

Planning Committee

11 January 2023

Late Representations

Since the last date for the submission of views on applications/matters before the Committee this evening, representations in respect of the under mentioned applications/matters have been received. The letters, copies of which will be available for inspection by councillors at the meeting, are summarised below.

Item 5 – Planning Applications

22/P/01336 – (Page 15) – Land bounded by the Friary Centre Bus Station, North Street and Leapdale Road, Guildford

Since the publication of the Committee Report, a further 58 letters of objection have been received. These set out the following comments:

- lack of public consultation, further engagement is required [Officer Note: The application has been notified in accordance with relevant legislation. In addition to the notification letters which have been sent to properties in the area immediately surrounding the site, site notices were erected around the area and notices were also published in the local press. The same consultation was carried out when the amended plans were received. Although it is not a statutory requirement, the applicant has also carried out a wide ranging consultation exercise with local stakeholders and members of the public];
- the development is too high and would harm the character of the town;
- inadequate parking is provided;
- reduced bus access to the town centre;
- loss of existing public car parks;
- the scheme is not viable;
- not enough resident parking on local roads and issuing resident permits to the new residents of the scheme will make the situation worse;
- impact on highway safety;
- proposal will overshadow the town turning it into a bad impression of a New Town development;
- the size of the proposed bus station is inadequate;
- the proposal will damage the central business district;
- the proposal is oppressive and will keep people away from visiting the town;
- style of the buildings are unimaginative and totally out of keeping with such a historical town;
- lack of daylight to streets and proposed residential units;
- some comments received in support of the application are identical. Concerns also raised regarding that some responders may not live in the borough [Officer Note: Using a template to submit comments on a planning application is not unusual and

may result in comments which are similar to each other. Using a template does not invalidate the comments which have been made. In addition, the consultation process is open to all, irrespective of whether or not they live in the borough];

- to use ugly 1960s built high rise buildings as a precedent and a reason that these 13 storey buildings will not look out of place is implausible [Officer Note: This is incorrect. Officers do not rely on other taller buildings as a justification for the current proposal. Each of the proposed buildings are considered to be appropriate in their own right];
- no affordable housing and this is 'overcome' by providing 20 shared ownership flats and a possible extra 28 [Officer Note: The 20 shared ownership properties proposed (plus the possible addition of 28 more) would be classed as affordable housing];
- just because this site is a brownfield site it should not mean that town planners should allow absolutely anything to be built there;
- there is no proposed biodiversity [Officer Note: This is incorrect. The proposal would result in a biodiversity net gain of 201%];
- increased traffic in the area;
- lack of local infrastructure (schools, doctors, hospitals etc);
- fire safety hazard from the tall residential buildings [Officer Note: No objection has been raised by the Health and Safety Executive];
- increased pollution;
- proposal brings no enhancement to the streetscene;
- concerns regarding the use of concrete as the main construction material;
- the density of the proposal is too great;
- a town centre should be a place for all the community to meet and should not be turned into a large housing area. The proposal would be better suited to a site on the outskirts of the town;
- the Council should reflect upon the beauty of Zaha Hadid unique architectural developments;
- no planting or open space between the blocks [Officer Note: This is incorrect, the plans show the numerous areas of open space and landscaping are proposed as part of the development];
- no assessment of the durability of the buildings;
- object to the demolition of any existing buildings;
- impact on the safety of shoppers;
- the proposal will be visible from miles around;
- closing of Leapale/Commercial Road will detrimentally affect the flow of traffic through the town centre and restrict access to disabled pick up points, leading to longer queues of traffic;
- removal of parking which is used by worshipers who attend St Saviours Church;
- the town doesn't need more apartments;
- the accommodation should be mainly affordable housing;
- more greed from the council against the wishes of residents;
- concerns regarding the loss of public space and amenities;
- is it okay for the Council to alter listed buildings? Building owners can't do it under any circumstances but the Council will turn a blind eye if it benefits them financially [Officer Note: The application is not made by the Council. The alterations to the listed

building have been assessed against relevant local and national policies and is deemed to be acceptable. This is set out in the report associated with application 22/P/01337];

- the proposal is utterly ill-conceived madness;
- at a time when we are looking at reduction in reliance on cars, surely we should be doing all we can to increase the public transport offerings available, not limiting this and paying lip service to all the efforts that are being made to reduce our carbon emissions;
- it should be a priority to ensure there is room to expand the number of bus stands, bus routes and frequency of journeys starting, ending and passing through the bus station in the coming years;
- the design and scale of the proposal has changed dramatically since the original consultation which took place nearly 18 months ago, however this development is now becoming overbearing for the location, given the height of the development. There also appears to be a lack of green space from the original proposal;
- there is no choice in housing. There is space to include a selection of town homes alongside the flats, not everyone wants to live in a flat;
- there's little thought on the long-term vision for the town and its housing, this development will be dated design wise long before its even built;
- adverse impact on views and harm to the conservation area;
- loss of light and wind tunnels will result;
- the compromises are too great, the result is poor and out of kilter with the Guildford historic streetscape;
- if this scheme is accepted it is an enormous lost opportunity to set the Guildford town centre up for decades and probably more than a century beyond;
- believe it will make access to shopping in Guildford less easy, less attractive and easier and better to go elsewhere, which no one would wish for the town;
- proposal will not augment or complement the existing infrastructure - they just sound like expensive flat blocks with some after thoughts to try and make people happy;
- more family housing is needed, not apartments;
- does the town need more commercial units when a large number are already vacant;
- the proposal needs more landscaping and tree planting;
- the mix of dwellings is not acceptable; and
- concerns regarding the financial viability assessment.

Since the publication of the Committee Report, a further 67 letters of support have been received. These set out the following comments:

- like the height of the buildings to provide more housing on brownfield sites and the lack of parking to promote sustainable transport;
- would like to see more effort for biodiversity, for example a living wall for the bus station;
- the Council should make adequate provision for food waste collection from the flats;
- Guildford needs to evolve and redeveloping this run down eyesore is a great start;
- not only will this rejuvenate a derelict / 'brownfield' part of the town centre the developer is making significant contributions to local education and infrastructure;

- while design is a subjective matter the scheme is policy compliant and on planning balance should be supported;
- the application is well balanced;
- the town centre is sorely in need of more housing and the provision of retail and community spaces seems well thought-out;
- modernise a largely unattractive section of North Street which has needed updating for many years. However, height of tallest block needs to be reconsidered and a compromise with Surrey County Council is needed;
- the architectural style of the development is attractive, and while not necessarily in keeping with the historic centre of Guildford, it will provide a pleasant modern counterpoint;
- transform North Street from the 'ugly sibling' of the High Street into a destination of its own right, and help usher Guildford into becoming the bustling modern town;
- the proposal will significantly improve Guildford;
- the proposal is a sustainable solution for the current derelict site and will provide open and modern facilities while respecting and complementing the town's historic features;
- provides 473 new homes without eroding the countryside, a much needed new bus station and will bring life back into the town centre which is rapidly declining;
- be a major boost to the retail and leisure sector;
- the buildings are taller than would ideally like to see but appreciate this is probably necessary to render the scheme viable and a small price to pay when taking account of all the benefits;
- important element is that all the proposed development is built to the highest specification, using good quality materials, considering sustainability and likely climate change. Some buildings are taller than many would like but if this allows the site to be profitable for the developer, using the best materials, than so be it;
- Guildford urgently needs more housing and this will ensure the centre of Guildford can prosper and encourage businesses to invest;
- it is right to have limited parking in the town centre to encourage the use of public transport and park and ride;
- now is the time to embrace change and redevelop this depressing and neglected area which detracts from Guildford in many ways;
- if people object to urban sprawl and building on green field sites then they have to accept that building tall is acceptable and
- far too dense to provide acceptable modern living standards.

A further letter has been received which neither objects or supports the proposal. The following comments are noted:

- SCC and the bus operators objected to the proposed entry and exit and alterations to the way traffic is re-routed after stopping up of Commercial Road and Woodbridge Road from North Street end. It would be reassuring to know what different arrangements, if any, for the entry to the bus station was agreed after St Edwards' discussion with SCC;

- it has been noted that two independent highways consultants had examined the proposals and were content with the alterations proposed by St Edwards. Have their reports been made public [Officer Note: Both reports have been added to the Council's website];
- there are better solutions in keeping Leapale Road one-way, restricting North Street two-way down to the Leapale Road junction with a turn-around facility and making Chertsey Street one-way to York Road. North Street would be one-way extended to Leapale Road junction and maybe restricted to traffic between 10 am to 4 pm like the High Street;
- keeping Leapale Road one-way removes the traffic exiting on to Onslow Street and facilitates buses entering the bus station and exiting it more conveniently;
- other alterations to Onslow Street northbound would facilitate entry of buses turning right before the roundabout towards the bus station since only buses would exit on to Onslow Street; and
- two-way cycle lanes could be incorporated in Leapale Road and Chertsey Street and cycle lanes designed to enter and exit Leapale Road/Woodbridge Road. The cycle lane could exit on to Onslow Street southbound that would be reduced to two lanes since bus lane would no longer be required.

Comments have also been received from the Surrey Hills Planning Advisor. The following comments are noted:

- only just learned today (04.01.23) of this planning application which is on the agenda for 11th January. I do not appear to have been consulted on this application in the same way as I had previously been consulted on major and/or high-rise development proposals (e.g. Guildford Station 14/P/02168) beyond the AONB but which might possibly harm its setting [Officer Note: The AONB Planning Advisor was not consulted on this planning application as it is located in the middle of the town centre. It is not located in the AONB and is at its closest point is more than one kilometre from the AONB];
- the Surrey Hills AONB Management Plan Policy P6 is a material planning consideration and...has not been considered either in the application submission or in the Officer Report to Committee. It reads: *"Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted"* [Officer Note: Although a Townscape and Visual Impact Assessment (TVIA) has been submitted with the proposal (as opposed to a Landscape and Visual Impact Assessment (LVIA)), the submitted TVIA does still offer an assessment of the proposal on both the AONB and AGLV. The TVIA also references the Surrey Hills AONB Management Plan. Notwithstanding the fact that this proposal is located within the middle of the built-up area of the town centre and is over one kilometre from the AONB, given the comments above, Officers have added a section to the report which assesses the proposal against relevant AONB policy requirements. This additional section can be found under 'Clarifications' on this Late Sheets];
- whilst the application has been supported by a townscape and visual impact assessment within one kilometre of the site, in the time available to me today, I have not so far seen on the Council's website, any proper assessment of the impact on views from the Surrey Hills AONB to the west and south. Normally, a Landscape and Visual

Impact Assessment would be expected. The assessment should include the collective impact of the permitted redevelopment of Guildford Station and this site [Officer Note: See Officer Note above. In addition, it is noted that the TVIA includes the cumulative impact of permitted and extant schemes such as Guildford Station];

- I have though noticed a photomontage within the townscape and visual impact assessment taken from a position on The Mount to the west. Without having been able to assess properly the proposal from various AONB viewpoints initially my main concern from this photomontage relates to the proposed 13 storey building both because of its sheer height and light colour contrasting with the dark background of Guildford's townscape that would make it all the more conspicuous and incongruous a feature in that viewpoint;
- without evidence seeking to demonstrate there would be no harm to views from the AONB and there being insufficient time with my other commitments in the next couple of days for me to elaborate upon my initial concerns and for Officers to consider such advice in order to report to Committee, the Council may feel it is not in a position to permit the application, if so minded, on 11 January [Officer Note: It is considered that the submitted TVIA does assess the impact of the proposal on the AONB and a number of vantage points within and in close proximity to the AONB have been tested. This will be set out in the addition section which is provided elsewhere in this Late Sheet]; and
- I would not be so concerned were the height of the 13-storey building reduced to, say, nine storeys. Even then the collective heights and massing of the buildings would be substantial.

A further email was received from the AONB Planning Advisor on 07.01.23. It notes the following additional points:

- well done for having negotiated some height reduction but I consider there should be more. I still consider the development would have an unfortunate dominating impact on the town centre that together with the insensitive Station development, would spoil its character and perception from outside views, including from at least one part of the AONB. Its height needs to be significantly reduced which may require the architecture of the building to be amended as that has been influenced by its height. I question whether it is necessary to have a "marker" building. The height and bulk of the Station development should not be a precedent for this scheme. Two wrongs do not make a right [Officer Note: The Officer Report clearly sets out why the proposal would not have a harmful impact on the character of the town centre. Officers do not rely on the Guildford Station development as a reason for recommending approval]; and
- if the Committee are nevertheless minded permitting the scheme, I would ask that more muted coloured external materials are used so the tallest building would not form such a prominent and incongruous feature. It may well have the support of architects, but I would question whether this would prove to be another example of such architect supported schemes that the public dislike, especially in the future, and associate as being a planning mistake, as we have seen in the past. Being so tall the

harm caused would be all the greater [Officer Note: The materials are already secured by condition and would need to be agreed with Officers].

Members have also directly received written correspondence from Surrey County Council in a letter dated 19 December 2022. A rebuttal to this from the applicant was received and circulated to Members on 10 January 2023. Both of these letters are provided in full as an appendix to these late sheets.

22/P/01337 – (Page 297) – Land bounded by the Friary Centre Bus Station, North Street and Leapdale Road, Guildford

Four letters of objection have been received. The following points are noted:

- demolishing any building should be considered a last resort - both from an environmental point of view, as well as a historical point [Officer Note: This Listed Building Consent application does not seek the demolition of the listed building, only its repair following the demolition of the non-listed building which is attached to it]; and
- several 19th and first half of the 20th century buildings are shown to be demolished [Officer Note: See comment above].

Other comments made relate to the main application and not matters which can be considered as part of this listed building consent.

