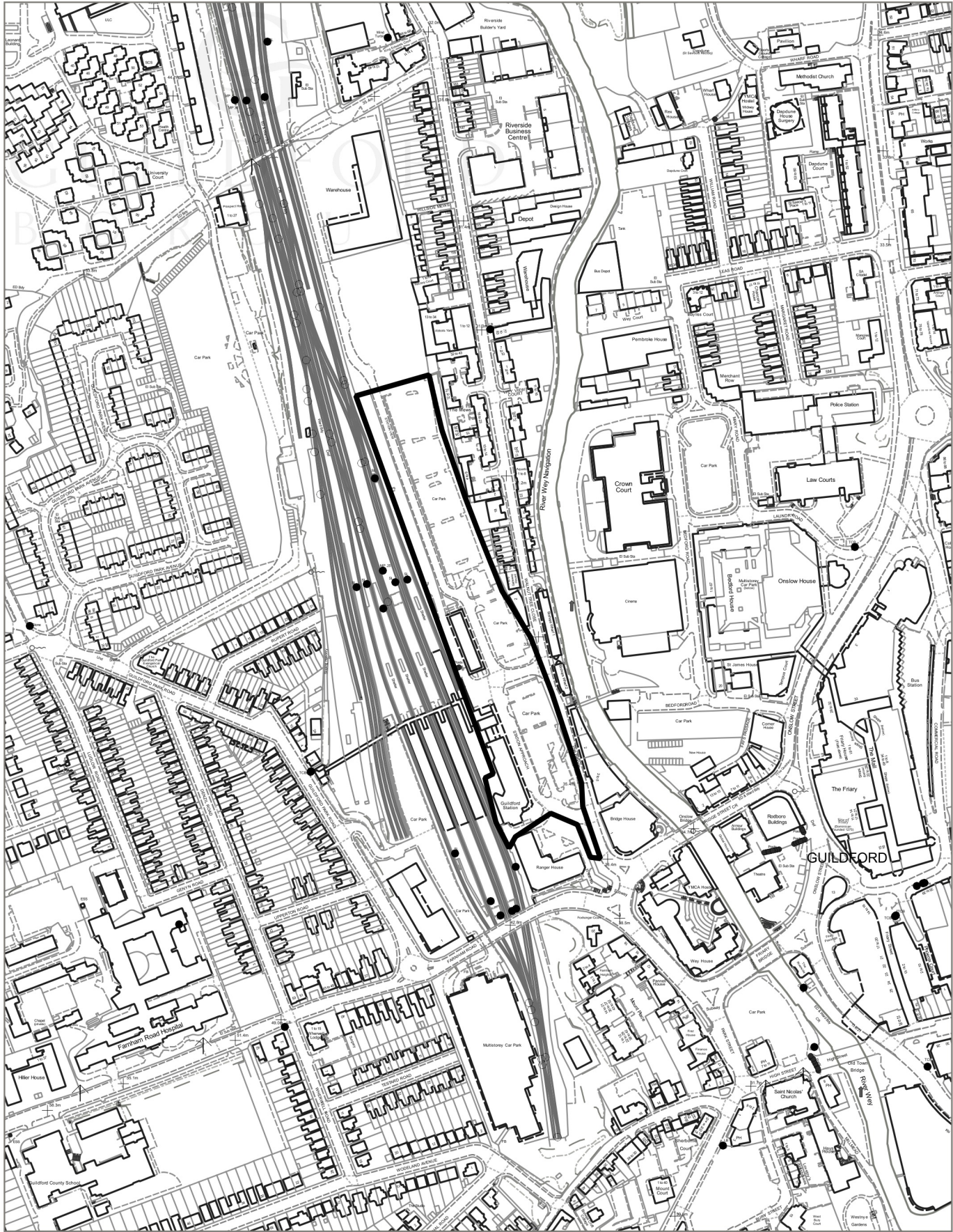


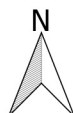
# 14/P/02168 - Guildford Railway Station, Station View, Guildford



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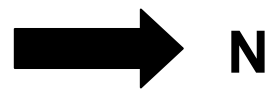
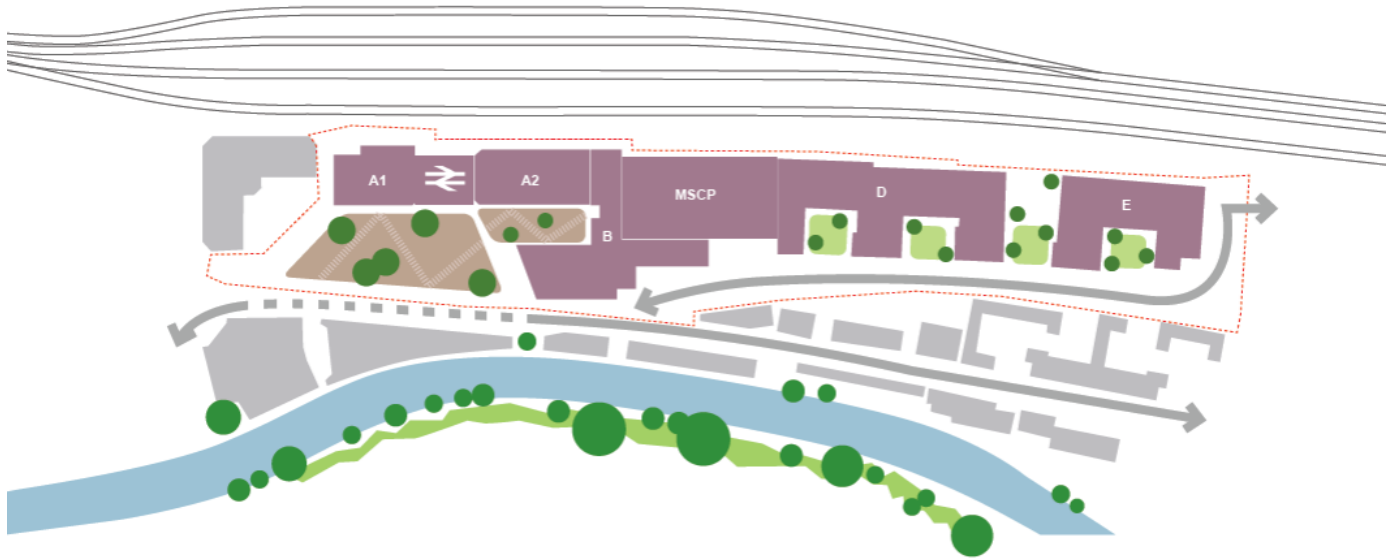
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Not to Scale



14/P/02168 – Guildford Railway Station, Station View, Guildford



Not to scale

**App No:** 14/P/02168      **Type:** F      **8 Wk Deadline:** 18/05/2016  
**Appn Type:** Full Application  
**Case Officer:** Paul Sherman  
**Parish:** Friary & St. Nicolas      **Ward:** Friary & St. Nicolas  
**Agent :** Mr. Dennis Pope      **Applicant:** Solum Regeneration  
Nathaniel Lichfield & Partners (Guildford) LLP  
14 Regent's Wharf      6 Cavendish Place  
All Saints Street      London  
London      W1G 9NB  
N1 9RL

**Location:** Guildford Railway Station, Station View, Guildford GU1 4UT  
**Proposal:** A mixed use redevelopment comprising 438 residential dwellings (Class C3 use); station retail/financial and professional services/food and drink and leisure floorspace (Class A1/A2/A3/Sui Generis and D2 uses); station and general office floorspace (Sui Generis and Class B1 uses); station improvements including new station building with booking hall and concourse (Sui Generis use); replacement station and office car parking, new residential car parking, cycle parking, a Station Plaza including new public realm with hard and soft landscaping, new access and servicing arrangements, plant and associated works.

The Planning Development Manager has referred this application to the Planning Committee because the application is for a large-scale significant development within the Town Centre and potentially has a wide range of impacts for the Borough.

Members undertook an up-front site visit on the 12th May 2016.

### **Site description**

The application site is located on the eastern side of Walnut Tree Close and comprises land and buildings forming the east side of Guildford Railway Station. The site extends to approximately 2.2ha and currently includes the station building and passenger facilities, the station retail units, surface car parking, train operator's offices and transport police offices. The site also includes part of the forecourt of an adjoining office building known as Ranger House.

The existing railway station building is predominantly single storey but includes two-storey elements located around the main station entrance. It has a total height of approximately 13 metres and provides approximately 1,450sqm of floor space including public areas, back office facilities and retail units. The retail units currently include a Marks and Spencer food store, a WH Smith, a Costa coffee shop as well as a sandwich shop, cafes and a car rental office. These uses total approximately 750sqm of floor space. To the north of the station building is a detached single storey building approximately 3.5m in height and with a floor space of approximately 375sqm. This building provides office space and associated accommodation for South West Trains who are the train operating company and for British Transport Police.

The remainder of the site is largely surface car parking with 488 spaces on site. This includes 246 public long-stay spaces, 83 public short stay spaces, 82 spaces for station staff, 69 spaces for the adjoining Ranger House Office building and 8 drop-off spaces.



There are currently two vehicular access points to the site from Walnut Tree Close. The first is at the southern end of the site close to the Bridge Street junction and this gives access for the pick/up drop off areas and the short stay car park. The second access, known as Station View, is located more centrally and serves the long stay car parking. Pedestrian access from the town centre to the site is via Bridge Street or via Walnut Bridge that passes over the River Wey at Bedford Road. There is also a pedestrian bridge over the railway tracks linking the station to Guildford Park Road.

The site is bounded to the west by the railway tracks and operational railway land. To the east, the northern part of the site adjoins Walnut Tree Close while the southern section of this boundary adjoins the rear boundaries of the residential units on Walnut Tree Close. To the north of the site is a Builders Merchants and a development site which has planning permission for a five-storey mixed use building comprising offices and 177 residential units (this is currently being built). To the south of the site is Ranger House which is a four-storey office building.

The site is located to the west of Guildford Town Centre and the surrounding area includes a mixture of residential and commercial uses of varying scale from two-storeys to five-storeys. The River Wey passes to the east of the site and this marks the Wey & Godalming Navigations Conservation Area; the site also adjoins the Bridge Street Conservation Area to the east, with Millmead and Portsmouth Road Conservation Area to the south and the Guildford Town Centre Conservation Area to the west. There are a number of listed buildings in the surrounding area mostly located within these Conservation Areas.

## **Proposal**

The full application proposes the mixed-use redevelopment of the site to provide 445 residential units, a new station building with booking hall and back office accommodation, 9 station retail units for uses A1, A2, A3 or D2 uses and a multi-storey car park. The application also includes alterations to the access arrangements, a new taxi rank and drop off areas, a new station plaza and areas of public open space.

The following amendments were made to the proposals during the course of the application:

- Removal of the 'marker' building (Building A2) and a reduction in heights of Buildings A1 and A2 from 15 and 11 storeys to 9 and 10 storeys respectively;
- Redistribution of building mass from Buildings A1 and A2 to Buildings D and E to the north but without any change in the building heights of the latter;
- Building C is combined with Building B and moved north in order to improve connectivity from a future (GBC proposed) River Wey footbridge across Walnut Tree Close to the Station Plaza;
- Safeguarded route at ground floor through Building A2 to provide opportunity to link with a new station footbridge if and when Network Rail bring this forward;
- Use of darker and more varied materials to distinguish between buildings and provide greater articulation;
- Station Plaza increased in size and reconfigured;
- Short term parking relocated from Station Plaza to Multi-Storey Car Park to allow space for bus drop-off to be provided; and
- 8 cycle parking spaces relocated to avoid need for cyclists to cross Station Plaza.

The proposal now comprises 8 development blocks running north to south through the site parallel to the railway tracks to the rear. The new station building would be located in the southern section of the site within a six-storey building containing the station concourse and supporting facilities, office accommodation for the train operating company and British Transport Policy, and office space for private let. The station building would be flanked by

Blocks A1 and A2 which would include retail uses on the ground floors with residential uses above. Block A1 would have a maximum height of 32m (10-storeys) and would be the highest building on the site; Block A2 would have a maximum height of 29m (8-storeys).

To the front of Block A1, A2 and the station building would be an area of public open space that would serve as the main pedestrian arrival point for the station. The area adjacent to the buildings would be pedestrianised; it would be hard surfaced and would include some informal seating areas as well as feature trees. The area closest to Walnut Tree Close would provide pick-up and drop-off areas, as well as a taxi rank and bus stop; this would be set lower than the pedestrian area and would be linked by steps and ramps. Vehicle access to the Station Plaza would be from Walnut Tree Close adjacent to Bridge Street with a separate egress located further to the north. The main pedestrian access routes from the Town Centre would be via Bridge Street entering the site from the south or via Walnut Bridge and accessing the site from the east.

Block B would be located to the north of Block A2 and together with Block A2 these buildings would partially enclose the north section of the Station Plaza. This building would have a maximum height of 26m (8/9-storeys) and would include retail uses on the ground floors with residential units above. The proposed multi-storey car park would be located north of Block B with this building partially enveloping the proposed car park. The car park would include 9 floors of parking and would provide a total 713 car parking spaces serving the residential units, commuters, station and support services staff and the relocated parking for Ranger House. Access to the car park would be from Walnut Tree Close via Station View which would be realigned to run adjacent to the eastern site boundary.

To the north of the proposed car park would be Blocks D and E; these buildings would have a maximum height of 25m (8-storeys) but would also include lower areas at 12m (4-storeys) and are designed with the higher sections of the building set closer to the railway and the lower sections fronting on to Station View. This part of the site would be entirely residential and would include a number of residential courtyards to the front and the side of the buildings. These would provide public open space for the future occupants of the development, would be soft landscaped and including external seating areas and children's play space.

*Scheme summary:*

No. of residential units: 438  
Station office: 1.877sqm  
Station ticket hall: 746sqm

Children's play area space: 190sqm

Existing commercial units:  
Uses: A1/A3/sui generis  
Number of units: 9  
Total floor area: 749sqm (GIA)

Proposed commercial units:  
Uses: A1/A3/A2/sui generis  
Number of units: 8-10  
Total floor area: 3,427sqm (GIA)

## **Relevant planning history**

The current railway station buildings were approved by planning permission 86/P/1712. A number of further consents have been granted in respect of alterations to the buildings and the car parks serving the station, however, there is no planning history directly relevant to the consideration of the current application.

## **EIA Development**

The proposal is for an urban development project exceeding 0.5ha and as such falls within Part 10(b) of the Town and Country Planning (Environmental Impact Assessment) (England) Regulations 2011 (known as the EIA Regulations). The Council issued a screening opinion on the 26th April 2012 which, after having regard to the select set out in Schedule 3, considered the proposal to be EIA Development.

The Council issued a Scoping Opinion on the 23rd September 2014; this set out the matters the Council considered should be assessed in the Environmental Statement (ES). The ES subsequently submitted with this application included a Non-Technical Summary and included detailed technical chapters on the following potential impacts:

- socio-economic impact
- transportation
- air quality
- noise and vibration
- ground conditions
- water resources
- townscape, landscape and visual impact
- daylight, sunlight and overshadowing
- heritage

The ES is intended to inform the decision maker of the likely significant environmental effects of the proposed development, both during construction and after completion. It identifies measures to prevent, reduce or offset any significant effects on the environment and identify cumulative and residual effects.

The Council has displayed site notices and placed an advert in the local paper advising that an application for EIA development has been received in accordance with the requirements of Article 13(3) of the Town and Country Planning (Development Management Procedure) (England) Order 2010, as amended. Representations received in respect of this publicity are summarised below.

The Council appointed external consultants to review the ES and they have advised that it meets the requirements of the current EIA Regulations and provides the data and information required to adequately assess the impact of the proposal on the environment.

This information has been considered in the preparation of this report.

## **Consultations**

Surrey County Council Highway Authority - no objection to the development subject to conditions and a financial contribution to deliver pedestrian and cycle infrastructure improvements

Highways England - no objection to the proposed development and no concerns are raised with regard to the strategic road network (SRN).

Surrey County Council Archaeological Officer - advises that the archaeological assessment prepared by Mills Whipp Projects conclude that the site generally has a low archaeological potential, however, recent discoveries elsewhere within the Wey Valley suggest that the potential for earlier prehistoric discoveries in particular may be higher than the assessment suggests. Therefore, there is a degree of uncertainty regarding the amount of previous disturbance on the site and further archaeological investigations are required so that the potential for archaeological deposits can be confidently predicted.

Because of the nature of these investigations they will probably have to take place following the determination of the application, and therefore should planning consent be granted provision for the archaeological investigations, as well as any mitigation works that may be required can be secured by a condition.

Surrey County Council Education School Commissioning Officer - no objection to proposed development subject to requested financial contributions.

Surrey County Council Right of Way Officer - no objection but the Countryside Access Office notes the proximity of the proposed development to Public Footpath 17

Surrey County Council Petroleum Officer - no specific comments to make on this application as it does not appear that there is any intention either today, or in future to store petrol at this site.

British Transport Police - no objection to the with the overall development and proposals for CCTV, lighting, restricted access to Multi Storey Car Park, businesses and residential areas and drop off and pick up areas. However, raises concerns about the proposed outdoor seating due to the potential for anti-social behaviour and lack of public conveniences. Although the increase in BTP presence and natural surveillance would assist in reducing this.

Health and Safety Executive - no specific comments to make on this application, as the proposed development does not lie within the consultation distance of a major hazard site or major accident hazard pipeline.

UK Powers Network - no objection.

Environmental Health Officer - no objection subject to conditions

Thames Water - has identified that the existing water supply infrastructure has insufficient capacity to meet additional demands for the proposed development, however, raised no objection subject to conditions. The existing foul network has insufficient capacity and TW has requested that a Grampian condition is included in any approval to ensure that relevant upgrade works are completed prior to the connection of any new properties.

Network Rail - fully supports the proposed scheme as it represents a unique opportunity to deliver station improvements in Guildford along with housing and value to the railway on a site which has had numerous failed attempts to find a workable development over the last 15 years. The proposals represent the best possible mechanism for bringing forward this beneficial upgrade to Guildford Station and as a first phase has been carefully designed to ensure that the station is future proofed to accommodate further potential station investment including on the west side of the tracks.

National Trust - concerns regarding the height of the proposed buildings particularly the ones which are to be located at the front of the application site and which will tower over the Billings and the other existing buildings, which are lower in height. The buildings would compromise the distinctive views of the Wey Navigation Conservation Area and will be visually harmful to the Conservation Area and its visual setting.

Natural England - objects on the grounds that, in the absence of suitable contributions towards SANG and SAMM, the development would be likely to contribute to a deterioration of the quality of the habitat on which the protected birds depend; and would result in increased disturbance to the bird species by reason of increased access to the protected site including access for general recreation and dog-walking.

Campaign to Protect Rural England - objects on the grounds that the height of the buildings will damage views across the town and would have a negative impact on the unique topography of the Guildford Town Centre and the Surrey Hills AONB. Considers that a piecemeal approach to the development is unacceptable and the station should be developed in its entirety on both sides of the railway tracks.

Surrey Hills AONB Advisor - following reduction of the height of the tallest building Surrey Hills AONB Officer raises no further objection.

Surrey Wildlife Trust - Surrey Wildlife Trust has reviewed the Preliminary (Phase 1) Ecological Survey Report by Wardell Armstrong dated July 2014, and advises that should planning permission be granted, the applicant should be required to undertake all the recommended actions in section 4 (Discussion and Recommendations), including the biodiversity enhancements detailed in section 5. Concern is raised that the applicant's ecologist has given little detail of the methodology used for them to be able to determine that buildings affected by development works had negligible bat roosting potential. Advises that the Local Authority should request further clarification on this issue, in order to prevent adverse effect to any legally protected species. The Trust further advises that this development offers opportunities to restore or enhance biodiversity and provides additional guidance to assist with biodiversity consideration of this site.

Environmental Agency - no objection subject to suggested conditions. In addition, EA advises that as the proposed development is located in flood zones 1, 2 and 3. In order for the development to be acceptable on flood risk terms standing advice should be followed in relation to surface water run-off, allowance for climate change and residual risk of flooding.

Historic England - initially raised concerns regarding the height and design of the proposed taller elements of the scheme and the impact these would have in views of the Cathedral from public viewpoints around the town, but in particular from the Castle Motte and Keep and the Jellicoe Roof Garden, which are key visitor attractions. Historic England also identified other impacts associated with the development in relation to the riverside conservation areas.

Following revision of the scheme, which shows that the taller elements of the proposal have been significantly reduced in height with the result that the whole development is now viewed below the skyline around the Cathedral, Historic England confirms that the main concerns have now been addressed with regards to the setting of the Cathedral.

However, due to the need to redistribute the quantum of development across the overall scheme, a more dense development and uniform massing and roofline has resulted and consequently the townscape and urban design impacts need to be fully considered.



Historic England advises that the new development should be integrated successfully with the townscape so that it does not appear visually dominant or overly dense along one plane in views from the Castle or from the Jellicoe Roof garden. It should also not be overly dominant in views of the Billings Warehouse when looking from Onslow Bridge and Bedford Road and car park. Historic England defer to the local authority to assess the full detail of the proposals in relation to impacts on conservation areas and townscape.

GBC Licensing Department - concerns regarding the number of spaces available for immediate hire. The current arrangement at the Station provides approximately 10 to 12 covered pick up spaces. These spaces are frequently occupied and the overspill of taxis queue in the existing car park waiting for a rank space to become available. Provision of only 4 taxi pick up spaces and 9 proposed taxi waiting spaces is likely to cause congestion and competition through vehicles looking to join the main rank. In addition, the proposed arrangement only provides a small covered section for waiting passengers, which is unlikely to result in an improved experience for customers or taxi drivers.

Surrey Gardens Trust - following the amendments it is agreed the effect on the Jellicoe Roof Garden would be "minor adverse" (in the Townscape/Landscape Visual Impact Assessment of the Environment Statement).

Abbotswood Residents Association - objects to the application on the grounds of height of the building which would set a precedent and alter the character of Guildford. They would appear monolithic from the surrounding countryside and each block would not be expressed as a separate unit. The provision of affordable housing is below that required. The proposal is premature and there is an opportunity for the wider site to be developed comprehensively with pedestrian links across the tracks. The station would not be upgraded to provide for future growth in capacity. The architecture does not respond to the town's heritage or intent. There would be an inadequate parking provision.

Downsedge Residents Association - object to the application on the grounds of the height of the proposed buildings, which would radically alter the character of Guildford and block views within the town and to and from surrounding countryside, including the Surrey Hills AONB. Concerns raised regarding the inadequate provisions of affordable housing and inadequate contributions to much needed integrated transport provisions and traffic improvements. In addition, the proposal fails to provide adequate improvements to the station in terms of access, does not deliver sufficient benefits to rail users, and does not meet the requirements of the approved Local Plan, and the policies within the NPPF.

Guildford Residents Association - objects to the application on the grounds of scale, bulk and density of the project, which would have a negative impact on the historic character of Guildford Town Centre. Also, raise concerns that the development does little to address the needs of the Borough in terms of affordable housing. The development fails to provide sufficient benefits to rail users. The development proposes inadequate transport and access arrangements and inadequate residential parking provision, at roughly one space for every two flats. Considers that the application should be part of an integrated approach to developing both sides of the railway track to make the best use of the opportunity and provide a joined up design. The application does not sufficiently address the major housing needs of the Borough as identified in the emerging Draft Local Plan, particularly affordable housing. The application provides inadequate provisions for a more integrated access to the station and the space allocated for buses, taxis, short-term car parking and vehicle circulation appears to be insufficient to meet the future growth in passenger numbers. Objects to the height, scale and character of proposed development, which would harm the distinctive character of Guildford and surrounding Surrey Hills AONB.

Merrow Residents Association - objects on the grounds that the height of the buildings is out of keeping with the historic character of the Guildford town centre and would block the views within and out of the town centre. The application does not sufficiently overcome the traffic problems surrounding the station. The application does not provide sufficient affordable housing and fails to provide an integrated direct pedestrian access into the station. The proposed short-term and drop-off car parking provisions are also insufficient.

Ganghill Residents' Association - objects to the height, scale and character of the proposed buildings. The application fails to meet housing needs of Guildford particularly affordable housing. The application fails to contribute towards the much needed infrastructure shortage of Guildford. The application does not provide an integrated pedestrian and vehicle access to the station and proposed insufficient station improvements and does not sufficiently capture measures for future growth of Guildford.

Holy Trinity Amenity Group - objects on the grounds that the proposed development represents overdevelopment of the site, with a very cramped layout. It also fails to anticipate the expected development on the west side of the station and other redevelopment in the area. In particular, Holy Trinity Amenity Groups considers that the proposed development fails to improve the station facilities and highlights the following issues:

- lack of strategy for development of rail travel for Guildford. No ambition to exploit the enormous potential of the excellent rail connections that Guildford has and/or improve sustainable transport measures.
- lack of pedestrian access from the station to the High Street and the Riverside.
- lack of direct step free access into the station and the platforms; no lifts are proposed.
- inadequate proposed concourse space, which currently is insufficient.
- inadequate forecourt (bus stops, taxi and car pick and drop off) area and no real improvements proposed to these areas.
- inadequate improvements to existing poor quality toilets.

Guildford Society - raises no objection to the principle of the development, however, objects on the grounds that approval should not be considered until the revision of the draft Local Plan is published. In addition, the Guildford Society objects to the application on the following grounds:

- the height and scale of the development would have a negative impact on the historic context and character of the Town Centre and would affect important views between the application site, the Castle, the Cathedral and River Wey.
- the proposed design is not in keeping with the character of surrounding area and would have an adverse impact on the character of Bridge Street Conservation Area and the characteristics of the Billings.
- the proposed development does not offer integrated transport solutions and makes no improvements to meet the existing traffic issues of Guildford. It does not provide any direct public access to the river; and there is a lack of pedestrian routes into the town centre and surrounding residential areas to the west.
- the proposed development fails to adequately improve the station concourse, booking hall, taxis and drop off facilities, and step free access to the station as well as within the station. No lifts and/or escalators are proposed to improve passenger movements.
- the application fails to supply sufficient affordable housing or other section 106 contributions towards infrastructure improvements.
- the application does not accord with the policies of the Local Plan and the Guildford Town Centre and Hinterland Masterplan Report.

## **Design Review Panel**

The proposals have been to the Design Review Panel (DRP). While in most cases proposals will be subjected to Design Review at pre-application stage the application was registered before the Guildford Design Review Panel was established. Accordingly the application was first presented to the Panel after the submission of the planning application, which is less than ideal as early engagement is preferable and more beneficial.

The application was presented to the DRP on the 31st March 2015 and the Panel reviewed the development as originally submitted. The applicant requested that the Panel's report should be confidential pending revisions to the scheme and a second design review to be undertaken at a later stage, the outcome of which would be made public. While the first Panel report is confidential the Panel generally supported the principle of the scheme, recognised the requirement to develop the train station and the opportunity to create an improved public space to the front of the station. The Panel did, however, express concerns with the height bulk and form of the overall development and its impact on the setting of the Town and on views across the town to the Cathedral.

The Panel recommended that any redevelopment of the site should ensure that the station building should be the key component of the scheme, both visually and in function, and that it was imperative that the scheme secured improvements to links to the town centre. The Panel also considered that the redevelopment should secure more than just a new ticket hall and that the development should seek to secure improvements to the whole user experience from alighting from the train to walking to the town centre.

The applicant presented a revised scheme to the DRP on the 23rd June 2015, with the main alterations being a reduction in height of some parts of the building, alterations to the design of the station building, alterations to the elevations of the residential blocks and alterations to the layout of the station plaza. The focus of the Review was on the buildings around the plaza, the design of the station building, the transport interchange and the links to the town centre.

The Panel considered that the design alterations to the scheme (particularly around the plaza) were sound and that the scheme was much improved on the previous iteration. In particular the Panel welcomed the alterations to the station square to realign the entrance with Walnut Bridge, the improvements to the design of the station building and lowering of the highest parts of the development. The Panel did, however, continue to express concern in respect of the proportion of single aspect units, the adjacencies of balconies fronting the square and the low proportion of affordable housing units. The Panel also advised that careful consideration should be given to the heights of the development in relation to adjoining buildings.

A copy of this follow up Design Review Panel report is appended in full.

## **Third party comments**

211 representations have been received raising the following objections and concerns:

- alternative scheme preferred that would deliver wider railway station improvements, a pedestrian link to Guildford Park Road and better interchange to buses
- the heights of the buildings are out of character as they would not respect the surrounding context and townscape of Guildford and appear over-dominant
- overlooking and loss of privacy
- overshadowing impact
- anti-social behaviour in the public realm

- inadequate provision for pick up/drop off, taxis, mini buses and bus bays
- harm to the heritage assets due to the settings of the conservation areas and would fail to preserve or enhance them
- traffic congestion from additional vehicular movements
- poor living environment for occupants
- low provision of affordable housing units
- the public realm would not have sufficiently distinguished shared surfaces, covered spaces, the space would be uninviting, would not be a gateway and would not define the desire line to Walnut Tree Bridge
- large number of steps in the public realm would provide poor pedestrian accessibility
- harm to the AONB
- insufficient capacity in local public service and infrastructure including healthcare, education, highways etc.
- poor design, not locally distinctive, unrelieved elevations and the car park cladding would stand out
- public consultation misleading
- no need for comparison shops
- set a precedent

There have been a total of 5 representations in support of the development; matters raised include:

- creates a new, attractive public realm
- improvement in the bus/rail interchange

## **Planning policies**

### **National Planning Policy Framework**

The NPPF was published in March 2012 and contains the Government's planning policies for England. Its primary objective is to deliver sustainable development having regard to the economic, social and environmental impacts of development and the NPPF places a strong presumption in favour of sustainable development. Of particular relevance to this application are:

- Chapter 1: Building a strong, competitive economy
- Chapter 2. Ensuring the vitality of town centres
- Chapter 4. Promoting sustainable transport
- Chapter 6. Delivering a wide choice of high quality homes
- Chapter 7. Requiring good design
- Chapter 10. Meeting the challenge of climate change, flooding and coastal change
- Chapter 11. Conserving and enhancing the natural environment
- Chapter 12. Conserving and enhancing the historic environment

### **Planning Practice Guidance**

The NPPF is also supported by the Planning Practice Guidance which gives advice on the implementation of the policies within the NPPF and is a material consideration in the determination of planning applications.

## **South East Plan 2009**

NRM6 Thames Basin Heaths Special Protection Area

## **Guildford Borough Council Local Plan 2003 (as saved by CLG Direction September 2007)**

G1	General Standards of Development
G5	Design Code
G6	Planning Benefits
G11	The Corridor of the River Wey and the Guildford and Godalming Navigations
G12	Location of Development
G13	Green Travel Plans
H4	Housing in Urban Areas
H10	New Residential Development
H11	Affordable Housing
M1	Parking Provision
M2	Long Stay Parking within Guildford Town Centre
M4	Provision for Buses
M5	Rail Network and Interchange Facilities
M6	Provision for Cyclists and Pedestrians
M7	Access from Walnut Tree Close to the Railway Station
S2	Additional Retail Development in Guildford Town Centre
GT8	Land and Buildings at Guildford Railway Station
HE1	New Development which Affects the Setting of a Listed Building
HE10	Development which Affects the Setting of a Conservation Area
HE11	Scheduled Ancient Monuments and Sites and Monuments of National Importance
NE1	Special Protection Areas and Areas of Conservation
N4	Species Protection
R2	Recreational Open Space Provision for Large New Residential Developments

### **National planning documents:**

Manual for Streets 2 (2010)

Written statement to Parliament: Planning update (March 2015)

### **Supplementary planning documents:**

Planning Contributions SPD (2011)

Sustainable Design and Construction SPD (2011)

Vehicle Parking Standards SPD (2006)

Surrey County Council Vehicular and Cycle Parking Guidance (2012)

Thames Basin Heaths Special Protection Area Avoidance Strategy 2009 - 2016

Residential Design Guide (2004)

Bridge Street Conservation Area Character Appraisal (2003)

### **Draft (Regulation 19) Local Plan**

The Council is currently consulting on its Proposed Submission Local Plan: strategy and sites (Regulation 19). The draft Plan proposes to allocate the station site for a mixed use development of approximately 350 residential units, retail, food and drink.

Paragraph 216 of the NPPF states that decision makers may give weight to relevant policies in emerging local plans according to the following criteria:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- 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
- the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF

Given the Proposed Submission Local Plan is still at consultation stage it cannot carry any material weight at this time.

### **Planning considerations**

The main issues to be considered in the determination of this application are:

- The principle of the mixed-use redevelopment of the site
- The mix and tenure of the residential units proposed
- The impact of the retail provision on the viability and vitality of the Town Centre
- Design review panel advice
- The impact of the development on the character of the area and wider townscape impacts
- The impact of the development on designated heritage assets
- The impact of the development on residential amenities
- The level of parking and the impact on the highway
- The impact on the Thames Basin Heaths Special Protection Area
- The risk of flooding and the impact on water resources
- Viability and legal agreement requirements
- Balancing exercise and conclusion

#### The principle of the mixed-use redevelopment of the site

The application site comprises the western section of Guildford Railway Station. The land and buildings forming the Railway Station, as a whole, are identified by the Local Plan 2003 (as saved) as a potential redevelopment site. Policy GT8 states that planning permission will be granted for a comprehensive mixed-use redevelopment and advises that appropriate uses would include offices, residential, hotel, retail and leisure. It further advises that the redevelopment should include improved transport facilities while maintaining existing levels of parking.

The application proposes the redevelopment of the site to deliver a mixed-use scheme of residential, retail, office and new station facilities along with a new station square and a 9-storey multi-storey car park. While the development is on a reduced area than that envisaged by Policy GT8 the principle of development complies with the objectives of this policy and accordingly the development is acceptable in principle. The development would also make a contribution to meeting the Council 5-year supply of housing although it is noted that not all of the units are likely to be delivered within 5-years.

The NPPF makes clear that in taking decisions on planning applications, Local Planning Authorities should apply a presumption in favour of sustainable development; paragraph 14 of the NPPF advises that the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. 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*
  - *specific policies in this Framework indicate development should be restricted*

The weight to be given to the presumption in favour of development will be considered in later sections of this report.

#### The mix and tenure of the residential units proposed

The application proposes a total of 438 residential units and would include a mix of one, two and three bedroom units. The provision of this housing would make a substantial contribution to the housing need required in the Borough, some of which could be delivered within the next five years, and this should be given significant weight in the determination of this application. The Borough has a need for all types of housing units however two and three bedroom units are in particular demand. While the development would deliver predominantly one and two-bedroom units, the opportunities to deliver three and four bedroom units in this high-density flatted scheme is somewhat limited. The applicant has provided a small proportion of three-bedroom units, however, it is accepted that the nature and location of the development is such that it would be more likely to attract demand for smaller units. The development would make a significant contribution to meeting the demand for one and two-bedroom units in the Town Centre, and the Borough in general, and it is considered that the mix of units is appropriate for this location.

Local Plan Policy H11 requires that at least 30% of housing in qualifying new development should be affordable housing. This is clarified by the Councils Planning Contributions SPD 2011 as being 35%, based on evidence of development viability. The applicant has, however, advised that the delivery of this quantum of affordable housing would render the scheme unviable. They have evidenced this through the submission of a Viability Assessment that considers the cost of the development and the likely return. This assessment concludes that the maximum proportion of affordable housing that could be delivered, having regard to other costs of development, is 45 units which equates to just 10.2% of the total proposed. This is well below the standard required by Policy H11, and this weighs against the grant of planning permission. The applicant contends that providing a policy compliant level of affordable housing would make the scheme unviable. This will be considered further below, however, the proposal is contrary to the objectives of Policy H11 of Guildford Local Plan 2003 (as saved) and the requirements of the Planning Contributions SPD.

#### The impact of the retail provision on the viability and vitality of the Town Centre

The Council has an identified retail hierarchy in the saved Local Plan which includes Guildford town centre, two district centres and 22 local centres. The station is within the town centre as recognised by the 2003 Local Plan, as paragraph 9.1 of the Local Plan 2003 site allocation policy GT8 states, that "The Town Centre contains the main railway and bus stations".

The proposed retail units are as follows:

Unit name	Block	Size (sqm GIA)	Use Class	Potential Use
R1	A1	252	A1/A3	Coffee shop
R2-A	A1	226	A1	Shop
R2-B	A1	226	A1	Shop
R3	A2	302	A1/A3	Coffee shop
R4	A2	346	A1	Shop
R5	A2	828	A3	Cafe/restaurant
R6	B	93	A1/A3	Shop or Cafe/restaurant
R7-A	B	66	A3 or A2/Sui Generis	Cafe/restaurant or taxi office
R7-B	B	67	A3 or A2/Sui Generis	Cafe/restaurant or taxi office
RB	B	845	A1	Shop
ROH	B	176	A1/A3	Shop or Cafe/restaurant
<b>Total</b>		<b>3,427</b>		

The units would face onto the public concourse and form part of the retail and food offer for people travelling through the station for passing trade. The station has a large pedestrian foot flow from rail passengers. As a result the trade for the units would be food to be bought and consumed elsewhere i.e. 'grab and go' and the shops and restaurants would be used by passengers while waiting to complement the station use. It would not be a destination in itself, but serving passing trade.

The proposal would comprise mostly smaller units with flexible use classes, their size would restrict the stock they could hold and space for covers. This would vary from the retail experience in the town centre. The proposal would not create a new retail destination, instead it would complement the existing station and new public realm, appealing to passing trade.

Paragraph 24 of the NPPF states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan. It goes on to note that main town centre uses, such as the proposed station retailing the subject of this application, should be located in town centres, rather than in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

Saved policy GT8 allocates the land for a comprehensive mixed-use development at Guildford Station, including retail to complement the station use. Given the site is allocated for development by a saved policy and is with the Town Centre there is no requirement to apply the sequential approach or to consider the retail impact of the development on the Town Centre.

#### The impact of the development on the character of the area and wider townscape impacts

Guildford town centre is set in a valley; the rising topography from the surrounding North Downs either side of the River Wey, allows for good views in an east-west direction, creating a strong visual connection between the town and surrounding countryside.

Guildford has two historic cores comprising the original medieval settlement around the Castle and Quarry Street and then from the 16th and 17th century the larger buildings began around the River Wey, when this became the first inland waterway navigation in 1653 and was being used for freight transport. Commercial and industrial development grew up in the late 19th and early 20th century around the railway, following the opening of Guildford Station in 1845.

Guildford has a tight urban grain and the pattern of the buildings has some strong continuity, even though the street blocks and plots vary due to the evolution of the town.

Guildford is a town that has many nodes which contribute to the legibility of the townscape; the landmark buildings and through routes create these. The railway station is a major landmark destination in the town centre. Any redevelopment of this site needs to ensure that the historic townscape and views from the surrounding areas would be maintained, that views of the rural river corridor are conserved and ensure continuity with the urban form. Furthermore, the bulk, massing and height must be considered in relation of that of the adjoining buildings, topography, the pattern of heights and views, vistas and landmarks.

The proposal is for a large development between 4 and 10-storeys in height and extends, largely unbroken, for the entire length of the tracks. The building would be significantly larger than any of the surrounding buildings and would dominate the area through its scale. Much of the volume and bulk of the development is driven by the large centrally located car park which equates to approximately a quarter of the footprint and is 9-storeys in height. Instead of being a break in the building the car park serves to link the residential blocks; the level of parking proposed limits the opportunity for the scheme to introduce breaks in the development and variation in heights and it is considered that the level of parking could have been reduced given the highly sustainable location for the site. Moreover, while the application is presented as a station redevelopment the new station represents a very small proportion of the overall development which is predominantly a housing led-scheme.

*Longer range impact on the townscape:*

The skyline of Guildford when seen from elevated viewpoints, such as the Motte and Keep of the Castle and Jellicoe Garden, comprises a variety of roof shapes and materials. Due to the topography and change in levels across the town centre, taller buildings do not appear prominent from these views. This results in a townscape that has some uniformity in height which forms a distinctive urban form to the foreground of Guildford Cathedral. Even though the proposed station buildings would not break the skyline, the linear mass and shape of the buildings would stand out from the buildings in the foreground and compete with the views and vistas of the Cathedral, particularly at night.

The river towpath is lined by vegetation and forms a rural oasis in the heart of Guildford and a link to the surrounding urban-rural fringe areas, this is a fundamental part of the urban structure of Guildford. This part of the river is framed by settlement on either side, there is a mixture of building height and buildings reduce in height further to the north along Walnut Tree Close or are set back from the river frontage where they are taller. The towpath is a route into the town and due to the height of the proposal, the proposed buildings would form a landmark, seen above the building adjacent to the river. The unrelenting roof form would change the perception of the townscape from this perspective and detract from the rural setting of the towpath.

### *Shorter range impact on the townscape:*

The buildings around the station in this southern part of Walnut Tree Close and along Bridge Street have narrow frontages, are low to mid-rise high building, have some depth to detailing on the façades, and varied roof forms even on the larger buildings such as Ranger House and Bridge House. This variation breaks up their mass and responds to the surrounding context.

Onslow Bridge was built to improve linkages to the station and is today heavily used as the main thoroughfare for vehicles and pedestrians. The view from the Bridge reveals the transition from the close grain urban area of Bridge Street to the elevations of the warehouse buildings, which provide a visually strong frame for the river. The buildings in this area have a linear block form, flat elevations, no gaps between buildings, taller buildings abutting the pavement and regular fenestration patterns. The proposed development is influenced by some of these key characteristics however, at the roof level there would predominantly be a single parapet that would result in an unrelenting linear roof span which would fail to create the variation that is seen in the surrounding roofscapes.

There are larger buildings adjoining the riverside, some of these are hard to the River, with the large buildings providing enclosure and screening to the river, although there are some glimpses of the river corridor in the narrow gaps between the buildings or through car parks. This forms a sense of legibility from the approaches to the station particularly from Bedford Road. There are gaps between the taller buildings that help people find their way. The proposed development would be a more dominant form from Bedford Road and significantly dilute the existing legibility.

Block B is a corner building that would be prominent from Walnut Tree Close and the views from Bedford Road, this is a point of orientation, as it would channel people to Walnut Tree Bridge at they leave the station. However, from Bedford Road this would infill the existing gaps between the buildings, so there would be less of a clear route.

While there is no objection in principle to some taller buildings on this site, this needs to relate to the context of surrounding development. The cumulative effect of the unrelenting mass of the upper levels of the proposed buildings with flat roofs of equal height means the proportions do not reflect the prevailing development patterns in this part of Guildford or complement it.

The roof shape does not reflect the subdivision of the facades and therefore appear as a monolithic mass and adds to the perceived bulk of the proposed buildings. This would have a harmful impact on the townscape and character of the area as the proposed development would fail to respect the established views, landmark buildings and roof forms of surrounding development. This would not reflect the existing urban grain of the area and would be detrimental to the legibility of spaces.

The applicants have submitted a Townscape, Landscape, Visual Impact (TLVIA) as part of their Environmental Statement and addendum. This identifies a minor adverse impact on the townscape and visual effects from the Castle Keep, Castle Motte, Jellico Roof Garden, the approach to Walnut Tree Bridge, and Bridge Street. The TLVIA concludes that the impacts are generally 'minor adverse' however officers consider that some of these impacts are under estimated.

For the reasons set out above it is concluded that the development would be contrary to the objectives of policies G5 (1), G5 (2) and G5 (6) of the Guildford Local Plan 2003 (as saved) and would conflict with the objectives of paragraphs 63 to 66 of the NPPF.

## The impact of the development on designated heritage assets

The application site is adjacent to three conservation areas. While none of the buildings in the immediate vicinity of the site are listed the scale of the development is such that it would have wider impacts on buildings such as Guildford Cathedral (Grade II\* Listed), the Castle (Scheduled Ancient Monument) and the Jellico Roof Garden (Grade II Listed)

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.'*

Section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 states that *'In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.'*

The statutory duty conferred by section 66(1) and 72(1) should be given great weight in the determination of planning applications and is over and above the weight to be given to development plan policies. In this respect policies HE1, HE4 and HE10 of the Guildford Local Plan 2003 (as saved) are relevant to the consideration of this application. It is also noted that paragraph 11.32 of the Local Plan states *"that Development adjacent to a conservation area, even at some distance, or on the skyline, where the height of new buildings could be significant, could affect sensitive views into and out of the conservation area."*

It is also one of the core principles of the NPPF that heritage assets should be conserved in a manner appropriate to their significance. Chapter 12 of the National Planning Policy Framework at para 129 sets out that the local planning authority should identify and assess the particular significance of any heritage asset. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paras 131-135 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.

The application site is adjacent to the River Wey and the Bridge Street Conservation Areas and the Millmead and Portsmouth Road Conservation Area lies a short distance to the west of the site. These Conservation Areas are Heritage Assets. The Bridge Street Conservation Area gains its special interest from the late 19th and early 20th century industrial buildings that built up in this part of Guildford following the arrival of the railway. This includes the Billings that are opposite the station and the scale, grain and massing of these buildings contribute to the special character of the area. They are also the most prominent buildings when viewed from Onslow Street, Bedford Road and the Grade II Listed Onslow Bridge. The proposed buildings would tower over the Billings in these views and although the development would be outside the Conservation Area it is concluded that the development would cause less than substantial harm to the to the significance of the Bridge Street Conservation Area.

Given the scale of the development, and as previously noted in this report, the proposed buildings will be visible in longer range views and this includes from the Grade II Listed Jellico Roof Gardens and from the Castle which is a Scheduled Ancient Monument.

The development will also be clearly visible in a number of views of Guildford Cathedral, which is Grade II\* Listed, including those from the Castle and the Roof Garden. While the applicant has reduced the height of the proposal from that which was previously submitted the buildings would be clearly visible in these views and the uniform and unbroken mass of the building would contrast sharply with the varied roofscapes that characterise the town. The impact on these views will be particularly felt at night when the development is illuminated. It is therefore concluded that the development will cause further less than substantial harm to the setting of the Grade II\* Listed Cathedral and would cause less than significant harm to the significance of the setting of the Grade II Listed Roof Garden. It is not, however, considered that the development would cause any material harm to the setting of the Castle.

Overall less than substantial harm to the significance of the designated heritage assets and their setting is likely, which is a definition set out in the NPPF. This is a wide ranging scale of harm. In planning terms the level of harm is significant given the importance of the heritage assets and the scale of the development. In line with para 134 of the NPPF it is necessary to weigh this against any public benefit, however, in line with the Planning (Listed Building and Conservation Area) Act 1990 special regard must be given to preserving the heritage assets and their setting. The public benefits will be considered in the balance section of this report.

For the reasons set out above it is concluded that the development would be contrary to the objectives of policies HE1, HE4 and HE10 of the Guildford Local Plan 2003 (as saved) and would conflict with the objectives of paragraphs 132 of the NPPF.

#### The impact of the development on residential amenities

##### *Neighbour amenity:*

The Supplementary Environmental Statement provides daylight, sunlight and overshadowing assessments in terms of the quantity of daylight and number of hours of sunlight available to neighbouring residential buildings. The analysis was carried out to determine which neighbouring windows of adjoining building would comply with the Building Research Establishment's (BRE) standards in 'Site Layout Planning for Daylight and Sunlight.'

The existing buildings which front Walnut Tree Close, already experience a loss of sunlight due to the obstructions such as the high embankment and overhanging balconies or the setting of windows in recesses between buildings. This accounts for the loss of light to 18 Walnut Tree Close, which has deep soffits and three windows at Gateway House, as these are set back in recesses and have large balconies above them.

The application site is elevated from the building fronting Walnut Tree Close to the west and has a raised embankment meeting the application site where there are trees. As a result, the development would not generate any significant overshadowing of these properties. The separation distance of at least 23m and tiered frontage to blocks D and E would also reduce any harmful overbearing impact to the neighbouring windows and gardens, as the highest parts of the building would be concentrated adjacent to the railway line.

##### *Occupier amenity:*

Further assessments were carried out in relation to the proposed residential units in terms of the levels of daylight and sunlight availability and overshadowing of all or part of existing and proposed open areas. A sample was carried out and the layout of the rooms and windows was designed to maximise the level of sunlight.



Where habitable rooms did not meet the standard this was by a small margin or where there are deep rooms so the light cannot reach the end of the room.

The residential units would form part of a flatted development on an urban site that is constrained by railway, road and the plot shape. Many of the units would be single aspect which would limit day light to some parts of the units and daylight would be more restricted to the rooms in Block B, where the rooms would turn corners or be close to Building A. However, they would have a south facing aspect, so even with the marginal overshadowing from the adjoining buildings they would still continue to enjoy adequate daylight.

There is a requirement for children's play space under saved policy R2. This would be provided within the residential courtyards adjacent to the car park and Blocks D and E, amounting to 190 sqm of children's play area space. In terms of private amenity space, this is largely provided by balconies and/or the communal roof terraces on Blocks A1, A2, B, D and E. Consequently, 88 percent of units either have access to a private balconies or communal terrace.

Given the scale of the developments and the number of units proposed it is inevitable that the units will benefit from differing levels of amenity space, day and sunlight and outlook. The majority of the units would be high quality and would provide a good standard of residential accommodation. While some of the units would have restricted day light and less attractive outlook the impacts are not so severe and do not affect a sufficient proportion of units to justify the refusal of the application on these grounds.

It is therefore concluded that the development generally accords with the objectives of policies G1 (3), G1 (13) and R2 of the Guildford Local Plan 2003 (as saved).

#### The level of parking and the impact on the highway

The application include the provision of a new forecourt adjacent to Walnut Tree Close and includes the reduction in the level of parking in this part of the site so that most of the 'station square' will be at the same level as the highway. This area will be served by an in and an out access points and will include a central circulation space. The area will provided two bus stops, 2 mini-bus stops, taxi ranks and waiting areas, and passenger drop off bays. The County Highway Authority has considered the access arrangements and operation of this area and advises that there are no highway safety objections to the proposal.

The application also proposes the erection of a centrally located multi-storey car park (MSCP) that would replace the existing surface level parking and provide additional parking to serve the proposed residential accommodation. In total the MSCP and surface parking would deliver 713 car parking spaces with 230 spaces to serve residential properties, 412 station and commuter spaces and 71 spaces to serve the other commercial uses. The MSCP would also include 10 short-stay parking spaces. The MSCP would be accessed from a realigned Station View that would link this part of the site to Walnut Tree Close and the County Highway Authority has raised no objection to the access arrangements for this part of the site.

The level of parking proposed to serve the station and commuters represents a marginal increase in the level of parking provided. The parking proposed to serve the residential units results in a parking provision of approximately 0.5 spaces per unit. There would also be 456 cycle parking spaces to serve the residential units and an additional 536 cycle parking spaces for railway users. The level of parking is below the maximum level of parking set out in the Parking Standards SPD which is for one space per unit for one and two-bed properties and two-spaces for three and four-bed properties.

The level of parking general accords with the maximum parking standard of the Vehicle Parking Standards SPD and, notwithstanding that the written Ministerial Statement (March 2015) indicates that Local Planning Authorities should not rigidly apply parking standards, in this instance the parking proposed is acceptable in transport terms. Notwithstanding this the site is within highly sustainable location, and given the concerns expressed above in respect of the scale of the car park, officers consider that a lower proportion of parking could be justified.

The development would result in a significant increase in the intensity of the use of the site and the addition of residential properties will have a resulting increase in the number of vehicle trips on the local highway network. Notwithstanding that walking, cycling and public transport would be viable alternatives to the private car. The proposed development will also increase the number of vehicles using Walnut Tree Close and the Gyratory. The application is supported by a Transport Assessment which assesses the impact on the local highway network and recommends mitigation which includes junction improvements to the junction of Walnut Tree Close and Bridge Street and Bridge Street and Onslow Street. The County Highway Authority has considered the proposals and the concluded that, subject to this mitigation, there would not be a significant adverse impact on the network.

Pedestrian access to the station would continue to be provided from the town centre via Bridge Street or across the Walnut Bridge from Bedford Road. The mitigation measures included within the application provide for a sum in the region of £340k towards improvements to pedestrian and cycle facilities in the vicinity of the site and this could include a contribution to the replacement of Walnut Bridge or any other proposals that improve links to the station by foot or bicycle. The application also provides for further bus stops on Walnut Tree Close and for safeguarded land within the development to link to any replacement bridge over the tracks to Guildford Park Road. These measures all add to the sustainability of the development and would improve pedestrian and cycle movements in and around the station.

Overall it is concluded the site is highly sustainable and would deliver improvements to pedestrian and cycle accessibility. The level of car parking is considered to be acceptable in highway terms and the development would not materially adversely impact on the safe and efficient operation of the highway network. For these reasons it is concluded that the development generally accords with the objectives of policies M1, M2, M4 and M5 of the Guildford Local Plan 2003 (as saved) and the objectives of section 4 of the NPPF.

#### The impact on the Thames Basin Heaths Special Protection Area

The application site is located within 3km of the Thames Basin Heaths Special Protection Area (TBH SPA). 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 of 438 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 which provides a framework by which applicants can provide or contribute to Suitable Alternative Natural Green Space (SANGS) within the borough which along with contributions to Strategic Access Management and Monitoring (SAMM) can mitigate the impact of development.

The avoidance strategy envisages that larger sites will provide their own SANG solution however given the urban location of this site it would not be possible for the development to provide on-site SANG and no other suitable site has been identified by the applicant for use as SANG.

Accordingly it is reasonable, in this instance, for the development to contribute to an existing SANG and capacity is currently available to mitigate the impact of this development.

It is therefore concluded that, subject to the completion of a legal agreement, the development would not compromise the integrity of the TBH SPA. However, no agreement is currently in place to secure this mitigation and accordingly the development would not meet the objectives of the TBH SPA Avoidance Strategy or Policy NRM6 of the South East Plan 2009.

#### The risk of flooding and the impact on water resources

The application site is located to the west of the River Wey and the site is significantly raised above the level of the river. Most of the site is within Flood Zone 1, which is identified by the Environment Agency as having a low probability of flooding, however a very small section of the eastern part of the site falls within Flood Zone 2. No buildings are proposed to be located within that part of the site that falls within Flood Zone 2 and there are no proposed level increases in this part of the site. Safe access and egress from all parts of the site is also possible by using routes that do not fall within the Flood Zone and it is noted that the Environment Agency has raised no objections to the proposal on flood risk grounds subject to appropriate conditions.

The site is located in an area where there are existing surface water flooding problems. The site is currently almost entirely hard surfaced and run-off from the site currently contributes to these underlining issues in the locality. The applicant has submitted a Flood Risk Assessment (FRA) which considers the risk of surface water flooding to the development and the impact of the development on the surrounding area. The FRA concludes that the use of a suitable SuDS scheme could reduce surface water run-off and deliver some benefit to the surrounding area. The applicant has submitted an outline SuDS solution for the site and it is reasonable to secure these full details by condition; accordingly no objection is raised to the proposal on these grounds.

Thames Water have raised no objection to the proposal on foul water or water supply grounds subject to Grampian conditions being included in any permission granted to ensure that the full details of the proposed infrastructure is provided and any required upgrades are completed prior to the commencement of development. These conditions are considered reasonable and should be included in any planning consent for the site.

The site is also within the a Source Protection Zone for groundwater and conditions should be included to ensure that the development does not impact on the quality of the groundwater or result in contaminants running off the site to the River Wey. Planning conditions would be required to ensure that details of piling and foundation design, details of any materials to be imported on to the site and the location and detail of any infiltration are provided and agreed before the commencement of development.

It is therefore concluded that, subject to planning conditions, the development meets the objectives of policies G1 (6), G1 (7) and G1 (10) of the Guildford Local Plan 2003 (as saved) and meets the objectives of section 10 of the NPPF.

## Viability and Legal Agreement Requirements

The viability of a scheme is a material planning consideration and the national Planning Practice Guidance makes clear that Local Planning Authorities should not seek planning obligations which make a proposal unviable. It states that:

*"In making decisions, the local planning authority will need to understand the impact of planning obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations.*

*This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance."*

(Paragraph: 019 Reference ID: 10-019-20140306, Revision date: 06 03 2014)

The Council's Planning Contributions SPD also acknowledges that the viability of a scheme is a legitimate consideration in determining planning obligation requirements, including affordable housing, and states:

*"If a development appraisal demonstrates that it is not viable for a development to meet all the requirements of this SPD but the development is needed to meet the aims of the Development Plan, the Council and other public sector agencies may negotiate planning obligations on a site by site basis and/or provide greater flexibility on when payment would be required (e.g. the Council may agree for the developer to pay the agreed sums in instalments or upon completion of the development). This is to encourage the delivery of housing that is a priority for the Borough." (Paragraph 2.20)*

The applicants Viability Appraisal has been independently reviewed by a consultant appointed by the Council. This review accepts the applicant's conclusion that the scheme proposed would not deliver sufficient revenue to allow for the delivery of a policy compliant level of affordable housing. This is principally due to costs within the development that are not typical of a solely residential scheme which include the provision of a multi-storey car park, a new station building with operational offices for the train operator and British Transport Police, and a new station square and a contribution to enhance the platforms and station facilities. The appraisal estimates these costs to be in the region of £24m. These are all essential components of the development without which development would not come forward; they are also elements that a traditional residential development would not deliver.

It is therefore accepted that the provision of a policy compliant level of affordable housing and other planning obligations required to make the scheme acceptable in planning terms would make the scheme unviable. Accordingly, the Council should prioritise its requirements so as to reach a level of planning obligations that would enable development to take place and the residential units to be delivered.

### *Legal Agreement Requirements*

The three tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010 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.

Regulation 123 of CIL Regulations states that a planning obligation may not constitute a reason for granting planning permission where the obligation provides for the funding or provision of an infrastructure project or type of infrastructure and five or more separate planning obligations for the funding or provision of that project or type of infrastructure have been entered into.

### *Affordable Housing*

The development delivers a less than policy compliant provision of affordable housing. Additional affordable housing would make the development unviable. While providing less affordable housing would create additional revenue and would allow other contributions to infrastructure the delivery of affordable housing is a high priority and should be sought over other contributions.

### *Thames Basin Heaths Special Protection Area*

The development is required to mitigate the impact on the development on the Thames Basin Heaths Special Protection Area through contributions to SANG and SAMM. Without this mitigation, the development must be refused. This contribution would be essential if the development were to be approved.

### *Highway improvements*

The highway improvements are necessary to mitigate the impact of the development on the highway network and mitigate direct impacts from the proposal. Improvements to pedestrian and cycle facilities in the town centre are also imperative to ensure that sustainable transport objectives can be met. Given the strain on the highway network in the vicinity of the site this should be a high priority.

### *Education, health and community facilities*

The development is likely to place additional pressure on school places, health services and community facilities and the development should mitigate these impacts. The new population would, however, not all use these services and the impact of development is likely to be split between a number of facilities. While the development should mitigate the full impact of the development the impacts are somewhat indirect and accordingly are a medium priority.

### *Play and openspace*

The application includes some on site playspace and amenity space for residents. While the level of provision is somewhat limited it is not unusual for a town centre development and it is considered to be acceptable. The application will increase pressure on local sports pitches and this impact should be mitigated, however, in the absence of an identified project that could mitigate this impact this should be a low priority.

### *Draft Heads of Terms*

Having regard to all the above, in the event that the application was to be approved the following should be secured by a Planning Obligation:

- 45 shared ownership affordable housing units
- a contribution of £2,020,120.50 towards SANG and SAMM
- a contribution of £338,714 towards pedestrian and cycling improvements

In addition, the Planning Obligation should include a suitable review mechanism to ensure that an additional viability assessment is undertaken at the end of the development and that if additional profit has been generated, a proportion of the profit should be transferred to the Council to deliver additional affordable housing units.

### **Balancing exercise and conclusions**

Paragraph 14 of the NPPF introduces a presumption in favour of sustainable development. The Councils relevant housing supply policies are out of date and as such this means granting permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or, there are specific policies in this Framework indicate that development should be restricted. Footnote 9 confirms that this includes, but is not limited to, policies that seek to preserve heritage assets. In this instance, the report identifies less than significant harm to a number of designate heritage assets and accordingly there is no presumption in favour of a grant of planning permission. Instead the benefits of the scheme should be weighed against the harm arising and the proposal should be determined on its merits.

### Matters weighing in favour of the grant of planning permission

#### *Delivery of additional market and affordable housing*

The proposal would deliver 438 residential units, of which 45 (c.10%) would be affordable. The benefits of delivering the market housing should be given significant weight, however, the level of affordable housing proposed is well below what is normally required. The development would make only a limited contribution to meeting the Council's need for affordable housing and the benefits of this element of the scheme therefore carry modest weight.

#### *Station improvements*

The development would deliver a new railway station building, a new station plaza, a new multi-storey car park, new station offices, improved cycle parking facilities. The applicant is also offering a contribution of £2m to be paid to the train operating company that they consider would deliver improvements platforms potentially including improve toilet and waiting facilities, refurbishment of canopies and refurbishment of the footbridge.

The new station and plaza would offer public benefits to commuters and other station users and would create a modern arrival and departure point for Guildford; this should be given moderate weight.



The new station offices and multi-storey car park are largely replacements for existing facilities and offer only limited benefits, however, the increase in the cycle parking provision on the site should be given modest weight.

The development does not, however, represent a whole-scale redevelopment of the station and the benefits of the proposal mostly stop at the new ticket hall.

Improvements beyond the new station building are relatively limited and will not materially improve the travelling experience of station users or expand platform capacity. Moreover, there is no mechanism to ensure that the contribution would be used to improve Guildford Station as there is no intention from the train operator to be party to any binding agreement. These wider station improvements should be given very limited weight.

#### *Pedestrian and environmental improvements*

The new station plaza would improve pedestrian links to the town centre and environment to the front of the station. The development would also deliver financial contributions that could be used to deliver additional pedestrian and environmental improvements within the Town Centre. The development would also 'future proof' a potential link through the building to allow access to a replacement of the existing footbridge should this come forward in later stages of the redevelopment of the wider station site. Together these benefits should be given significant weight.

#### *Economic benefits*

The development would deliver economic benefits both during and post construction. During construction a significant number of jobs would be created and this work force is likely to result in trickle down benefits to local businesses. After construction some additional jobs would be created from the additional retail and office space. The residential units would also bring additional potential expenditure into the town centre. These economic benefits should be given moderate weight.

#### Matters that weigh against the grant of planning permission

##### *Harm to designated heritage assets*

The development proposed would result in less than substantial harm to the setting and significance of a number of designated heritage assets including the Grade II\* Listed Cathedral, the Grade II Listed Jellico Roof Garden and the Bridge Street Conservation Area. The NPPF requires that 'great weight' should be given to the conservation of heritage assets and Section 66(1) and Section 72(1) of the Planning (Listed Building and Conservation Areas) Act requires the Council to 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.' While individually the harm to the heritage assets is less than substantial the cumulative harm arising from the development should be given significant weight in the determination of the application.

##### *Harm to the character of the area*

As noted in the body of the report the development would be significantly out of scale and character with the surrounding development and, by virtue of its scale, height, length and massing, would be harmful to the wider townscape of Guildford. The development would be entirely out of context with the scale of the surrounding development and would not reflect the urban grain and varied roof forms of the Town Centre. This harm should be given significant weight in the determination of this application.

### *Social Economic Impacts*

The development proposed would introduce additional residents into this part of the town centre and this increased population would place extra strain on local services and facilities such as schools, health services and community facilities.

The economics of the scheme are such that the development is unable to mitigate this impact and accordingly the development is likely to have an adverse impact on the provision of these services. While this impact is not so severe as to warrant the refusal of the application, this harm should be given considerable weight in the determination of this application.

### Conclusion

While the principle of the development is acceptable, the proposed height of the development would be the tallest buildings in the town centre and the massing would produce a prominent strong linear element into the townscape of Guildford, which would be an incongruous feature in both long and short views. The proposed development does not relate well to its immediate context and, given the topography of the town, would also be extremely prominent in longer views causing harm to the setting of a number of heritage assets.

While the development would deliver a number of benefits, these benefits do not outweigh the harm that would be caused by allowing the development to proceed. As such the application should be refused for the reasons set out below.

### **RECOMMENDATION:**

#### **Refuse for the following reason(s) :-**

1. The proposed development, by virtue of its monolithic scale, unbroken length, largely uniform height and unrelieved mass, would appear as a dominant and incongruous feature in the townscape and would be detrimental to the setting and the significance of Guildford Cathedral, which is Grade II\* Listed, and the setting and significance of the Jellico Roof Garden, which is Grade II Listed. The development would cause less than substantial harm to these designated heritage assets. Furthermore, the scale, mass and height of the proposed buildings would be overly prominent and overbearing when viewed from the Bridge Street Conservation Area, would adversely impact on the setting of the heritage asset and would be detrimental to its significance. The development would result in less than substantial harm to this designated heritage asset. The public benefits arising from the development do not outweigh the harm that would be caused by the development. As such the proposal is contrary to the objectives of policies HE1, HE4 and HE10 of the Guildford Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and would conflict with the objectives of paragraphs 132 and 134 of the NPPF. For these reasons the development is also contrary to the objectives of Section 66(1) and 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, as amended.
2. The development proposed, by virtue of its monolithic scale, unbroken length, largely uniform height, and unrelieved mass, fails to respect the urban grain and varied roof patterns of the town centre and would appear as an alien feature harmful to the townscape in long range views of the site.

Furthermore, the scale, height and mass of the proposed buildings would be significantly out of scale and character with the adjoining buildings such as the Billings and Ranger House and would appear overly dominant and incongruous in short range views around the application site. As such the proposal would be contrary to the objectives of policies G5 (1), G5 (2) and G5 (6) of the Guildford Local Plan 2003 (as saved by CLG Direction dated (24/09/2007) and would conflict with the objectives of paragraphs 63 to 66 of the NPPF.

3. In the absence of a completed legal agreement, the development fails to secure an appropriate provision of affordable housing and therefore fails to deliver a mixed community or the affordable housing needed in the Borough. The development therefore fails to meet the objectives of policy H11 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated (24/09/2007), the Planning Contributions SPD and chapter 6 of the National Planning Policy Framework.
4. In the absence of a suitable legal agreement, the application fails to deliver the transport sustainability measures required to promote sustainable travel choices such as walking and cycling. Accordingly, the development is contrary to the policies M4 and M6 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and the objectives of chapter 4 of the National Planning Policy Framework.
5. The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). The Local Planning Authority is not satisfied that there will be no likely significant effect on the Special Protection Area and, in the absence of an appropriate assessment, is unable to satisfy itself that this proposal, either alone or in combination with other development, would not have an adverse effect on the integrity of the Special Protection Area and the relevant Site of Special Scientific Interest (SSSI). In this respect, significant concerns remain with regard to the adverse effect on the integrity of the Special Protection Area in that there is likely to be an increase in dog walking, general recreational use, damage to the habitat and disturbance to the protected species within the protected areas. As such the development is contrary to the objectives of policies NE1 and NE4 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07) and conflicts with saved policy NRM6 of the South East Plan 2009. For the same reasons the development would fail to meet the requirements of Regulation 61 of The Conservation of Habitats and Species Regulations 2010, as amended, and as the development does not meet the requirements of Regulation 62 the Local Planning Authority must refuse to grant planning permission.

**Informatives:**

1. In accordance with paragraphs 186 and 187 of the National Planning Policy Framework, Guildford Borough Council takes a positive and proactive approach to development proposals focused on looking for solutions. We work with applicants in a positive and proactive manner by:
  - offering a pre-application advice service
  - updating applicants/agents of any issues that may arise in the processing of their application and where possible suggesting solutions

In this instance this included attending a number of meetings with the applicant, facilitating Design Review Panel meetings and accepting amended proposal. In this instance however it has not been possible to reach agreement on the proposal.

2. This decision relates expressly to the drawings as listed in the drawing schedule 5417:Rev F and dated 3rd November 2015.

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## South East Regional **Design Panel**

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Dear Mr Hughes

**GUILDFORD STATION REDEVELOPMENT, STATION VIEW, GUILDFORD GU1 4UT**  
**Planning application 14/P/02168**  
**Second review**

Thank you for asking the Guildford Design Panel to review the latest proposals for Guildford Station. Our meeting on 23 June followed an earlier review session on 31 March, when Panel members visited the site. We were again grateful to Euan MacGillivray (Rolfe Judd) and Jan Landolt (Landolt + Brown) for their presentations. It was also helpful to hear from Paul Sherman of Guildford Borough Council about the planning context and the progress of the Council's masterplan.

### SUMMARY

The Panel continues to support the principle of redeveloping Guildford Station. We are impressed by the progress that the design team has made since our last meeting.

We find the main design moves to be sound and we are encouraged that they seem to chime with the Council's masterplan for the centre of Guildford. We especially welcome the new emphasis being given to lining up with the footbridge across the River Wey, which promises to be a most attractive walking route into the town.

We commend the changes that have been made to the station square, whilst recognising the continuing challenge of reconciling the different user needs. We suggest that the next step would be to concentrate on improving the north and south entry points and the way Walnut Tree Close can be wholly assimilated with the square. Traffic management on Walnut Tree Close and the way it connects to the wider network will be critical.

The station design and the treatment of the façade is highly promising, with a stronger architectural emphasis and a better balance with the residential development on each side. The main need now is to manage the concourse and office entrance successfully.

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We welcome the overall reduction in height, which would bring the tallest blocks below the level of the skyline in the key view from Guildford Castle and thereby sustain the pre-eminence of the Cathedral as the town's western landmark.

Our comments are as follows:

## BACKGROUND

Guildford Station was built on the London to Portsmouth line in the 19<sup>th</sup> century and has been enlarged on several occasions with new lines and platforms. It once had substantial sidings. A new concourse was built in the 1980s, but this no longer meets operational needs and in its current state is a poor advertisement for the town. Pedestrian routes to and from the station are convoluted and often choked with traffic. Redevelopment offers the prospect of addressing these problems and of providing a fitting place of arrival.

A masterplan for central Guildford is in preparation, which will in turn contribute to the evidence base for the local plan. The proposals for the station were initiated independently from the emerging masterplan, but are now being progressed together to deliver some of the high level planning objectives, including better connections to the town centre and a mix of high quality housing and commercial development.

## DESIGN PRINCIPLES

We continue to believe that the station is the driving ambition and opportunity to deliver the future success of the town. It must be conceived in its urban design as the key component for the development. We have emphasised the importance of looking ahead to the prospect of a western concourse serving that side of the town. It is therefore encouraging that the latest proposals go a long way to bringing that day forward, by aligning the main pedestrian route into town with a possible station bridge and ensuring that the route is safeguarded.

We welcome the move away from making the station a dominant presence in distant views, competing with more established features on the skyline and not least, the natural landscape of the Wey valley. Within the station square itself, however, it is right that the station should declare itself confidently and we believe the balance has been achieved.

We reaffirm our support for the mix of uses and the principle of consolidating the car parking into a multi-storey, especially as this has now shrunk in size. We also welcome the closer liaison with the Council and their masterplanning team that is reflected in the current revisions.

## CIRCULATION AND ACCESS

In our last review we advised that the design of both the public realm and the buildings should be future-proofed to accommodate long term sustainable modes of transport and movement including fit-for-purpose cycle and bus provision. We also said that the station



should be more than a smart new concourse: the whole of the user experience, from alighting from the train to walking into the town centre, should be addressed. Opportunities for improving links across the tracks from east to west should also be maximised.

We support the improvements that have made to make the central space a generous and welcoming area for people arriving at or leaving Guildford. The arrangements for cyclists, drop-off parking and taxis are improved, for the general benefit of anyone wishing to linger in the square. The cycle routes should be clearly marked.

We welcome the creation of a new mini-square or outdoor café area. We also endorse the change to the position of Building C, which no longer blocks the paths between the station, the Wey footbridge and any future bridge over the tracks.

Whilst accommodating traffic on Walnut Tree Close as well as service vehicles is likely to remain a challenge, we think the team is working to reconcile the main conflicts. In our view, resolution of this problem will be critical to the quality and ambience of the new place, particularly if movements increase. We continue to emphasise the need for comprehensive, sustainable transport strategy that looks long term at changing patterns of transport and movement.

#### FORM AND APPEARANCE

We noted before that the site is sensitive, adjoining three conservation areas and being visible from a number of vantage points; amongst them the Castle, with its view across the Wey towards countryside and the Cathedral.

We welcome the lowering of the height and profile of the development and in particular, the effort to keep it below the ridgeline in the Castle view. Although the materials palette is still being worked up, the more muted tones of pale and red brick help the building assimilate with the Guildford skyline.

Closer to hand, the heights of the residential blocks seem appropriate for the dimensions of the square. The revised massing gives more prominence to the station entrance and we are greatly encouraged by the emerging work by Landolt + Brown to create a building of genuine architectural quality. The faceted glass front offers depth and subtlety, as well as practical shading. Careful thought needs to be given as to how the station will be signed, but it should look like an integral part of the composition and not an afterthought. The splays to the flanking residential blocks are also well considered, but at ground floor level more needs to be done to resolve the ambiguity between the office entrance at the side of the concourse and the main station entrance. Similarly, further thought may be needed in handling the orientation of the retail units.

The success of the square will be down to the activity at its edges, which has implications for the entrances from the north and south, as well as for the buildings that will face onto it.

## OTHER CONSIDERATIONS

We understand that the overall amount of accommodation remains approximately the same and that the massing removed from the tops of the buildings around station square A1, A2 & C has been added to the residential blocks to the north – Blocks D & E. In the absence of drawings for these residential blocks to the north, the Panel is unable to comment on the design including massing, elevations, detailed floor plans and public/private realm. The Panel repeats its concerns about residential blocks having a substantial proportion of single aspect units, served by long internal corridors.

The close adjacency and appearance of balconies projecting on the square should also be given careful consideration.

We are concerned that the provision of affordable or social housing could be as little as 10%, which would be counter to any ambitions for a mixed community. If the Council's normal targets cannot be met, sound evidence would be called for and suitable compensation provided through demonstrable public benefits. Importantly, careful consideration will need to be given to the mix of the new neighbourhood and also the adequate provision of play areas.

We would invite the team to look again at the glass lift arrangement in the centre of the square; if it is absolutely necessary, it could surely be accommodated more discreetly.

The Panel concurs with the suggestion by Tim Dawes of Guildford Council that the design team carefully consider the relationships and scale between Block C and the Billings, and Block A and Ranger House.

We hope that you and your team find these comments helpful in taking the design to the next stage. Please keep the Panel in touch with the project and do contact me if anything in this letter is unclear.

Yours sincerely



ROBERT OFFORD  
Panel Manager

cc Euan MacGillivray, Rolfe Judd Architects  
Jan Landolt, Landolt + Brown Architects  
Alan Jones Solum  
David Banks, Mace  
Ian Mitchell, Mayer Brown  
Denis Pope, Nathaniel Lichfield & Partners

Tim Dawes, Guildford Borough Council  
Paul Sherman, Guildford Borough Council  
Barry Fagg, Guildford Borough Council  
Kelly Jethwa, Guildford Borough Council

Panel members present: Richard Portchmouth (chair). Colin Black, David Hills  
Geoff Noble, Design South East

*This review was commissioned by Solum Regeneration with the knowledge and agreement of Guildford Borough Council.*

**CONFIDENTIALITY**

*Since the scheme was not the subject of a planning application when it came to the Panel, this letter is offered in confidence to the addressee and those listed as being sent copies. There is no objection to the letter being shared within the respective practices/organisations. DSE reserves the right to make the guidance known should the views contained in this letter be made public in whole or in part (either accurately or inaccurately). The letter would also be made available to any public inquiry concerning the scheme. DSE also reserves the right to make the guidance available to another design review panel should the scheme go before them. If you do not require this letter to be kept confidential, please let us know.*