landscaping'. They make these comments without having requested from the applicant any plan to demonstrate the area that would be needed for a permanent bus route and additional stands / stops. Additionally, Officers disagree with the CHA's assertion, and also note that space would be required to allow buses to pass refuse freighters servicing the development within this area, which would necessarily widen the required carriageway space even more, thereby further reducing the public realm space. The passage of buses through this space at all times would also materially affect the nature of the space removing the ability to create a safe, attractive and lively public realm area which prioritises pedestrians, cyclists and those with mobility impairment, in direct conflict with policy 112 of the NPPF and policies S3, D1 and ID3 of the LPSS.

The reinstatement of access for buses from North Street, via Commercial Road would therefore materially affect the potential for the creation of Friary Square and the pedestrianised areas in North Street as an effective public realm space, and would fail to remove the current severance of the Friary Centre from the larger pedestrianised area of the town centre, thereby eliminating the benefits that this scheme would bring to connectivity within the town centre and safety for pedestrians and all other road users.

- *Bus station capacity:*

RGP has advised as follows:

The TA has assessed three peak hour scenarios for bus departures in the future as outlined at paragraph 7.55 of the TA which includes the following:

- Scenario 1 - July 2022 timetables (51 buses)
- Scenario 2 - July 2022 timetable with Feb 2020 Park & Ride services (65 buses)
- Scenario 3 - February 2020 timetable (without Arriva services A/B/C) (72 buses)

These scenarios assess the current bus timetables with two future scenarios used as sensitivity tests to assess the future capacity of the bus station based on an incremental increase in services by adding the Park and Ride services back in (which are currently largely suspended) and running the full pre-covid February 2020 timetable.

These scenarios assume a 27% and 40% uplift in services from the current (July 2022) timetables. Whilst the Covid-19 pandemic has undoubtedly had a significant impact on public transport services, the level of bus services offered in Guildford as shown in the TA in paragraph 7.21 was declining from Autumn 2019. The popularity of public transport has further been hampered by hybrid working for many employees as we emerge from the pandemic, therefore reducing the need to travel to work for the full five day working week and impacting the use of many services including the Park and Ride services.

Table 7.1 of the TA shows the current use of the 22 bus stands indicating that four stands have one departure per hour and stand 11 has no departures scheduled. Currently stands 16 and 19 are shared, with stand 15 shared as an arrivals only stand. Two bus stands (10 and 11) in the current timetable are scheduled as having five departures an hour, however it is noted that stand 11 (routes 4 and 5) used to have six departures.

The TA references an ARUP report which identifies the capacity of 'Drive In Reverse Out' (DIRO) bays as six departures per hour and eight-12 departures per hour for 'Drive In Drive Out' (DIDO) bays. The assumption of six departures per hour per DIRO bay equates to a maximum level of one departure every ten minutes, whereas a DIDO can in theory have a maximum departure frequency of every five minutes (i.e. 12 departures per hour).

Whilst an increase in bus services would put more pressure on the reduced number of stands, the TA indicates that the proposed bus station could have a theoretical capacity of up to 92 departures an hour (allowing for a slight reduction in capacity for timetabling not matching exactly) assuming 14 DIRO stands and one DIDO departure stand.

Table 7.4 of the TA distributes Scenario 1 (current July 2022 timetable) across the proposed 16 stands (assuming stand 15 as an arrivals stand only). This scenario represents one bus departing the bus station on average every one minute ten seconds and represents the bus station operating at 55% capacity.

Table 7.11 of the TA distributes Scenario 2 (July 2022 timetable with Park and Ride services) across the proposed 16 bus stands resulting in 65 bus departures an hour. The departures equate to one bus departure from the bus station every 55 seconds and represents the bus station working at 71% of theoretical capacity.

Table 7.12 of the TA incorporates Scenario 3 (February 2020 pre-covid timetable) with 72 buses per hour which shows that six of the 15 departure stands would reach theoretical capacity with three of these shared between more than one operator meaning the bus station could be operating at 78% of its theoretical capacity.

The subject of the bus station capacity should be considered in the wider context of journey time reliability and network congestion as these have a direct impact on the possibility of the bus station's ability to operate closer to theoretical capacity.

Whilst in the Scenario 3 forecast the bus station would operate at 78% capacity the potential for the bus station to operate above 80% and maybe closer to 90% will in a large part depend on the surrounding network and the implementation of bus priority measures to support the bus station to operate efficiently and effectively in its new format.

- *Future capacity considerations:*

The GBC policy A5 site allocation wording indicates that not all the bus services need to be accommodated in the bus station. The Icen TA presents opportunities for growth outside the bus interchange including options for future consideration including the reallocation of the Bedford Wharf car park as a second set of bus stands and relocation of Park and Ride stops elsewhere within the town.

Park and Ride services are the services that have the most opportunity for flexibility in the future and there is the potential to adopt a strategy whereby Park and Ride services do not terminate at the bus station, which is adopted in many towns and cities across the UK, with the layover opportunities for drivers instead accommodated at the Park and Ride sites themselves, rather than the bus station.

Whilst having all services terminate at the bus station may be considered the most convenient, particularly with an improved public realm offering from the new development, if bus services were to grow significantly and stands were approaching capacity potentially causing timetable issues, the relocation of the Park and Ride services from the bus station could be considered to accommodate future growth.

Such an alternative arrangement could also be considered for bus services to the University and other destinations, such as large site allocations including those listed by the CHA in reason for refusal 2, where it is identified that interchange with other bus routes (i.e. at the bus station) was not necessary.

The SCC BSIP identifies two specific targets for increased bus patronage and improved average speed. It is not identified from the information provided by CHA whether the targeted increase in bus patronage corresponds with a requirement to increase the number and range of bus services accessing the bus station.

Different transport modes appeal to different demographics and are appropriate for different locations. Buses tend to operate well within urban areas where there is a critical mass of population wishing to make the journey in question. There is no suggestion from the CHA's response that currently existing buses are full and that there is insufficient capacity on the existing buses to accommodate a 7% increase in patronage. If sufficient capacity exists on existing services then the target of the BSIP would be unaffected by the capacity of the bus station itself. The target could be met by effective marketing to a targeted audience and appropriate pricing structure within the urban environment of the borough rather than a less targeted approach.

For rural communities it is known that bus use is generally less given the low numbers of potential patrons and as such different travel options should be targeted. In rural parts of the borough it is important to consider other demand responsive type services and opportunities which would be far more cost-effective, provide a more reliable service and would not need to be reliant on the bus station in the town centre.

- *Bus accessibility:*

The new bus interchange improves inclusive accessibility beyond what is currently provided at the bus station whilst working with the existing constraints that the site offers. A new canopy has been proposed which will reduce structural elements within the bus station itself and increase passenger space for alighting and boarding buses. Every bus stand has been shown to be accessible for wheelchair/mobility scooter users in a more inclusive way than is currently provided with a 1500mm turning circle available on each boarding platform.

An access management strategy is proposed in conjunction with the infrastructure changes shown on the submitted plans which will be developed with bus operators at the bus station and will be secured by condition to the application.

The detailed design of bus stops will be the subject of a planning condition, however the information provided at planning stage is sufficient to conclude that the accessibility of the bus station is appropriate to serve a range of users providing a significant improvement on the facilities at present.

Pedestrian routes are provided to all of the bus stops from the pedestrianised Friary Square in the south, from the internal pedestrian streets in the scheme, (including via a public lift), and public footways from Leapale Road around each side of the bus station apron (manoeuvring area for the buses) removing conflict between pedestrians and buses by eliminating the need for pedestrians or the disabled to cross the carriageway within the bus station area to access bus stops. The removal of all existing uncontrolled crossings and substandard crossings within the bus station will significantly improve pedestrian safety as well as the accessibility and legibility of bus stops.

Restraints to prevent pedestrians walking into the bus manoeuvring area will be dealt with at detailed design stage post-planning and a condition is suggested to ensure that the designs take into account people with visual impairment, cane users and wheelchair users or people with mobility impairments by ensuring sufficient height, upstands and visual contrast in provided within the detailed design

Although the CHA objects to the proposed accessibility arrangements as set out in reason for refusal three, it nevertheless seeks the following condition:

No part of the reconfigured bus station shall be brought into use unless and until the developer has funded and installed the following in accordance with a scheme to be first submitted to and approved in writing by the Local Planning Authority:

- the provision of raised kerbing (to a height of 140mm) to ensure level access onto / off buses for those with mobility issues,
- the provision of:
 - new high quality bus shelters serving 14,15 and 16,
 - real Time Passenger Information for every bus stop,
 - high quality arrival/departure boards that have a Content Management System installed

All to be provided in accordance with SCC's approved suppliers.

- details of a Bus Station Operational, Maintenance and Management Plan
- the provision of an improved bus station incorporating seating, lighting, wayfinding information and ancillary infrastructure.

The applicant has confirmed that the above condition is supported. Officers consider that the above condition satisfies the tests, being achievable relevant, and therefore they question why the CHA still includes reason for refusal three in light of the fact that this condition would be imposed on the planning permission. On the basis of the measures proposed, and the condition proposed which addresses accessibility further, Officers consider that the scheme satisfies the NPPF and LPSS and LPDM policies listed under Issue 3.

- *Conclusion:*

The SCC Bus Service Improvement Plan (BSIP) identifies nine different objectives as follows:

- faster, more reliable journeys
- bus lanes and other priority measures on roads with frequent services
- improved services in the evening and at weekends
- multi-journey, multi-operator ticket schemes
- contactless payment across all of Surrey
- better information, including journey planning websites, apps, roadside and printed information
- increased promotion of the bus network to non-users
- more real time passenger information
- the introduction of ultra-low and zero emission buses.

Most of these objectives are unaffected by the development proposals, with only the first objective 'Faster, more reliable journeys' potentially being affected as identified by the CHA. However, faster and more reliable journeys is also dependent on the implementation of bus lanes and other bus priority arrangements across the town and as such, with the agreed contribution of £1.5m for works to reduce bus service delays, it is within the CHA's gift to further reallocate road space and junction hierarchies to buses to achieve this objective.

It is noted within the BSIP that the Engagement Survey results identified that 98% of consultees identified 'the bus arrives at my stop on time and gets me to my destination when it is supposed to' as important or very important.

There are many different aspects which affect the choice of whether taking the bus is the most appropriate form of transport for a journey, such as: journey times, image, reliability, cleanliness, cost, ease of use, attractiveness of route, waiting facilities, information (real time) and frequency.

The CHA has identified concern with the journey times and reliability of bus services using the bus station as a consequence of the redevelopment of the bus station, however many other aspects would either be improved or would experience no change as a result of the development, particularly with the £1.5m contribution.

It is not considered that an average peak hour delay of nine seconds would be perceptible to the public whereas the improvements to the bus station facilities and the public realm surrounding this part of the town centre would likely result in an overall betterment to the bus station environment and a considerable enhancement of the perception of bus use amongst prospective patrons.

The retention of the southern access to the bus station suggested by the CHA would have a detrimental impact on the proposed character and operation of North Street and Friary Square which would negatively affect pedestrian safety, perpetuate rather than remove severance in the town centre, impact mobility impaired visitors to the town centre and detrimentally affect the ability to provide a flexible multi-use and adaptable community public realm space.

The proposed bus station would allow sufficient capacity for some growth in bus use in the future to at least match previous use pre-pandemic. It is also possible that additional provision or a different routing strategy not including a stop at the bus station could be afforded to buses in the town centre should future demand for buses require such provision.

The proposed bus station provides improvements to the existing arrangements for those with mobility impairments and the detailed design will be the subject of a planning condition.

The three reasons for refusal suggested by the CHA are therefore not considered to be supportable and overall the proposals align well with the objectives of the BSIP, and policies within the LPSS and LPDM.

Issue 4: Impact of construction traffic

Concerns relating to the impact of construction traffic were considered by the CHA and no objections have been noted. They note that a Construction Transport Management Plan (CTMP) will be required as part of any planning permission granted. The CTMP will need to detail all points in the above condition, for each phase of the development, and the Highway Authority will be consulted on this before any such condition can be discharged. The Condition as proposed by the CHA would cover the following:

A Construction Transport Management Plan, to include details of:

- parking for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- programme of works (including measures for traffic management)
- provision of boundary hoarding behind any visibility zones
- HGV deliveries and hours of operation
- construction vehicle routing
- measures to prevent the deposit of materials on the highway
- before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
- on-site turning for construction vehicles
- demonstrate how the existing public car parks on the site can safely operate during construction works (if appropriate)

The County Highway Authority will thereby be able to ensure that a detailed and comprehensive CTMP is provided to minimise disruption to Guildford town centre. Given the scale of the development and its location, it is inevitable that the proposal will lead to some level of traffic disruption and inconvenience in the area. However, this would not be to levels which result in any highway safety concerns and no specific objections have been raised by the County Highway Authority regarding the use of particular routes. As such, this concern can be adequately addressed by the CTMP condition and the proposal is deemed to be acceptable in this regard.

Flooding and surface water drainage

The site lies to the east of the River Wey flood plain and is therefore outside of flood zones two and three (greatest probability of flooding) and inside flood zone one. Flood zone one includes land which has a less than 1 in 1,000 annual probability of river flooding.

In terms of surface water flooding it is noted that the majority of the site is at 'very low' risk (annual probability of flooding of less than 0.1%) of surface water flooding. However, within the roads surrounding the site the risk varies from 'low' risk (between 0.1% and 1% annual probability), 'medium' risk (between 0.1% and 3.3% annual probability) and 'high' risk (greater than 3.3% annual probability) of surface water flooding. It is noted that the majority of the built development lies outside of the medium risk overland flood routes which are required for assessment under the NPPF; these flow routes are shallow and are restricted to the existing roads. It is noted that the site is not identified in the Guildford Surface Water Management Plan as a 'hot spot'. However, two of the requirements of the Local Plan allocation deal with flood risk and they state that development of the site as a whole should (i) achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of

the Level 2 SFRA and (ii) avoid development of more or highly vulnerable uses in flood zone two (medium risk) and flood zone three (high risk).

Paragraph 159 of the NPPF, states that 'inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere'. Paragraph 167 goes on to note that 'when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: (a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; (b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; (c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; (d) any residual risk can be safely managed; and (e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

The Planning Practice Guidance (PPG) provides additional guidance to ensure effective implementation of the planning policies set out within the NPPF regarding development in areas at risk of flooding. The PPG states that developers and LPAs should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the proposed development, and the appropriate application of SuDS.

Policy P4 of the LPSS states that 'all development proposals are required to demonstrate that land drainage will be adequate and that they will not result in an increase in surface water run-off. Proposals should have regard to appropriate mitigation measures identified in the Guildford Surface Water Management Plan or Ash Surface Water Study. Priority will be given to incorporating SuDS (Sustainable Drainage Systems) to manage surface water drainage, unless it can be demonstrated that they are not appropriate. Where SuDS are provided, arrangements must be put in place for their management and maintenance over their full lifetime'.

Policy P13 of the LPDMP also sets out more detailed requirements for SuDS.

Flood risk

As part of the application a Flood Risk Assessment (FRA) has been submitted along with a Drainage Strategy. The FRA notes that an 'intermediate' stage-discharge assessment has been carried out to estimate the peak flood levels at the site based on the updated guidance. This concluded that the design flood level is 32.35m AOD. According to the latest development proposals the lowest proposed finished floor level on site is 34.80m AOD, providing a freeboard (safety factor) of 2.46m. Therefore, the FRA confirms that the site is considered to be at a low probability of flooding from the River Wey throughout the anticipated 100 year lifetime of the development.

In terms of surface water, the medium risk overland flow routes passing through the site are shallow and are restricted to the existing road network. Due to the steep gradients of the existing roads, it is anticipated the overland flow routes will remain within the carriageway and will not affect the built development. The risk of flooding due to sewers and artificial sources is also low.

Therefore, in terms of flood risk the proposal is situated on a site which is sequentially preferable for redevelopment, in a manner which would not increase the flood risk to either the proposal or the surrounding area. On this basis, as regards flood risk, the proposal is considered to be compliant with policy P4 of the LPSS and the NPPF.

SuDS and surface water management / drainage

In terms of surface water drainage it is noted that a system will be provided to collect rainwater run-off, via rainwater outlets from all roofs, channels and terraces from all of the buildings within the development. There is also drainage provided to the podium areas at upper ground level. All rainwater will then drain by gravity and discharge to rainwater attenuation storage tanks which are located throughout the development. The development provides a total of 1,135 metre cubed of rainwater attenuation storage on site which are below many of the public and communal open space areas. From the attenuation storage areas rainwater will either be controlled by gravity or pumped at a controlled outfall rate of 5.2 l/s to existing or new surface water drainage outfall positions. The controlled release of storm water from the site will also help to minimise the on-site and downstream flooding of neighbouring properties.

It is noted that the Lead Local Flood Authority raised concerns with existing surface water flooding issues on North Street and the side streets such as Commercial Road and Leapale Road. At present, during times of heavy rain and flooding, surface water collects at the lower end of North Street and has difficulty clearing into the river if it is also high. The LLFA challenged the applicant to make this situation better through the scheme. The LLFA note that the applicant has now agreed to consider at the detailed design stage the following measures to deal with the existing surface water flows along the public highway:

- permeable surfacing;
- attenuating tree pits;
- rain gardens;
- the use of soakaways / hydrock systems; and
- SuDs planters

These measures will be subject to detailed discussions with the County Highway Authority as part of any S278 agreement and the works would also be secured by a detailed scheme which would be submitted and agreed by condition.

Overall, it is considered that the proposal would not increase flood risk elsewhere in the area. The measures introduced at the request of Officers will help to alleviate the existing surface water issues in the area, particularly at the lower end of North Street. These measures make the site more resilient, but will also decrease the surface water flood risk that currently exists in the area. As such, the proposal is deemed to be compliant with policy P4 of the LPSS, policy P13 of the LPDMP and the guidance contained within the NPPF.

Environmental health matters

Noise and vibration:

The noise and vibration impact section of the Environmental Statement (ES) notes that the main impacts arising from the development will be during the construction phase. It is noted that even when factoring in mitigation measures, the development will lead to some adverse effects in terms of both noise and vibration. Considering the scale and nature of the proposal it is inevitable that there will be some disruption caused as a result of construction works. This will include noise and vibration from demolition, piling increased construction traffic etc. Measures will be taken to reduce these impacts such as a condition to control construction hours and a requirement to

submit a Construction Environmental Management Plan (CEMP) before works begin. In addition it is noted that concerns regarding a noise nuisance (including from development sites) are best investigated and dealt with through Environmental Health legislation rather than through the planning system.

In terms of when the development has been constructed, the possible noise sources include from vehicular traffic associated with the development and the use of plant and equipment, which will be generally located on the roof of the building. The ES notes that the impacts of these noise sources would be negligible at worst. As mitigation, the Council's EHO has suggested conditions to limit the noise from mechanical sources (such as plant etc) to maximum levels. While such a restriction would not usually be applied by the Local Planning Authority, in this instance, given the nature of the development and the number of dwellings proposed, such a condition could be secured.

Colleagues in Environmental Health and Licensing have also noted that the site is located adjacent to the Five and Lime public house, which would abut Block B2 of the development. The Council's EHO has noted that 'essentially this venue has operated as a premises offering live music, the noise from which is clearly audible in the vicinity during the night time period. Whilst unaware of any party wall shared with the new development, the venue has operated without any obvious mitigation to control amplified music for some years due to the location within an area, which is and has been earmarked for redevelopment. Whilst there are no recorded complaints to the Environment and Regulatory Service, the sound of amplified music is regularly observed to be audible in the development area and surrounds by officers of the service whilst on noise patrol at weekends...It is noted that there have been representations, which clearly put the case for the public house continuing to emit noise at the same level and that this is covered by the agent of change principle. If the noise is allowed to continue without mitigation then the development will need to have to accommodate this in the residential facades facing the location Blocks A1, B1 and B2. This has been addressed in sections 8.7.6 to 8.7.13 of the noise report, however the tonal elements associated with largely bass noise have been highlighted as difficult to mitigate against...It is therefore unlikely that some parts of the development will be acceptable in terms of noise exposure'.

In response to the above, and a letter of objection which has been received from Five and Lime the applicant has noted the following: 'the impact from the operation of the public house on the future residents of the proposed development has been a design team consideration from the outset. As a result, the proposed development has been specifically designed in layout and form with this in mind....The application is supported by various technical information which will inform the technical specification of construction materials and methods in relation to the noise environment. For instance, the applicant will comply with the relevant glazing and ventilation specification for the relevant apartments. The heating and cooling strategy for the development relies on mechanical ventilation for all apartments, and so those apartments located closer to the Five and Lime will not be unique in this regard. However, glazing specification will likely be up-scaled for this part of the development in accordance with the necessary noise mitigation requirements as set out in the report'.

In respect of some the points raised in the objection letter, the applicant notes that the proposed development will protect future amenities of residents from noise from Five and Lime as follows:

- the proposed development includes a solid façade on the southern flank of Block B2, which will abut the party wall with Five and Lime pub and part of Norwich House. This solid façade will have no openings and so the proposed apartments at that location will be protected from noise from the public house. The apartments located to the rear of the Leapale Road elevation of Block B2, will be set back from the boundary, and a new courtyard will be provided between the site and Norwich House. This physical separation and the existing built

form at the site's boundaries will also play a part in protecting residents from noise and vibration;

- whilst the proposed new development will abut the existing public house, there will not be any physical connection between the two, so eliminating the risk of any transfer of vibration between buildings;
- whilst the existing public house will be generally founded on the ground immediately beneath it and has a traditional masonry construction, the proposed new development will be founded on concrete pile foundations and constructed with a reinforced concrete frame. Both of which will significantly reduce the likelihood of any transfer of vibration between new and existing;
- glazing in relevant locations will have the necessary acoustic specifications. In terms of workmanship, the applicant has much experience constructing new homes in noise environments typical of town centre urban environments. It may be appropriate to require verification of any treatment installed to protect residents from the noise from the public house in this regard, by an appropriately worded condition;
- the relevant apartments with such measures will likely be those in Block B2 with openings facing the public house. However, the specific apartments will be identified following detailed noise modelling following the planning stage, based on the parameters set out in the ES chapter. A condition is suggested in this respect; and
- the development includes exhaust air heat pumps combined with a heat recovery ventilation system that has the ability in warmer weather to operate in reverse providing an element of cooled air into the apartments, without the need for open windows.

The measures above have been considered by the Council's EHO. It is noted that 'the developers have obviously thought about this issue and taken specialist advice. The noise from the Five and Lime Public House is not subject to any particular controls in terms of licensing or environmental health. The venue has operated without intervention as there are currently no receptors affected by the noise. Essentially, the introduction of mitigation measures to insulate the building whilst providing isolation of the structure and artificial ventilation is a very reasonable solution...'. A condition has been recommended by the EHO which ensures that the above works are undertaken, to a standard which bring the noise levels within the new apartments in blocks B1, B2 and A to acceptable levels. On this basis, the EHO raises no objection to the relationship of the proposal to the Five and Lime public house.

Air quality:

The site lies within the Guildford Town Centre Air Quality Management Area (AQMA) which was designated on 1 October 2021. The AQMA was declared due to: exceedances / potential exceedances of annual air quality for NO₂ at several locations as well as using detailed air quality assessments using 2019 data. Policy P11 of the LPDMP notes that development proposals should have regard to the need to improve air quality and reduce the effects of poor air quality and that they must not result in significant adverse impacts on sensitive receptors, including human health, sensitive habitats and any sites designated for their nature conservation value, from any sources of emissions to air. The policy goes on to note that development proposals within, and in close proximity to AQMAs are required to demonstrate how the proposed avoidance and mitigation measures would make a positive contribution towards the aims of the Council's Air Quality Strategy and the appropriate Air Quality Action Plan.

It is noted that the applicant has committed to a range of measures which will help to limit any further air quality impacts as a result of the proposed development. These include:

- there are no additional fixed emission sources with the exception of potential extraction flues from food businesses;
- 100% of the parking spaces have electric vehicle charging;
- a car club is proposed as part of the development; and

- the construction and demolition phases can be controlled through a Construction Environmental Management Plan (CEMP) which could be secured by condition.

It is noted that Chapter 7 of the EIS deals with air quality. The report notes that in terms of road traffic emissions on nearby properties would be negligible and not significant. It is noted that concentrations in 2030 are predicted to be below those currently experienced, predominantly due to improvements in vehicle emissions and background concentrations. Air quality modelling shows that concentrations at the site are well below the air quality objectives, and therefore the site is suitable for residential use with no requirement for additional mitigation measures. It is noted that the proposed development results in small improvements in air quality, particularly along North Street. As such, the report concludes that the proposal would not interfere in the delivery of the Council's Air Quality Action Plan.

The Council's EHO raises no objection to the development on air quality grounds. With the conditions requested by the EHO and the requirement for the submission of a verification report the proposal is considered to be compliant with policy P11 of the LPDMP.

Extraction and ventilation from food premises:

The proposal includes a number of commercial units, some of which could be utilised by restaurants and other uses which may require odour extraction. The applicant has submitted a Ventilation and Extraction Report which confirms that the commercial units will be provided with kitchen extract ventilation, capable of providing 40 air changes per hour. The extract fans and ductwork will be fire rated and routed to exhaust locations at roof levels where applicable. It is noted that the routing to the external louvres at roof level will be internal, and so there will be no or minimal external ducting on the elevations of the proposed buildings. The louvres at roof level are to be duct mounted and discharged with maximum distance from any intake or openable windows.

The provision of internal ducting within the buildings is important to protect the quality of the design and the character of the streetscene. This can be secured by condition. With the conditions recommended by the EHO, no objections are raised to the development in this regard.

Contamination:

Policy P10 of the LPDMP deals with contamination and this matter should be dealt with through the planning process, including the level of detail which will be expected. The application is accompanied by a formal assessment of possible contamination of the site. The contamination risk assessment has identified hotspots of lead within the made ground which is considered overall to pose a low risk to human health and controlled water receptors. Limited asbestos contamination has also been identified. The submitted report makes recommendations for further intrusive investigation, particularly in areas of the site that are not currently accessible. This will take place alongside sampling for asbestos within excavated material that is due to be disposed of offsite. These measures can be secured by a suitably worded condition.

The Council's EHO has reviewed the contamination assessment and notes that the contamination present does not present any barriers to this development subject to conditions. As such, the EHO raises no objection to the proposed development, subject to conditions to ensure the development is suitable for its proposed use. The Environment Agency have also provided comments on contamination and they note that 'the previous use of the proposed development site was for various contaminative uses including a garage, bus depot, and car wash which present a moderate to high risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is within source protection zone one and located

upon a principal aquifer...The application's Phase 1 desk study...demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken'. The EA have suggested a range of conditions to adequately deal with contamination.

With the conditions recommended above in place, the proposal is deemed to be acceptable in this regard. The proposal is considered to comply with policy P10 of the LPDMP.

Ecology and biodiversity

Chapter 15 of the NPPF sets out the Government's planning policy with regard to the natural environment. Paragraph 174 of the NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by...' (inter alia):

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Paragraph 180 of the NPPF states that 'when determining planning applications, local planning authorities should apply the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Policy ID4 of the LPSS sets out the Council's principles in relation to biodiversity and ecology. The following policies of ID4 are considered to be particularly relevant to this section of the report:

- the Council will maintain, conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs). The Council will produce a Green and Blue Infrastructure Supplementary Planning Document (SPD) setting out how this approach will be implemented.

- new development should aim to deliver gains in biodiversity where appropriate. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA's objectives. The SPD will set out guidance on how this can be achieved.
- the designated sites in the following hierarchy are shown on the Policies Map or as subsequently updated:
 - European sites: Special Protection Areas (SPA) and Special Areas of Conservation (SAC)
 - National sites: Sites of Special Scientific Interest (SSSI)
 - Local sites: Sites of Nature Conservation Importance (SNCI) and Local Nature Reserves.
- permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the integrity of European sites, whether alone or in combination with other development. Any development with a potential impact on SPA or SAC sites will be subject to a Habitats Regulations Assessment.
- permission will only be granted for development proposals within or adjacent to national sites where it can be demonstrated that doing so would not be harmful to the nature conservation interests of the site and its function as an ecological unit.
- permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity. Where this test is met, every effort must be made to reduce the harm to the site through avoidance and mitigation measures

Policy NE4 of the saved Guildford Local Plan safeguards protected species.

In addition, it is noted the policy P6/P7 of the LPDMP deals with biodiversity in new developments. It is currently subject to a main modification (which are included in the text below), however, the changes proposed do not materially alter the substance of the policy. As such, considerable weight is afforded to the policy. Its main requirements are set out below:

- development proposals, including those exempt from minimum biodiversity net gain standards, are required to seek maximum biodiversity gain on site, subject to delivering other planning priorities, and to follow the mitigation hierarchy.
- major development proposals are required to set out plans for long term management and maintenance of on-site biodiversity.
- planting and landscaping schemes, open spaces, Sustainable Drainage Systems (SuDS) and Natural Flood Management measures are expected to incorporate species, habitats and management regimes that provide best biodiversity benefit as set out in BOA policy statements and other strategies.
- tree canopies are expected to be retained and new tree planting is expected to focus on the creation of new connected tree canopies and/or the extension of existing canopies, unless doing so would adversely impact on sensitive species or habitats. Tree planting schemes are expected to provide resilience in terms of climate, disease and ageing, incorporating large species with long lifespans where opportunities arise.
- planting schemes are expected to use UK sourced, native species, unless imported strains of native species would offer greater resilience and are free from disease.
- development proposals are required to include appropriate features in or on building structures that support nature, will last for the lifetime of the development and will cater for appropriate species and habitats.
- development proposals are expected to be designed to create areas of new habitat and provide appropriate links and corridors between new and existing habitats, avoiding and reversing fragmentation and species isolation. Development sites and built features are expected to be permeable for wildlife.
- major development proposals are expected, and minor development proposals are encouraged, to deliver measures that promote a sense of community ownership of green spaces and habitats.

- qualifying development proposals after the national scheme comes into effect are required to achieve a biodiversity net gain of at least 20 per cent, or the advised national minimum amount, whichever is greater, measured using the national biodiversity net gain calculation methodology.
- where previously developed land is exempted from biodiversity net gain under the relevant regulations, a minimum net gain will not be required unless the site supports at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value. Where these are present, a measurable 20% net gain for those features will be required.
- biodiversity gains are required to be delivered in a manner that is consistent with the biodiversity policies in this plan and LPSS 2019 Policy ID4: Green and Blue Infrastructure so that measures are focused on local priorities and will provide the best biodiversity value.
- new habitats and habitat improvements that contribute towards the achievement of biodiversity net gain are required to be secured and maintained for at least 30 years, or a period of time set out in national policy or legislation if this is greater.
- as part of the proposal the applicant has submitted an Ecological Appraisal and Biodiversity Net Gain Assessment (July 2022). These documents provide details on the technical scope and methodology used to address ecology and biodiversity.

Ecology

The site itself is not subject to any statutory or non-statutory ecological designations. The nearest statutory designation is Pewley Down LNR located approximately 1.1km to the south-east of the site. The nearest non-statutory designation is The Mount, Guildford SNCI located approximately 1km to the west of the site. All of the ecological designations in the surrounding area are physically well separated from the site and are therefore unlikely to be adversely affected by the proposals. The Thames Basin Heaths SPA falls within 5km of the site, as such the proposed residential development must be mitigated through a combination of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). This will be discussed in more detail in a separate section of the report.

The submitted Ecology Appraisal states that habitats present within the site include buildings and hardstanding, bare ground with recolonising vegetation, amenity planting and amenity grassland. However, it is noted that these habitats do not form important ecological features and it is considered that their loss to the proposals is of negligible significance. The appraisal goes on to note that the site generally offers limited opportunities for protected species and no evidence of any such species was recorded during the survey work. No specific records of bats from within or adjacent to the site were returned from the desktop study and the buildings on site exhibited only a low number of potential roosting opportunities for bats and overall are assessed as providing negligible to low suitability for bats. The site contains very limited vegetation with no features such as hedgerows or trees which would be of high value to foraging or commuting bats. As such, the site is of negligible importance to foraging and commuting bats.

Although the proposals would not result in any significant ecological harm, the applicant has set out a range of mitigation measures and ecological enhancements which will be implemented as part of the redevelopment of the site. These include, but are not limited to the careful clearance of the site when preparing for construction, the provision of bat and bird boxes and bee bricks, new habitat piles, hedgehog safeguards and the use of sensitive lighting. In addition (and as will be explained in more detail in the biodiversity section of the report below), the proposal includes habitat creation possibilities through new planting of trees and vegetation. Furthermore, the majority of the buildings would be finished with green and brown biodiverse roofs, which have been extended in area by 170sqm following the latest amendments.

The Council's Ecology Consultant has reviewed the proposal and the submitted documents. With regard to ecology the consultants note that *'a suite of ecological surveys has been undertaken to support the application and includes surveying the site for habitats and species. The surveys were undertaken in May 2022. The submitted Ecological Appraisal report prepared by Aspect Ecology (July 2022), detailed the surveys which were undertaken. The surveys included a phase 1 habitat survey which was conducted in May 2022 which would have been a suitable time for surveying grassland habitats on site. The site was assessed as not supporting any priority habitats and comprised buildings, hardstanding, bare ground with recolonising vegetation, amenity grassland, and amenity planting, within an urban setting. Protected species surveys for bats were included, whilst an assessment of the site to support other protected and notable species was made. Phase 1 bat surveys were undertaken following the Bat Conservation Trust (BCT) survey guidelines (2016), which did not identify any bat roosts on site, and buildings were assessed as holding negligible to low potential. Mitigation measures detailed in section 6 of the Ecological Appraisal, include the need to update surveys in the event of a delay when works commence, following a precautionary working methodology, and implementing a sensitive lighting strategy which are welcomed. Further mitigation measures are provided for safeguarding hedgehogs, and nesting birds, which are also welcomed. No protected species or priority species were recorded on site. Habitat creation including green roofs, and native tree planting, along with the provision of enhancement features for nesting birds, bats, and invertebrates are provided'*.

With conditions to secure the mitigation and enhancement measures noted above, no objections are raised to this element of the proposal and it is considered to be compliant with the relevant provisions of the NPPF, policy ID4 of the LPSS and saved policy NE4 of the Local Plan 2003.

Biodiversity

At present there is no formal adopted target for biodiversity improvements as part of the development process. However, it is noted that the emerging policy P6/P7 of the LPDMP suggests a biodiversity net gain of at least 20% should be achieved. It is however noted that this policy is only afforded modest weight at this stage as it is subject of a main modification. It is also noted that without setting a target, paragraph 174(d) of the NPPF states that 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures' should be a requirement of both plan making and decision taking. As such, it is noted that biodiversity net gain targets are being proposed at both a national and local level, with these being 10 and 20 percent respectively.

As part of the proposal the applicant has submitted a Biodiversity Net Gain Assessment. This notes that to quantify the level of biodiversity net gain that can be delivered under the proposed development, the change in biodiversity value resulting from the scheme has been calculated using the DEFRA Biodiversity Metric version 3.1 calculation tool and associated user guide. This takes account of the size, distinctiveness and ecological condition of existing and proposed habitat areas to provide a proxy measure of the present and forecast biodiversity value of a site, and therefore determine the overall change in biodiversity value. The report goes on to note that to establish the habitat baseline, broad habitat areas have been identified based on the survey work undertaken at the site, with habitat condition assigned based on the guidance set out in the Technical Supplement and professional judgement. The post-development habitat creation and enhancement is based on the landscape masterplan which has been submitted with the application. It is noted that post-development habitat being created includes green roofs, amenity lawns, urban trees and native hedgerow.

The data from the baseline habitat survey work and the proposed habitat enhancement and creation works have been coded into the metric by the applicant. In summary, the DEFRA 3.1 Biodiversity Impact Assessment Calculator indicates that the development will result in a 201.66 percent biodiversity net gain in habitat units and a 100 percent linear feature (hedgerow) units.

The Council's Ecology Consultant has noted the following with regard to biodiversity net gain *'the submitted Biodiversity Net Gain (BNG) Assessment (July 2022), has been prepared in accordance with the Environment Act and the BNG good practice principals for development, using the most current DEFRA metric version 3.1. The baseline habitats on site have been included with their associated condition, along with the correct use of strategic significance. The baseline habitats are all to be lost through the proposed development and therefore no enhancement measures have been provided. The habitat creation details have been provided along with a realistic and achievable targeted condition. The trading results have been satisfied for this development which is predicted to result in a net gain of 201.66 percent habitat units and 100 percent net gain in hedgerow units'*.

As such, while there are no adopted national or local targets in force at the current time, the proposal would significantly better the emerging requirements which are for at least a 20 percent net gain. As such, the proposal is deemed to be acceptable in this regard.

In terms of the other requirements of policy P6/P7 it is noted that the individual species of trees and plants to be used will be secured by condition. The retention of the biodiversity features set out by the applicant can also be secured for a period of at least 30 years. In terms of the features being proposed, the majority have the potential to incorporate species and habitats. For instances, the green and brown roofs provided throughout the development will allow for the creation of habitats as will the rain-garden which is to be located at the Friary Square. The management regime for these areas can be secured by condition. As such, it is considered the proposal is broadly compliant with policy P6/P7 of the LPDMP.

It is noted that the level of biodiversity net gain being achieved on the site as part of the development is something which weighs in favour of the proposal and which will form part of the balancing exercise undertaken at the end of this report.

As such, it is considered the proposal is broadly compliant with policy P6/P7 of the LPDMP and policies ID4 and NE4 of the LPSS.

Sustainable design and construction

Policy D2 of the LPSS states that new buildings must achieve a reasonable reduction in carbon emissions of at least 20 per cent below the relevant Target Emission Rate (TER) set out in Building Regulations 2010. It is noted that this should be achieved through the provision of appropriate renewable and low carbon energy technologies in the locality of the development and improvements to the energy performance of the building. Policy D2 is supplemented by the Council's Climate Change, Sustainable Design, Construction and Energy SPD 2020 which provides the framework for assessing the acceptability of sustainability and energy matters.

Policy D14 of the LPDMP (as modified) notes that 'new dwellings must achieve an emission rate no higher than the relevant Target Emission Rate (TER) set out in the Building Regulations (Part L)'. Policy D13 also sets out the Council's climate change adoption policies.

The applicant has submitted an Energy Statement and a Sustainability Statement with the application, the details of which will be discussed below.

Energy

The Climate Change, Sustainable Design, Construction and Energy SPD 2020 sets out an energy hierarchy which is: eliminate energy need; use energy efficiently; supply energy from renewable and low carbon sources and offset carbon emissions.

The Energy Strategy notes that a range of energy sources have been considered as part of the scheme development. It notes that the feasibility of decentralised energy production has been considered but as the proposed development is overlooked from a number of directions there were concerns about the visual impact of locating mechanical plant on the roofs. A communal heating system also has higher running costs to residents compared to an individual system that provides similar CO2 performance. Consequently, the option to serve the development with a communal air source heat pump system has been dismissed as there would have been a significant visual impact. Solar panels have been rejected for a similar reason and the fact that the buildings will be finished with green roofs, with little space left for potential solar arrays. Gas fired Combined Cooling, Heat and Power (CCHP) has been rejected on carbon grounds. In addition, a ground source system would require a large amount of ground study, boreholes etc. and result in a large investment if found to be suitable.

The Energy Strategy states that a range of energy efficiency measures are proposed, such as low U-values. They allow the proposed development to achieve a 21% reduction in overall regulated CO2 emissions, with a 18% reduction for the residential development and a 41% reduction for the non-residential development over a Part L 2013 baseline. The energy strategy for the residential units is that the space heating and hot water will be supplied by individual exhaust air heat pumps within each apartment. This delivers a further overall CO2 reduction of 49%. It is anticipated that the non-residential elements of the development will be served by individual air source heat pumps providing heating, hot water and cooling where necessary with space allocated either in the basement or in discreet locations at roof level. This approach delivers a further overall CO2 reduction of 1%.

The combination of the measures outlined above result in an overall 72% reduction in CO2 over the Part L 2013 baseline. This far exceeds the Council target of at least 20 per cent below the relevant Target Emission Rate (TER) and the proposal is therefore deemed to be acceptable in this regard.

Sustainability

The applicant's Sustainability Statement notes that the issue of sustainable development has been considered throughout the design of the proposed development. In particular, the incorporation of sustainable design and construction methods, energy and water saving measures, waste reduction techniques as well as measures to enhance the ecological value of the site, have been factored into the design of the scheme.

In terms of sustainability the following elements of the proposal are noted:

- energy strategy: As already noted, the proposed development will achieve a 72% reduction in regulated CO2 emissions over the Part L 2013 baseline through energy efficiency measures, heating technology and renewable energy technologies.
- site layout and urban form: Design measures implemented across the site reduce shadowing, allow for natural ventilation and natural daylight, and maximise solar gain in winter.
- biodiversity and ecology: Enhancements will be implemented through the provision of landscaped areas, play space and additional tree and shrub planting across the site.
- flexibility and adaptation: Future proof design measures have been incorporated including

- higher ceilings and the ability to move internal walls without the need for structural alterations.
- overheating: The scheme has been designed to ensure overheating risk is reduced to acceptable levels in accordance with the new Approved Document O (2021) and CIBSE TM59:2017 requirements.
- sound insulation: The dwellings are to target an improvement on Building Regulations Part E through party walls and floors.
- inclusive access: 10% of the new dwellings will be designed to meet Building Regulations Approved Document M4(2) and 5% will meet Part M4(3) Clause 2a with respect to being adaptable to meet the needs of wheelchair users.
- water efficiency: Flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum daily water consumption of 110 litres/person/day (including 5 litres/person/day for external water consumption) in line with Part G requirements. Rainwater harvesting tanks will be installed to reduce the demand on potable water and promote effective use of water supplies for landscaping irrigation purposes.
- biodiverse roof: All roofs that do not form resident terraces will be provided with a combination of either green or brown roofing solutions.
- flood Risk and SUDs: The proposed development site lies in a low flood risk zone and will benefit from SUDs such as biodiverse roof, geo-cellular storage and a swale.
- sustainable transport: The site will benefit from a good existing public transport network and sustainable modes will be encouraged through the provision of 638 cycle storage spaces and electric vehicle charging points.
- materials: The applicant has committed to the use of main materials that are A+ to B in the Green Guide to Specification.
- waste and recycling: Adequate facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- building for Life: The principles of the scheme will be implemented into the design of the development. All twelve considerations under the assessment have been marked 'green,' demonstrating good practice.
- sustainable construction: The site will aim to achieve an excellent score with the Considerate Constructors Scheme and will closely monitor construction site impacts.

The Council's Planning Policy team note that the information that has been provided is highly detailed and useful. It is noted that, generally, the scheme appears to perform very well on carbon and energy and seems strong on sustainability.

All of the above commitments which are contained in both the Energy and Sustainability Statements can be secured by condition.

Overall, the proposal meets the requirement of policy D2 of the LPSS, policies D13 and D14 of the LPDMP and the Climate Change, Sustainable Design, Construction and Energy SPD 2020.

The impact on the Thames Basin Heaths Special Protection Area

The application site is located within the 400 metre to 5 kilometre buffer of the Thames Basin Heaths Special Protection Area (TBHSPA). Natural England advise that new residential development in proximity of the protected site has the potential to significantly adversely impact on the integrity of the site through increased dog walking and an increase in general recreational use. The application proposes a net increase in residential units and as such has the potential, in combination with other development, to have a significant adverse impact on the protected site.

The Council has adopted the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD 2017 which provides a framework by which applicants can provide or contribute to Suitable Alternative Natural Greenspace (SANG) within the borough which along with contributions to Strategic Access Management and Monitoring (SAMM) can mitigate the impact of development.

Natural England is satisfied that, subject to compliance with the adopted SPD, the impact of the development on the Thames Basin Heaths SPA can be appropriately mitigated. Based on the adopted tariffs and the number and mix of units, the proposal generates a SAMM contribution of £335,939.81 and a SANG contribution of £2,522,012.03.

If the above mitigation was secured by way of a s.106 agreement, it is considered that the proposal would be compliant with the objectives of the TBHSPA Avoidance Strategy SPD 2017 and policy NRM6 of the South East Plan 2009.

An Appropriate Assessment has also been completed by the Local Planning Authority and it has been agreed with Natural England.

S.106 considerations

The three tests as set out in Regulation 122(2) require s.106 agreements to be:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

If all aspects of the application are deemed to be acceptable, then the following contributions would be secured by way of a s.106 agreement.

Thames Basin Heaths SPA

The development is required to mitigate its impact on the TBHSPA and this would be secured through a legal agreement (SAMM £335,939.81 and SANG £2,522,012.03). This would accord with the TBHSPA Avoidance Strategy SPD 2017 and the advice provided by Natural England. Without this, the development would be unacceptable in planning terms and would fail to meet the requirements of the Habitat Regulations. The obligation is necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

Affordable housing / late stage review

The affordable housing situation has been set out above. In short, although the scheme is not viable, the applicant has offered 20 on-site shared ownership units and the possibility of securing a further 28 on-site affordable units should they receive grant funding from Homes England. The affordable housing is required through policy H2 of the LPSS and although not policy compliant would go some way to meeting the Council's 40% requirement. The provision of these units could be secured through the legal agreement.

As noted above, if Members were minded to prefer a late stage review instead of the above offer, then this would be in accordance with policy H7 of the LPDMP. This too could be secured by the legal agreement.

As already noted in the report, the above is an either / or scenario, the option of securing both is not part of the applicant's offer. It is Officer's view that the on-site affordable offer is the better of the two options and should therefore be secured through the legal agreement.

Either way, both options are considered to be necessary, directly related to the development and reasonable and therefore would meet the requirements of Regulation 122.

Primary healthcare

The Surrey Heartlands Health and Care Partnership (SHHCP) have been involved in discussions relating to this proposal from a relatively early stage. The SHHCP note that due to the increased population that the development will bring to the town centre, it has the potential to increase pressure on the primary healthcare service in an area where there is already some pressure in the system.

During pre-application discussions, the Local Planning Authority has been able to negotiate that one of the proposed commercial units on Leapale Road could be given over to the SHHCP or NHS as a healthcare facility. The SHHCP have confirmed their interest in this proposition and two possible units have been identified which would meet their needs. While exact details of the leasing arrangements etc have not been finalised, the applicant has confirmed their willingness to secure such a use through the s.106 legal agreement. If the need arises for such a facility (which would need to be confirmed by the SHHCP within set timescales), the proposal could deliver a new community healthcare centre for both new residents of the scheme and the wider population. This would not only mitigate the primary healthcare impacts of the proposal, but would be a benefit of itself to the town centre and the wider population.

In the event that the SHHCP do not follow up their 'option' of taking a unit within the development or in the event that timescales do not align, then as a backstop the SHHCP have requested a contribution of £286,032 in lieu of the on-site provision. This contribution is calculated based on the population of the development and would be used towards improving primary healthcare provision in the immediate area.

As both options would mitigate the impacts of the development, the obligation is necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

Policing

The proposal as a whole has the potential to increase pressures on existing policing resources in the area. Surrey Police note that the application will create an additional demand upon the police service that does not currently exist. The police will need to recruit additional staff and officers and equip them. The development will also require the services of a police vehicle. Staff and officers will also need to be accommodated in a premises that will enable them to serve the development. They note that it is necessary to secure section 106 contributions for policing infrastructure, due to the direct link between the demand for policing services and the changes in the operational environment beyond Surrey Police' control i.e. housing growth and the subsequent and permanent impact it has upon policing. They note that securing modest contributions means that the same level of service can be provided to residents of new development as it is to existing residents and without compromising front line services. The consequence of no funding is that existing infrastructure will eventually become stretched, and the communities may not receive adequate policing.

The contribution of £72,440.65 will be used towards the capital costs associated with employing additional staff, as well as those towards fleet provision and accommodation at Guildford police station.

As the contribution is required to mitigate the impacts of the development, the obligation is necessary, directly related to the development and reasonable and therefore meets the requirements of Regulation 122.

Highways

Although the County Highway Authority have objected to the application, as a fall back they have set out their conditions and s.106 requirements which would need to be secured if the Council were minded to approve the application. These are:

Car club: The provision of the following entirely at the applicant's expense, including the costs of on street adjustments and traffic orders:

- a minimum of two car club vehicles for a minimum of five years, with all costs associated with the provision of the vehicle including provision of parking space either within a publicly accessible location of the development or on the public highway and pump priming being met by the developer.
- £50 worth of free travel for car club vehicles for each residential unit.
- three year's free membership of the car club for all initial occupants of the residential units.

Public transport vouchers: Prior to first occupation of each residential unit the applicant will be required to provide each dwelling with a combined cycle/bus voucher of £250 per dwelling, at a total cost of £118,250. The developer shall monitor and report to the County Highway Authority the uptake of the vouchers by each household, all in accordance with a scheme to be submitted to and agreed in writing by the County Highway Authority. All monies shall be index linked from date of any resolution to grant planning permission and paid to the County Highway Authority.

More recently, the County Highway Authority have introduced a requirement for a financial contribution towards bus service priority improvements. The contribution which has been agreed with the applicant totals £1.5m. The County Highway Authority note that this contribution would be used for bus service priority and journey time reliability improvements on the strategic bus routes entering Guildford town centre. The improvements would include bus friendly traffic management, bus only lanes (including camera enforcement), bus gates, intelligent bus priority at traffic signals (IBP) and possibly the redesign of junctions. A number of locations have been earmarked for these works and they include A3100 Portsmouth Road, A3100 London Road, A281 Millbrook, A31 Farnham Road, Egerton Road / Guildford Park Road, A322 Worplesdon Road and Woodbridge Road, A323 Aldershot Road, A320 Woking Road, A25 Epsom Road, Onslow Street / Woodbridge Road junction and the A25 Dennis roundabout. In total it is noted that all of the above projects would total an expenditure of approximately £30m. As such, the contribution secured through this development would help to deliver this mitigation.

It is considered that these requirements are directly related to the development, fair and reasonable in scale and necessary to make the proposed development acceptable in planning terms and have been agreed in principle by the applicant.

Open space

As noted above, the proposal is deficient in terms of the amount of formal playing field space and children's playspace that is being provided on-site. However, saved policy R2 does allow for this to be mitigated as a contribution towards off-site provision. The relevant contributions are set out in the Council's Planning Contributions SPD. The off-site contribution for formal playing fields would amount to £574,511.39. As there is no on-site provision, the full amount would be payable. In terms of children's playspace it is noted that some is being provided on-site and as such, only a proportion of the contribution would be required. This would amount to £433,530.09. Therefore, the total open space contribution would be £1,008,041.48.

As the contribution is required to mitigate the impacts of the development, the obligation is necessary, directly related to the development and reasonable and therefore meets the

requirements of Regulation 122.

However, as noted above, due to viability reasons the applicant has confirmed that it will not be possible to contribute the amounts noted above. Instead, a contribution of £53,789 has been offered towards off-site improvements to children's playspace. The improvements earmarked are to the existing facilities at Foxenden Quarry. Given this situation, only £53,789 can be secured towards open space through the legal agreement. Although significantly less than required, it would still be compliant with the requirements of Regulation 122. The harm resulting from the under provision will be set out later in the report.

Heritage harm v public benefits balancing exercise

As noted above, paragraph 199 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. The requirements of Section 66(1) and the case law governing these provisions should be remembered. The report has concluded that the development and its associated works would result in less than substantial harm to a number of heritage assets, including those of the highest significance. This includes the harm caused to the setting and significance of one of the UK's most important listed buildings, the Grade I listed (and Scheduled Ancient Monument) Guildford Castle Keep and the Grade II* listed Guildford Cathedral. The proposal would also result in harm to a number of conservation areas.

It is noted that Historic England (HE) has concluded that the cumulative harm caused by the development would be at the lower end of less than substantial. The Council's Conservation Officer has concluded that the cumulative harm is slightly greater, having also concluded less than substantial harm, but in the low to mid level.

Paragraph 202 of the NPPF states that 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Guidance in the form of the Historic Environment PPG does seek to explain the concept of 'public benefit' stating that 'public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit'. It is acknowledged that the proposal does result in a number of public benefits and these will be set out and discussed below:

Provision of housing

The proposal provides a total of 473 residential dwellings on a site which is allocated through the Local Plan. The provision of these units will help meet the Council's identified need and demand for additional housing. The provision of such a large number of dwellings would make a material and significant contribution to the borough's supply of housing.

Provision of affordable housing

The proposal would now provide a guaranteed number of 20 on-site shared ownership dwellings, with a possibility of a further 28 shared-ownership units if the applicant secures funding from Homes England.

It is noted that only limited weight can be afforded to the 28 additional units as these are not guaranteed, however, even so, the provision of affordable housing is a clear public benefit. The scheme has been confirmed as being unviable even with zero provision, and notwithstanding this the applicant has made the above offer. The borough has had difficulty in supplying affordable homes over recent years and there is a clear need and demand for further units. While the proposed offer is a small percentage of the overall number of units being provided, 20 affordable homes, with the possibility of 28 more, is a meaningful contribution which will help with the Council's supply.

As already discussed in the affordable housing section of this report, Members may prefer a late stage viability review to the applicant's affordable housing offer. In such a scenario, the affordable housing would fall away as a public benefit. This will be considered in the conclusion below.

Removing a long term derelict site

It is noted that the application site is an amalgamation of a number of different land parcels which have suffered from varying stages of dereliction over a prolonged period. Over the last decade, former commercial buildings and dwellings have been gradually demolished and what now exists are temporary surface car-parking uses, vacant, cleared land and in the case of Dominion House an outdated office building which is partly occupied with little prospect of future use without significant (and probably cost prohibitive) renovation. Although the site is not within the retail core of the town centre, it is in an area which is prominent and which is visible to many. The site abuts the bus station and one of the side entrances to the biggest shopping centre in the town and is also visible in part from Onslow Street which is one of the main routes into Guildford. Its current condition and prolonged period of dereliction damages the character, reputation and image of Guildford as a regional centre and market town of Surrey. It is noted that the Council has made a number of attempts to regenerate the site, however, these have failed to materialise into planning applications. The only planning application to be approved was in 2004/06 for the extension of the Friary Centre. However, this scheme was not implemented and is unlikely to now correspond to the current retail environment which has changed significantly over the last decade.

The continued long-term dereliction of the site may result in the further knock-on decline of this part of the town centre and North Street in particular. Shops and businesses would be difficult to attract to an area which is in long term decline and there is a risk that this impact would gradually spread to North Street. The continued dereliction of the site would also prohibit its more efficient use for housing and other facilities which would benefit the wider town and its residents. The continued dereliction is also more likely to attract crime and anti-social behaviour to the area.

The proposal would offer the complete regeneration of the site and would go further by pedestrianising a large section of North Street. It would provide a mix of uses on the ground floor, which have now been accepted by the Council's consultants and planning policy team as being of a quantum which is justified given the current retail and commercial environment. It would also introduce 473 residential units into the town, which would bring all the benefits associated with this increased activity. The proposal would have a substantial and positive transformative impact not only on North Street, but also the town as a whole. It would remove the derelict sites and re-purpose them to provide a development which is be-fitting of the twenty-first century

The redevelopment of the site would, overall, make a more effective use of this highly sustainable site in the County town. It is noted that paragraph 120(c) of the NPPF states that planning decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'. The proposal would also accord with the similar requirements of policy S3 of the LPSS, as well as the site allocation. This policy notes that the enhancement of the public realm and its amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area's regeneration.

As such, the redevelopment of this vacant site, and the prevention of further long-term dereliction is considered to be a public benefit of the proposal.

Vitality of the town centre

At present the site is vacant and this has a negative impact on the vitality of this part of the town centre. There are currently no uses which act as a positive attractor for visitors. While the car parks do result in trips, they are not ones which contribute positively to the vitality of the surroundings.

The proposal on the other hand would be a mixed-use scheme which would provide activity and life throughout the day and night. The large number of residential properties would provide comings and goings and activity and the proposed commercial units, some of which may be well suited for food and beverage outlets, would provide a more prolonged level of activity from the morning until late evening. Through the thoughtful design of the scheme, new public squares and spaces have been created which would become areas for al-fresco dining, meeting areas for residents and for relaxation and recreation.

The proposal would have the result of transforming the character, vitality and viability of this part of the town centre from a largely deserted area to a lively and active site which has life throughout the day and night.

This is considered to be a material public benefit of the proposal.

New areas of public realm

At present, the town centre lacks usable areas of public open space. It is noted that the Castle Grounds offer a high quality area of open space, however, this is on the other side of the town centre. Other areas include spaces adjacent to the river, the rotunda at the junction of Friary Street and North Street (which is of limited attractiveness as an amenity space) and Quakers Court further along North Street. There is a noticeable lack of 'dwell spaces' where people can rest for a short period in an attractive environment and the lack of any focal open spaces areas which could be destinations in themselves and capable of supporting events throughout the year.

The proposal includes three main new public open space areas. These include the Dial which would be located towards the middle of the scheme, the North Street Square which has been welcomed by Design South East and Friary Square which would infill the former Commercial Road between the Friary Centre and Black Sheep Coffee.

It is noted that each of these spaces would be managed and maintained by the management company and would be available to the public 24/7. Each space would provide a different experience for the public. North Street Square would be a large area of public realm, fronted by commercial units and finished with a water feature and areas of seating and landscaping. The

space could be used for play by children (the water feature). as an event space during the year and for rest and relaxation as a place to dwell while shopping or visiting the town centre. Friary Square would be a busier space between North Street and the bus station. It would be finished as a rain garden and has the potential to incorporate areas of playspace. Significant areas of planting and trees would be provided in this space. The Dial would be at the centre of the scheme and would be a bustling space also fronted by commercial units and the entrance into the concierge for the residential apartments.

The provision of such a high quality range of open spaces would be a substantial benefit to the town centre.

New bus interchange

As already noted in the report, the existing bus station offers a very poor and un-welcoming environment for bus users. It also presents a poor first impression for visitors who may be arriving in the town centre from the park and ride facilities.

While the passenger facilities would not alter dramatically, the environment and design of the concourse would change dramatically for the better. A new canopy would be provided, as well as new seating and waiting areas. Access on to buses would also be improved.

The new station would provide a modern, clean environment for passengers and together with the rest of the development would provide a much improved entry into the town centre for bus users. This is also deemed to be a public benefit of the scheme which is worthy of consideration.

Pedestrianisation of North Street

The proposal includes the part pedestrianisation of North Street between the main entrance to the Friary Centre and its junction with Leapale Road.

The pedestrianisation would include new paving throughout, new street furniture, signage and lighting. The pedestrianisation, in itself would positively transform and revitalise this section of North Street. It would elevate North Street and provide another high quality pedestrian environment to the town centre (in addition to the High Street).

The pedestrianisation works will therefore have obvious benefits to the character and appearance of the area, but it will also offer a safer environment for town centre users, particularly for those with mobility difficulties. The works are also likely to raise the attractiveness of North Street as a retail destination which may help to attract further business to this area of the town centre.

The pedestrianisation of North Street is therefore seen as a major public benefit of the development.

Economic benefits

At present, the site provides very little in the way of economic benefits to the town.

The Planning Statement submitted with the application notes that the proposal will result in a range of temporary and permanent economic benefits for the wider area - not just the town centre. These include:

- during construction, the development will create or sustain a total of 337 net jobs on average throughout the year. Some of these jobs will be available for local construction workers.
- it is forecast that when completed, the commercial floorspace will support as many as 118

- (full-time equivalent) jobs;
- the increase in employment would increase the earnings in the local economy by approximately £2.29m per annum. This would have further knock-on benefits to the local economy;
 - it is estimated that the additional 473 residential units would increase spending in local shops by approximately £12.5m per annum

The economic benefits of the proposal are therefore considered to be a public benefit of the proposal.

Biodiversity benefits

As noted above, policy P6/P7 of the LPDMP seeks biodiversity net gain of at least 20%. However, as this proposal involves the redevelopment of a previously developed site (which does not support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value) the requirements of policy P6/P7 would not be applicable to the proposal. Notwithstanding this, through the planting of new trees, the provision of green / brown roofs, installation of bird and bat boxes and bee bricks and the provision of flowering lawns on amenity grassland, the proposed scheme would achieve a biodiversity net gain of 201%. Even if policy P6/P7 were applicable to the development, the proposal would greatly exceed its requirements.

Such a large betterment in biodiversity, when they are not even applicable to the development, is considered to be a public benefit of the scheme.

Energy and sustainability benefits

The proposal would be a fully electric development, thereby reducing the reliance on fossil fuels for energy. The Council's requirement is that developments should achieve a 20% reduction in carbon emissions. The subject application significantly better the Council's requirements by reducing emissions by 72%. The residential units will all be fitted with individual exhaust air heat pumps. which means that the development will be gas free. In addition, all of the car parking spaces will have charging facilities and a car club is to be provided which will use electric vehicles. Other key benefits include:

- future proof design measures have been incorporated including higher ceilings and the ability to move internal walls without the need for structural alterations.
- the scheme has been designed to ensure overheating risk is reduced to acceptable levels.
- flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum daily water consumption of 110 litres/person/day
- rainwater harvesting tanks will be installed to reduce the demand on potable water and promote effective use of water supplies for landscaping irrigation purposes.
- commitment to the use of main materials that are A+ to B in the Green Guide to Specification.
- facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- the site will aim to achieve an excellent score with the Considerate Constructors Scheme and will closely monitor construction site impacts.

The benefits of reducing carbon emissions are obvious in terms of climate change. Such a significant betterment of the Council's policy is considered to be a public benefit of the scheme

Heritage harm v public benefits balance:

Overall, the public benefits of the proposal are wide ranging and long lasting. The proposal would fundamentally transform a large area of the town centre which has been in varying stages of decline and dereliction for a prolonged period. The proposal would create a modern, attractive and high-quality space for residents and visitors which would offer a very different town centre experience which is not currently available in Guildford. The pedestrianisation of North Street, the new bus station and the provision of a number of high quality areas of public realm are benefits which will have a positive impact on a much wider area than the site.

As noted above, paragraph 199 of the NPPF states that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. The impacts on the heritage assets, and in particular the Grade I listed (and Scheduled Ancient Monument) Guildford Castle Keep, the Grade II* listed Guildford Cathedral and the conservation areas are recognised and are given great weight and considerable importance.

Although great weight and considerable importance has been afforded to the heritage harm, it is considered that the significant scale of the public benefits and the transformative impact that the development would have on the town centre, are considered to be sufficient in this instance to outweigh the identified heritage harm. This would be the case even if the affordable housing was not secured.

As such in this regard the proposal is considered to be compliant with the NPPF and policy D3 of the LPSS.

Final balancing exercise

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a broad judgement regarding whether the development accords with the plan read as a whole. Paragraph 11 of the NPPF also states that 'plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means...approving development proposals that accord with an up-to-date development plan without delay'. While the proposal does conflict with some policies, overall and taken as a whole, the development is considered to accord with the development plan. Therefore, the presumption is that the application should be approved without delay.

Notwithstanding this, it is noted that the harm identified above must be considered and balanced against the benefits of the proposal. As already set out above, paragraph 202 of the NPPF requires a balance of the heritage harm against the public benefits of the scheme. That balance has been carried out above, and the conclusion that has been reached is that the public benefits of the scheme do outweigh the heritage harm. However, the other harms resulting from the proposal must also be assessed, together with the heritage harm, and these should also be balanced against the benefits of the proposal. This final balancing exercise will be carried out below.

In assessing the weight to be afforded to harms / benefits, officers have applied a scale which attributes moderate, significant, or substantial weight to each identified harm / benefit. Having attributed such weight, an overall judgement is then required regarding the balance of harm vs benefit.

As noted above, the less than substantial harm identified to designated heritage assets carries **substantial (great) weight and considerable importance** in the planning balance. Given the full analysis in relation to heritage harm above, that exercise is not here repeated, but other identified planning harms are considered below.

Other harm:

Harm to neighbouring amenity

It has been concluded above that the proposal would reduce the internal amenity of the residential properties which are associated with All Bar One and Five and Lime. It is noted that in the case of All Bar One, the proposal would have an adverse overbearing impact on this property and in the case of Five and Lime, the proposal would have an adverse overbearing and dominating impact on this property.

It is acknowledged that while the rooms impacted would be in residential use, it is staff accommodation associated with the businesses which operate from the respective ground floors (e.g. a restaurant / bar and bar). As such, it is noted that their amenity is already compromised as a result. While this residential accommodation should be protected to some degree, it must be recognised that staff accommodation, in a dense urban location will not achieve the same levels of amenity as would normally be expected. While this does not remove the harm caused, it does, in Officer's view reduce the level of weight which should be attributed to it.

Bearing all of the above in mind, **moderate weight** is afforded to this harm in the balance.

Lack of open space / contribution in lieu

As set out above, the proposal does not meet the requirements of saved policy R2 of the Local Plan. The proposal does not provide the required amount of on-site formal playing field space or children's playspace. While saved policy R2 does allow for mitigation through a financial payment in lieu of on-site provision, the applicant has only agreed to pay £50,000 of the £1,008,041.48 which is required.

This under provision is in direct conflict with saved policy R2 and the proposal would not mitigate its impact on existing open space provision in and around the town centre. As such, the proposal will place additional pressure on these facilities which will impact on existing and future residents and their access to open space.

Significant weight should be afforded to this matter.

No other harms have been identified throughout the report.

Benefits of the proposal:

The benefits of the scheme have already been set out above in the section entitled 'heritage harm v public benefits and balancing exercise'. For ease of reference, the individual benefits resulting from the scheme will be summarised again below and a level of weight attributed to them.

Provision of housing

The proposal provides a total of 473 residential dwellings on a site which is allocated through the Local Plan. The provision of these units will help meet the Council's identified need and demand for additional housing. The provision of such a large number of dwellings would make a material and significant contribution to the borough's supply of housing.

Substantial weight is afforded to this matter.

Provision of affordable housing

The proposal would now provide a guaranteed number of 20 on-site shared ownership dwellings, with a possibility of a further 28 shared-ownership units if the applicant secures funding from Homes England.

It is noted that only limited weight can be afforded to the 28 additional units as these are not guaranteed, however, even so, the provision of affordable housing is a clear positive aspect of the proposal. The scheme has been confirmed as being unviable even with zero provision, and notwithstanding this the applicant has made the above offer. The borough has had difficulty in supplying affordable homes over recent years and there is a clear need and demand for further units. While the proposed offer is a small percentage of the overall number of units being provided, 20 affordable homes, with the possibility of 28 more, is a meaningful contribution which will help with the Council's supply.

Given the comparatively low provision compared to the policy requirement, the fact that the units are shared ownership rather than for affordable rent, **significant weight** is afforded to this matter.

As already discussed in the affordable housing section of this report, Members may prefer a late stage viability review to the applicant's affordable housing offer. In such a scenario, the affordable housing would fall away as a benefit of the scheme. This will be considered in the conclusion below.

Pedestrianisation of North Street

The proposal includes the part pedestrianisation of North Street between the main entrance to the Friary Centre and its junction with Leapale Road.

The pedestrianisation would include new paving throughout, new street furniture, signage and lighting. The pedestrianisation, in itself would positively transform and revitalise this section of North Street. It would elevate North Street and provide another high quality pedestrian environment to the town centre (in addition to the High Street).

The pedestrianisation works will therefore have obvious benefits to the character and appearance of the area, but it will also offer a safer environment for town centre users, particularly for those with mobility difficulties. The works are also likely to raise the attractiveness of North Street as a retail destination which may help to attract further business to this area of the town centre.

The pedestrianisation of North Street is therefore seen as a major public benefit of the development.

Substantial weight is afforded to this matter.

Economic benefits

At present, the site provides very little in the way of economic benefits to the town.

The Planning Statement submitted with the application notes that the proposal will result in a range of temporary and permanent economic benefits for the wider area - not just the town centre. These include:

- during construction, the development will create or sustain a total of 337 net jobs on average throughout the year. Some of these jobs will be available for local construction workers.
- it is forecast that when completed, the commercial floorspace will support as many as 118 (full-time equivalent) jobs;
- the increase in employment would increase the earnings in the local economy by approximately £2.29m per annum. This would have further knock-on benefits to the local economy;
- it is estimated that the additional 473 residential units would increase spending in local shops by approximately £12.5m per annum

The economic benefits of the proposal are therefore considered to be a public benefit of the proposal.

Significant weight is afforded to this matter.

Biodiversity benefits

As noted above, policy P6/P7 of the LPDMP seeks biodiversity net gain of at least 20%. However, as this proposal involves the redevelopment of a previously developed site (which does not support at least one protected or priority species population or habitat, or an assemblage of species with an otherwise demonstrably high biodiversity value) the requirements of policy P6/P7 would not be applicable to the proposal. Notwithstanding this, through the planting of new trees, the provision of green / brown roofs, installation of bird and bat boxes and bee bricks and the provision of flowering lawns on amenity grassland, the proposed scheme would achieve a biodiversity net gain of 201%. Even if policy P6/P7 were applicable to the development, the proposal would greatly exceed its requirements.

Such a large betterment in biodiversity, when they are not even applicable to the development, is considered to be a public benefit of the scheme.

Significant weight is afforded to this matter.

Energy and sustainability benefits

The proposal would be a fully electric development, thereby reducing the reliance on fossil fuels for energy. The Council's requirement is that developments should achieve a 20% reduction in carbon emissions. The subject application significantly better the Council's requirements by reducing emissions by 72%. The residential units will all be fitted with individual exhaust air heat pumps which means that the development will be gas free. In addition, all of the car parking spaces will have charging facilities and a car club is to be provided which will use electric vehicles. Other key benefits include:

- future proof design measures have been incorporated including higher ceilings and the ability to move internal walls without the need for structural alterations.
- the scheme has been designed to ensure overheating risk is reduced to acceptable levels.

- flow control devices and water efficient fixtures and fittings will be installed in all dwellings to target a maximum daily water consumption of 110 litres/person/day
- rainwater harvesting tanks will be installed to reduce the demand on potable water and promote effective use of water supplies for landscaping irrigation purposes.
- commitment to the use of main materials that are A+ to B in the Green Guide to Specification.
- facilities will be provided for domestic and construction related waste, including segregated bins for refuse and recycling.
- the site will aim to achieve an Excellent score with the Considerate Constructors Scheme and will closely monitor construction site impacts.

The benefits of reducing carbon emissions are obvious in terms of climate change. Such a significant betterment of the Council's policy is considered to be a public benefit of the scheme

Significant weight is afforded to this matter.

Benefits associated with the s.106 contributions

The s106 contributions agreed with the applicant have been set out above. While it is acknowledged that the contributions are only required to offset and mitigate the impacts of the development, the improvements that the contributions bring are nevertheless beneficial to the wider community.

It is noted that this is particularly true for the possible provision of a new NHS facility as part of the development. If delivered by the NHS, this facility would provide wider benefits to those living in the town centre. The provision of a purpose-built, modern facility would also be of benefit. However, as there is no certainty as to whether this facility will be provided (the alternative is the payment of a financial contribution in lieu), the additional weight that can be attributed to this matter is very low.

Overall, the contributions that have been secured will help to improve local facilities. **Modest weight** is afforded to this matter.

The following benefits arise from the scheme complying with the requirements of the site allocation (policy A5 of the LPSS).

Removing a long term derelict site

It is noted that the application site is an amalgamation of a number of different land parcels which have suffered from varying stages of dereliction over a prolonged period. Over the last decade, former commercial buildings and dwellings have been gradually demolished and what now exists are temporary surface car-parking uses, vacant, cleared land and in the case of Dominion House an outdated office building which is partly occupied with little prospect of future use without significant (and probably cost prohibitive) renovation. Although the site is not within the retail core of the town centre, it is in an area which is prominent and which is visible to many. The site abuts the bus station and one of the side entrances to the biggest shopping centre in the town and is also visible in part from Onslow Street which is one of the main routes into Guildford. Its current condition and prolonged period of dereliction damages the character, reputation and image of Guildford as a regional centre and market town of Surrey. It is noted that the Council has made a number of attempts to regenerate the site, however, these have failed to materialise into planning applications. The only planning application to be approved was in 2004/06 for the extension of the Friary Centre. However, this scheme was not implemented and is unlikely to now correspond to the current retail environment which has changed significantly over the last decade.

The continued long-term dereliction of the site may result in the further knock-on decline of this part of the town centre and North Street in particular. Shops and businesses would be difficult to attract to an area which is in long term decline and there is a risk that this impact would gradually spread to North Street. The continued dereliction of the site would also prohibit its more efficient use for housing and other facilities which would benefit the wider town and its residents. The continued dereliction is also more likely to attract crime and anti-social behaviour to the area.

The proposal would offer the complete regeneration of the site and would go further by pedestrianising a large section of North Street. It would provide a mix of uses on the ground floor, which have now been accepted by the Council's consultants and planning policy team as being of a quantum which is justified given the current retail and commercial environment. It would also introduce 473 residential units into the town, which would bring all the benefits associated with this increased activity. The proposal would have a substantial and positive transformative impact not only on North Street, but also the town as a whole. It would remove the derelict sites and re-purpose them to provide a development which is be-fitting of the twenty-first century

The redevelopment of the site would, overall, make a more effective use of this highly sustainable site in the County town. It is noted that paragraph 120(c) of the NPPF states that planning decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'. The proposal would also accord with the similar requirements of policy S3 of the LPSS, as well as the site allocation. This policy notes that the enhancement of the public realm and its amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area's regeneration.

As such, the redevelopment of this vacant site, and the prevention of further long-term dereliction is considered to be a public benefit of the proposal.

Substantial weight is afforded to this matter.

Vitality of the town centre

At present the site is vacant and this has a negative impact on the vitality of this part of the town centre. There are currently no uses which act as a positive attractor for visitors. While the car parks do result in trips, they are not ones which contribute positively to the vitality of the surroundings.

The proposal on the other hand would be a mixed-use scheme which would provide activity and life throughout the day and night. The large number of residential properties would provide comings and goings and activity and the proposed commercial units, some of which may be well suited for food and beverage outlets, would provide a more prolonged level of activity from the morning until late evening. Through the thoughtful design of the scheme, new public squares and spaces have been created which would become areas for al-fresco dining, meeting areas for residents and for relaxation and recreation.

The proposal would have the result of transforming the character, vitality and viability of this part of the town centre from a largely deserted area to a lively and active site which has life throughout the day and night.

This is considered to be a material public benefit of the proposal.

Substantial weight is afforded to this matter.

New areas of public realm

At present, the town centre lacks usable areas of public open space. It is noted that the Castle Grounds offer a high quality area of open space, however, this is on the other side of the town centre. Other areas include spaces adjacent to the river, the rotunda at the junction of Friary Street and North Street (which is of limited attractiveness as an amenity space) and Quakers Court further along North Street. There is a noticeable lack of 'dwell spaces' where people can rest for a short period in an attractive environment and the lack of any focal open spaces areas which could be destinations in themselves and capable of supporting events throughout the year.

The proposal includes three main new public open space areas. These include the Dial which would be located towards the middle of the scheme, the North Street Square which has been welcomed by Design South East and Friary Square which would infill the former Commercial Road between the Friary Centre and Black Sheep Coffee.

It is noted that each of these spaces would be managed and maintained by the management company and would be available to the public 24/7. Each space would provide a different experience for the public. North Street Square would be a large area of public realm, fronted by commercial units and finished with a water feature and areas of seating and landscaping. The space could be used for play by children (the water feature). as an event space during the year and for rest and relaxation as a place to dwell while shopping or visiting the town centre. Friary Square would be a busier space between North Street and the bus station. It would be finished as a rain garden and has the potential to incorporate areas of playspace. Significant areas of planting and trees would be provided in this space. The Dial would be at the centre of the scheme and would be a bustling space also fronted by commercial units and the entrance into the concierge for the residential apartments.

The provision of such a high quality range of open spaces would be a substantial benefit to the town centre.

Substantial weight is afforded to this matter.

New bus interchange

As already noted in the report, the existing bus station offers a very poor and un-welcoming environment for bus users. It also presents a poor first impression for visitors who may be arriving in the town centre from the park and ride facilities.

While the passenger facilities would not alter dramatically, the environment and design of the concourse would change dramatically for the better. A new canopy would be provided, as well as new seating and waiting areas. Access on to buses would also be improved.

The new station would provide a modern, clean environment for passengers and together with the rest of the development would provide a much improved entry into the town centre for bus users. This is also deemed to be a public benefit of the scheme which is worthy of consideration.

Significant weight is afforded to this matter.

Overall harm v benefits balance:

Overall, the public benefits of the proposal are wide ranging and long lasting. The proposal would fundamentally transform a large area of the town centre which has been in varying stages of decline and dereliction for a prolonged period. The proposal would create a modern, attractive and high-quality space for residents and visitors which would offer a very different town centre experience which is not currently available in Guildford. The pedestrianisation of North Street, the new bus station and the provision of a number of high quality areas of public realm are benefits which will have a positive impact on a much wider area than the site.

The main harm resulting from the proposal is to the heritage assets. It is again noted that this includes harm to the most highly graded assets in the Country, Grade I and II* listed buildings and to multiple conservation areas. However, as noted above, this heritage harm is outweighed by the public benefits of the proposal.

Overall, it is considered that the benefits associated with the proposal do outweigh the identified harm, including harm to designated heritage assets. The proposal accords with the development plan read as a whole and other material considerations do not weigh against the grant of planning permission. As such, the proposal is deemed to be acceptable and is therefore recommended for approval.

It is noted above that Surrey County Council have objected to the proposal on three grounds. These have been set out above. While these concerns have been fully considered and taken into account, in this instance, the Local Planning Authority is of the view that there are other reasons and policies which outweigh and overcome them. This view is supported by independent reports that have been commissioned by the Local Planning Authority and the corporate arm of Guildford Borough Council. It is also noted paragraph 111 of the NPPF states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'. In this instance, it could not be said that the concerns put forward by the County Council would result in severe impacts on the highway. In this instance, given the independent reports that have been received, and taking into account the other aims of the NPPF which have a primary aim of giving 'priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas' (with access to high quality public transport noted as being a second preference, and so far as possible) the Local Planning Authority is entitled to disagree with the County Highway Authority and prefer the views provided by others. As such, the Local Planning Authority disagrees with the objections put forward by the County Highway Authority and has found no overall harm in highways or public transport terms.

Notwithstanding the above, even if Members disagree with Officers that there is no highways harm or harm to the operation of the bus network in the town and if they give the highest level of weight to this harm (i.e. substantial), it would still not tip the balance towards the refusal of the application.

In addition, if Members do prefer the use of a late stage viability review instead of the on-site affordable housing, this would reduce the overall benefit associated with the proposal.

However, in such a scenario (highways harm and no affordable housing benefit), it is Officer's view that the benefits of the scheme would still clearly and demonstrably outweigh the harms identified.

Conclusion

The application site forms a large portion of an important town centre allocation for a mixed used development including residential accommodation and commercial floorspace. The delivery of the scheme, and therefore a large portion of the allocation, is an important aspect of the proposal.

It has been concluded above that the development would be compliant with the requirements of the allocation. While a reduced quantum of commercial floorspace is provided, this is allowed through the policy and has been tested by independently appointed experts. Given the current environment the commercial floorspace envisaged by the allocation is no longer realistic. The now residential led development would bring a significant number of new homes to the town centre. These would be located in a highly sustainable location, close to transport routes, jobs and shops and services. The residential units would also make a material and meaningful contribution to the Council's housing supply. While the scheme has been confirmed to be unviable with zero affordable housing, through negotiation with Officers, the applicant has now offered at least 20 on-site shared ownership units, with the possibility of achieving 28 more (subject to external funding).

It is noted that the site is in a sensitive town centre location and is close to listed buildings and conservation areas. While it is acknowledged that the proposal has a modern appearance and would have its own character, it still reflects and has references to the surrounding built environment. The Council's Urban Design Officer is of the opinion that the proposal complies with the relevant design policies of the Local Plan. In addition, while harm to heritage assets has been identified by both the Council's Conservation Officer and Historic England, the public benefit balance that has been carried out by Officers concludes that the public benefits of the proposal clearly and demonstrably outweigh this.

The proposal would result in long-lasting and diverse benefits to the town. The site has been derelict for a considerable period of time and this proposal would act as a catalyst for its regeneration. The associated public realm works and the pedestrianisation of North Street would transform this part of the town centre and would materially improve its appearance and character. The pedestrianisation and the modifications to the bus station would also remove bus traffic from the western end of North Street which would improve the safety and environment for pedestrians. Other benefits have been set out in the report and include beyond policy requirement carbon reduction measures and biodiversity net gain. The proposal would also result in significant economic benefits from both the construction of the scheme as well as the proposed commercial units and introducing a significant residential population into the area.

It is acknowledged that Surrey County Council have objected to the proposal, based mainly on the proposed changes to the bus station and the resulting impact on bus journey times, amongst other matters. However, as has been set out in the report, two independent reviews of the highways situation has been undertaken, as well as the Transport Assessment submitted with the application. All three of these reports conclude that the proposal is acceptable in highways and public transport terms. While the comments from Surrey County Council have been carefully considered, in this instance it is concluded that they cannot be adopted by the Local Planning Authority for the reasons already set out. Notwithstanding SCC's position, their without prejudice conditions have been included and in addition, a contribution of £1.5m towards bus service priority improvements has been agreed by the applicant. While this does not remove the highways objections, it will help to offset the concerns of the County Council.

As well as the heritage harm which has been noted above, harm has also been found to be caused to the amenity of some residential dwellings. The applicant is also failing to fully mitigate the impact of the scheme on open space.

A detailed planning balance has been undertaken and in summary, the benefits of the proposal are so significant and are of such importance that they do clearly and demonstrably outweigh the harm which has been identified (even when giving substantial weight and great importance to the heritage harm). As such, the application is recommended for approval, subject to the conditions outlined in this report and the completion of a legal agreement which will secure the Head of Terms.

APPLICATION NUMBER	GU/22/01336
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DEVELOPMENT AFFECTING ROADS
TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Mr. Robert Packham

Location: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, GU1

Development: A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:
 ? Demolition of existing buildings; ? A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding; ? Erection of buildings ranging from 4 to 14 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with; ? Hard and soft landscaped areas to form pedestrianised streets and public spaces; ? Associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Rd) and associated infrastructure; ? The stopping up of adopted highway (including Commercial Road and Woodbridge Road); ? Alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

Contact Officer	Abigail Grealey	Consultation Date	11 August 2022	Response Date	24 November 2022
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The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

1. The proposed development leads to an increase in bus journey times, particularly those arriving from the south and the west, specifically all bus services travelling into Guildford along the A281, A3100, A31 and from the University/RSCH, resulting in increased passenger delays and reduced customer satisfaction levels. Despite the emergency access route provided from the south via North Street, it has not been demonstrated that the proposed entrance and exit to the bus station would provide satisfactory levels of operational efficiency and resilience. The failure of which would result in increased passenger delays and reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of Surrey County Council's (SCC) Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).

2. The proposed development results in a reduction in the number of bus stands and layover spaces, and it has not been satisfactorily demonstrated that this reduction can accommodate the planned future growth, which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan (LTP4), the DfT Bus Back Better- National Bus Strategy for England (2021), Guildford Local Plan (Site allocations A25, A26 and A35) and the NPPF (2021).
3. It has not been demonstrated that the proposed bus station is accessible for all users. The failure of which is prejudicial to vulnerable users and would lead to reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).

Notes to Planning Officer:

Notwithstanding the above recommended reasons for refusal, the County Highway Authority very much support the principal of redevelopment of this site and remain committed to working with the applicant and Guildford Borough Council to deliver a fit for purpose high quality development to serve Guildford's long term future needs. We recognise the value that a redevelopment would add to this part of the town, which could comprise a much-needed refurbishment of the existing bus station and pedestrianisation of North Street.

Whilst we support the principal of redevelopment, it must be able to meet Guildford's future transport needs. The Guildford Local Plan proposes the delivery of thousands of new homes at the strategic housing sites at Wisley, Gosden Hill, Blackwell Farm and Ash, all of which will need to demonstrate high levels of non-car accessibility to reduce carbon emissions. In addition is the strategic site at Dunsfold in Waverley, and all these sites will need to invest in local bus services, as well as Park and Ride services, the primary focus of which will be Guildford Town Centre, a key attractor for employment and leisure trips.

The emerging 'Shaping Guildford's Future' (SGF) work commissioned by the Borough Council in partnership with the County Council, recognises the importance of growing bus patronage and improving journeys times and reliability. The SGF Transport Strategy Stage 2 Report identifies the County Councils Bus Service improvement Plan (BSIP) and supports its targets to (i) improve average bus speeds by 5mph, (ii) increase passenger numbers from 7.24m (2019/20) to 8.53m (by 2024/25), (iii) improve average passenger satisfaction from 56% (2019/20) to 66% (by 2024/25), and (iv) to improve journey time reliability from 78.5% (Nov 2019) to 90.2% (by 2024/25). The current proposals for the bus station in terms of its access and capacity would seriously hinder the achievement of these targets.

The BSIP provides the bus strategy for the County Council's fourth Surrey Local Transport Plan (LTP). The LTP plays a crucial role in helping to achieve the Council Council's ambition to become a carbon neutral county by 2050. In respect of bus travel, it notes "The delivery of improved bus services across the county to form the core of an integrated public, shared and active transport system will be at the heart of successfully delivering our LTP4 and achieving the four key objectives of decarbonisation, sustainable growth, well-connected communities and clean air and excellent quality of life".

It is widely recognised that bus patronage saw a sharp decline during the Covid-19 pandemic and a key objective of both the LTP and BSIP is to get more people using buses in Surrey. Official Statistics from the Department for Transport shows that domestic bus travel has almost returned to pre-covid levels (March 2020 to October 2022)

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1109168/COVID-19-transport-use-statistics.ods)

It is hugely important that SCC and its partners work collaboratively to build upon the post Covid-19 recovery to ensure the delivery of a range of exemplar services and infrastructure to meet the future needs of residents and businesses. We believe that the redevelopment of the existing Bus Station is at the core of achieving this and as a once in a lifetime opportunity, the solution must be the right one. We are optimistic that with continued collaboration with the Borough Council, St. Edward, the right solution can be found, striking the right balance between achieving the wider benefits the development clearly brings and contributing towards Guilford's future transport needs.

At the present time, we are not able to positively respond to the planning application. We are however committed to working with the applicant with the aim of reaching agreement, which if forthcoming, we would rather provide a revised response, if time allowed, before the meeting of your planning committee. Equally, if you are minded to determine the application now in the knowledge of our strong and well-founded objections outlined above, we have provided a set of planning conditions and recommended mitigation measures to partially protect the interests of the highway and its users, and to limit to some degree, the wider transport impact.

Further commentary in support of the above reasons for refusal:

To offer some clarity around each of our areas of concern, we offer the following further commentary:

Bus

1. Bus vehicle routing and manoeuvrability/bus layout, resulting in increased bus journey times

It is proposed that the bus station will operate with a north in, north out entrance and exit. Currently it is south in, north out with the free flow of Commercial Road. The bus operators have been clear that a single entry and exit would compromise their operational efficiency and resilience. SCC commissioned Arup to undertake a Bus Station Capacity Study to provide a greater understanding of the bus stations current and future needs. Their report identified the change in access arrangements as a problem. The removal of the existing southern access point has the potential to disrupt all bus services in Guildford without a suitable alternative. For example, if the proposed single point of access suffered congestion due to a concentration of services arriving and departing at the same time, the ability of operators to retain a reliable service in line with published timetables would be compromised. It is noted in the revised submission that the emergency access route from the south via North Street would alleviate some of our concerns in the event of an emergency if the access became blocked. However, this would not provide operational day to day benefits, or provide the Operators with the levels of resilience that they currently have.

In addition to buses being delayed entering and leaving the bus station, queuing buses within the bus station could cause an obstruction to buses wishing to depart the stands. Queuing buses could also prevent buses arriving at the stands. The increased likelihood of queuing buses entering and leaving the bus station will cause unnecessary harm and delays, impacting air quality and passenger experience.

Having reviewed the revised submission, we welcome the minor alterations to the bus lane on Woodbridge Road, however, whilst this might provide operational benefits, this will not result in improved journey times. The modelling report suggests an average increase in bus journeys times in the morning peak of 21 seconds, and 3 seconds in the evening peak. It is stated in the Transport Assessment that these will have a minimal impact, but nonetheless we need to consider the harm and the weight of national and local policy relating to the hierarchy of transport and the importance of maintaining and promoting the viability of public Transport services. Further, in

reality we believe that these delays will be longer due to the additional distance some services will need to travel. With the removal of the southern entrance to the bus station at North Street, there is an additional journey time for services from the south and west of around 340m as they travel via Onslow Street, York Road roundabout and Woodbridge Road, furthermore they would then need to navigate three additional sets of traffic lights and perform a U-turn at a busy roundabout. The Transport Assessment gives a headline figure of an average delay, but it is not the case for those buses arriving from the south and west. This increase does not support any current SCC policy, and is contrary to the aims and ambitions of national transport policy, nor do the Bus Operators support this.

2. Operational Service allocation and layover and Future Proofing

The Arup report sets out a number of potential options for a future bus station with bus stands and layover spaces, including detail of how these different options could be delivered, noting that some require significant policy change. The bus station capacity as proposed is significantly less than current which is unacceptable operationally (a matter that the bus operators themselves have raised concern with). Furthermore, there has been no mitigation to help support a smaller bus station – capacity has simply been removed. The Arup review of the Icen Operational Note (this is the basis of the justification of the proposal) identifies that there is a risk that current and future bus operations will not be able to run effectively with this reduction in capacity. It has not been demonstrated that the number of layover spaces proposed will meet the operational needs.

We also need to recognise that buses require a greater dwell time at bus stands in Guildford to allow all the passengers to board/alight; this is a major interchange with heavy passenger boardings, noting these passengers will be young and old, buggies, people with mobility challenges and wheelchair users. Neither do the proposals seem to recognise the need to increase passenger numbers.

The SCC BSIP has been developed in collaboration and consultation with both Bus Operators and the Local Planning Authorities. It has been designed to improve bus services in Surrey, and has been drawn up in delivery of the government’s ‘Bus Back Better’ policy. As part of the BSIP, a number of key performance targets have been developed for the Guildford area, including an increase in passenger numbers of 7% by 2024/25 compared to 2018/19 levels. There is also a target for an increase of 5% on average speeds compared to the 2019/2020 figures.

Extract from SCC BSIP:

Figure 25 BISP Targets

	2018/19	2019/20	Target for 2024/25
Average Speeds	-	12.73mph	+5%
Passenger Numbers	7.97m	7.24m	8.53m
Average Passenger Satisfaction	60%	56%	66%
	Nov 2019	June 2021	Target for 2024/25
Reliability (% of services arriving within time target)	78.5%	87.2%	90.2%

Shaping Guildford’s Future Transport Strategy Stage 2 Report states that the above table aligns well with the needs of Shaping Guildford’s Future to encourage increases in bus travel. These increases in passenger numbers do not take account of the significantly increased demand that will arise from the Strategic Housing allocation sites cited above.

The County Highway Authority recognise that the applicant has attempted to provide additional capacity by the provision of a further layover space and adjustment to bays 15 and 16. Having

reviewed this we do not believe that this will create any additional capacity. The nature of the services and their varying durations of stay means that it would be impractical operationally to configure the services as suggested. Such additional provisions to those already proposed do not satisfy our concerns and believe that this application will seriously prejudice the achievement of these SCC and GBC objectives.

3. Accessibility

All bus stands and stops need to be fully accessible to meet Equality Act requirements. Further detail has been provided by the applicant by way of an additional report. SCC are committed to making all its bus stops accessible for all users, as such we believe that the new bus station at Guildford must also be designed to meet the same requirements. The remodelled bus station is a once in a lifetime opportunity to enable access for all; if this cannot be provided now, its extremely unlikely that further accessibility improvements will be able to follow in the future. Due to the reduced size of the bus station, the waiting and circulation of passengers will be concentrated into a smaller area, meaning creating additional space to meet accessibility requirements in the future will be even more difficult to achieve.

It may be possible to overcome this reason for refusal with the applicant's submission of further information. The County Highway Authority need to be provided with a fully dimensioned plan showing the dimensions of the saw tooth arrangement along with the swept path of wheelchair and mobility scooters gaining access onto and off the buses. The current plans do not show this information in sufficient detail.

How our objection could be overcome:

Subject to all the above points being addressed, the County Highway Authority are optimistic that with continued collaboration with GBC and the applicant the right solutions can be found for the bus station. We believe that reinstating the southern access point on Commercial Road could address a number of our concerns by:

1. Retaining a secondary access point so there are always two points of access.
2. Providing an increase in the number of bus stands, thereby enabling the potential for sufficient capacity and the potential for growth.
3. Maintaining existing levels of resilience and operational efficiency.
4. Enabling compliance with the Equality Act.
5. Removing any negative impacts on bus journey times and reliability.

We recognise that a southern access point could be seen to compromise the available space for public realm improvements in the southern end of Commercial Road/North Street. However with further analysis we believe that such a provision would not dilute the value of this new public realm to any significance.

The Emergency Vehicle Access Strategy within the Transport Assessment notes how a large fire appliance will need to enter Commercial Road via North Street from the south and exit Commercial Road via the Bus Station to the north, via a lockable gate or barrier.

It is also recognised that pedestrianisation cannot take place on North Street between the existing taxi rank outside McDonalds and the western arm of North Street where it joins Commercial Road. This area would need to be kept clear at all times to (i) allow servicing of McDonalds and Phoenix Court, and (ii) to allow a large HGV to turn and exit onto the gyratory in the event that such a vehicle cannot access North Street due to the restricted hours of access.

In meeting the fire access need and the existing serving and proposed turning requirements, there will be a need to provide for a clear uninterrupted access route for large HGVS and fire appliances from North Street to the Bus Station. This is borne out by the proposed design of Friary Square. (The Local Planning Authority should note that the proposed landscaping in this area is partly located on land that sits beyond the current adopted highway limits of Commercial Road.

Shared spaces for buses and pedestrians are not uncommon and exist in many towns and cities in the UK. There are a variety of public realm treatments available, and the County Highway Authority see no reason why a solution cannot be found at the bottom end of North Street where it meets the southern end of Commercial Road. Furthermore, the County Highway Authority believe that it would be possible to retain an access point from the south, incorporate additional bus stands/stops, whilst at the same time retaining much of the currently proposed public realm and landscaping.

Finally, the amount of new public realm affected by this modest suggested change at the southern end of Commercial Road, is a very small percentage of the overall significantly improved space allocated to public realm within the development itself, and on the rest of North Street between Commercial and Leapale Roads.

Fallback position:

The County Highway Authority has significant concerns with the proposed development in its current form as outlined above. However, we recognise that the Local Planning Authority needs to consider these alongside other matters which it may deem to carry more weight. In the event that the Local Planning Authority is minded to approve this application, and in an effort to safeguard all users of, and the functioning of the highway, the following conditions and obligations should be imposed:

Section 106 Agreement requiring:

Car club

The provision of the following entirely at the applicant's expense, including the costs of on street adjustments and traffic orders:

- (a) A minimum of two car club vehicles for a minimum of five years, with all costs associated with the provision of the vehicle including provision of parking space either within a publicly accessible location of the development or on the public highway and pump priming being met by the developer.
- (b) £50 worth of free travel for car club vehicles for each residential unit.
- (c) Three year's free membership of the car club for all initial occupants of the residential units.

Public Transport Vouchers

Prior to first occupation of each residential unit to provide each dwelling with a combined cycle/bus voucher of £250 per dwelling, at a total cost of £118,250. The developer shall monitor and report to the County Highway Authority the uptake of the vouchers by each household, all in accordance with a scheme to be submitted to and agreed in writing by the County Highway Authority.

All monies shall be index linked from date of any resolution to grant planning permission and paid to the County Highway Authority.

Conditions

1. Except for site clearance and demolition works, no other operations shall be commenced until a Highway Works Construction Delivery Plan and been prepared and submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway

Authority. Such Plan shall detail the programming, sequencing timing and delivery of the required highway works listed at paragraphs (a) to (g) below including the decommissioning and Stopping Up of the existing highways at Woodbridge Road and Commercial Road:

- (a) The construction of the proposed vehicular access to Leapale Road including visibility zones in general accordance with the approved plans. One constructed the visibility zones shall be kept permanently clear of any obstruction over 0.6m high.
- (b) The proposed alterations to the highways of North Street, Woodbridge Road, Leapale Road, Commercial Road in general accordance with the approved plans and the associated Traffic Regulation Orders as broadly illustrated on the Hierarchy Plan.
- (c) The installation of the proposed physical barrier on North Street and ancillary works to prevent vehicular access during restricted hours. Such details to include a proposed North Street Operational Management Strategy which once approved shall be implemented and operated in accordance with the approved details.
- (d) The creation of an emergency bus access route, refuse vehicle access route and delivery vehicle access route through the new Friary Square from North Street in accordance with details to be included within the North Street Operational Management Strategy.
- (e) The widening and alteration of the existing bus lane on Woodbridge Road at both the bus station exit and at its junction with Onslow Street, in general accordance with the approved plans.
- (f) The construction of a right turn facility for buses into Woodbridge Road at its junction with Onslow Street, in accordance with details to be submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority; OR in the event that such works can't reasonably be delivered, the applicant shall fund other measures of equivalent value aimed reducing bus journey times and delay in Guildford Town Centre and its approaches.
- (g) The proposed public realm works in North Street and Commercial Road in accordance with details to be submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority. Such works to include:
 - i. high quality materials, street furniture, wayfinding signage and sustainable drainage features as may be required by the County Highway Authority,
 - ii. details to provide for the safe and efficient movement of cyclists through the pedestrianised area.

Once the Highway Works Construction Delivery Plan is approved, the required highway works shall be constructed at the applicant's expense and in general accordance with the approved plans under the terms of a S278 Highways Agreement to be entered into between the applicant and the County Highway Authority. Implementation shall be in strict accordance with the timescales and details specified in the agreed Plan (unless otherwise agreed in writing), and in further compliance with the County Highway Authority's Technical Approval and Road Safety Audit requirements.

2. The development hereby approved shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be permanently retained and maintained for their designated purposes.
3. The development hereby approved shall not be occupied unless and until 100% of the proposed parking spaces are provided with a fast charge socket (current minimum

requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the Local Planning Authority and thereafter retained and maintained to the satisfaction of the Local Planning Authority.

4. The development hereby approved shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for:
 - (a) The secure parking of a minimum of 529 bicycles within the residential development site,
 - (b) The secure parking of a minimum of 473 e-bike charging points within the residential development site,
 - (c) The secure parking of a minimum of 109 bicycles for non-residential land uses within the development site in locations to be agreed with the County Highway Authority,
 - (d) 20% of available cycle parking provided in communal cycle storage shall be provided with e-bike charging points, and lockers with internal electrical sockets for the charging of removable e-bike batteries.
 - (e) 5% of available cycle parking provided in communal cycle storage shall be provided as disabled spaces,
 - (f) Space to be provided for the parking of adaptive cycles in communal cycle storage,
 - (g) Facilities within the development site for cyclists to change into and out of cyclist equipment / shower,
 - (h) Facilities within the development site for cyclists to store cyclist equipment,

Thereafter the approved facilities shall be provided, permanently retained and maintained to the satisfaction of the Local Planning Authority.

5. No development shall commence until a Construction Transport Management Plan, to include details of:
 - (a) parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) vehicle routing
 - (h) measures to prevent the deposit of materials on the highway
 - (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
 - (j) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the approved details shall be implemented during the construction of the development.

6. The development hereby approved shall not be first occupied unless and until the following has been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority:
 - (a) A Travel Statement including information pack to be provided to residents / staff / visitors regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs, and thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.
7. The development hereby approved shall not be first occupied unless and until a pedestrian inter-visibility splay measuring 2m by 2m has been provided on each side of the access to Leapale Road, the depth measured from the back of the footway (or verge) and the widths

outwards from the edges of the access. No obstruction to visibility between 0.6m and 2m in height above ground level shall be erected within the area of such splays.

8. The development hereby approved shall not be first occupied unless and until the proposed three oversailing balconies on Leapale Road are provided with a S177 licence under the terms of the Highways Act 1980 and in accordance with the requirements of the County Highway Authority.
9. The development hereby approved shall not be first commenced unless and until an Access and Management Strategy is agreed with the Bus Operators and Surrey County Council in accordance with details to be submitted to and approved in writing by the Local Planning Authority. Once agreed this shall be implemented at all times upon first use of the reconfigured bus station.
10. No part of the development shall be first occupied unless and until the developer has funded and installed the following in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority and in consultation with Surrey County Council and local Bus Operators:
 - a. The provision of raised kerbing (to a height of 140mm) to ensure level access onto / off buses for those with mobility issues,
 - b. The Provision of:
 - i. New high quality bus shelters serving 14,15 and 16,
 - ii. Real Time Passenger Information for every bus stop,
 - iii. High quality arrival/departure boards that have a Content Management System installed,
All to be provided in accordance with SCC's approved suppliers.
 - a. Details of an Bus Station Operational, Maintenance and Management Plan,
 - b. The provision of further improved staff and customer facilities, at the existing kiosk locations at the northern end of the bus station.
 - c. The provision of an improved bus station incorporating seating, lighting, toilets, wayfinding information and ancillary infrastructure.

Reasons

The above conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

The above conditions are required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2021.

Policy

The above conditions are required to satisfy the Guildford Local Plan policies.

The above conditions are required in order that the development should meet the objectives of National Planning Policy Framework and Surrey County Councils Local Transport Plan.

Highway Informatives

1. The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the County Highway Authority before any works are carried out on any

footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see

<http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.

2. The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
3. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the County Highway Authority Local Highways Service.
4. All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980.
5. Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.
6. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2022. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.
7. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
8. No operations involving the bulk movement of [earthworks] materials to or from the development site shall commence unless and until facilities have been provided in accordance with [the approved plans / a scheme to be submitted to and approved in writing by the Local Planning Authority] to so far as is reasonably practicable prevent the creation of dangerous conditions for road users on the public highway. The approved scheme shall thereafter be retained and used whenever the said operations are undertaken.
9. The scheme to implement waiting restrictions or other relevant works to regulate or restrict the

operation of the highway shall first require a Traffic Regulation Order or Notice prior to use. The alteration of the Traffic Regulation Order or creation of a new Order or Notice is a separate statutory procedure which must be processed at the applicant's expense prior to any alterations being made. In the event that the implementation of waiting restrictions or other works requiring an Order or Notice is not successful due to unresolved objections the applicant shall submit an alternative scheme to the Local Planning Authority for its approval prior to first occupation of the development. Any alternative scheme or works shall be implemented prior to the occupation of any dwellings to the satisfaction of the Local Planning Authority.

10. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.

Note to Case Officer:

Road Safety Audit (RSA)

A stage 1 RSA has been undertaken internally, and a Designer's Response has been provided. Further work and detail is required at Stage 2 and 3, which will be undertaken as part of the S278's for the site.

TRO's

The development will entail a range of Traffic orders, not least of which will involve the reversal of the one-way operation and pedestrianisation of North Street. Leapale road will also become two way. There are a range of other TRO's that provide restricted access to North Street, Martyr Road, Leapale Lane, Haydon Place and Ward Street. The County Highway Authority believe that the proposed restrictions require further clarity and refinement at the detailed design stage.

Pedestrianisation on North Street

Much of the development will be serviced from North Street and the County Highway Authority is satisfied that adequate provision has been made to serve both the existing and proposed needs. The pedestrianisation scheme itself will be the subject of detailed design and will need to encompass all aspects such as closure points, method of vehicle control and enforcement, use of materials, street furniture, signage and provision for sustainable travel modes. It should be noted that North Street will need to accommodate two-way cycle usage and the eventual design will need to facilitate this along with way marking signage.

Residential servicing and deliveries

All residential servicing, including deliveries, waste collection, food deliveries and taxi/uber collections and drop offs will take place from Leapale Road, using the new laybys. Whilst these laybys will be heavily used for all these purposes, the County Highway Authority are satisfied that there is sufficient capacity to meet the demand.

Stopping Up

Commercial Road, Woodbridge Road and North Street provide a substantial developable area and

we recognise that the development can only proceed with SCC's agreement to the stopping up. The critical test being whether SCC feels the roads are surplus to our requirements. In order for us to deem those roads surplus we need to be satisfied that all other transport elements can perform satisfactorily, not just now but also for the future without these two roads. The cumulative issues of bus station capacity and access, re-routing of traffic, amongst other related issues, means that we are currently finding it difficult to deem these roads surplus. At this stage, if we were consulted by the DfT, the County Highway Authority's position on this would be to refuse the stopping up, as we do not currently deem this land surplus to requirements.

Highway Trees

The applicant has confirmed that there are currently no existing highway trees impacted by the proposals.

Travel Plan

Having consulted our Travel Plan Officer, a Travel Plan is not needed here, and instead a Travel Statement shall be provided which includes an information Pack and shall be provided to residents/staff/visitors in accordance with Condition 8. These should be combined into one document, and should include the content of a residents' travel information pack (already referred to) and a description of the sustainable travel content of noticeboards and/or any proposed development website. Details of how this work will be undertaken should also be included, eg details of who will put the travel information packs together and distribute them, who will administer the car club scheme and public transport vouchers here, who will look after the noticeboards and who will update the website, if one is proposed.

Leapale Road Residential Access

At the S278 stage, the County Highway Authority may request that the development access is constructed as a Copenhagen crossing, which is a good way of providing a continuous footway across side roads. They helpfully reinforce the highway code by giving priority to pedestrians at junctions.

Right turn facility into Woodbridge Road

If the applicant is unwilling to retain and provide the southern access from North Street for buses, some level of mitigation is required to partially offset the predicted increase in bus journey times. Whilst such a provision would not overcome our recommended reason for refusal, a solution that could be explored further would be to provide a right turn facility from Onslow Street into Woodbridge Road. Condition number 1f has been included to require this provision in the event that our reasons for refusal are disregarded and planning permission is granted.

To further support this, see below a quote taken from the Markides Associates report 'Buses in Guildford, Shaping Guildford's Future, 26 July 2022', prepared for Guildford Borough Council:

"In contrast to the benefit of less buses using the gyratory from the north as a result of the new access arrangements, buses from the south and west will now need to do a U-turn at York Road roundabout in order to access the bus station. The ramifications of this result in unnecessary increases to journey times and the risk of reducing the reliability of routes. This issue could be mitigated by allowing right turning buses into Woodbridge Road at the junction with Onslow Street, although this junction would require reconfiguration to make this possible".

APPLICATION NUMBER	GU/22/01336
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DEVELOPMENT AFFECTING ROADS
TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Mr. Robert Packham

Location: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, GU1

Development: A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:
 ? Demolition of existing buildings; ? A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding; ? Erection of buildings ranging from 4 to 14 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with; ? Hard and soft landscaped areas to form pedestrianised streets and public spaces; ? Associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Rd) and associated infrastructure; ? The stopping up of adopted highway (including Commercial Road and Woodbridge Road); ? Alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

Contact Officer	Abigail Grealey	Consultation Date	11 August 2022	Response Date	12 December 2022
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The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who has assessed the application on safety, capacity and policy grounds and recommends the proposal be refused on the grounds that:

1. The proposed development leads to an increase in bus journey times, particularly those arriving from the south and the west, specifically all bus services travelling into Guildford along the A281, A3100, A31 and from the University/RSCH, resulting in increased passenger delays and reduced customer satisfaction levels. Despite the emergency access route provided from the south via North Street, it has not been demonstrated that the proposed entrance and exit to the bus station would provide satisfactory levels of operational efficiency and resilience. The failure of which would result in increased passenger delays and reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of Surrey County Council's (SCC) Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).

2. The proposed development results in a reduction in the number of bus stands and layover spaces, and it has not been satisfactorily demonstrated that this reduction can accommodate the planned future growth, which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan (LTP4), the DfT Bus Back Better- National Bus Strategy for England (2021), Guildford Local Plan (Site allocations A25, A26 and A35) and the NPPF (2021).
3. It has not been demonstrated that the proposed bus station is accessible for all users. The failure of which is prejudicial to vulnerable users and would lead to reduced customer satisfaction levels. The combination of which will limit efficient and effective bus operations supporting sustainable development, and passenger growth which is contrary to the targets of SCC's Bus Service Improvement Plan (2021) and Local Transport Plan 4 (2021), the DfT Bus Back Better- National Bus Strategy for England (2021), and the NPPF (2021).

Notes to Planning Officer:

Notwithstanding the above recommended reasons for refusal, the County Highway Authority very much support the principal of redevelopment of this site and remain committed to working with the applicant and Guildford Borough Council to deliver a fit for purpose high quality development to serve Guildford's long term future needs. We recognise the value that a redevelopment would add to this part of the town, which could comprise a much-needed refurbishment of the existing bus station and pedestrianisation of North Street.

Whilst we support the principal of redevelopment, it must be able to meet Guildford's future transport needs. The Guildford Local Plan proposes the delivery of thousands of new homes at the strategic housing sites at Wisley, Gosden Hill, Blackwell Farm and Ash, all of which will need to demonstrate high levels of non-car accessibility to reduce carbon emissions. In addition is the strategic site at Dunsfold in Waverley, and all these sites will need to invest in local bus services, as well as Park and Ride services, the primary focus of which will be Guildford Town Centre, a key attractor for employment and leisure trips.

The emerging 'Shaping Guildford's Future' (SGF) work commissioned by the Borough Council in partnership with the County Council, recognises the importance of growing bus patronage and improving journeys times and reliability. The SGF Transport Strategy Stage 2 Report identifies the County Councils Bus Service improvement Plan (BSIP) and supports its targets to (i) improve average bus speeds by 5mph, (ii) increase passenger numbers from 7.24m (2019/20) to 8.53m (by 2024/25), (iii) improve average passenger satisfaction from 56% (2019/20) to 66% (by 2024/25), and (iv) to improve journey time reliability from 78.5% (Nov 2019) to 90.2% (by 2024/25). The current proposals for the bus station in terms of its access and capacity would seriously hinder the achievement of these targets.

The BSIP provides the bus strategy for the County Council's fourth Surrey Local Transport Plan (LTP). The LTP plays a crucial role in helping to achieve the Council Council's ambition to become a carbon neutral county by 2050. In respect of bus travel, it notes "The delivery of improved bus services across the county to form the core of an integrated public, shared and active transport system will be at the heart of successfully delivering our LTP4 and achieving the four key objectives of decarbonisation, sustainable growth, well-connected communities and clean air and excellent quality of life".

It is widely recognised that bus patronage saw a sharp decline during the Covid-19 pandemic and a key objective of both the LTP and BSIP is to get more people using buses in Surrey. Official Statistics from the Department for Transport shows that domestic bus travel has almost returned to pre-covid levels (March 2020 to October 2022)

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1109168/COVID-19-transport-use-statistics.ods)

It is hugely important that SCC and its partners work collaboratively to build upon the post Covid-19 recovery to ensure the delivery of a range of exemplar services and infrastructure to meet the future needs of residents and businesses. We believe that the redevelopment of the existing Bus Station is at the core of achieving this and as a once in a lifetime opportunity, the solution must be the right one. We are optimistic that with continued collaboration with the Borough Council, St. Edward, the right solution can be found, striking the right balance between achieving the wider benefits the development clearly brings and contributing towards Guilford's future transport needs.

At the present time, we are not able to positively respond to the planning application. We are however committed to working with the applicant with the aim of reaching agreement, which if forthcoming, we would rather provide a revised response, if time allowed, before the meeting of your planning committee. Equally, if you are minded to determine the application now in the knowledge of our strong and well-founded objections outlined above, we have provided a set of planning conditions and recommended mitigation measures to partially protect the interests of the highway and its users, and to limit to some degree, the wider transport impact.

Further commentary in support of the above reasons for refusal:

To offer some clarity around each of our areas of concern, we offer the following further commentary:

Bus

1. Bus vehicle routing and manoeuvrability/bus layout, resulting in increased bus journey times

It is proposed that the bus station will operate with a north in, north out entrance and exit. Currently it is south in, north out with the free flow of Commercial Road. The bus operators have been clear that a single entry and exit would compromise their operational efficiency and resilience. SCC commissioned Arup to undertake a Bus Station Capacity Study to provide a greater understanding of the bus stations current and future needs. Their report identified the change in access arrangements as a problem. The removal of the existing southern access point has the potential to disrupt all bus services in Guildford without a suitable alternative. For example, if the proposed single point of access suffered congestion due to a concentration of services arriving and departing at the same time, the ability of operators to retain a reliable service in line with published timetables would be compromised. It is noted in the revised submission that the emergency access route from the south via North Street would alleviate some of our concerns in the event of an emergency if the access became blocked. However, this would not provide operational day to day benefits, or provide the Operators with the levels of resilience that they currently have.

In addition to buses being delayed entering and leaving the bus station, queuing buses within the bus station could cause an obstruction to buses wishing to depart the stands. Queuing buses could also prevent buses arriving at the stands. The increased likelihood of queuing buses entering and leaving the bus station will cause unnecessary harm and delays, impacting air quality and passenger experience.

Having reviewed the revised submission, we welcome the minor alterations to the bus lane on Woodbridge Road, however, whilst this might provide operational benefits, this will not result in improved journey times. The modelling report suggests an average increase in bus journey times in the morning peak of 21 seconds, and 3 seconds in the evening peak. It is stated in the Transport Assessment that these will have a minimal impact, but nonetheless we need to consider the harm and the weight of national and local policy relating to the hierarchy of transport and the importance of maintaining and promoting the viability of public Transport services. Further, in

reality we believe that these delays will be longer due to the additional distance some services will need to travel. With the removal of the southern entrance to the bus station at North Street, there is an additional journey time for services from the south and west of around 340m as they travel via Onslow Street, York Road roundabout and Woodbridge Road, furthermore they would then need to navigate three additional sets of traffic lights and perform a U-turn at a busy roundabout. The Transport Assessment gives a headline figure of an average delay, but it is not the case for those buses arriving from the south and west. This increase does not support any current SCC policy, and is contrary to the aims and ambitions of national transport policy, nor do the Bus Operators support this.

2. Operational Service allocation and layover and Future Proofing

The Arup report sets out a number of potential options for a future bus station with bus stands and layover spaces, including detail of how these different options could be delivered, noting that some require significant policy change. The bus station capacity as proposed is significantly less than current which is unacceptable operationally (a matter that the bus operators themselves have raised concern with). Furthermore, there has been no mitigation to help support a smaller bus station – capacity has simply been removed. The Arup review of the Icen Operational Note (this is the basis of the justification of the proposal) identifies that there is a risk that current and future bus operations will not be able to run effectively with this reduction in capacity. It has not been demonstrated that the number of layover spaces proposed will meet the operational needs.

We also need to recognise that buses require a greater dwell time at bus stands in Guildford to allow all the passengers to board/alight; this is a major interchange with heavy passenger boardings, noting these passengers will be young and old, buggies, people with mobility challenges and wheelchair users. Neither do the proposals seem to recognise the need to increase passenger numbers.

The SCC BSIP has been developed in collaboration and consultation with both Bus Operators and the Local Planning Authorities. It has been designed to improve bus services in Surrey, and has been drawn up in delivery of the government’s ‘Bus Back Better’ policy. As part of the BSIP, a number of key performance targets have been developed for the Guildford area, including an increase in passenger numbers of 7% by 2024/25 compared to 2018/19 levels. There is also a target for an increase of 5% on average speeds compared to the 2019/2020 figures.

Extract from SCC BSIP:

Figure 25 BISP Targets

	2018/19	2019/20	Target for 2024/25
Average Speeds	-	12.73mph	+5%
Passenger Numbers	7.97m	7.24m	8.53m
Average Passenger Satisfaction	60%	56%	66%
	Nov 2019	June 2021	Target for 2024/25
Reliability (% of services arriving within time target)	78.5%	87.2%	90.2%

Shaping Guildford’s Future Transport Strategy Stage 2 Report states that the above table aligns well with the needs of Shaping Guildford’s Future to encourage increases in bus travel. These increases in passenger numbers do not take account of the significantly increased demand that will arise from the Strategic Housing allocation sites cited above.

The County Highway Authority recognise that the applicant has attempted to provide additional capacity by the provision of a further layover space and adjustment to bays 15 and 16. Having

reviewed this we do not believe that this will create any additional capacity. The nature of the services and their varying durations of stay means that it would be impractical operationally to configure the services as suggested. Such additional provisions to those already proposed do not satisfy our concerns and believe that this application will seriously prejudice the achievement of these SCC and GBC objectives.

3. Accessibility

All bus stands and stops need to be fully accessible to meet Equality Act requirements. Further detail has been provided by the applicant by way of an additional report. SCC are committed to making all its bus stops accessible for all users, as such we believe that the new bus station at Guildford must also be designed to meet the same requirements. The remodelled bus station is a once in a lifetime opportunity to enable access for all; if this cannot be provided now, its extremely unlikely that further accessibility improvements will be able to follow in the future. Due to the reduced size of the bus station, the waiting and circulation of passengers will be concentrated into a smaller area, meaning creating additional space to meet accessibility requirements in the future will be even more difficult to achieve.

It may be possible to overcome this reason for refusal with the applicant's submission of further information. The County Highway Authority need to be provided with a fully dimensioned plan showing the dimensions of the saw tooth arrangement along with the swept path of wheelchair and mobility scooters gaining access onto and off the buses. The current plans do not show this information in sufficient detail.

How our objection could be overcome:

Subject to all the above points being addressed, the County Highway Authority are optimistic that with continued collaboration with GBC and the applicant the right solutions can be found for the bus station. We believe that reinstating the southern access point on Commercial Road could address a number of our concerns by:

1. Retaining a secondary access point so there are always two points of access.
2. Providing an increase in the number of bus stands, thereby enabling the potential for sufficient capacity and the potential for growth.
3. Maintaining existing levels of resilience and operational efficiency.
4. Enabling compliance with the Equality Act.
5. Removing any negative impacts on bus journey times and reliability.

We recognise that a southern access point could be seen to compromise the available space for public realm improvements in the southern end of Commercial Road/North Street. However with further analysis we believe that such a provision would not dilute the value of this new public realm to any significance.

The Emergency Vehicle Access Strategy within the Transport Assessment notes how a large fire appliance will need to enter Commercial Road via North Street from the south and exit Commercial Road via the Bus Station to the north, via a lockable gate or barrier.

It is also recognised that pedestrianisation cannot take place on North Street between the existing taxi rank outside McDonalds and the western arm of North Street where it joins Commercial Road. This area would need to be kept clear at all times to (i) allow servicing of McDonalds and Phoenix Court, and (ii) to allow a large HGV to turn and exit onto the gyratory in the event that such a vehicle cannot access North Street due to the restricted hours of access.

In meeting the fire access need and the existing serving and proposed turning requirements, there will be a need to provide for a clear uninterrupted access route for large HGVS and fire appliances from North Street to the Bus Station. This is borne out by the proposed design of Friary Square. (The Local Planning Authority should note that the proposed landscaping in this area is partly located on land that sits beyond the current adopted highway limits of Commercial Road.

Shared spaces for buses and pedestrians are not uncommon and exist in many towns and cities in the UK. There are a variety of public realm treatments available, and the County Highway Authority see no reason why a solution cannot be found at the bottom end of North Street where it meets the southern end of Commercial Road. Furthermore, the County Highway Authority believe that it would be possible to retain an access point from the south, incorporate additional bus stands/stops, whilst at the same time retaining much of the currently proposed public realm and landscaping.

Finally, the amount of new public realm affected by this modest suggested change at the southern end of Commercial Road, is a very small percentage of the overall significantly improved space allocated to public realm within the development itself, and on the rest of North Street between Commercial and Leapale Roads.

Fallback position:

The County Highway Authority has significant concerns with the proposed development in its current form as outlined above. However, we recognise that the Local Planning Authority needs to consider these alongside other matters which it may deem to carry more weight. In the event that the Local Planning Authority is minded to approve this application, and in an effort to safeguard all users of, and the functioning of the highway, the following conditions and obligations should be imposed:

Section 106 Agreement requiring:

Bus Service Priority Improvements

Prior to commencement of the development, an index linked financial contribution (calculated from the date of any resolution to grant planning permission) of £1.5 million payable to the County Highway Authority for bus service priority and journey time reliability improvements on the Strategic Bus routes entering Guilford Town Centre.

Car club

The provision of the following entirely at the applicant's expense, including the costs of on street adjustments and traffic orders:

- (a) A minimum of two car club vehicles for a minimum of five years, with all costs associated with the provision of the vehicle including provision of parking space either within a publicly accessible location of the development or on the public highway and pump priming being met by the developer.
- (b) £50 worth of free travel for car club vehicles for each residential unit.
- (c) Three year's free membership of the car club for all initial occupants of the residential units.

Public Transport Vouchers

Prior to first occupation of each residential unit to provide each dwelling with a combined cycle/bus voucher of £250 per dwelling, at a total cost of £118,250. The developer shall monitor and report to the County Highway Authority the uptake of the vouchers by each household, all in accordance with a scheme to be submitted to and agreed in writing by the County Highway Authority.

All monies shall be index linked from date of any resolution to grant planning permission and paid to the County Highway Authority.

Conditions

1. Except for site clearance and demolition works, no other operations shall be commenced until a Highway Works Construction Delivery Plan and been prepared and submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority. Such Plan shall detail the programming, sequencing timing and delivery of the required highway works listed at paragraphs (a) to (g) below including the decommissioning and Stopping Up of the existing highways at Woodbridge Road and Commercial Road:
 - (a) The construction of the proposed vehicular access to Leapale Road including visibility zones in general accordance with the approved plans. Once constructed the vehicular and pedestrian visibility zones shall be kept permanently clear of any obstruction over 0.6m high.
 - (b) The proposed alterations to the highways of North Street, Woodbridge Road, Leapale Road, Commercial Road in general accordance with the approved plans and the associated Traffic Regulation Orders as broadly illustrated on the Hierarchy Plan.
 - (c) The installation of the proposed physical barrier on North Street and ancillary works to prevent vehicular access during restricted hours. Such details to include a proposed North Street Operational Management Strategy which once approved shall be implemented and operated in accordance with the approved details.
 - (d) The creation of an emergency bus access route, refuse vehicle access route and delivery vehicle access route through the new Friary Square from North Street in accordance with details to be included within the North Street Operational Management Strategy.
 - (e) The widening and alteration of the existing bus lane on Woodbridge Road at both the bus station exit and at its junction with Onslow Street, in general accordance with the approved plans.
 - (f) The construction of a right turn facility for buses into Woodbridge Road at its junction with Onslow Street, in accordance with details to be submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority; OR in the event that such works can't reasonably be delivered, the applicant shall fund other measures of equivalent value aimed reducing bus journey times and delay in Guildford Town Centre and its approaches.
 - (g) The proposed public realm works in North Street and Commercial Road in accordance with details to be submitted to and approved in writing by the Local Planning Authority after consultation with the County Highway Authority. Such works to include:
 - i. high quality materials, street furniture, wayfinding signage and sustainable drainage features as may be required by the County Highway Authority,
 - ii. details to provide for the safe and efficient movement of cyclists through the pedestrianised area.

Once the Highway Works Construction Delivery Plan is approved, the required highway works shall be constructed at the applicant's expense and in general accordance with the approved plans under the terms of a S278 Highways Agreement to be entered into between the applicant and the County Highway Authority. Implementation shall be in strict accordance with the timescales and details specified in the agreed Plan (unless otherwise agreed in writing), and in further compliance with the County Highway Authority's Technical Approval and Road Safety Audit requirements.

2. The development hereby approved shall not be first occupied unless and until a Vehicle and Parking Occupation Strategy Plan has been submitted to and approved in writing by the Local Planning Authority. The Strategy shall include a timetable for the setting out within the site, in accordance with the approved plans, so that vehicles can be parked and for vehicles to turn so that they may enter and leave the site in forward gear. The development shall only be constructed in full accordance with the agreed Strategy. Thereafter the parking and turning areas shall be permanently retained and maintained for their designated purposes.
3. The residential units hereby approved shall not be first occupied unless and until a scheme for the provision of electric vehicle charging points for all of the proposed parking spaces has been submitted to and approved in writing by the Local Planning Authority. The scheme shall demonstrate that all of the charging points are provided with a fast charge socket (current minimum requirements - 7 kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply). The approved scheme shall be implemented and installed in accordance with the Vehicle and Parking Occupation Strategy agreed through condition XX. Thereafter the approved scheme shall be retained and maintained to the satisfaction of the Local Planning Authority.
4. Block XX – XX shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority for:
 - (a) The secure parking of a minimum of 529 bicycles within the residential development site,
 - (b) The secure parking of a minimum of 473 e-bike charging points within the residential development site,
 - (c) The secure parking of a minimum of 109 bicycles for non-residential land uses within the development site in locations to be agreed with the County Highway Authority,
 - (d) 20% of available cycle parking provided in communal cycle storage shall be provided with e-bike charging points, and lockers with internal electrical sockets for the charging of removable e-bike batteries.
 - (e) 5% of available cycle parking provided in communal cycle storage shall be provided as disabled spaces,
 - (f) Space to be provided for the parking of adaptive cycles in communal cycle storage,
 - (g) Facilities within the development site, other than for the residential uses, for cyclists to change into and out of cyclist equipment / shower,
 - (h) Facilities within the development site, other than for the residential uses, for cyclists to store cyclist equipment,

Thereafter the approved facilities shall be provided, permanently retained and maintained to the satisfaction of the Local Planning Authority.

5. No development shall commence until a Construction Transport Management Plan, to include details of:
 - (a) parking for vehicles of site personnel, operatives and visitors
 - (b) loading and unloading of plant and materials
 - (c) storage of plant and materials
 - (d) programme of works (including measures for traffic management)
 - (e) provision of boundary hoarding behind any visibility zones
 - (f) HGV deliveries and hours of operation
 - (g) vehicle routing
 - (h) measures to prevent the deposit of materials on the highway
 - (i) before and after construction condition surveys of the highway and a commitment to fund the repair of any damage caused
 - (j) on-site turning for construction vehicles

has been submitted to and approved in writing by the Local Planning Authority. Only the

approved details shall be implemented during the construction of the development.

6. Before any dwelling hereby approved is first occupied, a Travel Statement shall be submitted to and approved in writing by the Local Planning Authority. The Statement shall include details of an information/welcome pack to be provided to residents / staff / visitors regarding the availability of and whereabouts of local public transport / walking / cycling / car sharing clubs / car clubs. The Travel Statement shall be implemented in full upon the first occupation of the development. Thereafter the said approved facilities shall be provided, retained and maintained to the satisfaction of the Local Planning Authority.
7. The residential development hereby approved shall not be first occupied unless and until the proposed three oversailing balconies on Leapale Road are provided with a S177 licence under the terms of the Highways Act 1980 and in accordance with the requirements of the County Highway Authority.
8. The proposed works to the reconfigured Bus Station shall not be commenced unless and until an Access and Management Strategy for the Bus Station has been submitted to and approved in writing by the Local Planning Authority. The agreed Strategy shall be implemented at all times upon first use of the reconfigured bus station.
9. No part of the reconfigured Bus Station shall be brought into use unless and until the developer has funded and installed the following in accordance with a scheme to be first submitted to and approved in writing by the Local Planning Authority:
 - a. The provision of raised kerbing (to a height of 140mm) to ensure level access onto / off buses for those with mobility issues,
 - b. The Provision of:
 - i. New high quality bus shelters serving 14,15 and 16,
 - ii. Real Time Passenger Information for every bus stop,
 - iii. High quality arrival/departure boards that have a Content Management System installed,All to be provided in accordance with SCC's approved suppliers.
 - a. Details of an Bus Station Operational, Maintenance and Management Plan,
 - b. The provision of further improved staff and customer facilities, at the existing kiosk locations at the northern end of the bus station.
 - c. The provision of an improved bus station incorporating seating, lighting, toilets, wayfinding information and ancillary infrastructure.

Reasons

The above conditions are required in order that the development should not prejudice highway safety nor cause inconvenience to other highway users.

The above conditions are required in recognition of Section 9 'Promoting Sustainable Transport' in the National Planning Policy Framework 2021.

Policy

The above conditions are required to satisfy the Guildford Local Plan policies.

The above conditions are required in order that the development should meet the objectives of National Planning Policy Framework and Surrey County Councils Local Transport Plan.

Highway Informatives

1. The permission hereby granted shall not be construed as authority to carry out any works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway or any works that may affect a drainage channel/culvert or water course. The applicant is advised that a permit and, potentially, a Section 278 agreement must be obtained from the County Highway Authority before any works are carried out on any footway, footpath, carriageway, verge or other land forming part of the highway. All works (including Stats connections/diversions required by the development itself or the associated highway works) on the highway will require a permit and an application will need to be submitted to the County Council's Street Works Team up to 3 months in advance of the intended start date, depending on the scale of the works proposed and the classification of the road. Please see <http://www.surreycc.gov.uk/roads-and-transport/permits-and-licences/traffic-management-permit-scheme>. The applicant is also advised that Consent may be required under Section 23 of the Land Drainage Act 1991. Please see www.surreycc.gov.uk/people-and-community/emergency-planning-and-community-safety/flooding-advice.
2. The developer is advised that as part of the detailed design of the highway works required by the above conditions, the County Highway Authority may require necessary accommodation works to street lights, road signs, road markings, highway drainage, surface covers, street trees, highway verges, highway surfaces, surface edge restraints and any other street furniture/equipment.
3. The permission hereby granted shall not be construed as authority to obstruct the public highway by the erection of scaffolding, hoarding or any other device or apparatus for which a licence must be sought from the County Highway Authority Local Highways Service.
4. All bridges, buildings or apparatus (with the exception of projecting signs) which project over or span the highway may be erected only with the formal approval of the Transportation Development Planning Team of Surrey County Council under Section 177 or 178 of the Highways Act 1980.
5. Notwithstanding any permission granted under the Planning Acts, no signs, devices or other apparatus may be erected within the limits of the highway without the express approval of the Highway Authority. It is not the policy of the Highway Authority to approve the erection of signs or other devices of a non-statutory nature within the limits of the highway.
6. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2022. Where undercover parking areas (multi-storey car parks, basement or undercroft parking) are proposed, the developer and LPA should liaise with Building Control Teams and the Local Fire Service to understand any additional requirements. If an active connection costs on average more than £3600 to install, the developer must provide cabling (defined as a 'cabled route' within the 2022 Building Regulations) and two formal quotes from the distribution network operator showing this.
7. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on or damage the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders. (Highways Act 1980 Sections 131, 148, 149).
8. No operations involving the bulk movement of [earthworks] materials to or from the development site shall commence unless and until facilities have been provided in accordance

with [the approved plans / a scheme to be submitted to and approved in writing by the Local Planning Authority] to so far as is reasonably practicable prevent the creation of dangerous conditions for road users on the public highway. The approved scheme shall thereafter be retained and used whenever the said operations are undertaken.

9. The scheme to implement waiting restrictions or other relevant works to regulate or restrict the operation of the highway shall first require a Traffic Regulation Order or Notice prior to use. The alteration of the Traffic Regulation Order or creation of a new Order or Notice is a separate statutory procedure which must be processed at the applicant's expense prior to any alterations being made. In the event that the implementation of waiting restrictions or other works requiring an Order or Notice is not successful due to unresolved objections the applicant shall submit an alternative scheme to the Local Planning Authority for its approval prior to first occupation of the development. Any alternative scheme or works shall be implemented prior to the occupation of any dwellings to the satisfaction of the Local Planning Authority.
10. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the "Considerate Constructors Scheme" Code of Practice, (www.ccscheme.org.uk) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.

Note to Case Officer:

Road Safety Audit (RSA)

A stage 1 RSA has been undertaken internally, and a Designer's Response has been provided. Further work and detail is required at Stage 2 and 3, which will be undertaken as part of the S278's for the site.

TRO's

The development will entail a range of Traffic orders, not least of which will involve the reversal of the one-way operation and pedestrianisation of North Street. Leapale road will also become two way. There are a range of other TRO's that provide restricted access to North Street, Martyr Road, Leapale Lane, Haydon Place and Ward Street. The County Highway Authority believe that the proposed restrictions require further clarity and refinement at the detailed design stage.

Pedestrianisation on North Street

Much of the development will be serviced from North Street and the County Highway Authority is satisfied that adequate provision has been made to serve both the existing and proposed needs. The pedestrianisation scheme itself will be the subject of detailed design and will need to encompass all aspects such as closure points, method of vehicle control and enforcement, use of materials, street furniture, signage and provision for sustainable travel modes. It should be noted that North Street will need to accommodate two-way cycle usage and the eventual design will need to facilitate this along with way marking signage.

Residential servicing and deliveries

All residential servicing, including deliveries, waste collection, food deliveries and taxi/uber collections and drop offs will take place from Leapale Road, using the new laybys. Whist these

laybys will be heavily used for all these purposes, the County Highway Authority are satisfied that there is sufficient capacity to meet the demand.

Stopping Up

Commercial Road, Woodbridge Road and North Street provide a substantial developable area and we recognise that the development can only proceed with the making of a stopping up order by the Secretary of State. The County are consulted in this process, to ensure that the roads are surplus to our requirements as public highways. In order for us to deem those roads surplus we need to be satisfied that the wider network can adequately facilitate any displaced/ re-routed traffic. The Transport Assessment has now demonstrated this, so we will not object to the stopping up in the event that Planning Permission is granted despite our recommendation to refuse.

Highway Trees

The applicant has confirmed that there are currently no existing highway trees impacted by the proposals.

Travel Plan

Having consulted our Travel Plan Officer, a Travel Plan is not needed here, and instead a Travel Statement shall be provided which includes an information Pack and shall be provided to residents/staff/visitors in accordance with Condition 8. These should be combined into one document, and should include the content of a residents' travel information pack (already referred to) and a description of the sustainable travel content of noticeboards and/or any proposed development website. Details of how this work will be undertaken should also be included, eg details of who will put the travel information packs together and distribute them, who will administer the car club scheme and public transport vouchers here, who will look after the noticeboards and who will update the website, if one is proposed.

Leapale Road Residential Access

At the S278 stage, the County Highway Authority may request that the development access is constructed as a Copenhagen crossing, which is a good way of providing a continuous footway across side roads. They helpfully reinforce the highway code by giving priority to pedestrians at junctions.

Right turn facility into Woodbridge Road

If the applicant is unwilling to retain and provide the southern access from North Street for buses, some level of mitigation is required to partially offset the predicted increase in bus journey times. Whilst such a provision would not overcome our recommended reason for refusal, a solution that could be explored further would be to provide a right turn facility from Onslow Street into Woodbridge Road. Condition number 1f has been included to require this provision in the event that our reasons for refusal are disregarded and planning permission is granted.

To further support this, see below a quote taken from the Markides Associates report 'Buses in Guildford, Shaping Guildford's Future, 26 July 2022', prepared for Guildford Borough Council:

"In contrast to the benefit of less buses using the gyratory from the north as a result of the new access arrangements, buses from the south and west will now need to do a U-turn at York Road roundabout in order to access the bus station. The ramifications of this result in unnecessary increases to journey times and the risk of reducing the reliability of routes. This issue could be mitigated by allowing right turning buses into Woodbridge Road at the junction with Onslow Street, although this junction would require reconfiguration to make this possible".

Mr John Busher
By email only

Direct Dial: 0207 973 3700

Our ref: L01533198

3 October 2022

Dear Mr Busher,

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND BOUNDED BY THE FRIARY CENTRE BUS STATION, NORTH STREET
AND LEAPALE ROAD, GUILDFORD, GU1
Application Nos 22/P/01337 & 22/P/01336**

Thank you for your letters of 11 August 2022 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Historic England Advice

Summary

Historic England wishes to raise concerns about the impact of the proposal on heritage grounds because it would cause harm to a number of designated heritage assets. In our opinion, harm to heritage assets could be avoided or minimised through improvements to the design and we recommend that the Council seeks amendments to the scheme to achieve this.

The main issues appear to stem from block E which, from a range of views, appears out of scale or visually challenging within the townscape and would cause harm to the historic environment. The mass and scale of the proposals would also appear harmful to the conservation area in some longer-range views.

We consider that the harm from the scheme could be minimised through reductions in the height of the scheme, in particular block E.



Regarding external architectural detailing of the scheme, we strongly encourage that those buildings fronting onto North Street received further refinement to ensure a really high-quality elevation.

We are content to leave the details of the listed building consent to the Council's conservation officer.

Historic England Advice

Significance of Guildford's townscape

Guildford nestles between two hills at a crossing point on the River Wey. Its dynamic topography is an important characteristic of the town, instrumental in shaping its historical development and how the various streets were laid out. This topography also results in a variety of dramatic views and vistas, both within the town and also out to the surrounding landscape.

The town originated as a commercial and defensive centre along the route to London. A fort (in the Castle's current location) and the steep approach from the east provided the basis for the Saxon "new town" laid out in the 10th century above the floodplain of the river. This became the nucleus for Guildford's famous sloping cobbled High Street.

This hilly topography has been exploited over the centuries, and significant buildings, such as the Castle and the Cathedral, command imposing positions on the high ground overlooking the town. Lying between these is the historic town and its historic roofscape. This comprises a number of conservation areas and listed buildings.

The town conservation areas are significant for the quality of the historic townscape. This is represented by generally low scale, a variety of building styles and ages, a relatively intact historic street pattern and the highly characterful close rhythm and tight urban grain which reflects the town's early origins in the medieval period and its subsequent development over several centuries. The river conservation area stretches along the route of the Wey from Weybridge to Godalming and was historically a route for goods to travel to and from London. It is now valued for the remnants of the commercial uses along the river including wharf and warehouses, and for its now tranquil beauty.

The presence of Victorian and early 20th century industrial buildings closer to the river illustrates the growth of Guildford during that time, with buildings up to 4 storeys, but this phase of development reinforced Guildford's character as a town of relatively low buildings, punctuated by the occasional church spire.

Modern development has in some cases eroded the quality of Guildford's historic townscape. The highly disruptive impact of the residential "towers" of Bishops Court and Mounts Court can easily be seen. However, modern development does not have an especially prominent role in key views (largely because these taller elements are



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small in number and avoid the historic areas of the town) and thus is not hugely harmful to an appreciation of Guildford's important historic townscape.

Assessment of Impact of the scheme

The application proposes the demolition of some existing buildings and replacement with building up to 14 storeys high for Class E non-residential floorspace at lower levels and residential use above. The scheme also proposes improvements to the bus station, landscaping and other associated infrastructure.

Historic England was engaged in pre-application advice giving from June 2022 and responded to details of the scheme, similar in nature to that submitted here.

Please note, we have focussed our advice on those heritage assets where we consider there would be greatest impact. However, others may also be affected and the Council should consider the impact on these, including non-designated heritage. Assessment of cumulative impact across the historic environment should also take place.

The dramatic topography upon which Guildford was built means there are a number of important long views and vistas in which one can appreciate the richness of Guildford's historic townscape.

The supporting information accompanying the application sets out assessment of the impact of the proposals on heritage assets (Volume III Appendix 9.1 Built Heritage Desk Based Assessment of the Environmental Statement – undated), together with the views provided in the Townscape and Visual Impact Assessment (TVIA) 27/07/22. The Design and Access Statement also provides useful information about the proposed layout of the scheme and buildings within it.

View from Castle Motte

The TVIA view 7 clearly illustrates how the scheme will appear in views from the Castle Motte. The castle was sited to control the crossing point over the river Wey and is on high ground so an enemy can be seen when approaching from north or south. While Guildford has expanded greatly since medieval times the generally low scale of relatively modern development has allowed this aspect of the Castle's role to remain readily appreciable. While Guildford has expanded greatly since medieval times the generally low scale of relatively modern development has allowed this aspect of the Castle's role to remain readily appreciable. The carefully stepped building heights cross the scheme helps to achieve a general grading of the built form such that the scheme would not (with the exception of block E), as a whole appear uncomfortably out of scale and thus disruptively visible when appreciating the historic townscape in this view. However, this view does show that the taller tower (block E) will protrude out above this general graded form and appear quite incongruous and conspicuous. In addition, views to the landscape beyond the town will be obscured, which causes harm to the historical purpose of the castle and thus its significance.

The proposed light colour for the external treatment of this taller tower has been chosen to reduce its visibility against light grey skies, however we are concerned that



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it will in fact be very clearly seen and cause clear harm to the appreciation of historic town and the Castle views. We consider the impact of the scheme as seen from here would cause harm to the scheduled monument of the Castle, in the lower range of less than substantial (for impact on conservation area see section below).

Town Centre Conservation area

The qualities and characteristics of the Town Centre conservation area lie in its historical built form, of low height buildings clustered around a few streets and the main cobbled High Street that dips down to the river below. The view from the Castle Motte is one place where one can read the general extent of the medieval Saxon burgh as it guards a strategic gap in the Downs. In addition, the roofscape seen from this high point is especially pretty taking in the variety and layering of the pitched, predominantly clay tile roofs with the backdrop of the hills and landscape beyond. There are very few things that disrupt these historical impressions within the conservation area (the main ones being the two towers on the western slopes of the town, and which demonstrate how damaging tall buildings can be to the character of the town). The proposed development, and block E in particular, will be visible in a number of views which would disrupt the sense of scale and character that makes up the conservation area, appearing incongruous and large. A number of viewpoints illustrate this well, including view 10, 12, 14 and 15.

We think that combined this harm to the Town Centre conservation area would be less than substantial in the lower half of the spectrum.

Dapdune Wharf

Views from Dapdune Wharf, as seen in TVIA view 1 indicates that the development would be clearly visible above existing office blocks, as a taller element, and would further obscure the remaining small part of the spire of St Saviours that can be seen. The character of the Wey conservation area at this point incorporates historical commercial character (low-scale timber wharf buildings) and a view towards the historic town of Guildford. This view is also identified within Guildford Borough Council's views SPD and this document sets out that the visibility of St Saviour's spire 'punctuating the skyline' is clearly one which is important. This view has unfortunately been harmed through developments in the 20th century. Nevertheless, we would encourage that these harms are not perpetuated through further insensitive development and the SPD is aligned with that. In our view the scheme would cause some harm to the character of the Godalming and Wey Navigation conservation area, at the lower end of less than substantial.

St Saviour's church

St Saviours is a church with spire, designed to be a landmark and an eyecatcher. The building is prominent to make salvation easy to find. With a large building nearby this will draw your eye from the church and diminish the message that those who designed and commissioned the building were trying to convey. Views along Woodbridge Road that currently allow one to see the spire against the sky would be compromised by the height, massing, colour and detailing of the residential block. In our view, through negative change to the setting of the church one's ability to



appreciate its designed prominence and scale, would be harmed. We judge this to be less than substantial, in the lower range.

Guildford Cathedral

Guildford Cathedral (grade II*) occupies a commanding position on the western hill of the town. It can be seen for miles around: a prominent landmark of Guildford. It is perhaps the best-known work by Sir Edward Maufe, combining restrained Gothic architecture with Scandinavian influences. It is one of only three post war Anglican Cathedrals including the earlier Liverpool Cathedral by Sir Gilbert Scott, also in the neo Gothic tradition, and Sir Basil Spence's post war Cathedral at Coventry.

Archive plans indicate that Maufe took full advantage of the elevated position and the open landscape setting of Stag Hill in his designs for the Cathedral complex, feasibly with input from Jellicoe, then working on behalf of Guildford Borough Council to develop a strategic town plan. The response is a building of monumental scale, with a substantial central tower and tripartite west end. Today, although the context of the Cathedral is changed, it remains the most dominant building for miles around, sitting atop its green mound above the town.

View 2 in the TVIA show a wireline of the proposals and it appears that block E in particular would appear unfortunately prominent in the view that takes in Guildford town, the landscaping around the cathedral and the building itself sitting majestically on Stag Hill. Block E would appear out of scale with the predominant scale of buildings within Guildford and would appear likely to perpetuate the issues set out within the Views SPD that 'detractors present within the view are the House of Fraser building (formerly Army & Navy department store), which appears bulky and prominent, and other relatively large-scale modern commercial buildings which obscure views or glimpses of the more modest historic buildings and fine-grained roofscape within the historic core'. And so we consider that the scheme would compromise the qualities of the Cathedral and cause harm, below the mid-range of than less than substantial.

Policies relevant to the historic environment

As the application would affect conservation areas and the setting of listed buildings, the statutory requirement to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area (s.72, 1990 Act) and to have special regard to the desirability of preserving the setting of listed buildings s.16, 62, 1990 Act) must be taken into account by your authority when forming a view about the likely acceptability of a proposal.

This is an important distinction that can greatly affect the outcome of setting assessments. Historic England's guidance 'The Setting of Heritage Assets' (GPA3: Good Practice Advice in Planning Note 3) provides detailed guidance on how assess the effect of development in the setting of heritage assets in compliance with the NPPF.

When considering proposals which might affect the significance of designated heritage assets, decision makers are required by the NPPF to minimise or avoid the conflict between the proposals and the conservation of the heritage asset (paragraph



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195).

LPAs must give great weight to heritage asset's conservation (and the more important the asset, the greater the weight should be). They should also be satisfied that any harm is clearly and convincingly justified and outweighed (bearing in mind the great weight that should be given to conservation) by the delivery of public benefits (Paragraphs 199-202).

Historic England's 'The Setting of Heritage Assets' (GPA3: Good Practice Advice in Planning Note 3) states at Para 39 that 'Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements.

For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence, or noisiness of a development.'

Guildford Town Centre Views SPD 2019 identifies historic legacy landmark buildings and highlights the positive effect they have on informing the historic development of the town, enhancing views and skylines, and as features and focal points on views and vistas within Guildford's historic form and landscape setting. It highlights that important landmarks need to be protected.

In Guildford Local Plan the application site makes up a portion of the allocated site A5 for a comprehensive mixed-use redevelopment scheme. The policy sets out a range of requirements for redevelopment including that the development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent conservation area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes.

Assessment of the impacts, heritage benefits and recommendations for the Council

Historic England acknowledges that this is a sustainable location for new development, which utilises a brownfield site and offers opportunities to create a valuable new quarter within the town along with a considerable amount of residential accommodation, and the site allocation establishes the principal of that.

However, we have identified a range of places where harm would clearly be caused to designated heritage assets. The harm varies across the various heritage assets but sits generally at the lower levels of less than substantial to the Town Centre and Wey Navigation conservation areas, the listed St Saviour's church, Guildford Cathedral and the scheduled Castle.

Further efforts should be made to avoid or minimise this harm (as required by paragraph 195 of the NPPF), which could be achieved, primarily through reducing the height of block E.

If improvements to the scheme to avoid or minimise the harm cannot be agreed the Council will need to apply paragraphs 200 and 202 of the NPPF, considering whether



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the harm is clearly and convincingly justified and weighing it against public benefits. In doing this, the decision maker needs to give great weight to the conservation of heritage assets (a tilted balance, in favour of conservation). This weight should be afforded in decision making irrespective of whether the harm is substantial or less than (NPPF paragraph 199). To do this the Council will need to consider whether the benefits associated with development could be delivered without the heritage harm, specifically would it be possible to reduce the height of block E and still have a scheme that delivered the benefits claimed? If block E is essential the tilted balance means that the public benefits have to be of a reasonably high order in order to outweigh the harm.

It is important to take into account any heritage benefits that the scheme would secure. We acknowledge that, should a high-quality finish and detailing to new buildings along North Street be secured this would provide a good setting to the conservation area. We also agree with the design and access statement that the layout of the new scheme responds to the varied street pattern of the historic high street and perpendicular lanes, and could provide a fitting relationship to the existing town at street level. However, these benefits have only limited heritage gains and beyond this the scheme achieves little for the designated historic environment. As such, the weighing up exercise will rest on those other public benefits put forward as part of the application.

Recommendation

Historic England has concerns on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 195 and believe that harm could be reduced or avoided through amendments to the designs of the scheme and recommend the Council seeks to achieve amendments to address our concerns.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
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Yours sincerely,

Rachel Fletcher

Inspector of Historic Buildings and Areas

E-mail: Rachel.Fletcher@HistoricEngland.org.uk



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
HistoricEngland.org.uk

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Historic England

Mr John Busher
Guildford Borough Council
Millmead House
Millmead
GUILDFORD
Surrey
GU2 4BB

Direct Dial: 0207 973 3700

Our ref: P01533153

11 November 2022

Dear Mr Busher

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND BOUNDED BY THE FRIARY CENTRE BUS STATION, NORTH STREET AND
LEAPALE ROAD, GUILDFORD, GU1
Application No. 22/P/01336**

Thank you for your letter of regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The scheme has been amended to reduce to height of Block E by 2.2m and to reduce Core C2 by a storey along with other limited and localised design amendments. Revised LVIA images have also been submitted to illustrate how the altered scheme would appear.

Unfortunately, the amendments to Block E are not sufficient to make a marked difference to the impact the block would have on historic Guildford from the wide range of vantage points highlighted in our letter of 3rd October 2022. The other changes to Core C2 would not address the concerns we raised principally about Block E.

Therefore, we remain of the opinion that the proposals would cause harm to a number of heritage assets, largely due to the height, mass and colour of Block E, which from a range of views appears out of scale or visually challenging within the townscape. We have judged this harm to be at the lower end of less than substantial to the Town Centre and Wey Navigation conservation areas, St Saviour's church, Guildford Cathedral and the scheduled Castle.

As per our earlier advice, we continue to put forward that harm from the scheme could



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be minimised through greater reductions in the height of the scheme, in particular Block E, and as required by paragraph 195 of the NPPF.

If meaningful improvements to the scheme to avoid or minimise the harm cannot be agreed the Council will need to apply paragraphs 200 and 202 of the NPPF, considering whether the harm is clearly and convincingly justified and weighing it against public benefits. In doing this, the decision maker needs to give great weight to the conservation of heritage assets (a tilted balance, in favour of conservation). This weight should be afforded in decision making irrespective of whether the harm is substantial or less than (NPPF paragraph 199). To do this the Council will need to consider whether the benefits associated with development could be delivered without the heritage harm, specifically would it be possible to reduce the height of block E and still have a scheme that delivered the benefits claimed? If block E is essential the tilted balance means that the public benefits have to be of a reasonably high order in order to outweigh the harm.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF, in particular paragraph 195.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Rachel Fletcher

Inspector of Historic Buildings and Areas

E-mail: Rachel.Fletcher@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
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Consultation – GBC Design & Conservation

Application No.: 22/P/01336 & 22/P/01337

Case Officer: John Busher

Conservation Case Officer: LB

Location: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, GU1

Proposal: A mixed-use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:

- Demolition of existing buildings;
- A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding;
- Erection of buildings ranging from 4 to 14 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with;
- Hard and soft landscaped areas to form pedestrianised streets and public spaces;
- Associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Rd) and associated infrastructure;
- The stopping up of adopted highway (including Commercial Road and Woodbridge Road);
- Alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

1. DESCRIPTION OF SITE

- 1.1. The Application site lies within the Town Centre to the East of the River Wey and North of the High Street, on the edge of the Town Centre Conservation Area. The broadly triangular site extends to southern edge of North Street, the western edge of Commercial Road and Guildford Bus Interchange, and the northern and eastern edges of Leapale Road. The application site also extends along North Street between the junction with Onslow Street to the west and the junction with Hayden Place to the east. The site can also be accessed from Leapale Lane which extends east of the Leapale Road and Woodbridge Road junction; and is bisected by Woodbridge Road which extends north-south between North Street and Leapale Road.
- 1.2. The site is bound by the Friary shopping centre to the west, Onslow House to the north, a telephone exchange and multi-storey car park to the north-west and to the south the shops, cafes and restaurants along North Street and the alleyways that link North Street with the High Street including Swan Lane, Angel Gate and Market Street. Several Listed Buildings lie close to the site including the Church of St Saviour on Woodbridge Road to the north.

- 1.3. The main part of the Site is largely empty with areas of surface parking and the remnants of demolished structures. Dominion House office block lies at the northern tip of this area and the built frontage to north street remains intact. This frontage includes Number 17 North Street, which is a Listed Building. There is a fall of around 6m from Leapale Road at the junction of North Street to Commercial Road. The scale of existing buildings varies from larger structures that include Onslow House, the telephone exchange and Friary Centre to the lower rise buildings and finer urban grain of North Street.

2. DESCRIPTION OF WORKS

- 2.1. This is an extensive mixed development scheme which proposes to deliver:
- A new bus interchange – 16 bays and 5 layover spaces
 - 2,358 sq. m of gross internal area (GIA) town centre floorspace within Use Class E
 - 473 apartments, ranging from 1-3 bedrooms across 10 core block structures of heights ranging from 4 – 14 storeys
 - Basement residential parking – 136 vehicle spaces & 638 cycle spaces
 - New public realm, including new pedestrian routes and public spaces – North Street Square; Friary Square; The Dial, and The Northern Gateway
- 2.2. The built form of this proposal would generally comprise a structure of perimeter blocks establishing public realm frontages and private rear courtyards. Building heights would reflect the immediate context of the site with a slender tall building marking the sites northern gateway, stepping down to the North Street buildings. Within this general arrangement there would be variation in height to reflect the fine grain and varied roofscape of the historic town centre. 'Silhouette' and 'Gateway' buildings would step up in height with lower storey 'Link' buildings completing the street scene. Special 'Placemaker' buildings would be used to help define key spaces and locations within the site.

3. IMPACT ON HERITAGE ASSETS

- 3.1. An assessment of heritage assets has been undertaken by the applicant. This study area has been defined by the following parameters:
- All heritage assets within 500m of the application site
 - Assets of highest value (Grade I & II*) lying within 1km of the application site and which have the potential to be affected by changes in their setting
- 3.2. As a result of the above parameters the study identified the following:
- 188 Listed Buildings (grade I, II* & II)
 - Locally Listed Buildings
 - 5 Conservation Areas
 - 4 Scheduled Monuments
 - 1 Registered Park or Garden
 - 5 Non-designated Heritage Assets
 - Buildings of Townscape Merit
- 3.3. For the purposes of these comments I am satisfied, having read through the supporting documents that there are a vast number of heritage assets that have been identified in the study area which will not be impacted by the proposed development, as either there is no or very limited intervisibility between the asset and the site, or the way in which the asset is experienced or understood will not be impacted by the proposed development. Therefore, my comments will be solely focused upon the following assets:

Listed Buildings

1. Church of St Saviour – Grade II
2. 17 North Street – Grade II
3. Stoke House – Grade II
4. Cathedral Church of the Holy Spirit, Stag Hill – Grade II*
5. Guildford Castle Keep^ – Grade I
6. St Catherine’s Chapel^ - Grade I
7. Treadwheel Crane^ - Grade II*
8. St Mary’s Church – Grade I
9. St Nicholas Church – Grade II*
10. Church of Holy Trinity – Grade I

Registered Park & Garden

11. Jellico Roof Garden, High Street – Grade II

Conservation Areas

12. Town Centre Conservation Area
13. Wey and Godalming Conservation Area
14. Bridge Street Conservation Area
15. Stoke Fields Conservation Area

Locally Listed

16. 41, 42 & 43 North Street
17. 67-71 North Street
18. 72 North Street
19. 12 North Street
20. 17-21 Market Street
21. 18 Market Street

Non- Designation Assets

22. 18 North Street & Nos 108-109 Woodbridge Road
23. 16 North Street
24. 19 North Street
25. 1-3 Leapale Road
26. Guildford Telephone Exchange

^ = Scheduled Monument

- 3.4. The following chart discusses each of the sites listed above in order, setting out a basic understanding of the asset, the contribution of setting, its significance and then follows on to discuss whether the proposed development would have impact on significance and/or setting. Where harm is identified, then this will be stated, with reference to the requirements set out in the NPPF

Listed Buildings

1	HERITAGE ASSET: Church of St Saviour	GRADE: II
<p>Description</p> <p>This asset is situated to the north of the application site and at the closest point the distance between the site and the asset measures approximately 85m</p> <p>The Church of St Saviour was built by H S Legg and Sons in the Decorated style and was consecrated in 1899. Its development arose as a consequence of Guildford's population expansion and growth of the late 19th Century. Its structure is constructed of coursed sandstone, with ashlar dressings and is covered over by a clay tiled roof. A tall three-staged tower, which is topped off by a thin needle spire, is sited in the north-west corner next to the gabled western entrance, which includes a buttressed narthex across its front. This western elevation is dominated by a single large 3-light tracery window in the Decorated style with trefoil patterned detailing.</p> <p>The internal plan is based on an aisled nave, which is covered over by a panelled waggon roof, a two-bay chancel on a higher level and short transepts.</p> <p>An extension, which spans the depth as the original structure, was added in the 1980's to the north. This addition is of a contrasting modern design that uses stone, steel and glass.</p>	<p>Contribution of Setting</p> <p>The church was originally built on the garden belonging to a large house, which historic mapping indicates was named as The Elms. This original early setting was composed of a terrace row of small cottages, together with a public house facing on to Woodbridge Road, immediately to the south of the church, with more terraced housing to its east and north. The land on the opposite side of Woodbridge Road (west) at the time of the Church's consecration had recently been developed (1896) as the new home of Guildford's cattle market and corn exchange, which had been relocated from North Street.</p> <p>Little of this original setting remains. The cattle market and corn exchange have long since been replaced by a civic campus consisting of the town's magistrate court and police station, whilst other modern development has also been constructed within the immediate setting, such as no.1 Onslow St and Onslow House. Another significant change to the setting is the road and road junctions immediate to the site, all of which are heavily engineered and are detractive. As a consequence, the setting of the church is impinged by a lot of activity, movement and noise</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Is a building of special interest as reflected by its Grade II listing status • Provides legibility to the town's 19th Century expansion • Good example of late 19th Century gothic ecclesiastical design • Use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence • Tall legible spire within the townscape 		
<p>Impact of Proposal on Significance and Setting</p> <p>This asset is located fairly close to the northern end of the application site, on Woodbridge Road and was purposefully designed to be prominent in local views thanks to the height and reach of its thin needle spire.</p> <p>It has been identified that the proposed development by virtue of the scale of Blocks C2 and E and some of the design articulation would challenge the design intent of this particular heritage asset.</p> <p>This concern is particularly apparent in TVIA viewpoint 10 (Woodbridge Road). This view focuses on St Saviours from the junction of Woodbridge Road and Leas Road, north of both the asset and the application site. In this view Block E replaces Dominion House and essentially terminates this linear view. Whilst acknowledging that Block E has been designed and sculpted carefully with consideration to providing visual interest as well as minimising its impact upon the asset and its significance, there is still a concern that the resulting structure</p>		

still presents a challenge to the heritage asset as a result of its height, but also by virtue of the contrasting materiality (dark brick) proposed for the inset balconies. The concern is that the height and material treatment is such that they undermine one's ability to appreciate and experience the asset's designed prominence and scale, and equally, that it shifts the visual focus away from the church and onto Block E, thus diminishing and harming its significance.

In addition to the identified harm from Block E, the asset's significance and setting is challenged further by the presence of the upper 2 floors of Block C2, which would be visible to the east of the church's spire. In isolation, the presence and impact of the upper couple of storeys of Block C2 upon the significance of the church in **TVIA view 10 (Woodbridge Road)** is considered to be limited, however, when one looks at the scheme holistically, the cumulative impact of Blocks C2 and E together starts to overwhelm and encroach into the spire's existing unconstrained setting, thereby resulting in harm. In terms of wider views, the impact of Block C2 upon the setting of the St Saviour's spire is much greater. For example, in **TVIA viewpoint 1 (Dapdune Wharf)** the spire's silhouette would be diluted by the presence of the upper storeys of Block C2, which would sit behind it. This is clearly contrary to the guidance set out in the Guildford Town Centre Views SPD, which stipulates that development should not compete with St Saviour's Church spire for prominence.

Harm to the significance and setting of this heritage asset has clearly been identified in the above. I would assert that in this instance it would be qualified at the lower/mid range of less-than-substantial. I therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified	Less-than-substantial (Low-Mid)
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2	HERITAGE ASSET: 17 North Street	GRADE: II
Description	Contribution of Setting	
<p>This asset directly adjoins the application site on its southern boundary.</p> <p>This 3-storey property is an early 19th Century shop, that has been converted into a bar, with accommodation above. It is constructed of grey brick and covered over by a hipped slate roof, which is obscured by a brick dentilled plat band parapet. Two tall brick chimneys with dentil decoration are located on the property's western side, each carrying three chimney pots.</p> <p>Window opening on the upper floors are recessed with timber or stone sills and splayed brick headers. Joinery is typically sash (hornless), with those to the first floor being 2/2 but with the upper glazing bars having been removed and the glazing replace with single panes. At second floor level the openings are smaller and thus the windows are 3/6 with the upper sash being half the height of the lower.</p> <p>A plate glass shopfront with central door sits across the ground floor elevation and is accentuated and decorated by means of 2 attached fluted Doric columns. Access into the property is by a set of 3 steps. A further door (6 panelled) sits off to the right-hand side, and this too is marked by a further 2 fluted Doric columns.</p>	<p>The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function.</p> <p>North Street is a street that underwent considerable change during the 20th Century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Officer, and which continues to change into the 21st Century.</p> <p>Its current built character is composed of a varied mix of ages, architectural styles and material palette</p>	
Significance		
<ul style="list-style-type: none"> • Is a building of special interest as reflected by its Grade II listing status • The brick tone is not local to Guildford and thus indicates that it was imported to the town. The transportation of this material at the time of construction would have been at great cost, therefore indicating that whoever commissioned its construction was relatively wealthy. • Illustrates early 19th Century domestic and commercial detailing and design 		
Impact of Proposal on Significance and Setting		
<p>In the case of this asset there are two main considerations that I consider need to be assessed:</p>		
<ul style="list-style-type: none"> • the impact of the demolition of no.18 North Street & Nos 108-109 Woodbridge Road upon the asset's fabric and setting • the impact of the proposed development scheme upon setting 		
<u>Demolition of no. 18 North Street & Nos 108-109 Woodbridge Road</u>		
<p>It is proposed to demolish No.18 North Street which adjoins directly on to this heritage asset. This property has been identified as a non-designated heritage asset and thus the principal of the loss of this building from that particular perspective is considered and dealt with further on in this report. Nevertheless, it is recognised that its removal has the potential to have a physical impact upon no.17 North Street, as well as an impact upon its setting.</p>		
<p>Starting with setting, it is acknowledged that the architectural and historic interest of no.18 North Street contributes positively to the setting of this heritage asset and thus its demolition would result in further removal of its historic setting and thus some erosion of the asset's significance. However, there is recognition that the alteration to this setting is somewhat offset by the creation of a new public square in its place, which I would conclude has been designed sympathetically using what appears to be an appropriate material palette - natural aggregate flag paving (light grey) & natural aggregate block paving (terracotta blend) - that is considerate to the surrounding historic environment.</p>		

In terms of the physical impact upon no.17 North Street, there is a reasonable chance that the process of removal and/or making good could have an influence upon the asset's structure and fabric, however to what extent is currently uncertain, as there are still a number of unknowns. Nevertheless, the methodology currently set out in the supporting document appears to well be sensitively considered and appears appropriate for the context of the works. I particularly welcome the provision of a further method statement that is to be presented to the LPA two weeks before the commencement of works, as more information should have been gained to inform this, and therefore consider that this should be included as a condition in the supporting Listed Building Consent application should officers be minded recommending approval.

Proposed Development

The impact on this asset's setting is mixed, with some positive identified as well as some negatives.

Starting with the positives. As previously mentioned, the provision of a new public square, one which has been designed sympathetically using a sensitive material palette is certainly viewed as a transformational enhancement to the assets setting, as is the proposed pedestrianisation of North Street, both of which would enable better appreciation of it. I would also suggest that the replacement of no. 15 North Street, which is currently seen as a negative detractor, with a building (Block A) that is of a more complementary and improved design, is an action that would further enhance this listed building's setting, by virtue of it improving the North Street streetscape.

Nevertheless, despite some significant enhancements to the asset's setting there is a concern with the visual challenge that the cumulation of Blocks B1, B2, C1 and C2 and the resultant incongruous layering that is placed upon its scale and setting. This is most apparent from Angel Gate as demonstrated in **TVIA viewpoint 14 (Angel Gate)**. There is also a concern with the use of a stark white render on Block B2's elevation. Whilst I appreciate that the designed contrast was intended to ensure that the frontage of the listed building could be read separately, my concern is that the resultant contrast is too harsh and actually draws a viewers focus away from the principal asset.

Give all of the above I have to conclude that there is some harm to the setting of this statutory asset. I would assert that the harm identified would qualify as being less-than-substantial at the lower end of the spectrum and therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified

Less-than-substantial (Low)

3	HERITAGE ASSET: Stoke House	GRADE: II
<p>Description</p> <p>This asset is situated obliquely to the north of the application site and at the closest point the distance between the site and the asset measures approximately 20m.</p> <p>Stoke House is a brown/red brick faced, town house whose origins date back to the 17th Century, but which was rebuilt in the mid-18th Century and further extended in the 19th and 20th centuries (to the left and rear respectively).</p> <p>The 17th/18th century section is three storeys in height and covered over by a tripled hipped clay tiled roof set, behind a brick parapet. The front elevation is articulated by an off centre (left of centre) canted bay rising through all floors, and 12 pane (6 over 6) timber sash windows under gauged-brick head throughout.</p> <p>The 19th Century subservient red brick addition breaks forward on the left. This structure reads as being two storeys, thanks to its set-back slate covered mansard 3rd storey. Architecturally, it shares many similarities with its 18th Century host, in terms of its form, materiality and detailing, but it clearly not an exact replica as there are more flourishes in its design. For instance, the gauged brick heads are constructed using an accented biscuit coloured brick; each window opening is accentuated by a stone cill, which at first floor level are further embellished by stone brackets; and the 2-storey canted bay is decorated by a corbel arcade over the ground floor.</p>	<p>Contribution of Setting</p> <p>Much of the property's original 18th Century setting has been removed and replaced by more contemporary development, this includes a modern development, known as Bell Court, to its rear and eastern side, which dates to the late 1980's, early 1990's. Also, the large telephone exchange building opposite, which was constructed in 1937, and the large expanse of cleared site that forms the application site.</p> <p>Despite experiencing all of this change, what has remained relatively consistent in terms of this asset's setting has been the road layout. Despite its modern engineering and scale, much of the layout that currently existing is historic. Nevertheless, the activity, movement and noise arising from the use of this infrastructure does influence how one experience this asset.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Is a building of special interest as reflected by its Grade II listing status • Historic interest as survival of an early house outside of the main town but also provides legibility and understanding to the town's northern expansion • Use of vernacular material and traditional building techniques in its construction • Illustrates both 18th and 19th Century domestic detailing and design 		
<p>Impact of Proposal on Significance and Setting</p> <p>This asset is best appreciated from Leapale Lane, Leapale Road junction. From this position one can recognise that its setting is entirely modern, and I would agree with the assessment reached in the supporting Heritage Assessment, that the building relies on its inherent historic and architecture interest for its significance rather than its setting. Nevertheless, this does not signal that that its setting is insignificant. Development still must have regard towards preserving a setting that is of significance, but equally in instances where a setting has suffered from inappropriate past development actions there is an opportunity to seek enhancement.</p> <p>It has been identified that the change to the asset's setting will be considerable by virtue of the scale, mass and quantum of development being proposed.</p> <p>TVIA viewpoint 18 (Leapale Lane) is one view which illustrates the relationship between the proposed development and the heritage asset and the likely magnitude of change to the setting. In this view Block E, which sits at 14-storey, will replace the current 5-storey Dominion House in terminating the view.</p>		

I am in full agreement with the assessment reached in the supporting heritage statements that this block dominates the view, but equally would also agree that it has been designed and sculpted adeptly to avoid or limit the imposition of a harsh, monolithic intrusion by using varying heights, setbacks and building lines. These design elements, together with the use of a contrasting white brick palette and articulated elevations which provide visual interest, does, in my view, help to form a legible piece of high-quality piece 21st century architecture for the town, that I would perceive as an enhancement to the existing Dominion House.

However, in terms of the proposed developments impact upon this particular heritage asset I can appreciate that the sculpted and considered design of Block E does go some way towards reducing and mitigating the perceived mass and volume of this structure, nevertheless it still places a sizable challenge to the assets more domestic scale, as does the scale and massing of the other nearby blocks (Blocks C2 and D4) which are also considered to influence this setting and are of a considerable scale and mass.

Notwithstanding the above, there is recognition that the proposed development does provide area of public realm directly opposite which is certainly seen as being a positive to the setting of this heritage asset. This area is known in the scheme as The Northern Gateway and is an important pedestrian entry point into the proposed scheme from the North. This piece of public realm is of a fairly intimate scale and its layout has been rationally designed with the purpose of facilitating pedestrian movement, but still offers areas of planting which would help to soften, not only the floor scape, but would aid in softening the immediate setting of Blocks E, C2 and D4, as well as Leapale Road.

A further positive to the setting is the full pedestrianisation of Woodbridge Road and the rationalisation of the existing road junction.

Give all of the above I have to conclude that there is some harm to the setting of this statutory asset by virtue of the visual challenge the proposal places upon the prevailing human scale of the surrounding townscape. I would assert that the resultant harm in this instance would be qualified at less-than-substantial at the lower end of the spectrum, when giving consideration to the fact that the setting of this asset does not contribute to its significance and that there are some arising positives that have been identified. In doing so, I advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified	Less-than-substantial (Low)
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4	HERITAGE ASSET: Cathedral Church of the Holy Spirit, Stag Hill	GRADE: II*
Description		Contribution of Setting
<p>This asset is situated approximately 1 km to the north-west of the application site.</p> <p>Guildford Cathedral was designed by Edward Maufe in 1932/3, the building was the result of a competition to design a cathedral for the newly formed diocese of Guildford on land gifted for the building by the Onslow family.</p> <p>The cruciform cathedral with central tower is an imposing structure sitting on the crown of Stag Hill, the list description describes the architecture as “Modified gothic style with arts and crafts influences.” Writing in 1932, Sir Edward Maufe said: ‘The idea has been to produce a design, definitely of our own time, yet in the line of the great English Cathedrals; to build anew on tradition, to rely on proportion, mass, volume and line rather than on elaboration and ornament.’ Pevsner Architectural Guide described the building as ‘sweet-tempered, undramatic curvilinear gothic’, and the interior as ‘noble and subtle.’ The exterior is brick with stone dressings, the bricks used in construction were made from clay from the hill on which the building stands.</p>		<p>Today the Cathedral is a visually prominent landmark of Guildford and can be seen for miles around sitting on top of the green verdant mound of Stag Hill. The building has a commanding presence in many views around the town and at night, when the floodlit building is seen against the dark cushion of Stag Hill, the silhouette is particularly dramatic. It is seen as a single monumental entity on top of a green hill.</p> <p>Its elevated position also provides a vantage point over the town centre where a number of landmark structures and assets can be identified in view, such as Guildford Castle and Holy Trinity Church. In this view the dramatic valley, in which the town sits, is easily identifiable as is the relationship between the town and its landscape setting.</p> <p>A comprehensive plan for landscaping the setting of the cathedral was never produced, so Maufe’s design focuses on the two approaches to the landmark, from the South and West. Local views along these approaches also contribute to the appreciation of this heritage asset.</p> <p>Its local setting now includes the post war buildings of the University Surrey on the north hillside.</p>
Significance		
<ul style="list-style-type: none"> • It is one of only three Anglican cathedrals built in England since the 17th century. • Association with Sir Edward Maufe, known for his work on places of worship and memorials, including the Air Forces Memorial at Egham • West doors, bronze and glass, angel engravings by John Hutton¹. Also engraved the angels within the South Transept doors • Central buttress pier to Maufe’s design but executed by Vernon Hill². The pier is crowned by a figure of St John the Baptist to a design by Eric Gill³ • Roundel window in the east gable of the chancel with a figure of Christ in Majesty is by Anthony Foster⁴ to a design by Eric Gill • Extensive number of statues across the Cathedral including, The Hand of God, Archangel Gabriel, St Martha, St Catherine and the Gilded Angel (weathervane) by Alan Collins⁵ • Statues of St Cecilia and Lady Margaret Beaufort by Dennis Huntley⁶ 		
Impact of Proposal on Significance and Setting		
<p>Visual prominence was a key factor in the siting of this heritage asset on Stag Hill, not least for symbolic reasons. The architectural design emphasis is that of prominence through its enormously impressive scale including its imposing mass and height. The solid materiality, simple fenestration and massive central tower present an imposing silhouette that can be</p>		

¹ Glass engraving artist, known for the glass engravings on the Great West Screen of Coventry Cathedral - Screen of Saints and Angels

² English sculptor lithographer, illustrator and draughtsman who worked regularly with Sir Edward Maufe including the Runnymede Air Force Memorial

³ English sculptor, typeface designer and printmaker who was associated with the Arts and Craft movement, producing sculpture work for the BBC’s Broadcasting House and 55 Broadway, St James, London (former TFL headquarters) amongst others.

⁴ English sculptor. Foster was Gill’s assistant and stepped in to complete the sculpture following Gill’s death

⁵ English sculptor, most notable for the design and execution of the John. F. Kennedy Memorial at Runnymede

⁶ English sculptor whose most notable works are those at Guildford Cathedral.

appreciated across the historic town from most angles. An important element of the setting and relationship between the cathedral and the town is the visual interplay with the other church towers that form important elements of the historic townscape, as well as the ability to be able to appreciate the visual relationship with the castle. Because of its landmark status and its visual prominence, the asset features in a number of the key views identified in the Guildford Town Centre Views SPD, and thus has been captured in multiple TVIA viewpoints supporting the application, including **TVIA viewpoint 2 (Pewley Hill), TVIA viewpoint 4 (Hogs Back), TVIA viewpoint 6 (Bright Hill), TVIA viewpoint 7 (Castle Motte) & TVIA viewpoint 8 (Stag Hill)**.

It should be noted that views of the Proposed Development are not possible directly from the cathedral at ground floor level, due to the topography of the site and the existing vegetive screening which encloses the Seeds of Hope Children's Garden, located at the east end of the Cathedral's grounds. The closest location where views are possible is best represent by **TVIA viewpoint 8 (Stag Hill)** which is taken from the east facing slope of Stag Hill, over 100m from the cathedral itself. It is a view which is characterised by the grassland and mature trees and hedgerows that forms the setting to cathedral at its eastern end. The view also demonstrates the visual relationship between Stag Hill and Pewley Hill and reveals the distinctive topography of the town. Key valued features in this view include legacy landmark features, Guildford Castle Keep and Holy Trinity Church. Helpfully, the supporting wireline and modelling confirms that the introduction of the proposed development would not obscure or cause challenge to the legacy landmark features, thereby not affecting the intervisibility between these assets, a quality of the Cathedral's significance. Equally, the taller elements of the proposed development which would be seen, specifically Blocks D4 and E, take a position in this view that benefits from partial screening arising from the existing vegetation within the foreground, thereby, helping to mitigate their overall visibility. Nevertheless, there is a concern that the scale and prominence of Block E, despite being partially screened, could still appear as an incongruous addition against the more domestic and historic scale of the town from this outlook, and thereby would result in harm to the asset.

In terms of returning views of the asset these are captured in **TVIA viewpoint 2 (Pewley Hill), TVIA viewpoint 4 (Hogs Back), TVIA viewpoint 6 (Bright Hill), & TVIA viewpoint 7 (Castle Motte)**. In all instances I am satisfied that the Proposed Development will not present a direct prejudicial challenge to the significance or prominence of the Cathedral, however it is recognised that in these views the scale of Block E would appear at odds with the scale and grain of Guildford's prevailing townscape, thereby undermining the Cathedral's wider setting. In the case of **TVIA viewpoint 6 (Bright Hill)** the height of Block E does begin to encroach over the crest of Stag Hill, which is clearly contrary to the guidance set out in the Guildford Town Centre Views SPD.

Whilst the scheme, for the large part, does not present a concern, there is no getting away from the fact that harm to the asset's significance has been identified. I would assert that the harm identified would qualify as being less-than-substantial at the lower end of the spectrum. I therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified	Less-than-substantial (Low)
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5	HERITAGE ASSET: Guildford Castle Keep, Castle Hill	GRADE: I & Schedule Monument
<p>Description</p> <p>This asset is situated approximately 270m to the south of the application site on high ground overlooking the River Wey, as well as the ford crossing it.</p> <p>This asset is recognised to be the remains of the Guildford Castle’s tower keep which dates from the mid-12th Century and first mentioned in written record in 1173. The structure was subject to a partial rebuild, following a fire in the 13th Century. It was converted to a house for Francis Carter, a Guildford merchant in the 17th Century who had bought the castle and its grounds from King James I.</p> <p>The predominantly Bargate rubble stone Keep is situated on a mound, most likely to have been the site of an earlier wooden keep and shell keep. The structure measure approximately 14 metres square and reaches 19 metres in height (3 storeys) with battlemented parapets. The internal floors, roof and the majority of the dressed stone details have not survived. Some ornamentation is evidenced in the southwest corner (first floor) of the structure, this is likely to have been the chapel. The current main entrance is a modern addition.</p> <p>The site was eventually sold to Guildford Borough Council in 1885 where the grounds and castle were opened up as a public amenity.</p>	<p>Contribution of Setting</p> <p>Locally, the assets setting comprises of the castle grounds and the remains of other parts of the castle complex such as the ruins of the Shell Keep and the Private Apartments. The complex is fairly self-contained which is articulated by a combination of the surrounding townscape as well as the immediate Victorian park landscape. Nevertheless, the site’s elevated position and graduating topography does allow for wide reaching views looking north, west and south, especially from the Castle Keep motte.</p> <p>Views to the north overlook the High Street, North Street and the town’s northern suburbs; those to the West overlook Quarry Street and down over towards the lower river area around Millbrook and across over to The Mount; View to the South takes in the southern extremities of the town as well as St. Catherine’s Chapel.</p> <p>The topography of Guildford plays a pivotal role in the contribution made by the setting of the castle to its significance and an understanding of that significance. What is noted in views out from this asset is the visual prominence of the important ecclesiastical buildings of Guildford, with the stone towers of St Mary’s and St Nicholas rising above the tile and slate roofscape below. There is also very strong visual link to the mighty brick tower of the Cathedral which crowns Stag Hill beyond the compact historic core of the town, which is reciprocated back. Equally, there is also an appreciation of the wooded surroundings of Guildford and its position with the natural valley topography which helps to illustrate and provide an understanding of the reasons for the town’s origins and evolution, as well as why it looks the way it does.</p> <p>The River and Town Bridge are also aspects of its wider setting that contribute to its significant not least as this relates back to the military aspect of this heritage asset.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Ruinous structure of exceptional interest, reflected by its Grade I listing and Schedule Monument status • Surviving ruin of a royal castle dating to at least the 1170s • Town landmark • Tangible link to the early settlement of Guildford as a site of fortification • Used as a prison by the end of the 12th Century up until 16th Century, when it was moved to Southwark • Strong group value with other castle remains • Associated with King Henry II who used the castle as a hunting lodge and King Henry III, who turned Guildford Castle into one of the most luxurious palaces in England and oversaw the rebuilding works following the 13th Century fire • Referenced in art and literature over the Centuries including ‘<i>South West Prospect of Guildford in The County of Surrey</i>’, engraved by Samuel and Nathaniel Buck, 1738 • John Darborne⁷ became guardian of the castle in 1544 • Rare survival and valuable resource which illustrates how the defensive complex was organised, operated and evolved 		

⁷ Merchant and alderman of Guildford, as well as being Mayor in 1523, 1531 and 1538/39.

- Importance and dominance of the castle expressed through its materials, including expensively worked stone
- The intended visual prominence and sense of scale which contrasts with the finer grain and smaller scale of the historic town
- High status residence with traces of ornate stonework still extant
- Architectural relationship between the castle and St Mary's and St Nicholas as important civic buildings, sharing similar materials and deliberately prominent architectural scale
- *'represents the grim official architecture of Henry II built in memory of the recent civil war and before the new ideas of castle building were brought back from the Crusades'* Nairn and Pevsner (*The Buildings of England – Surrey*)
- Evidence of medieval graffiti on some of the chalk walls

Impact of Proposal on Significance and Setting

As a grade I listed structure as well as Scheduled Monument this is an asset of high significance. The castle's raised elevation and prominence allows for views to the town and surrounding landscape and thus is considered to have a wide-reaching setting which includes the proposed development site. The consequence of this is that the asset appears in a number of the key views identified in the Guildford Town Centre Views SPD, and thus has been captured in multiple TVIA viewpoints supporting the application, including **TVIA viewpoint 3 (St Catherine's Hill), TVIA viewpoint 4 (Hogs Back), TVIA viewpoint 5 (Farnham Road), TVIA viewpoint 7 (Castle Motte) & TVIA viewpoint 8 (Stag Hill)**.

The most immediate of the viewpoints is **TVIA viewpoint 7 (Castle Motte)**. This illustrates the view that is to be gained of the Proposed Development directly from the Castle and its immediate setting. In this view Blocks B1, C2, D1, D2, D3, D4 and E can be seen rising gradually back from North Street and continuing the prevailing townscape layering. Generally speaking, it is felt that in this view the graduating heights of the scheme are successful in achieving a compatible grading of built form that would not appear uncomfortably out of scale with, or incongruous to the prevailing historic townscape. The exception to this is Block E, which sits at 14 storeys tall and as a result projects and towers above the graded townscape. Whilst the placemaking reasons for this contrast are acknowledged and in the main agreed with, I would still conclude that from a heritage perspective the resultant urban form would appear noticeably incongruous and would also hinder onward views from the asset, thus diminishing a part of the asset significance and causing harm.

In terms of returning views of the asset these are captured in **TVIA viewpoint 3 (St Catherine's Hill), TVIA viewpoint 4 (Hogs Back), TVIA viewpoint 5 (Farnham Road) & TVIA viewpoint 8 (Stag Hill)**. In all instances I am satisfied that the Proposed Development will not present a challenge to the asset.

For instances, in the case of **TVIA viewpoint 8 (Stag Hill)**, the supporting wireline and modelling confirms that views of the Castle Keep would be maintain and remain prominent from this position, as it is separated sufficiently enough from the Proposed Development not to obscure or challenge it, thus not affecting the intervisibility between the castle and the cathedral. Equally, the taller elements of the proposed development which would be seen, specifically Blocks D4 and E, take a position in this view that benefits from partial screening arising from the existing vegetation within the foreground, thereby, helping to mitigate their overall visibility. Nevertheless, the concern noted above, that the height and scale of Block E would appear noticeably incongruous, are still equally relevant from this perspective.

With regards to **TVIA viewpoint 3 (St Catherine's Hill)** this verified view confirms that the small area which is likely to be observed would sit subtly above a belt of coniferous trees that form the central part of the middle distance of this view, and thus helping to limit and restricts its visual prominence, but more significantly demonstrates that the proposed development would not conceal, interfere or detract from the group of Legacy Landmarks that can be observed in this view including Guildford Castle.

Whilst the scheme, for the large part, does not present a concern, there is no getting away from the fact that harm to the asset's significance has been identified. I would assert that this harm would qualify as being less-than-substantial at the lower end of the spectrum. I therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified

Less-than-substantial (Low)

6	HERITAGE ASSET: St Catherine's Chapel	GRADE: I & Schedule Monument
<p>Description</p> <p>This asset is situated 1.3km south of the application site and has been included in the assessment as it forms the subject of a key view in the Guildford Town Centre Views SPD.</p> <p>This ruined and roofless chapel structure dates to the 14th Century. It was erected by Richard de Wauncey, Rector of St Nicholas (one of Guildford's ancient parish churches) on the site of an earlier chapel. Construction is of sandstone rubble with grey ashlar stone dressing. It is rectangular in plan and spans 3 bays in length. The walls are buttressed on its north and south sides and would have been topped off with pinnacles. A taller quoined turret is located within the NW corner. All elevations are animated by arched windows, in a variety of sizes, but all in the Decorated style, with hood mouldings.</p> <p>Evidence suggests that the chapel was no longer in use by 1546 and is not mentioned in the list of chapels or chantries suppressed under King Edward VI.</p> <p>It was partly restored as a 'romantic ruin' by Robert Austen in 1793.</p>	<p>Contribution of Setting</p> <p>The chapel sits perched on a steeply sided hilltop overlooking the River Wey, which is 100m to its east. Whilst there has been development to the north, its setting is largely rural. It has commanding views over the countryside (East, South & West) as well as towards the town centre (North), and affords views to Guildford Castle, the cupolas of Abbots Hospital and Holy Trinity Church's tower all of which are key landmark legacy buildings, as well as being heritage assets in their own right.</p> <p>It is the northern outlook (towards the town centre) which has been identified in the Guildford Town Centre Views SPD (viewpoint 5) as being an important view which helps to reveal/illustrate Guildford's development and evolution, and the importance of its relationship with the countryside beyond.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Chapel of exceptional interest, reflected by its Grade I listing status and its Schedule Monument status. • Its age and surviving medieval undisturbed upstanding fabric illustrates important information about the nature and date of its use up to its abandonment, as well as illustrating methods of craftsmanship, building techniques and use/application of materials • Area around the chapel is likely to contain important archaeological and environmental information relating the use and history of the site • The chapel and its setting are the subject of a number of works by the artist J M W Turner (1775-1851), some of which are displayed in the Tate Gallery. It also formed the subject of a pieces of work by other artist such as Samuel Palmer (1805- 1881) and Percy Robertson (1868-1934) • Formed the location of the St Catherine's Fair which began in the 14th Century – The some of the artwork by Turner and Palmer depict this event 		
<p>Impact of Proposal on Significance and Setting</p> <p>I agree with the supporting heritage assessment which concludes that the impact of the proposed development would not sufficiently alter the setting sufficiently to cause harm to this heritage asset.</p> <p>I am in agreement that a small section of the upper floors of the development are likely to be observed from this asset's location, the most likely of which would be Block E, as clarified in modelling and verified views, particularly TVIA viewpoint 3 (St Catherine's Hill). This verified view confirms that the small area which is likely to be observed would sit subtly above a belt of coniferous trees that form the central part of the middle distance of this view, and thus helping to limit and restricts its visual prominence. Equally and more importantly, the verified view also confirms that the proposed development would not conceal, interfere or detract from the group of Legacy Landmarks that can be observed in this view (Guildford Castle, cupolas of Abbots Hospital and Holy Trinity Church tower.)</p> <p>Also contributing positively is the chosen material palette. I believe the use of a light colour material treatment for Block E will help to further reduce and restrain the developments visibility from this position, as a lighter material will blend more subtly against the sky backdrop.</p>		

As such, I am satisfied that the proportion of the proposed development which would be visible, together with the 1.3km distance between the site and the chapel will not change its setting sufficiently to cause harm.

Harm Identified

No harm to significance identified.

7	HERITAGE ASSET: Treadwheel Crane, Millbrook	GRADE: II* & Schedule Monument
<p>Description</p> <p>This asset is situated approximately 140m to the south-west of the application site.</p> <p>Situated on the east side of the River Wey navigation, the Treadwheel Crane structure dates from the late 17th Century/early 18th Century. It consists of a wooden slewing crane and timber framed structure of two bays that is wrapped in timber weatherboard cladding (black) and covered over by a plain tiled roof. The southern bay is open whilst the northern bay is enclosed, it is this enclosed section which houses a suspended timber treadwheel which is approximately 5m in diameter and 1.5m wide. The crane, which sits to the west side of the structure is formed of timber baulks rotating between top and bottom bearings, it hausting hook is linked to the treadwheel by the means of a chain</p> <p>The crane is a rare survival and is believed to have been the last working example in Great Britain. The only other comparable structure known to survive is a double wheel crane at Harwich. It was last used unload stone used in the construction of Guildford Cathedral in about 1960. The structure has gone undergone repairs in both the 18th and 19th Century, and in 1971 it was dismantled and re-erected near its original position on the former Guildford Wharf to accommodate the construction of the gyratory system.</p>	<p>Contribution of Setting</p> <p>Although relocated, the structure remains alongside the Navigation with which it has a historical functional relationship. It is sited on the east bank in an area of public open space, which is contained by the river to the west, Millbrook, which is situated at an elevated level, to the east as well as the gyratory to the North. Being situated so close to Millbrook and the Gyratory its siting is one which is associated with a lot of activity, movement and noise.</p> <p>One of the best ways to experience the setting of the crane is via the navigation itself taking the route that formally would have been used for the transport of goods and now used primarily for leisure. It can also be appreciated from the Town Bridge looking north, where it can be seen in relation to the Navigation and the industrial and commercial buildings on the southside of Bridge St, as well as from Friary Bridge where it can be viewed against the backdrop of the protrusion of the post-war Friary Court development, and the existing department store.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Is a particularly important building of more than special interest reflected by its Grade II* listing and Schedule Monument status • Believed to be the last working example in Great Britain – very rare survival of a former industrial structure with technological interest. • Serves as a reminder of the importance of the River Wey to the successful development and growth of Guildford as an industrial and commercial centre • Illustrates the River Wey’s history as a working river and the transportation of goods to London, including coal, grain and timber 		
<p>Impact of Proposal on Significance and Setting</p> <p>The proposed development site does not form part of this asset’s setting and there are very limited opportunities in which the site and the asset could be read together. The main, and probably only location in which both sites could be appreciated is from Park Lane, looking NE across the surface carpark. This is a view which does not form part of the TVIA study, nevertheless I have been able to assess it through the modelling exercise. The conclusions reached when undertaking this exercise is that whilst the upper storeys of Blocks Block E, D3 and D4 can viewed, they would read as background layering to the Friary Centre and Friary Court development, which are more immediate to the Crane’s riverside setting. I am therefore satisfied that its impact would be negligible, and as a result no harm to significance has been identified.</p>		
<p>Harm Identified</p>	<p>No harm to significance identified.</p>	

8	HERITAGE ASSET: Church of St Mary	GRADE: I
<p>Description</p> <p>This asset is situated to the south of the application site and at the closest point the distance between the site and the asset measures approximately 200m.</p> <p>St Mary's Church is certainly one of Surrey's most important medieval churches, containing an outstanding amount of historic fabric spanning over 1000 years. It stands at the junction of Quarry Street and Mill Lane, close to the centre of Guildford, on raised ground overlooking the River Wey to the west and is one of the three ancient parishes of the borough of Guildford, with St Nicolas' and Holy Trinity being the other two.</p> <p>The origins of the present church date back to the 10th/11th Century with the tower being recognised as the oldest surviving piece of architecture in Guildford. The church has a cruciform plan with central crossing tower, truncated chancel with apsidal chapels on the north, south and east and an aisle nave to the west. Its triple gabled west end is flanked by angle buttresses with an apex crucifix on the centre gable. The structure is constructed from flint and chalk rubble with clunch dressing and is covered over by a plain tiled roof.</p> <p>The structure evidences a number of phases of construction, including its pre-conquest tower, Norman transepts (1100) which were lengthened in 1180, nave arcades which date from 1170-1180, 13th century widened aisles and 14th century fenestration. A programme of major restoration was undertaken in 1882 by T. Goodchild.</p>	<p>Contribution of Setting</p> <p>The church sits relatively centrally within its plot. Forming its immediate setting to all but its eastern flank is the churchyard which is typical in its character (presences of headstones, tombs (including Miles Tomb, discussed separately) and managed landscape). It is one of the few open spaces within the centre of Guildford and is still used for the burial of ashes and as place of reflection.</p> <p>The church is very much a focal point for Quarry Street and Mill Lane, contributing positively to the townscape. It is surrounded by a mix of low density commercial and residential buildings, many of whom are individually of historic significance (most being listed themselves), and which exhibit a wide range of ages and style, from medieval to the early C20, revealing the many layers of development of the town</p> <p>Although over 60 feet tall the church is not considered to be a dominant feature on the skyline of Guildford due to the graduating topography of the area. Nevertheless, it is identified as a Key Landmark Legacy Building⁸ within the Guildford Town Centre Views SPD. Long or medium range views of the Church's tower are extremely limited, but restricted glimpsed views, predominantly in the winter months are achievable from higher ground, such as the Castle Keep and grounds as well as the Cathedral/Stag Hill. Restricted short-ranged views are possible the valley bottom in places such as Park Street.</p> <p>The relationship of St Mary's Church to the river is important. Whilst its visual connection with the river has been lost with the introduction of development between the church and the river, historic mapping does show that the church and the river, up until relatively recently (relative to the age of the church) had a visual connection.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Church of exceptional interest, reflected by its Grade I listing status • Its age, Saxon origins and pre-Conquest fabric make it particularly significant, together with the later work over the centuries from the mediaeval to the modern • Location and setting forms a pivotal part of the historic landscape of central Guildford with its early settlement focused around the immediate area around St Mary's – One of the three ancient parishes of the Borough of Guildford, there has been a church on the same site since at least the 7th Century • Culturally significant in that it has been at the centre of life for the settlement of Guildford for over 1000 years • Place of royal worship in the 12th and 13th Centuries • Important landmark in the street scene • Records show that Reverend Charles Lutwidge Dodgson, who is better known by his pen name Lewis Carroll, preached at the church whilst staying at the family home, The Chestnuts on Castle Street. • Referenced in art and literature over the Centuries including '<i>South West Prospect of Guildford in The County of Surrey</i>', engraved by Samuel and Nathaniel Buck, 1738 		

⁸ Key Landmark Buildings – notable for their prominence in and around the town. Many utilise height to express their significance through spires, towers and cupolas although some assert their prominence through high quality design and building materials. – [Guildford town centre views SPD - Guildford Borough Council](#) Page 7

- It's a reflection of evolving ecclesiastical building traditions and styles
- Use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town.
- Gothic style of the mid-13th Century is unusual for Surrey
- Survival of the late Saxon town, built solely of flint and chalk rubble with no reinforcing quoins. The tower originally was situated at the church's western end, but due to church's growth and expansion it is now positioned more centrally within the structure's composition. Survival of such a tower is of exceptional importance.
- Survival of the 12th and 13th century east end of chancel and chapels
- Survival of the 12th century nave arcades
- Survival of the 15th century roofs (in general) and possible pre-15th Century chancel roof structure
- Outstanding collection of late medieval (15th Century) stone roof corbels in the north and south aisles
- Quality of internal aesthetics recognised by Pevsner – "almost the only attractive town-church interior in Surrey"
- The graduated raising of the internal floor levels eastwards signifies and heightens the importance of the east end
- Survival of 15th Century screen between the Chapel of St Mary and the south aisle
- Small fragments visible of the extensive decorative scheme of murals that once existed in the St John's Chapel. Suggestions have been made that this work is by William Florentine circa 1240, who was working at Guildford Castle for Henry III at the same time
- Royal coat of arms in the north aisle are to Queen Anne, dated 1707
- Ring of 8 bells cast in 1754 but rehung by Mears and Stainbrook of London – the ring is one of the oldest and most complete in Surrey

Impact of Proposal on Significance and Setting

I am satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as **TVIA viewpoint 4 (Hog's Back)** and **TVIA viewpoint 8 (Stag Hill)**. Equally I am satisfied through the modelling exercise I have undertaken, together with the submitted TVIA's that proposed development does not prejudice the significant visual interplay between the Cathedral and this historic town church. I therefore conclude that the proposed development will not harm any element of setting that contributes to this heritage assets significance.

Harm Identified

No harm to significance identified.

9	HERITAGE ASSET: Church of St Nicholas	GRADE: II*
<p>Description</p> <p>This asset is situated to the south-west of the application site and at the closest point the distance between the site and the asset measures approximately 225m.</p> <p>Situated on the western bank of the River Wey the present St Nicolas' church is a Grade II* listed building which happens to be the third church on the site. The current church dates from the 15th Century, although the only surviving section from this period is the Loseley Chapel. The rest of the structure dates to the 1870's to a design by S.S Teulon, with construction undertaken by Ewan Christian. The exceptions to this are the tower lantern which was designed by Stanley Gage Livock and added in 1951 and the glazed extension which fronts on to Millmead, which is a late 20th Century addition.</p> <p>The church is a large building constructed of Bargate stone and covered over by an aluminium roof. The exception to this is the Loseley Chapel which is of coursed flint rubble construction. It is almost cruciform plan with a square crossing tower. The church comprises of a chancel with an apsidal end, broad aisled nave with clerestory, north and south aisles, sacristy, 3 storey tower, tower lantern (added 1951), north organ chamber/flower vestry, north-west porch and narthex at the west end of the south aisle.</p>	<p>Contribution of Setting</p> <p>St Nicolas Church sits in a prominent location at the end of the High Street, on the south side, between Bury Street and Millmead. In terms of the role of the building in the streetscape, it occupies an important location within the western end of the High Street, beyond Millbrook and the River Wey with one being able to appreciate its value and significance as a town landmark in short, medium and long-range views from across the town as well as the surrounding hills. Its tall tower and scale contrasts sharply with that of the surrounding historic townscape to the south, west and east, and its physical prominence is especially noticeable in views down the High Street and along the river.</p> <p>The church is also very much visible from around the gyratory, which sits to its north. From this perspective one sees that this context is characterised by fragmented townscape of island blocks and large surface car parking as well as busy main roads with a significant degree of activity and noise.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Is a particularly important building of more than special interest reflected by its Grade II* listing status • St Nicolas parish is one of the three ancient parishes of the Borough of Guildford • Important landmark in the street scene • The connection between the chapel and the original church, together with its association with Loseley House and the More⁹ (later More-Molyneux) family who have lived there for over 500 years, gives heightened significance to the Chapel • Loseley Manuscripts, now house partly in the Surrey History Centre and partly in the Folger Shakespeare Library in Washington DC, USA highlight the significant literary and cultural links with the lives of people remembered in the Chapel, enabling a remarkable insight into Tudor and Stuart Surrey, the More family and their connections with the royal court • Constructed by Ewan Christian, a leading Victorian architect, best known for the National Portrait Gallery in London • It's a reflection of evolving ecclesiastical building traditions and styles • Use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town. • Survival, albeit much altered of the 15th Century Loseley Chapel – it is the only surviving part of the original medieval church • The church contains the work of artists of national significance, Thomas Earp and Joseph Aloysius Pippett – these bodies of work are recognised to be good examples of their craft on ecclesiastical art of the period. The works include <ul style="list-style-type: none"> ∴ The West Wall – painted in 1893 (Pippett) 		

⁹ One of the most important gentry families in Tudor/early Stuart Surrey.

- ∴ Alabaster pulpit and font (Earp)
- Stain glass and wall mosaics of St George and St Helena in the north aisle manufactured by Clayton and Bell, one of the most prolific and proficient English workshops of stained glass in the late 19th and early 20th century.
- Strong representation of work of locally based craftsmen, including:
 - ∴ Statue of St Nicolas in the chancel by Tom Wren of Watts Studio
 - ∴ Font designed by Grafham-based Henry Woodyer
 - ∴ Statues of Our Lady and St George by Blacking and Webb – made in their Flower Walk studios which was located beside St Nicolas’ Rectory.

Impact of Proposal on Significance and Setting

I am satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as **TVIA viewpoint 4 (Hog’s Back)** and **TVIA viewpoint 8 (Stag Hill)**. Equally I am satisfied through the modelling exercise I have undertaken, together with the submitted TVIA’s that proposed development does not prejudice the significant visual interplay between the Cathedral and this historic town church. I therefore conclude that the proposed development will not harm any element of setting that contributes to this heritage assets significance.

Harm Identified	No harm to significance identified.
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10	HERITAGE ASSET: Church of Holy Trinity	GRADE: I
<p>Description</p> <p>This asset is situated approximate 230m to the south- east of the application site.</p> <p>Occupying a prominent site on the High Street, Holy Trinity Church also known as the ‘Upper Church’ is a mid-18th Century church that replaced an earlier medieval church. It is of the Palladian style which was popular at the time of its construction. It is set back from the footpath and is elevated several meters above all neighbouring buildings on the High Street, thereby requiring steps and a ramp to access the west front.</p> <p>The arrangement of the structure comprises of a nave, with apsidal chancel and two transepts, a vestry to the southeast and a three-stage tower to the west end. The majority of the structure’s fenestration consists of tall round-headed windows</p> <p>A small amount of the old medieval church, known as the Weston Chapel, survives and this is believed to date from circa 1540. It is located on the structures southwestern corner and is identifiable by its flint and free stone chequer work. This phase of construction contrasts with the main Palladian structure, which was built between 1749-63 by James Horne and constructed from a palette of red/brown brick with gauged brick and stone dressings and a slate roof cover. A few additional later phases of construction are identifiable, these include the addition of the apsidal east end and transepts by Sir A.W Blomfield in 1888 and the 1913 vestry.</p> <p>The church’s north side elevation, which faces on to the High Street is identifiable by the six regimented round headed windows on a string course and a centrally positioned smaller window which sits over a Portland stone pedimented door surround with block rustication and double panelled door.</p>	<p>Contribution of Setting</p> <p>Holy Trinity sits in a prominent location on the High Street which is quite an open and wide public space that has been enhanced by the pedestrian scheme, which restricts vehicular traffic throughout the day.</p> <p>The church itself sits to the front of its fairly generous plot and is nestled in between the historic properties fronting on to the High Street. Its status in the streetscape is reinforced by the fact that the structure is set back a little from the prevailing building line, but also by its elevated position.</p> <p>The church is very much one of the focal points for the High Street, particularly towards the upper section contributing positively to the townscape. As mentioned, it is surrounded by a mix of low density commercial and residential buildings, many of whom are individually of historic significance (most being listed themselves), and which exhibit a wide range of ages and style, from medieval to the early C20, revealing the many layers of development of the town</p> <p>Forming its immediate setting to the south is the churchyard which is typical in its character (presences of headstones, tombs (including Miles Tomb, discussed separately) and managed landscape). It is one of the few open spaces within the centre of Guildford and is used as place of reflection and pause. Also experienced in the assets immediate context are features such as the grade II listed church boundary walls and railing which surround it, as well the memorial to Major Geoffery Brooke Parnell, and Elkin Vault, which provide group value. Enclosing the churchyard on two side are terraces of historic residential development and the Trinity Centre.</p> <p>The square crenelated tower acts as dominant feature on the skyline of Guildford due to the graduating topography of the area. It is identified as a Key Landmark Legacy Building¹⁰ within the Guildford Town Centre Views SPD. Long or medium range views of the Church’s tower are viable from a number of aspects around the town and are more pronounced in the winter months. Those of particular significance include the view from Guildford Cathedral at Stag Hill, which enables a wider appreciation of the Church in relation to the Castle and those from The Mount.</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Church of exceptional interest, reflected by its Grade I listing status • Holy Trinity parish is one of the three ancient parishes of the Borough of Guildford • Important landmark in the street scene • Focal point in views along the high street 		

¹⁰ Key Landmark Buildings – notable for their prominence in and around the town. Many utilise height to express their significance through spires, towers and cupolas although some assert their prominence through high quality design and building materials. – [Guildford town centre views SPD - Guildford Borough Council](#) Page 7

- Nairn and Pevsner identify the church as ‘*Surrey’s only big C18 church, handsome and pedestrian at the same time*’
- Apsidal east end and transepts by Sir A.W Blomfield¹¹
- Weston Chapel built by Richard Weston¹² of nearby Sutton Place
- Referenced in art and literature over the Centuries including ‘*South West Prospect of Guildford in The County of Surrey*’, engraved by Samuel and Nathaniel Buck, 1728
- Tomb and memorial to George Abbot (Archbishop of Canterbury 1611-33)
- Tomb of Sir Robert Parkhurst (Lord Mayor of London, d.1637)
- Memorial to Arthur Onslow (Speaker of the House of Commons 1728-1761)
- War memorials to the Queen’s Royal West Surrey Regiment (WW1)
- Survival, albeit much altered of the 16th Century Weston Chapel – it is the only surviving part of the original medieval church
- Use of contrasting form, fabric and scale to the prevailing vernacular to establish and reinforce its civic and functional prominence and historical importance within the hierarchy of the town.
- c.1770 pulpit built in the style of Wren

Impact of Proposal on Significance and Setting

I am satisfied that by virtue of the distance between the asset and the application site, together with the intervening built form, opportunities to view the proposed development from or in conjunction with this asset would be very limited, confined to a small number of distant views, such as **TVIA viewpoint 3 (St Catherine’s Hill), TVIA viewpoint 4 (Hog’s Back), TVIA viewpoint 5 (Farnham Road) and TVIA viewpoint 8 (Stag Hill)**. Equally I am satisfied through the modelling exercise I have undertaken, together with the submitted TVIA’s that proposed development does not prejudice the significant visual interplay between the Cathedral and this historic town church. I therefore conclude that the proposed development will not harm any element of setting that contributes to this heritage assets significance.

Harm Identified

No harm to significance identified.

¹¹ English architect, significant works include Royal College of Music as well as number of ecclesiastical projects

¹² Courtier and diplomat who served as Governor of Guernsey, Treasurer of Calais and Under-Treasurer of the Exchequer during the reign of King Henry VIII

Registered Park and Garden

11	HERITAGE ASSET: Jellicoe Roof Garden, High Street	GRADE: II
Description		Contribution of Setting
<p>This asset is situated directly to the south of the application site on the opposite side of North Street.</p> <p>The garden of c 770m² is situated above the former Harvey's department store (now House of Fraser), which is a five-storey building on the north side of Guildford High Street. The Sir Geoffrey Jellicoe designed garden occupies one of the roofs of the building and is surrounded to the south, east, and west by plain cast-iron railings (c 1m high). The garden has an L-shaped floor plan following the outline of the underlying roof. Its main component is a shallow lily pool, which forms a large sheet of water covering the entire roof space, except for the site of the former cafe, in which various flower beds and viewing platforms are set, connected by steppingstones.</p>		<p>The main attributes of setting that contribute to this heritage assets significance are principally the department store itself, which includes nos.105-111 High Street, as well as the extensive views out over Guildford and the surrounding countryside, which provide a sense of connection between the asset and its wider surroundings</p>
Significance		
<ul style="list-style-type: none"> • Association with Sir Geoffrey Jellicoe, one of the 20th century's most celebrated landscaped architects • Designed to symbolise the flight of the first sputnik • The circular shapes in the design 'embody the idea of planets spinning through space' (Architectural Review 1957) • Jellicoe said that it was "...<i>primarily a sky garden... the underlying idea has been to unite heaven and earth the sensation is one of being poised between the two.</i>" 		
Impact of Proposal on Significance and Setting		
<p>The garden was designed to use the town of Guildford as its setting and currently from this vantage point one is able to observe and appreciate the fine urban grain and human scale of the town, as well as take in the dramatic valley topography and treelined back drop which adds to the towns distinctive character and provides a narrative to its existence and evolution.</p> <p>The modelling exercise undertaken has confirmed that the proposed development would be readily viewed from this unique vantage point by virtue of its, scale, height, massing and extent. This is likely to be most acute from the northern end of the garden with many of the development's core blocks being evident, however as the viewer moves more centrally within the garden the development's visibility is moderately diminished, reduced to just the upper floors of Blocks C1, C2, D3, D4 and E. The proposed development becomes even less apparent as you move into the southern section of the garden behind the café, to the extent that its completely removed from view.</p> <p>From the above analysis I have concluded that the introduction of the proposed development would undoubtedly challenge this outlook, by virtue of the exaggerated, and contrary scale and massing of some of the built components such as Blocks C2, D4 and E, appearing incongruous to the prevailing townscape and severing views out across the town towards the north-west. Thankfully, views from the garden of the town's most significant landmarks, such as Guildford Castle and Guildford Cathedral will remain unaffected.</p> <p>When giving consideration to the asset's uniqueness, particularly in terms of its outlook, and Jellicoe's vision that the idea of the garden was "<i>to unite heaven and earth the sensation is one of being poised between the two</i>" I would determine the resultant harm as being less-than-substantial at the low end of the spectrum. In doing so, I advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF. I note that the supporting heritage statement suggests that the application of well-designed structures within the garden's setting will add interest and the green elements on roofs and balconies will have an especially beneficial effect. Unfortunately, I am not</p>		

convinced by this assertion. Whilst I am not opposed to the design of the proposed development, nor do I have concerns with the proposed provision of green roofs and balconies across the scheme, I am not convinced that they, individually or collectively, aid in mitigating the identified harm noted above sufficiently.

Harm Identified

Less-than-substantial (Low)

Conservation Areas

12	HERITAGE ASSET: Guildford Town Centre Conservation Area	GRADE: N/A
Description	Contribution of Setting	
<p>This conservation area is located directly to the south of the application site with its boundary line being drawn down the centre of North Street, thereby including properties on North Street's southern side. It was designated in 1969 and is one of the Borough's conservation area's which benefits from a character appraisal (adopted 2006).</p> <p>The focus of this large Conservation Area is Guildford's historic town centre, which takes in Guildford Castle, the High Street and a mix of commercial, residential and civic areas. The Conservation Area is bounded to the West by Millbrook and the modern shopping area; to the South by the mediaeval chalk quarries and early 20th century suburbs; and to the east and north by late 19th century residential suburbs.</p> <p>The character appraisal divides the conservation area into four character areas Guildford Castle and the quarries; the High Street; 19th century housing to the south of Sydenham Road; and 19th century and later development to the north of the High Street.</p> <p>The Guildford castle and the quarries character area sits on a west facing slope that drops down to the River Wey. A mix of uses can be found here - mainly offices, tourism and leisure, and some residential. Its most important buildings are Guildford Castle and St Mary's Church. Architectural and building materials vary – bargate stone, clunch, flint, brick, and clay tiles are all found here. It is characterised by terrace properties set on the back of pavements, many of which are listed and a number of which date to the 16th and 17th centuries and are timber framed. Roofscape features, such as steeply pitched gables and brick chimneys also contributed to the visual interest in views of and within this area.</p> <p>The High Street is the towns historic commercial corridor that climbs dramatically in her easterly direction from the junction with Millbrook. It is connected to two subsidiary east-west corridors, one lying to its north (North Street) and the other to its south (Castle Street/Sydenham Road) by narrow lanes that run broadly north-south. These 'gates' as the lanes are historically known tended to be owned by inns and taverns and became public roots from the 16th century onwards. Buildings which define this area are of 2 to 3 storeys, a large number of these are former town houses of the 17th 18th and 19th centuries with the ground floors now presenting as shops. Architectural expression varies from one plot to another, and this lends the High Street a '<i>unity-in-diversity</i>' as Nairn and Pevsner term it. A</p>	<p>The conservation area's setting is influenced by the character of the adjoining conservation areas of Millmead & Portsmouth Road and Wey & Godalming Navigations to the west, Stoke Fields to the North and Waterden Road and Charlotteville to the east.</p> <p>A further influence are the surrounding hills which offer important elevated views of the town centre enabling one to appreciate the significance of the conservation area and its relationship to the wider town. Views of particular note are from Pewley Hill, St Catherine's Hill; the Hogs Back; Farnham Road and Stag Hill. Equally, there are reciprocal view back out from the conservation area towards the surrounding wooded hills to the west.</p>	

number of Guildford landmarks can be found in this area including the Guildhall with its projecting clock, Holy Trinity Church and the Jacobean Abbots Hospital.

Notable views and vistas within the conservation area include:

- Along The High Street
- Into and out of the Castle Grounds, focusing on the Norman Keep

Significance

- Origins as a Saxon settlement focused on the High Street, Guildford Castle and Quarry Street
- Survival of its medieval plan
- Development and growth over the centuries – becoming the County town of Surrey
- The importance of the River Wey Navigation and later the arrival of the railway
- Reference in art and literature over the years
- Rich townscape of early defensive, civic, domestic, educational and religious buildings
- Many landmarks are important contributors to the identity of the town

Impact of Proposal on Significance and Setting

The Town Centre Conservation Area has a close relationship with application, the most immediate of which is the shared a boundary along North Street, but equally the site's eastern edge lies not too far from the boundary along Haydon Place. The dense urban grain which characterises a significant proportion of the designated area means that the proposed development will not be visible from many areas, this includes High Street and Quarry Street, which are areas with the highest concentration of designated heritage assets and therefore of greatest significance. Assessments have concluded that the proposed development has most potential for impact in the following locations:

- Conservation Area's northern edge (North Street, Angel Gate and Swan Lane) [Character Area 2]
- Between Haydon Place and Stoke Road/Chertsey Street [Character Area 4]

Character Area 2 (Angel Gate & Swan Lane)

Swan Lane and Angel Gate are two pedestrian ginnels that run north/south, connecting the High Street with North Street, in which views of the proposed development would be possible, particularly towards their northern ends. The views along these linking routeways are identified in the Town Centre Conservation Area Appraisal as being of significance to the character of the designated area.

In the case of Swan Lane, the introduction of the proposed scheme would represent as significant visual change, as signalled in **TVIA viewpoint 15 (Swan Lane)**, which demonstrates that Block B1 would be prominently visible having replaced 18 North Street & Nos 108-109 Woodbridge Road and consequently curtail onward views towards the spire of the Church of St Saviour. Also apparent in this view, to vary extents, would be Blocks D2, D3, D4 and E. The visual impact of the proposed changes, whilst considerable, is not necessarily considered to be to the detriment of this view or to the character of this part of the conservation area, as I believe the development's scale, design, layered composition and material palette are all successfully responsive to the surrounding context. That said, I do appreciate that the proposed scheme would result in the loss of onward views towards St Saviour's spire which is regrettable, however I do not consider that the significance of this part of the conservation area is dependent on having intervisibility with the spire, and as such, I am not overly concerned with this loss. In fact, an argument could be made that a terminated view is more characteristic of Guildford's ginnels and alleys.

Angel Gate is a narrow pedestrian lane and is formed of the yards of the Angel Hotel, which fronts on to the High Street. This narrow linear lane is framed with small to medium foot printed red-brick buildings and is terminated at its northern end by the elevation of No.17 North Street (Grade II). Above this, in the distances one is able to appreciate the pinnacle of the Church of St Saviour's spire. **TVIA viewpoint 14 (Angel Gate)** is a representative view of the proposals impact from Angel Gate, and it is a view where the proposed development does present a concern, by virtue of the visual challenge the cumulation of Blocks B1, B2, C1 and C2 and the resultant incongruous layering places upon the scale and setting of No.17 North Street (Grade II), as well as appearing discordant with the general low scale character of the Conservation Area. The resultant effect, in my opinion, is one which harmfully prejudices the setting of both the listed building and the conservation area.

Character Area 4 (Haydon Place & Stoke Road/Chertsey Street)

This character area, which is situated to the east of the site, is an area characterised by late 19th Century suburban terraced housing.

The visual relationship between the application site and the character area is extremely limited, a consequence of the interceding large- scale development (Leapale Multi-storey Carpark and Guildford Telephone Exchange), and thus views toward the site are restricted to locations such as The Bars and Martyr Road. Both of these locations are represented in the supporting TVIA, however the most concerning of these is verified viewpoint from The Bars **TVIA viewpoint 12 (The Bars)**.

TVIA viewpoint 12 (The Bars) illustrates clearly that there would be a significant change to this view, with Block E of the proposed development punctuating and terminating this linear view, thus resulting with it becoming a dominant visual feature in views out from the conservation area at this point. Whilst its impact is somewhat mitigated by its design and angled positioning all of which are welcomed positively, the scale and height of Block E still presents a conflict to the scale of the surrounding prevailing townscape, appearing as an incongruous form, and thereby challenging the setting of this conservation area.

Wider Views

In addition to the above the proposed developments height, scale and mass are also considered to present a challenge to the character and setting of the Town Centre Conservation Area, particularly in those wider views where one can appreciate the richness of Guildford's historic townscape within its unique context, **TVIA Viewpoint 6 (Sydenham Road/Bright Hill)** and **TVIA Viewpoint 11 (Castle Motte)**. It is appreciated that the application site is situated at the periphery of the town centre in an area that is largely characterised by larger scaled 20th Century building and is beyond the extent of the homogeneous historic core. Nevertheless, it is an area which has been identified in the Views SPD as containing structures of a scale and mass which competes with the fine grained, domestic scaled townscape of the conservation area. Therefore, the concern here is that the proposed changes to the host building's height, scale and massing could perpetuate this concern and disrupt the sense of scale and character that defines the Town Centre Conservation Area, by appearing more noticeably incongruous within its setting.

Harm to the significance and setting of this heritage asset has clearly been identified in the above. I would assert that in this instance it would be qualified at the lower/mid range of less-than-substantial. I therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified

Less-than-substantial (Low-Mid)

13	HERITAGE ASSET: Wey and Godalming Navigations Conservation Area	GRADE: N/A
Description		Contribution of Setting
<p>This conservation area was designated in 2002 as part of a joint strategy with Waverley, Woking, Runnymede and Elmbridge councils. In total, the conservation area runs for 20 miles (from the River Thames at Weybridge to the Town Bridge at Godalming). It specifically covers the long and sinuous Wey and Godalming Navigation channel throughout the borough, however, it is slightly fragmented within the town centre as a result of other transecting conservation areas, such as the Bridge Street Conservation Area. The section of conservation area immediately to the north of the Bridge Street Conservation Area includes Dapdune Wharf and its listed buildings, whilst the sections to the south of the Bridge Street Conservation Area contains the schedule monument and listed Treadwheel Crane and the site of the Town Wharf.</p> <p>The navigation is characterised by the river corridor and open spaces and vegetation fronting it. The river corridor itself is a long narrow space lined by the towpath and crossed by bridges. It is well enclosed by development within the town centre and this tapers down as you progress out to the north and south.</p> <p>Relative to the application site, this conservation area is situated directly to the west.</p>		<p>The setting of the conservation area is extensive and varied. In the section between Dapdune Wharf and Onslow Bridge, the setting is characterised by a significant amount of recent development, adjacent to both sides of the vegetated riverbank, some of which is large in terms of footprint and/or scale.</p>
Significance		
<ul style="list-style-type: none"> • One of the earliest waterways in Britain to be made navigable – linking Guildford to the River Thames • Locally important and environmentally sensitive corridor through Surrey, linking heavily populated and commercially developed suburban areas with open countryside. • Development and use of the navigation has significantly influenced local history townscape and landscape through the Wey valley, and has supported Guildford's growth from the late 17th century until the arrival of the railways in the mid-19th century • Offers unique opportunities for informal recreational enjoyment, educational development and historical enrichment • There is group value from structures associated with both its function (e.g. locks and lock keepers cottages) and use as a working waterway (e.g. mills and wharfs) 		
Impact of Proposal on Significance and Setting		
<p>The significance of the Conservation Area lies in its importance in the industrial history of Guildford and the historic buildings and landscapes that form its setting.</p> <p>I am confident that the intervisibility between the proposed development and the conservation area would be limited thanks to the screening provided by the intervening built context. Nevertheless, I do recognise that there would be the occasional opportunity for glimpsed views where, for the most part, the proposed development would be viewed subtly in conjunction with the existing built form. That said, there is one identified view where the resultant development would be more conspicuous, this is at Dapdune Wharf. In this view Block E and the upper floor of Block C2 would be visible from the conservation area, as illustrated in TVIA viewpoint 1 (Dapdune Wharf), which demonstrates Block E appears strikingly evident above Surrey Police Station, and the upper floor set back of Block C2 emerging behind the spire of St Saviours. Yet, whilst the proposed development is likely to be noticeable from limited locations within the conservation area, I am satisfied that its introduction would not affect one's ability to appreciate this heritage asset's significance.</p>		

In terms of the impact on setting, it is acknowledged that that the proposed development would compete with the spire of St Saviour's Church, firstly, as its silhouette would be diluted by the presence of the upper storeys of Block C2 which would sit behind it, and secondly, as a consequence of the cumulative impact of Blocks C2 and E together. As such, I find myself agreeing with the supporting heritage assessment that this would facilitate in eroding the connection between the river and the town centre, albeit to a fairly limited extent.

Giving consideration to the above it is my view that the proposed development would result in some harm to setting of the conservation area, and I would judge this harm to be at the lower end of less-than-substantial. I therefore advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF. Additionally, it is also worth noting that **TVIA viewpoint 1 (Dapdune Wharf)** is identified within the Town Centre Views SPD where there is clear guidance that new town centre development, which has the potential to form a component... is no higher than the existing buildings and does not compete with the spire of St Saviour's Church for prominence, thus the proposal is deemed to be contrary to this guidance.

Harm Identified	Less-than-substantial (Low)
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14	HERITAGE ASSET: Bridge Street Conservation Area	GRADE: N/A
<p>Description</p> <p>This conservation area is located approximately 100m to the west of the application site. It was designated in 2003 and is one of the Borough’s conservation area’s which benefits from a character appraisal, adopted at the time of the designation.</p> <p>It is focused upon the grade II listed Onslow Bridge and a small section of the River Wey. This small conservation area retains urban fabric from the late 19th century that is linked to the town's industrial and mercantile expansion. The supporting character appraisal describes the historic interest of the conservation area as <i>“the hub up late 19th and early 20th century phase of commercial and industrial growth of the town following the arrival of the railway and the subsequent construction of Onslow Bridge, Bridge Street and Onslow St.”</i></p> <p>The area includes the Rodboro buildings (Grade II) which were the first purpose-built car factory in Britain, if not the world and the Central Hall Picture Palace, now known as the Casino Nightclub, which was the first cinema in Guildford and among the first to be opened after the introduction of the cinematographic act in 1910. Architecturally the area has a coherent character and similar architectural themes are used throughout the area with many of the newer buildings having been designed to successfully pick up on the established themes but applying a modern twist. Examples of the architectural themes exhibited include the use of pilasters and pier buttresses; brick and terracotta detailing; nonstandard windows and doors; symmetry and the back of pavement building line. A strong sense of enclosure is created by flat elevations usually three or four storeys high. Another aspect of the character of this area is movement with the Gyrotory serving as a major vehicular route within the town</p>	<p>Contribution of Setting</p> <p>The main elements of setting that contribute to the significance of this heritage asset are the riverscape and townscape characteristics found in the adjoining conservation areas of the Wey and Navigations and Millmead and Portsmouth Road. Equally, it can be argued that townscape characteristics which define Guildford Town Centre and its conservation area are also big influences.</p> <p>The gyrotory and the large-scale buildings fronting it comprise a large, negative component of its setting to its east, south and west (particularly the blank frontages of the Friary Centre).</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Evidences the town’s industrial and mercantile past centred around the growth of the railway • Site of the 1st purpose-built car factory in Britain – Rodboro Buildings • Town’s second river crossing point- built 1882 – bridge was required to improve the access to the new station • Bustling and busy environment – both historically and today • Coherent character, particularly with the more historic fabric as this was constructed within a 30-year period • Industrial and commercial character • Lower scale and massing (3-4 storeys) • Buildings crowned with pitched roofs, often gable ended to the street • Use of projecting bay windows at first floor 		
<p>Impact of Proposal on Significance and Setting</p> <p>This conservation area is screened from the majority of the application site by the Friary Centre, nevertheless the supporting TVIA, together with modelling does evidence that visibility of the proposed development is feasible, both within the conservation area and from its setting.</p>		

As evidenced in **TVIA view 11 (Farnham Road)**, principally what would be viewed from within and just beyond the conservation area would be the upper floors of Block E, D3 and D4, but there are areas where glimpsed views would be gained to blocks C1 and C2. All of this would all be read as background to the Friary Centre but would appear as a significant change in outward views from the conservation area, given their scale, height and quantum.

Nevertheless, I am mindful that this conservation area is one which tends to be utilised as a movement corridor, be it traffic navigating around the gyratory, or pedestrians moving between Guildford Train Station and the centre, thus it is an area which is characterised by lots of activity and noise and is not an area where one is encouraged to pause and take in views. Taking account of this, I have used the model to understand how the development would appear in a more kinetic environment, when moving through the conservation area. This exercise demonstrated that **TVIA view 11** is where the visual impact of the proposed development is at its acutest, due the locations rising topography and its more open aspect, however, as you move eastward along Bridge Street, towards the Friary Centre, the visual impact of the development experienced from the conservation area depreciates, the closer you get to the Friary Centre, with Blocks C1, C2 and D3 eventually being removed from view.

I agree with the supporting heritage impact assessments that the proposed development will not change the character or significance of the conservation area, nor does it harm an important element of its setting, however I am mindful that there still will be a considerable visual change to this asset's setting due the proposals scale, height and quantum. Nevertheless, I appreciate that this change is very dynamic and as a consequence, the resultant impact upon the conservation area does vary across its extent.

Give all of the above I have to conclude that there is some harm to the setting of this conservation area by virtue of the visual challenge and distraction the proposal places upon the prevailing human scale of the surrounding townscape. I would assert that the resultant harm in this instance would be qualified at less-than-substantial, and I would place this harm of the lower end of the spectrum, given the distance between the application site and the conservation area. In doing so, I advise that this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Harm Identified

Less-than-substantial (Low)

15	HERITAGE ASSET: Stoke Fields Conservation Area	GRADE: N/A
Description		Contribution of Setting
<p>This conservation area is located approximately 275m to the north-east of the application site</p> <p>It is a small designated area, which is focused upon a road of the same name. It is predominantly characterised by small, semi-detached, 19th red-brick houses, that front onto the street, nevertheless it contains the double fronted Prince Albert Public House on Stoke Road, which is of stone rubble and ashlar construction, and Guildford Nursery School which is a former late 19th/early 20th century school on York Road.</p>		
Significance		
<ul style="list-style-type: none"> • Comprehensive group of buildings which evidences the towns 19th century expansion • Illustrates 19th century domestic building stock – design, scale and material palette 		
<p>Impact of Proposal on Significance and Setting</p> <p>I agree with the supporting heritage assessment which concludes that the impact of the proposed development would be negligible.</p> <p>Modelling and verified views, particularly TVIA viewpoint 9 (Stoke Fields), illustrates that a small section of the upper floors of Blocks C1 and C2 would be glimpsed, however I am satisfied that what would be seen from this heritage asset is extremely limited, but nevertheless would sit comfortably with the existing townscape layering. Equally, the materiality of these sections are considered to sensitively responsive to the prevailing materiality, and thus would appear recessive.</p> <p>I am satisfied that the proposed development does not prejudicially impact upon the setting and significance of this conservation area, and as such no harm has been identified.</p>		
Harm Identified	No harm to significance identified.	

Locally Listed Buildings

16	HERITAGE ASSET: 41, 42 & 43 North Street		Local Listed
Description		Contribution of Setting	
<p>Early 19th century pair of 2-storey commercial units attributed to Thomas Swayne, a prolific local builder. The street elevation is stuccoed with a dentil cornice and a parapet with indented decoration hiding a pitched slate roof. A lion on a plinth stands on top of the parapet over no.41 (right-hand side) and signals the property former use as the Little White Lion Public House. Modern shopfronts now animate the ground floor.</p>		<p>This assets setting is predominantly the lower end of North Street.</p>	
Significance			
<ul style="list-style-type: none"> • Illustrates early 19th century commercial building stock – design, scale and material palette • Grouping has local architectural and historic interest for their part in the 19th century development of Guildford town • Surviving link to the now demolished (1957) coaching inn White Lion Hotel which fronted on to the High Street 			
Impact of Proposal on Significance and Setting			
<p>This asset is situated at the lower end of North Street, sitting directly at the head of the North Street Commercial Road junction, and thus has a more immediate relationship with the proposed scheme. Of particular immediacy is the pedestrianisation works of North Street and the development of Friary Square. Both of these particular elements are shown to be undertaken directly in front of this asset and thereby will have a more obvious impact upon the asset setting.</p> <p>The principal of pedestrianisation is certainly seen as a positive step in terms of improving how they and their immediate or wider setting are experienced. Such an action will, by virtue of the removal of traffic and improvements to the quality and materiality of the public realm, are likely to result in positive visual, audible and accessibility changes to the setting, all of which are strongly welcomed.</p> <p>From the above assessment, I am satisfied that the proposed development does not prejudicially impact upon the setting and significance of this group of Non-Designated Heritage Asset, and as such no harm has been identified.</p>			
Harm Identified		No harm to significance identified.	

17-21	HERITAGE ASSET: 67-71 North Street, 72 North Street, 12 North Street, 17-21 Market Street & 18 Market Street	Local Listed
Description		Contribution of Setting
<p>67-71 North Street – A short row of shops by Henry Peak, on the corner of North Street and Market Street that date to circa 1895, but which have been redeveloped. 3 storeys in height and of red brick construction that is accented with terracotta decorative vertical panels and a dentil course. Modern ground floor shopfronts to both Market Street and North Street.</p> <p>72 North Street – Former 3 storey Police Station, now retail unit, built in the 1890’s. Constructed from red brick with ashlar rustication to the ground floor. Classically symmetrical elevation with stone cornice to roof with dentils, surmounting stone balustrade and central pediment decorated with Guildford’s coat of arms.</p> <p>12 North Street – Former Surrey Arms public house now commercial unit, built in 1865 by Henry Peak. Situated on the corner of North St and Haydon Place, it was the flagship of North Street Brewery, until it was sold in 1890. It was also one of earliest buildings to be constructed on the north side of North Street. Construction is of red brick with stucco to the ground floor and is covered over by a hipped slate roof. At ground floor level, the entrance is within the chamfered corner facing the junction of North St and Haydon Place whilst modern shop windows animate both elevations.</p> <p>17-21 Market Street – Originally the workshops of Williamson’s furniture manufacturers, now a shop, which dates to the late 19th Century. Unusual example of an ex-industrial building in the town centre. Construction is of red brick covered over by a pitched slate roof with deep overhanging eaves. Upper three storey elevations arranged into four bays, each defined by a large 3-light window.</p> <p>18 Market Street – 19th century 3 storey, brick constructed workshop by Henry Peak, now converted to commercial premises with modern shop floor units to the ground floor.</p>		<p>These properties immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function.</p> <p>North Street is a street that underwent considerable change during the 20th Century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Officer, and which continues to change into the 21st Century.</p> <p>Its current built character is composed of a varied mix of ages, architectural styles and material palette</p>
Significance		
<ul style="list-style-type: none"> • Illustrates 19th century commercial building stock – design, scale and material palette • Comprehensive group of buildings which have local architectural and historic interest for their part in the 19th century development of Guildford town • The Market Street properties show local historic interest in the towns recent industrial/commercial past • A number of these properties are attributed to Henry Peak (1831-1914) who was Guildford’s first Borough Surveyor and latterly became Mayor of the town in 1899. His projects include the present Castle Grounds and the development of Charlotteville and Stoughton. Most famously he was responsible for the paving of the town centre, using granite setts., which remain a significant feature of the historic High Street 		
Impact of Proposal on Significance and Setting		
<p>It is considered that these particular assets are situated in positions towards the upper section of North Street, where they are not going to be directly impacted by the proposed scheme, although they are likely to indirectly benefit from the pedestrianisation proposals between Commercial Road and Leapale Road.</p>		
<p>The principal of pedestrianisation is certainly seen as a positive step in terms of improving how they and their immediate or wider setting are experienced. Such an action will, by virtue of the removal of traffic and improvements to the quality and materiality of the public realm, are likely to result in positive visual, audible and accessibility changes to the setting, all of which are strongly welcomed.</p>		

From the above assessment, I am satisfied that the proposed development does not prejudicially impact upon the setting and significance of this group of Non-Designated Heritage Asset, and as such no harm has been identified.

Harm Identified

No harm to significance identified.

Non-Designated Heritage Assets

22	HERITAGE ASSET: 18 North Street & Nos 108-109 Woodbridge Road	Non-Designated
<p>Description</p> <p>This asset directly adjoins the application site on its southern boundary.</p> <p>Early 20th century, two story development, that is sited on the north-eastern corner of the North Street and Woodbridge Road. It is constructed on red brick and is covered over by a combination of a shallow pitched slate roof (no. 18) and flat roof (108-109) which is hidden behind a parapet. The roof arrangement to 108-109 is almost certainly a later amendment. The building's elevation is animated by a combination of modern shopfront units to the ground floor, no.18 fronting to North Street and 108-109 wrapping around the corner. At the upper level the fenestration is timber sash set within a contrasting profiled surround, but there is a subtle difference between the two addresses. No.18 has segmental architraves above the first floor whilst Nos. 108-109 have flat tops.</p>	<p>Contribution of Setting</p> <p>The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function.</p> <p>North Street is a street that underwent considerable change during the 20th Century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Officer, and which continues to change into the 21st Century.</p> <p>Its current built character is composed of a varied mix of ages, architectural styles and material palette</p>	
<p>Significance</p> <ul style="list-style-type: none"> • Illustrates early 20th century commercial building stock – design, scale and material palette • Some legible local architectural and historic interest for its part in the town centre's 20th century development 		
<p>Impact of Proposal on Significance and Setting</p> <p>This is a heritage asset of local importance whose architectural and historic interest contributes positively to the setting of the adjoining listed building (17 North Street) as well as the setting of the Guildford Town Centre Conservation Area.</p> <p>The proposed scheme would require this asset to be completely demolished and for it to be replaced by a new public square at North Street entrance to the scheme.</p> <p>In terms of the asset as a non-designated heritage asset (NDHA), the act of demolition would result in total loss of its historic and architectural significance, which I would assess as being limited in nature. In weighing applications that affect NDHA's, the NPPF Framework states that a balanced judgement is required, having regard to the scale of any harm or loss and this significance of the heritage asset. Thus, I would conclude the following: substantial harm to an asset of limited significance.</p> <p>Looking more widely at the impact upon the setting and significance of the adjoining statutory listed building (17 North St) and the opposite Town Centre Conservation Area. It has been concluded that the removal of 18 North Street & Nos 108-109 Woodbridge Road would contribute to further erosion of their historic setting, but in terms of listed building, also has the potential for physical impacts on the asset, that may require some degree of repair. However, these impacts are somewhat offset by the creation of a new public square in its place which I would conclude has been designed sympathetically using what appears to be an appropriate material palette - natural aggregate flag paving (light grey) & natural aggregate block paving (terracotta blend) - that is considerate to the surrounding historic environment. Because of the sensitive context, should Officers be minded approving the application, then I would advise it the following is conditioned:</p> <ul style="list-style-type: none"> • Samples of all paving materials to be used, including block paving, accent paving, tactile paving, edgings strips, kerbs etc... • Full specification details of the water feature • Full specification details of fixed street furniture, including benches, bins etc... 		
<p>Harm Identified Substantial harm to an asset of limited significance.</p>		

23	HERITAGE ASSET: 16 North Street (Guildford Cobblers)	Non-Designated
Description <p>This asset directly adjoins the application site on its southern boundary.</p> <p>19th century, 3-storey shop with accommodate on the upper two floors. Constructions is of red and multicoloured brick with a single window opening on each floor. The structure is covered over by a double pitched slate roof, with hidden central valley.</p>		Contribution of Setting <p>The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function.</p> <p>North Street is a street that underwent considerable change during the 20th Century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Officer, and which continues to change into the 21st Century.</p> <p>Its current built character is composed of a varied mix of ages, architectural styles and material palette</p>
Significance		
<ul style="list-style-type: none"> • Illustrates early 19th century commercial building stock – design, scale and material palette and Guildford's commercial development 		
Impact of Proposal on Significance and Setting <p>This asset is best appreciated and experienced from North Street. From this position one can recognise that its setting is quite constrained and offers very little to the property's significance.</p> <p>Part of the proposed development seeks to replace the adjoining building, no.15 North Street, with a new residential block identified on the submitted plans as Block A. The building that it is to be replaced is clearly a modern addition to the street-scene whose architectural expression, form and material palette is in total contrast to the prevailing vernacular and thus is considered to be a detractor. As such, its removal is welcomed positively, as such an action would help to enhance the setting of no.16 North St.</p> <p>In terms of the impact of the replacement building (Block A), it is considered that the proposed scale and massing of this structure have a sensitive relationship with this asset and is no more harmful than the existing structure. Equally, the application of a more rational and balanced design that uses an appropriate material palette that is complementary to its neighbour, is also welcomed positively.</p> <p>Whilst this asset doesn't form the focus of any of the TVIA viewpoints, one does acknowledge that the layering of the proposed development that can be seen in TVIA view 14, would sit behind this asset. In terms of whether this would be readable together with the asset, a modelling exercise that has been undertaken confirms that the proposed development behind would not be identifiable in context with this asset</p> <p>Given all of the above I am satisfied that the proposed development does not prejudicially impact upon the setting and significance of this Non-Designated Heritage Asset, and as such no harm has been identified.</p>		
Harm Identified	No harm to significance identified.	

24	HERITAGE ASSET: 19 North Street (Barclays Bank)	Non-Designated
<p>Description</p> <p>This asset directly adjoins the application site on its southern boundary.</p> <p>A late 1960's 2-storey development in the brutalist style, using steel, glass and concrete, which was built on the site of the town's former Methodist Church. This purpose-built banking hall has plate glass windows at ground floor level with inset horizontal windows with a scalloped concrete canopy to the first floor. The 1st floor walls are textured concrete.</p>	<p>Contribution of Setting</p> <p>The property's immediate setting is principally formed from the townscape of North Street, which is commercial in its character and function.</p> <p>North Street is a street that underwent considerable change during the 20th Century, with the removal of many of its historic buildings, such as the Methodist and Congregational Churches and the Post Office, and which continues to change into the 21st Century.</p> <p>Its current built character is composed of a varied mix of ages, architectural styles and material palette.</p>	
<p>Significance</p>		
<ul style="list-style-type: none"> • Architectural interest as one of the few high quality modern buildings in the town centre • Distinctive style and application of materials makes it a landmark in the town centre 		
<p>Impact of Proposal on Significance and Setting</p> <p>It is considered that the proposed development would be a complementary addition to this asset's setting. In particular, the provision of the proposed new North Street public square, which would be located immediately in front of the asset, together with the pedestrianisation of North Street would serve as significant enhancement. The removal of traffic and the improvements to the quality and materiality of the public realm would, in my opinion, result in a positive visual, audible and accessibility change to the setting, all of which are strongly welcomed.</p> <p>I am therefore satisfied that the proposed development does not prejudicially impact upon the setting and significance of this Non-Designated Heritage Asset, and as such no harm has been identified.</p>		
<p>Harm Identified</p>	<p>No harm to significance identified.</p>	

25	HERITAGE ASSET: 1-3 Leapale Road (Five & Lime)	Non-Designated
Description		Contribution of Setting
<p>This asset directly adjoins the application site at its south-eastern corner.</p> <p>Nos. 1-3 Leapale Road is a terrace of three late 19th century houses now brought together as a public house. Modern public house fenestration to the ground floor with sash windows above. Materially, the property is of brick construction, but the upper floors of the front elevation and the whole of the rear elevation have been covered over by a coarse off-white render. The whole structure is covered over by a pitched slate roof.</p>		<p>Surrounded by surface parking, modern commercial development and cleared site all of which does not contribute to the property's significance and interest.</p>
Significance		
<ul style="list-style-type: none"> • Illustrates 19th century commercial building stock – design, scale and material palette and Guildford's commercial development 		
Impact of Proposal on Significance and Setting		
<p>This asset is best appreciated and experienced from Leapale Road. From this position one can recognise that its setting has changed greatly since this asset was first built and therefore offers very little to the property's significance.</p>		
<p>The proposed development seeks to construct a series of residential blocks on the surface carpark and vacant land that sits to the north of this property. The most immediate structure to this asset, and thus is likely to have the greatest influence upon its significance, is identified on the submitted plans as Block B2. This Block is split into two architectural typologies, as indicated in the supporting DAS, that being Gateway and Narrow Plot.</p>		
<p>The Gateway typology is the most immediate to the asset, sitting adjacent to it, and fronting on to Leapale Road. For the most part this section is 7-storeys in height, which is significantly taller than the Five & Lime. However, the provision of a smaller (4-storey) southern wing, which in effect acts as a linking component, has been designed and placed to aid with dissipating this contrast, which I consider, having assessed the submitted plans and modelling, works effectively, particularly as the height of the wing is complementary to the height of the Five & Lime. What also is shown to assist in mitigating the potential for harm, is the curvature of Leapale Road. This curvature helps to lessen the immediacy of the relationship between the asset and the site, thus limiting what aspects are able to be read together.</p>		
<p>Notwithstanding the above, there is acknowledgement the impact of this block would be more acute from within the rear yard/beer garden as a result of the proposals depth and height, however historic mapping and photographs has revealed that a property of a similar depth and height to that of the wing section had historically contributed to its immediate setting. With this knowledge I am now much more content with the proposals impact upon this asset, and as such, consider that it would not negatively prejudice its architectural or historical significance nor its setting.</p>		
<p>In terms of the design, architectural expression and chosen material palette of this typology, I'm satisfied that there would be complementary relationship with the neighbouring asset and therefore is welcomed positively.</p>		
<p>With regards to the Narrow Plot, which sits behind the Gateway building, away from Leapale Road, thus further into the site, the modelling exercise that has been undertaken confirms that this element would not be identifiable in context with this asset as a result of the arrangement and positioning of existing and proposed structures.</p>		
Harm Identified	No harm to significance identified.	

26	HERITAGE ASSET: Guildford Telephone Exchange	Non-Designated
Description		Contribution of Setting
<p>This asset is situated to the north-west of the application site and at the closest point the distance between the site and the asset measures approximately 10m.</p> <p>Guildford Telephone Exchange was constructed in 1937 on the intersection of Leapale Road and Leapale Lane, relacing an earlier exchange on the north side of Leapale Lane. The building is of red and buff brick laid in Flemish bond with ashlar banding and window surrounds. It has flat roofs and retains its original metal casement windows. The original entrance was in a single storey addition at the apex of the building. The entrance and windows have been bricked up but the datestone above the entrance remains and bears the Royal cypher of King George VI and the date, 1937.</p>		<p>This property's setting is one which has changed greatly since the structure was first built. It is now predominantly surrounded by more contemporary development of varying styles, such as the office development of Bell Court to its north and the multi-storey carpark to the south. Its setting is also defined by the application site which sits across the road to west and is predominantly characterised by cleared land, some of which is used as surface carparking, and Dominion House which is a 5-storey office block.</p>
Significance		
<ul style="list-style-type: none"> • Historic and architectural interest as an inter-war telephone exchange • Royal cypher of King George VI dated to the 1st year of his reign 		
Impact of Proposal on Significance and Setting		
<p>The introduction of the proposed development would re-introduce a strong built frontage to the western side of Leapale Road which is positively welcomed, as the current vacant land is seen a major detractor. Equally, the design and varied built form of the building components, particularly Blocks B2, C1 and C2 are considered to be well articulated and complementary to scale of this asset.</p>		
<p>I am therefore satisfied that the proposed development does not prejudicially impact upon the setting and significance of this Non-Designated Heritage Asset, and as such no harm has been identified.</p>		
Harm Identified	No harm to significance identified.	

4. CONCLUSION

4.1. The proposal is substantial and has the potential to have an impact across an extensive area of Guildford. The following two tables summarise the level of harm identified in the above assessment. The reason for subdividing the results in to Designated Heritage Assets and Non-Designated Heritage Assets is that the NPPF directs for subtly different approaches in assessment, with paragraphs 199-202 guiding the approach for Designated Heritage Assets and paragraph 203 providing direction for Non-Designated Heritage Assets.

Statutory Designated Heritage Asset				
		Heritage Asset	Level of Harm Identified	Significance of Asset
1	BH76	Church of St Saviour	L/M	Medium
2	BH5	17 North Street	L	Medium
3	BH18	Stoke House	L	Medium
4	BH188	Cathedral Church of the Holy Spirit, Stag Hill	L	High
5	BH190	Guildford Castle Keep	L	High
6	BH205	St Catherine's Chapel	NH	High
7	BH71	Treadwheel Crane, Millbrook	NH	High
8	BH141	Church of St Mary	NH	High
9	BH33	Church of St Nicholas	NH	High
10	BH110	Church of Holy Trinity	NH	High
11	BH189	Jellico Roof Garden	L	Medium
12	N/A	Town Centre Conservation Area	L/M	Medium
13	N/A	Wey and Godalming Conservation Area	L	Medium
14	N/A	Bridge Street Conservation Area	L	Medium
15	N/A	Stoke Fields Conservation Area	NH	Medium

Gradings

DARK RED = Substantial Harm (SH)

MID ORANGE = Low/Mid end of Less than Substantial (L/M)

LIGHT ORANGE = Low end of Less than Substantial (L)

GREEN = No harm to significance identified (NH)

Non-Designated Heritage Assets				
		Heritage Asset	Level of Harm Identified	Significance of Asset
16	BH193	41, 42 & 43 North Street	NH	Medium
17	BH194	67-71 North Street	NH	Medium
18	BH195	72 North Street	NH	Medium
19	BH196	12 North Street	NH	Medium
20	BH197	17-21 Market Street	NH	Medium
21	BH198	18 Market Street	NH	Medium
22	BH204	18 North Street & Nos 108-109 Woodbridge Road	SH	Low
23	BH199	16 North Street (Guildford Cobblers)	NH	Low
24	BH200	19 North Street (Barclays Bank)	NH	Low
25	BH201	1-3 Leapale Road (Five & Lime)	NH	Low
26	BH203	Guildford Telephone Exchange	NH	Low

4.2. The special interest or significance of these assets are typically architectural and historic, however there are examples of assets having some archaeological significance, such as the Castle, and cumulatively they illustrate the evolution of Guildford as an historic county town.

4.3. The attributes of significance which have been commonly identified in the above detailed assessment are:

- Survival of historic, domestic scaled, urban grain which by virtue of contrast, contributes to the visual dominance of prominent historic civic buildings, such as the castle, cathedral, Holy Trinity Church, St Mary's Church and St Nicholas' Church, individually and cumulatively.

- Ability to appreciate the position of prominent historic civic buildings, such as the castle, cathedral, Holy Trinity Church, St Mary's Church and St Nicholas' Church, from the topography and landscape setting of the town.
 - Appreciation of contrasting form, and fabric to the prevailing vernacular for key historic buildings to establish and reinforce civic and functional prominence and historical importance within the hierarchy of the town.
 - The evolution of Guildford's development, stimulated by the coming of the Wey Navigation and more recently the railway, which facilitated the transporting of goods and materials.
- 4.4. Based on the above, the setting and context of the development is therefore clearly a complex, historic and sensitive one.
- 4.5. Referring back to the above summary table. In terms of Designated Heritage Assets, harm has been identified to 9 assets, all at less-than-substantial. For the majority of the assets the harm identified is considered to be at the lower end of the spectrum, nevertheless there are two assets (Church of St Saviour and Town Centre Conservation Area) where the harm identified is slightly greater and thus has been categorised at the low-mid level. The identified harm to the historic environment of Guildford and its heritage assets, some of which are Grade II* and Grade I listed as well as Scheduled Monuments and therefore of exceptional interest, has to be given great weight, with even greater weight being applied to those higher graded assets, this is to ensure that the historic environment and the assets are conserved in a manner appropriate to their significance. Legislation and guidance are clear that harm should be avoided or minimised, and where it remains, it has to be clearly justified and balanced against any arising public benefits.
- 4.6. With regards to the Non-Designated Heritage Assets assessed, harm was only identified to one asset, this being 18 North Street & Nos 108-109 Woodbridge Road, which is one of the properties on the application site that is to be demolished as part of the proposed scheme. The act of demolition would result in total loss to historic and architectural significance and thus the harm identified is considered as 'substantial'. In the case of Non-Designated Heritage Assets, the NPPF directs that a balanced judgement will be required, having regard to the scale of any harm or loss and the significance of the heritage. In this particular instance, whilst the scale of harm is at the highest possible, the asset itself is judged to be of low/limited significance as it is an asset whose heritage values are compromised by poor preservation and a compromised contextual setting.
- 4.7. It should be noted that whilst harm has been identified in certain areas and to certain assets, I have also identified attributes which do positively contribute or enhance the historic environment or a heritage asset and furthermore, do consider that the proposed scheme offers an opportunity to deliver a high quality, regenerated quarter for the town, to an area of redundant brownfield that is currently seen as a detriment. Drilling down to those elements which I consider to be of greatest concern, I would include:
- The height of Block E
 - The height Block C2
 - The cumulation of built form and layering behind no.17 North Street
 - The materiality of the inset balconies on Block E
 - The use of render in sensitive locations
- 4.8. Whilst I accept that efforts to address the above concern (all or in part) will not resolve all areas of harm identified, I am confident and do believe that the identified harm could be reduced, and in some instances, possibly avoided. As such I would encourage that the applicant makes amendments to the scheme as means of avoiding or minimising harm, as required by paragraph 195 of the NPPF.

Cumulative Assessment – Heritage Assets

- 4.9. PPG guidance on the Historic Environment, clearly states in paragraph 18a-013-20190723 that *"when assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change."* Given the quantum and calibre of heritage assets that are within the immediate context of the development site a cumulative assessment is considered to be essential.
- 4.10. Referring back to the table provided in paragraph 4.1, this demonstrates that harm to significance and/or setting is identified in 10 out of the 26 heritage assets that were assessed (9/15 Designated Heritage Assets & 1/12 Non-Designated Heritage Assets). With the exception of the single Non-Designated Heritage Asset where 'substantial harm

was identified to an asset of limited significance', the harm identified to the remaining assets was considered to be 'less-than-substantial' and ranged from 'low' to 'low/mid'.

4.11. Given the above assessment, I can only conclude that when considering the historic environment as a collective that there is resultant cumulative harm from the proposal. My instinct is to suggest that this level of harm would be quantified at 'less-than-substantial (medium)'. I believe this is a fair assessment when one takes into consideration the following:

- The number of heritage assets, together with their degree of significance where harm has been identified
- The range of harm identified, which in this case includes a couple of instances of 'less-than-substantial (low-mid) as well as a 'substantial harm (total loss)' to an asset of limited significance.

4.12. As has been advised for each of the individual assessments this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Cumulative Assessment – Other Development Scheme

4.13. In terms of the potential effect of the Proposed Development in combination with other development proposals, the schemes which I consider are contextually relevant are as followed:

- Guildford Railway Station (14/P/02168) - Approved
- Guildford Park Road (16/P/01290) – Approved
- Debenhams (21/P/02232) – Decision Pending
- 1 Onslow Street (21/P/00539) – Decision Pending

4.14. With regards to the approved applications, both these residential schemes are located to the west of the application site, with the Guildford Railway Station scheme being approximately 250m away and Guildford Park Road being approximately 500m away. They are visible in a number of key verified views such as **TVIA viewpoint 2 (Pewley Hill)**, **TVIA viewpoint 4 (Hogs Back)**, **TVIA viewpoint 6 (Bright Hill)**, **TVIA viewpoint 7 (Castle Motte)** and **TVIA viewpoint 8 (Stag Hill)**.

4.15. I find myself, to some degree, agreeing with the conclusions reached in the supporting Heritage Assessment (para 9.10.7) that whilst the proposed development and these schemes identified will have an impact on built heritage asset, that because of their locations and distances from each other the degree of impact would not too detrimental. Nevertheless, the asset which is likely to be most affected would be Guildford Town Centre Conservation Area, in terms of its wider setting. I would also assert that this would also be the case for the Debenhams scheme.

4.16. In terms of the application at 1 Onslow Street. This site is situated immediately to the North-West of the application site. The scheme proposes alterations to the existing 5th floor, replacement of existing mansard and plant, together with the addition of a further three floors and refurbishment of external elevations. It is a scheme which has been submitted with a model that I have been able to use alongside this applications model enabling me to consider both schemes together. The outcome of this has enabled me to conclude that the proposed scheme would sit comfortably alongside the proposed changes at no.1 Onslow Street, both in terms its architecture design and form, its articulation and its material palette.

4.17. Nevertheless, by virtue of the cumulative scale, height and massing of both schemes I find myself concluding that there would be additional harm to the setting of St Saviour's Church. Collectively the additional height and massing to no.1 Onslow Street and the presence and scale of Block E, would encroach and enclose more noticeably upon the church spire's aerial setting. I would assert that whilst the degree of harm would increase it would still fall within the 'less-than-substantial (low/mid)' threshold, but towards the upper limits.

4.18. In terms of the cumulative impact of both schemes upon the special character, appearance and setting of the Town Centre Conservation Area, I'm inclined to suggested that there would be limited cumulative impact. This is because the massing, scale and intervening position of the proposed Friary Quarter scheme would hinder onward views to no.1 Onslow Street in many of the key views from the south. Nevertheless, I do appreciate that both schemes are likely to be viewed collectively from more wider vantage point to the west where one can appreciate the richness of Guildford's historic townscape within its unique context.

Consultation – GBC Design & Conservation

Application No.: 22/P/01336 & 22/P/01337

Case Officer: John Busher

Conservation Case Officer: LB

Location: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, GU1

Proposal: A mixed-use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising:

- Demolition of existing buildings;
- A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding;
- Erection of buildings ranging from 4 to 14 storeys comprising the following uses: residential dwellings with associated car parking, hard and soft landscaped communal areas, ancillary cycle storage, residents gym, concierge and management office (Use Class C3); flexible non-residential floor space (Class E) together with;
- Hard and soft landscaped areas to form pedestrianised streets and public spaces;
- Associated vehicular access, servicing arrangements, plant, highway works (including alterations to North Street, Leapale Road and Commercial Road; and junctions at Leapale Road / North Street; Leapale Road / Commercial Road / Woodbridge Rd) and associated infrastructure;
- The stopping up of adopted highway (including Commercial Road and Woodbridge Road);
- Alterations to a Listed Building (17 North Street) including the exposure to part of the flank elevation and party wall works.

1 INTRODUCTION

1.1 These comments respond to the package of amendments that have been made to the original scheme submitted in August 2022. They should be read in conjunction with the Conservation comments that were initially provided.

2 DESIGN AMENDMENTS

2.1 The amended scheme is explained clearly in the applicants Covering Letter Planning Statement Addendum and the Design and Access Statement Addendum, both submitted October 2022. Revisions to the scheme include:

2.2 Block A

- Change to the design of the cornice materiality on the set back element

2.3 Block B

- Addition of a communal roof terrace above the North Street Square building on Building B2;

- Amendment to the internal layout and rear elevation of the link element as seen behind All Bar One (17 North Street);
- Change from render appearance from both sides of green arch link to white brick;
- Change in design use for the setback elements on the top floor where relevant;
- Addition of a storey to the green arch link (increase in 1 unit) (between Blocks B2 and C1);
- Amended internal layout of Building B2 to accommodate link; and
- Removal of one wheelchair accessible unit to be provided on 1st floor (2 bed 3 persons unit is replaced by a 1 bed 2 persons unit).

2.4 Block C

- Removal of the setback floor on core Building C2 (removal of 2 units) (reduction in height by 2.6 metres); and
- Amended internal area of the studio apartment.

2.5 Block D

- Change in appearance of the two southern most elements closest to North Street on Blocks D1 and D2 from render to white brick;
- Change in design used for the setback elements on the top floors;
- Change to setback façade to allow more windows to be accommodated; and
- Change in internal layout to accommodate the change to the set back.

2.6 Block E

- Removal of the first floor and reduction in ground floor level to 4.1 metres above ground level, reducing the overall building height by 4.25 metres (resulting in the removal of 1 unit);
- Removal of the overrun/plant and shared terrace floorspace from roof level floorspace;
- Addition of an additional storey to the shoulder (addition of 2 units) (due to the overall building height being reduced by 2.2 metres, shoulder height only increases by 0.95m from submitted height);
- Swap the dark brick on inset balconies to a lighter colour; and
- Extend the green base to include the revised first floor.

3. IMPACT ON HERITAGE ASSETS

3.1. Revision to Block A

- The profile and detail of the setback to Block A has been revised in favour of a more simpler fascia design and cladding which further reinforces the buildings verticality. These revisions are seen to be relatively subtle in nature and as such are considered to have a neutral impact upon the immediate historic environment This includes a neutral impact upon the following heritage assets:
 - 17 North Street
 - Guildford Town Centre Conservation Area
 - Jellico Roof Garden
 - 19 North Street

3.2. Revisions to Block B

- The majority of the alterations made to this element of the scheme are viewed positively and would serve to mitigate some of the concern previously identified. One of the most significant changes that I have identified is the materiality changes to the link element (Block B2) which sits behind All Bar One (17 North Street). The revision from white render to red brick is positively welcomed, as it offers a more tempered and harmonious backdrop to the no.17 North Street, as confirmed in **TVIA viewpoint 14 (Angel Gate)** of the TVIA addendum document. I therefore consider that this particular alteration would be beneficial to the setting of the following heritage assets;
 - 17 North Street
 - Guildford Town Centre Conservation Area
 - 19 North Street
- It is now proposed to provide a communal roof terrace on top of Block B1. In order to facilitate this change, a 225mm parapet is to be added around the building's perimeter, along with railings, which are generously set back from the new parapet. Generally speaking, I have no concerns in principle with the provision of a roof terrace in this location and equally, I am also comfortable that the degree of elevation changes needed are so subtle in their nature that they are unlikely to be discernible to present harm to the immediate historic environment. I therefore conclude a neutral impact to the following heritage assets:
 - 17 North Street
 - Guildford Town Centre Conservation Area
 - 16 North Street
- In terms of the revisions to the green arched link (Block B2) – materiality changes (white render to white brick) and the provision of additional storey, I am satisfied that these changes would not have an effect upon any of the identified heritage assets. Nevertheless, from a design perspective I am supportive of them.

3.3. Revisions to Block C

- The removal of the setback floor to Block C2 is strongly welcomed from a heritage perspective as it lessens the challenge placed by the proposed development upon the visible silhouette of the Church of St Saviours spire, as confirmed by many of the views presented in the TVIA addendum document. **TVIA viewpoint 1 (Dapdune Wharf)** is a view where the loss is perhaps most noticeable and most beneficial as Block C2 is no longer in the view, thus allowing the spire to remain unimpeded or unchallenged, thereby complying with the guidance set out in the Guildford Town Centre Views SPD.
- In the case of **TVIA viewpoint 10 (Woodbridge Road)** the change made would still mean that Block C2 would still be discernible, however the perceived height, bulk and massing is much reduced as is the impact and challenge to the heritage asset.
- As corroborated by **TVIA viewpoint 14 (Angel Gate)**, the removal of this setback is also beneficial to the setting of 17 North Street as well as views from the Guildford Town Centre Conservation Area, by virtue of it helping to mitigate the visual challenge posed by the cumulation of Blocks B1, B2, C1 and C2 and its incongruous layering.

- To conclude this particular alteration would represent a beneficial improvement to the setting of the following heritage assets;
 - The Church of St Saviour
 - 17 North Street
 - Stoke House
 - Guildford Town Centre Conservation Area
 - Wey and Godalming Navigation Conservation Area

3.4. Revisions to Block D

- Both the material changes to Block D1 & D2 (white render to white brick) and the design & fenestration changes to all setbacks are viewed positively and would serve to be beneficial to the following heritage assets:
 - Guildford Town Centre Conservation Area
 - Guildford Castle Keep
 - Jellico Roof Garden

3.5. Revisions to Block E

- The reduction in the height of Block E together with the materiality changes are both strongly welcomed, and I believe they are both positive action which would assist in minimise harm across a number of heritage assets. Most pertinently St Saviour Church. **TVIA viewpoint 10 (Woodbridge Road)** demonstrates that the proposed changes would result in this component of the development having a slightly more comfortable relationship with heritage asset of St Saviours, although there is no denying that harm would remain as I still deem that the scale of the proposed development would remain at a quantum that would, to some extent, visibly challenge the intentional scale and prominence of the church within the hierarchy of the town.
- The reduction in the height of Block E is helpful at mitigating its presence in views such as TVIA viewpoint 1 (Dapdune Wharf), nevertheless the structure does remain visible. However, when taking into account the positive outcome of having Block C2 no longer in this view, and therefore no direct conflict with the spire of St Saviours, the actions taken are considered to be sufficient to overcome the harm previously identified, particularly when giving consideration to the fact that this is one single, specific, view within, what is, a very extensive and sinuous conservation area.
- Other assets where the proposed reduction in height and or materiality changes would represent a discernible beneficial improvement include:
 - Stoke House
 - Guildford Castle Keep
 - St Catherine's Chapel
 - Jellico Roof Garden
 - Guildford Town Centre Conservation Area
 - Bridge Street Conservation Area

- In the case of Guildford Castle Keep, the reduced height of Block E helps to positively strengthen the scheme’s proportionable and consistent townscape grading, by sitting more comfortably with Blocks B, C & D. Block E would continue to be of a scale which would restrict onward northward views from the asset, thereby diminishing the Castle’s historic strategic role in terms of controlling the River Wey bridging point. However, the outwards views to the north, that would have historically been an important aid in helping to control the bridging point, have already been substantially compromised by existing large-scale development, such as House of Fraser, 1 Onslow St and Onslow House (EA Games), and as such, the asset’s significance, in terms of this northwards outlook and onward views has already been completely lost. Giving consideration to the above, I am satisfied that there proposed structure/development does not result in harm to the historical or architectural significance.
- With regards to the proposed 950mm height increase to the ‘shoulder’ of the tower. I am confident that this proposed change is so subtle it is unlikely to be discernible to present harm to the immediate historic environment, and therefore represents a neutral change.

4. CONCLUSIONS

- 4.1. Going through the revisions made by the applicant it would appear that they have heeded the advice offered in paragraphs 4.7 & 4.8 of my initial comments and have sought to make amendments to those areas identified as being of greatest concern, which is positively received.
- 4.2. Following the above assessments, I have made the adjustments to the identified harm for the following heritage assets
- Church of St Saviour – decreased from low/mid to low
 - Guildford Castle Keep – harm no longer identified
 - Guildford Town Centre Conservation Area - decreased from low/mid to low
 - Wey and Godalming Navigation Conservation Area - harm no longer identified
- 4.3. I should also point out that there are a few instances where beneficial improvements have been identified above, as a consequence of the proposed changes, yet are not of a degree to completely eliminate the harm previously identified. This includes the following assets
- 17 North Street
 - Jellico Roof Garden
 - Bridge Street Conservation Area
- 4.4. The follow tables summarised the level of harm identified for both the original submission (Aug 22) and the scheme as revised (Oct 22).

Statutory Designated Heritage Asset				
	Heritage Asset	Level of Harm Identified	Level of Harm Identified	Significance of Asset

			Original Submission	Following Amendments	
1	BH76	Church of St Saviour	L/M	L	Medium
2	BH5	17 North Street	L	L	Medium
3	BH18	Stoke House	L	L	Medium
4	BH188	Cathedral Church of the Holy Spirit, Stag Hill	L	L	High
5	BH190	Guildford Castle Keep	L	NH	High
6	BH205	St Catherine's Chapel	NH	NH	High
7	BH71	Treadwheel Crane, Millbrook	NH	NH	High
8	BH141	Church of St Mary	NH	NH	High
9	BH33	Church of St Nicholas	NH	NH	High
10	BH110	Church of Holy Trinity	NH	NH	High
11	BH189	Jellico Roof Garden	L	L	Medium
12	N/A	Town Centre Conservation Area	L/M	L	Medium
13	N/A	Wey and Godalming Navigation Conservation Area	L	NH	Medium
14	N/A	Bridge Street Conservation Area	L	L	Medium
15	N/A	Stoke Fields Conservation Area	NH	NH	Medium

Non-Designated Heritage Assets					
		Heritage Asset	Level of Harm Identified		Significance of Asset
16	BH193	41, 42 & 43 North Street	NH	NH	Medium
17	BH194	67-71 North Street	NH	NH	Medium
18	BH195	72 North Street	NH	NH	Medium
19	BH196	12 North Street	NH	NH	Medium
20	BH197	17-21 Market Street	NH	NH	Medium
21	BH198	18 Market Street	NH	NH	Medium
22	BH204	18 North Street & Nos 108-109 Woodbridge Road	SH	SH	Low
23	BH199	16 North Street (Guildford Cobblers)	NH	NH	Low
24	BH200	19 North Street (Barclays Bank)	NH	NH	Low
25	BH201	1-3 Leapale Road (Five & Lime)	NH	NH	Low
26	BH203	Guildford Telephone Exchange	NH	NH	Low

Gradings

DARK RED = Substantial Harm (SH)

MID ORANGE = Low/Mid end of Less than Substantial (L/M)

LIGHT ORANGE = Low end of Less than Substantial (L)

GREEN = No harm to significance identified (NH)

- 4.5. Following the points made in paragraphs 4.1 - 4.3 one can conclude that the suite of revisions made have, in the main, been successful at mitigating, reducing or overcoming the level of harm previously identified to a reasonable number of heritage assets, with the

highest degree of harm now identified to a 'Statutory Designated Heritage Asset' being 'less-than-substantial (low)' as opposed to 'less-than-substantial (low/mid)'.

- 4.6. The identified harm to the historic environment of Guildford and its heritage assets, some of which are Grade II* and Grade I listed and Scheduled Monuments, and therefore of exceptional interest, has to be given great weight, with even greater weight being applied to those higher graded assets, this is to ensure that the historic environment and the assets are conserved in a manner appropriate to their significance. Legislation and guidance are clear that harm should be avoided or minimised, and where it remains, it has to be clearly justified and balanced against any arising public benefits.

Cumulative Assessment – Heritage Assets

- 4.7. PPG guidance on the Historic Environment, clearly states in paragraph 18a-013-20190723 that *“when assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.”* Given the quantum and calibre of heritage assets that are within the immediate context of the development site a cumulative assessment is considered to be essential.
- 4.8. Referring back to the tables provided in paragraph 4.4 this demonstrates that harm to significance and/or setting is now identified in 8 out of the 26 heritage assets that were assessed (7/15 Designated Heritage Assets & 1/12 Non-Designated Heritage Assets). With the exception of the single Non-Designated Heritage Asset where 'substantial harm' was identified to an asset of limited significance', the harm identified to the remaining assets has been reduced to 'less-than-substantial (low)' following the changes to the proposed scheme.
- 4.9. Given the above assessment, I can only conclude that when considering the historic environment as a collective that there remains a resultant cumulative harm from the proposal. However, I would suggest that this has been reduced as result of the proposed amendments to 'less-than-substantial (low/mid)'. I believe this is a fair assessment when one takes into consideration the following:
- The number of heritage assets, together with their degree of significance where harm has been identified
 - The range of harm identified, which is now limited to 'less-than-substantial (low)' for the majority, as well as a single case of 'substantial harm (total loss)' to an asset of limited significance.
- 4.10. As has been advised for each of the individual assessments this harm needs to be weighed against the public benefits of the proposal as directed by paragraph 202 of the NPPF.

Cumulative Assessment – Other Development Scheme

- 4.11. As before, the schemes which I consider are contextually relevant are as followed:
- Guildford Railway Station (14/P/02168) - Approved
 - Debenhams (21/P/02232) – Resolution to Approve

- 1 Onslow Street (21/P/00539) – Decision Pending

- 4.12. My re-assessment indicates that the proposed amendments are only likely to slightly change my conclusion regarding 1 Onslow Street, therefore the previous comments (paragraphs 4.14 & 4.15) for the remaining 2 schemes remain relevant.
- 4.13. With regards to the 1 Onslow Street application, I previously had concluded that there would be additional harm to the setting of St Saviours Church as collectively, the additional height and massing to no.1 Onslow Street, and the presence and scale of Block E, would encroach and enclose more noticeably upon St Saviours church spire's aerial setting, thereby resulting in the 'less-than-substantial (low/mid)' harm, but towards the upper limits.
- 4.14. Following the proposed amendments, I consider the degree of challenge that both these schemes collectively place on the upon the setting of the Church and its spire would reduce, but only limitedly. In my view the revised height and massing of the proposed development is not a significant enough change to reduce the harm to less-than-substantial (low). I therefore conclude that the level of harm remains at 'less-than-substantial (low/mid) however has been reduced towards the lower limits on the sliding scale.