

Executive Report

Ward(s) affected: Friary and St. Nicolas; Holy Trinity; Onslow; Christchurch; Shalford

Report of Director of Planning and Regeneration

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Guildford Town Centre Views Supplementary Planning Document

Executive Summary

This report recommends the adoption of the Guildford Town Centre Views (GTCV) Supplementary Planning Document (SPD). The SPD provides further guidance to the Guildford borough Local Plan (“the Local Plan”) relating to important views to which new development will be required to have regard. These include 15 views into and out of the town centre from the surrounding landscape and views within the town centre of important historic buildings and local landmarks.

This SPD will be a material consideration in the determination of planning applications and appeals. It provides guidance to planners, developers, designers and decision makers on how to manage change to key views with the aim of retaining the character of Guildford and what makes it special, including the ability to appreciate key heritage assets and to understand the relationship of Guildford with its landscape setting.

The SPD requires that development proposals have regard to important views and that any likely impacts are carefully assessed during the planning application process. To assist in this assessment, applicants are required to provide an assessment and analysis in relation to the SPD’s view management guidance along with illustrative material, including verified views with applications.

Whilst the NPPF and the Local Plan reflect a policy basis for consideration of views in the planning application process, officers consider that the SPD provides invaluable detail on important views and how they may be protected and opportunities for their enhancement sought so that they may continue to contribute to Guildford’s unique character. The need for effective guidance is strengthened in the context of the development pressure on the town centre now and likely in the future. In this context, the following recommendations are tabled before the Executive.

Recommendation to Executive

- (1) That the Guildford Town Centre Views Supplementary Planning Document, as set out as **Appendix 1** to this report, be adopted as a Local Development Document.
- (2) That the Director of Planning and Regeneration be authorised, in consultation with the appropriate Lead Councillor, to make such minor alterations to improve the clarity of the adopted Supplementary Planning Document as she may deem necessary.

Reasons for Recommendation:

- The recommendation under a) will enable the adoption of the SPD as a Local Development Document and will add weight to this guidance as a material consideration in the assessment of planning applications.
- The recommendation under b) allows for minor modifications to the SPD should they be necessary prior to publication.

1. Purpose of Report

- 1.1 This report requests the Executive to adopt the Guildford Town Centre Views (GTCV), Supplementary Planning Document (SPD) as set out in Appendix 1 for the reasons set out in this report.

2. Strategic Priorities

- 2.1 The SPD assists in achieving the Council's priorities set out in the Corporate Plan 2018-2023, particularly 'place making.' Through the application of its guidance, it will support the regeneration and improvement of the Guildford town centre in a manner that maintains and where possible enhances important views that are part of the Town's unique local character.

3. Background

Development Context

- 3.1 Guildford's town centre has a unique and distinctive character. It comprises a wealth of heritage assets, including numerous listed buildings, conservation areas, monuments and historic gardens. The landscape setting to Guildford includes wooded, undulating and picturesque countryside, much of which is designated as the Surrey Hills Area of Outstanding Natural Beauty. The town's varied topography combined with high quality town and countryside result in strong and distinctive visual links between town and country.
- 3.2 There are, however, strong development pressures, which whilst they may contribute to the vitality and vibrancy of the town centre, if not carefully considered and managed, could threaten the character of the town and its setting.

Purpose of the GTCV SPD

- 3.3 The GTCV SPD does not set out new policy. It is one of a series of such documents which aim to provide further guidance to the Guildford borough Local Plan: Strategy and Sites, in this case in relation to Policy S3 Delivery of development and regeneration within Guildford Town Centre, as well as complementing Policies D1 Place Shaping and D3 Historic Environment. Policy S3 requires that new development will have regard to important views into and out of the town centre from the surrounding landscape and views within the town centre of important historic buildings and local landmarks¹.
- 3.4 The SPD seeks to contribute to ensuring that the character of the town centre is maintained and opportunities for enhancement are sought through guiding new development in a manner that is sensitive to important views. The document provides guidance to planners, developers, designers and decision makers on how to manage change to important views with the aim of retaining the character of Guildford and what makes it special, including the ability to appreciate key heritage assets and to understand the relationship of Guildford with its landscape setting.
- 3.5 The SPD is a material consideration in the assessment of planning applications and seeks to provide a consistent and fair basis for the assessment of the impact of development proposals on identified important views. It may also be used to support evidence in appeal cases.

Selection of important views

- 3.6 The SPD focusses on views that are deemed to be important in the context of Policy S3, the selection of which were informed by a list of criteria (see section 3.1 of the draft SPD). This supported the narrowing of focus to 15 important views. These views were grouped into three categories as identified below.

Category	Key viewpoint / view
River Corridor – views along the River Wey	1. Dapdune Wharf, looking south
	2. Wey-South Path at Shalford Park, looking north
Town Centre Approach – views from key approaches to Guildford	3. Stoke Park, looking south west
	4. Pewley Hill, looking north west
	5. St. Catherine’s Hill looking north
	6. Hog’s Back, looking north east
	7. Farnham Road, looking east
Town Centre – views within, or focussed on, the town centre	8. Sydenham Road / Bright Hill, looking north
	9. High Street, looking west
	10. Quarry Street, looking north
	11. Castle Motte, looking north west
	12. Old Town Bridge, looking east
	13. Old Town Bridge, looking west
	14. The Mount, looking east
	15. Stag Hill, looking south east

¹ See Guildford borough Local Plan: strategy and sites, Policy S3(5)(c) and (d).

- 3.7 The selection of views does not preclude other views being valued and being a material consideration in terms of specific planning applications.

Requirements for planning applications impacting important views

- 3.8 The SPD requires that any development proposal likely to affect one or more views identified in the document is expected to:
- have regard to the view management guidance set out in the SPD;
 - through the planning application carefully assess the impact of the proposals on the view(s).
- 3.9 In order to assist in the assessment of the impact of proposals on important views, applicants will be expected to include:
- an assessment of context, local and town wide, that identifies which views will be affected; and
 - an analysis of how the proposal has had regard to the “view management guidance” (included in relation to each of the identified views in section 5 of the SPD) as part of the design and access statement; and
 - accurate illustrative material, including verified views, with any application.
- 3.10 The “view management guidance” components of each of the view analysis sections of the SPD provide context-specific direction on, amongst other matters:
- appropriate heights for new development (especially limits in relation to existing landmark buildings or other aspects such as key ridgelines)
 - avoiding obscuring or otherwise detracting from key visual connections;
 - maintaining key landscape or built character elements that may assist in focussing and framing or otherwise contributing to important views;
 - materials to be used (in new development) in order that they maintain the harmony and quality of important views and drawing on vernacular materials where appropriate to provide a sense of place;
 - landscaping and screening proposals;
 - commentary on scale, massing, roofscapes and detailed design considerations;
 - positioning, design and materials of roof / plant enclosures;
 - opportunities to improve views;
 - cross referencing guidance given in the townscape character assessment for the relevant character area.
- 3.11 Consideration of seasonal differences has informed the view management guidance in each of the identified views and has been highlighted where appropriate.

4. Consultations

- 4.1 The SPD was drafted in consultation with Development Management, Major Projects, and Planning Policy teams. Early input was provided by the Place Making and Innovation Executive Advisory Board (see below).
- 4.2 The Lead Councillor for Planning approved the draft document for public consultation in June 2019. Formal public consultation on the draft SPD was undertaken for a period of four weeks from 17 June to 15 July 2019.
- 4.3 A total of 26 formal responses were received as a result of the public consultation. All responses have been documented and analysed with an officer response to the main issues raised. See **Appendix 2: Consultation Statement** for the full documentation of representations and responses.
- 4.4 There was notable support for the SPD amongst the comments. The main issues raised relate to (see Appendix 2 for further detail):
- **Views (selection):** There was some criticism of the views selected including that the selection would downgrade the value of other views (in a number of cases, other views were proposed to be included); that the views concentrate on longer distance views rather than localised impacts relating to shorter distance views.
 - **Views (other general):** it was suggested that the language used should be stronger and more prescriptive. Furthermore, it was proposed that additional detail be included regarding the desired outcomes in terms of view detractors and guidance on night time views and the illumination of buildings.
 - **Heights:** There were comments that the SPD should include greater detail on new building heights, including specifying limits in the town centre.
 - **Views (view specific comments):** A number of comments were made regarding the detailed wording relating to individual views and associated guidance.
 - **Other design elements:** There were comments that the SPD should provide greater detail on appropriate massing and scale of buildings.
- 4.5 The comments received have been considered in finalising the SPD, as evidenced in the Consultation Statement. This includes relatively minor revisions to the document, where appropriate.

5. Executive Advisory Board comments

- 5.1 A draft of the work forming a basis for the SPD was considered at a meeting of Place Making and Innovation Executive Advisory Board on 8 April 2019 (Minute No. BEI36). Several comments were made on finer detail including the positioning of views from viewpoints and the representation of the station development. These have been considered in compiling the draft SPD. It was agreed that the views from the House of Fraser in the High Street did not satisfy the criteria for selection as a key view.

- 5.2 In summary, the EAB supported the study and drafting of the SPD, which would assist the Council to anticipate (and respond to) the impact of future development in Guildford, particularly that involving tall buildings.

6. Equality and Diversity Implications

- 6.1 Public authorities are required to have due regard to the aims of the Public Sector Equality Duty (Equality Act 2010) when making decisions and setting policies. Whilst the SPD is guidance, an Equalities Impact Assessment (EqIA) Screening was undertaken including consideration of the potential for differential impacts on certain groups with protected characteristics. No significant adverse differential impacts were identified by the screening. The EqIA screening indicates that it is not necessary to carry out a full EqIA.
- 6.2 It is not considered that the SPD or the proposal for its adoption will have any impact upon any of the protected characteristics specified in the Equality Act 2010. Accordingly, in adopting the SPD, it is considered that the Council will be acting in compliance with its duties under section 149 of the Equality Act.

7. Financial Implications

- 7.1 No financial implications apply as a result of the prospective adoption of the SPD.

8. Legal Implications

- 8.1 In order to fulfil the statutory criteria for a Local Development Document, the SPD has to have been prepared in line with the requirements of section 19 Planning and Compulsory Purchase Act 2004 and Parts 4 and 5 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 8.2 Once adopted as a local development document, the GTCV SPD will be a material consideration in the determination of relevant planning applications and, as such, the LPA shall be able to have regard to it in the determination of planning applications.
- 8.3 Pursuant to section 9D of the Local Government Act 2000, the Executive of the Council has the power to adopt the SPD as a Local Development Document.

9. Human Resource Implications

- 9.1 There are no Human Resource implications associated with adopting the SPD. The SPD will assist in the assessment of planning applications, and officers do not consider that additional staff resources will be necessary as a result.

10. Summary of Options

- 10.1 Officers recommend that the SPD is adopted.
- 10.2 The Executive, however, have the option of not adopting the SPD. The result would be significant reliance on the NPPF and Local Plan in terms of

consideration of views in relation to the town centre, without the benefit of more detailed guidance.

- 10.3 Officers consider that not adopting the SPD would detract from the Council's ability to provide guidance regarding important views to assist in the conceptualisation and assessment of new development in Guildford. This risks schemes coming forward with potentially detrimental impacts on important views. These impacts may compound over time and detract from Guildford's appeal and unique character.

11. Conclusion

- 11.1 Officers consider that there are sound reasons for adopting the GTCV SPD. It carries weight in the determination of planning applications. It is detailed and provides the necessary guidance for conceptualising development schemes that are sensitive to important views, along with direction in terms of assessment of applications, which may impact on these views. Through its application, it will contribute to retaining the character of Guildford and what makes it special, including the ability to appreciate key heritage assets and to understand the relationship of Guildford with its landscape setting.

12. Background Papers

Strategic Environmental Assessment and Habitats Regulations Assessment Determination Statement (available at: <https://www.guildford.gov.uk/viewsspd>)

Screening Equality Impact Assessment (available at: <https://www.guildford.gov.uk/viewsspd>)

13. Appendices

- Appendix 1: Guildford Town Centre Views Supplementary Planning Document (Draft)
- Appendix 2: Guildford Town Centre Views Supplementary Planning Document Consultation Statement