

**Guildford Borough Council**

**Guildford Town Centre Views  
Supplementary Planning Document (SPD)  
September 2019**

**Consultation Statement**

**September 2019**

Prepared in accordance with Regulation 12 of the  
Town and Country Planning (Local Development) (England) Regulations 2012

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## Introduction

- 1.1 We have prepared this consultation statement in accordance with Regulation 12(a) of the Town and Country Planning (Local Development) (England) Regulations 2012 (SI No 767, 2012). All references to “regulation(s)” in this document are to these Regulations unless otherwise stated.
- 1.2 Regulation 12(a) requires that before we adopt a Supplementary Planning Document (SPD), including a revision of a SPD we must prepare a statement setting out:
- the persons whom the authority consulted when preparing the SPD;
  - a summary of the main issues raised by those persons; and
  - how those issues have been addressed in the SPD.

## Preparing the SPD

- 2.1 In preparing the Guildford Town Centre Views SPD, we involved, and sought views on early drafts from the organisations and individuals listed in **Table 1**. The main issues they raised are included in the table below. The suggestions were incorporated into the draft SPD for consultation.

**Table 1 : Those consulted in preparing the draft SPD**

Who we consulted	Their response
GBC Head of Major Projects	Provided comments on draft SPD
GBC Planning Policy Manager	Provided comments on draft SPD
GBC Head of Development Management	Provided comments on draft SPD
Placemaking and Innovation Executive Advisory Board	Provided comments on the views study that informed the SPD

- 2.2 In preparing the draft Guildford Town Centre Views SPD, we carried out screening to consider whether a full Strategic Environmental Assessment (SEA), Habitats Directive Assessment (HRA), and / or Equalities Statement would be needed under the relevant legislation. We consulted the three “environmental bodies”, Natural England, Heritage England and the Environment Agency in confirming the SEA and HRA screening opinions.

## Formal consultation on the draft SPD

- 3.1 We held a four-week consultation on the draft SPD between 17 June 2019 (midday) and 15 July (11.59pm). We advised those local residents, businesses, residents and amenity groups, and other members of the public and relevant organisations whose details we hold on our [Get Involved website](#) of the consultation by email or letter, depending on the contact information they have supplied. This included the many organisations that the Regulations classify as “specific consultees”, including Natural England, the Environment Agency and Heritage England with particular regard to the draft Strategic Environmental Assessment and Habitats Regulations Appraisal screening.
- 3.2 We also publicised the consultation on our website and made the consultation documents available in the borough’s four libraries and in the main Council office at Millmead. These arrangements are in accordance with our [Community Involvement in Planning](#), June 2013.
- 3.3 Section 23(1) Planning and Compulsory Purchase Act 2004 provides that:
- The local planning authority may adopt a local development document (other than a development plan document) either as originally prepared or as modified to take account of :
- (a) any representations made in relation to the document (see **Table 2** below);
  - (b) any other matter they think is relevant (see **Table 3** below);
- Regulations 11(2) and 14 of the Town and County Planning (Local Planning) (England) Regulation 2012 state that an adoption statement must be provided to clarify any modifications made.
- 3.4 We considered the 26 formal responses that we received from specific and general consultees and made amendments to the draft SPD update arising from these. A summary of the main issues raised by the 26 responses received is presented in **Table 2** below. In accordance with Regulation 11, we also amended the draft SPD to account for the other matters we thought relevant, as set out in **Table 3** below.

**Table 2: Consultation responses from specific and general consultees with resultant changes made to the draft SPD**

<b>Consultee ref</b>	<b>Main issues</b>	<b>Response</b>	<b>Amendment/ no change</b>
GTCV19/8	Poor photo quality	A low resolution version was uploaded to the website for accessibility purposes. A high-resolution version is available.	No change
GTCV19/2	Impact of Railway redevelopment on views	Guildford Station redevelopment has been approved on appeal. It has been shown in the SPD as approved, to illustrate its impact and the importance in the future that due regard is given to key views identified within the SPD.	No change
GTCV19/7 Transport for London	No comments to make on the draft SPD	Noted	No change
GTCV19/3	Little or no consideration should be given to the presence of trees. They are short lived and liable to be blown down/cut down	Trees are important to the landscape setting and character of an area. They do change over seasons and time. It is important to consider their contribution to the landscape character of an area, and their contribution to the town and surrounding areas for example to both frame and soften development on close and wider views as well as their contribution to nature, wildlife, amenity and environmental health of the town.  Local Plan policies and the NPPF support the importance of trees and landscape, and their consideration in development proposals.	No change
GTCV19/4	Guildford is a lovely town and the town centre and surrounding areas are something to be proud of and must be preserved.	Agree with the broad principles of the comments which the SPD seeks to support.  The purpose of the Views SPD is to identify views/viewing places that help to promote a better	No change

	<p>This SPD highlights the beauty of the town and why it remains such a great tourist attraction and money earner for businesses and GBC.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>• Shalford to Godalming towpath</li> <li>• South to Shalford and tow path, north to Stock Lock</li> </ul> <p>SPD should include impact of Blackwell Farm on views from the Hogs Back (viewpoint 6)</p>	<p>understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>The Views SPD considers the Important Views in their current context.</p>	
GTCV19/5 Highways England	<p>Highways England are concerned with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network, in this case the A3. Have reviewed this consultation and its supporting documentation and have no comments.</p>	Noted	No change
GTCV19/6 Natural England	<p>The SPD is unlikely to have major effects on the natural environment, but may nonetheless have some effects. Therefore do not wish to provide specific comments, but advise that the following issues are considered:</p> <ul style="list-style-type: none"> <li>• Green Infrastructure</li> </ul>	<p>Noted and agreed.</p> <p>As part of the ongoing work of the Local Plan further detailed development management policies and other SPDs will be prepared. This will consider many of these aspects in more detail.</p>	<p>Minor change to text to strengthen reference to trees and the landscape setting of Guildford and surrounding area, reference to seasonal views and the Guildford Landscape Character Assessment</p>

	<ul style="list-style-type: none"> <li>• Biodiversity enhancement</li> <li>• Landscape enhancement</li> <li>• Other design considerations</li> <li>• Strategic Environmental Assessment/Habitats Regulations Assessment</li> </ul>		
GTCV19/9 Environment Agency	No comments to make in respect of the proposed SPD.	Noted	No change
GTCV19/10	<p>A Town Centre Views SPD is certainly needed and this draft is very welcome.</p> <p>SPD should include views that can and should be improved as well as those to be protected.</p> <p>Should include reference to Townscape Character Assessment in section 1.2.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>• Bridge Street along the river and into the town</li> <li>• From the upper part of North Street, looking down and across the street.</li> </ul>	<p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p>	Amendments proposed to include reference to the Landscape Character Assessment and the Townscape Character Assessment
GTCV19/11	<p>This is an excellent document. Format, presentation and the seasonal photos are of note.</p> <p>No mention of overall limits on height which must impact upon views.</p> <p>Should include the following additional</p>	<p>Support welcome</p> <p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to retain the character of Guildford and what makes it</p>	Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor

	<p>views:</p> <ul style="list-style-type: none"> <li>• Views from the train line</li> <li>• Bookers Tower</li> <li>• Old Town Bridge looking south, with The Arnaud, Millmead and the Locks</li> </ul>	<p>special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>Views from the train line are fleeting and limited, and therefore do not qualify as an Important View.</p>	buildings
GTCV19/12	Impact of Railway redevelopment on views	Guildford Station redevelopment has been approved on appeal. It has been shown in the SPD as approved, to illustrate its impact, and the importance in the future that due regard is given to key views identified within the SPD.	No change

GTCV19/13	<p>The SPD should include more information related to mass and scale.</p> <p>The SPD should include how the views will change locally and/or from a shorter distance.</p> <p>Should include the following additional view:</p> <ul style="list-style-type: none"> <li>Views from the train line</li> </ul>	<p>Other planning policies, the NPPF, local plan, SPD'S and heritage legislation will address matters such as mass and scale, impact of development on shorter distance views.</p> <p>Other planning policies, the NPPF, local plan, SPD'S and heritage legislation will address matters such as mass and scale, impact of development on shorter distance views.</p> <p>Views from the train line are fleeting and limited, and therefore do not qualify as an Important View.</p>	<p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings</p>
GTCV19/14 Ockham Parish Council	<p>General support to the contents of the SPD</p>	<p>Support welcome.</p>	<p>No change</p>
GTCV19/15	<p>SPD is very comprehensive.</p> <p>Page 61 View 6 and page 97 View 11– need to add in wording concerning the impact of any proposed development on woodland on Stag Hill surrounding the Cathedral.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>views from the train line</li> </ul> <p>SPD should consider night time views e.g. view 11</p> <p>The SPD should include more information related to mass and scale.</p> <p>The SPD should include how the views will change locally and/or from a shorter distance.</p>	<p>Support welcome</p> <p>In relation to specific points:</p> <p>Viewpoint 6 – the views management guidance does refer to maintaining a wooded setting and a treed skyline backdrop against which the Cathedral is seen in this wider view across the town.</p> <p>Viewpoint 4: Pewley Hill point 1 refers to the prominence of Guildford Cathedral, and that new development within the view should not compete with it, for example by rising above the otherwise undeveloped wooded skyline or appearing overly dominant by virtue of scale, height, massing or detailed design. Point 2 refers to maintaining the significant tree and woodland cover which occupies the slopes of the hills surrounding the town, providing a backdrop and setting of the Cathedral.</p> <p>Views from the train line are fleeting and limited,</p>	<p>Minor change to text to strengthen reference to trees and the landscape setting of Guildford and surrounding area, reference to seasonal views and the Guildford Landscape Character Assessment</p> <p>Amendments proposed to include general reference to the importance of considering the impact of development on night-time views.</p> <p>Amendments proposed to include how heights, bulk and mass will be</p>

		<p>and therefore do not qualify as an Important View.</p> <p>Other planning policies, the NPPF, local plan, SPD'S and heritage legislation will address matters such as mass and scale, impact of development on shorter distance views.</p>	<p>considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings</p>
GTCV19/18	<p>Disagree with description of University in Viewpoint 4. It consists of jumbled hideous buildings partially hidden by vegetation.</p> <p>Whilst there are frequent views and descriptions of The Cathedral there are none referenced from the Hogs Back Downs. This is the only main view of the entire building.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>views from the train line</li> </ul>	<p>The University site does include a variety of buildings, but the overriding view of the buildings as seen on Viewpoint 4: Pewley Hill, looking north west; does show the buildings as described on page 39 with a palette of warm buff coloured brickwork and a discernible material colour on distance views from the town and which the SPD seeks to inform.</p> <p>Viewpoint 6: Hogs Back, looking north west does include views of The Cathedral from the open chalk grassland on the eastern edge of the Hog's Back and where it can be seen on a green hill in both the summer and winter view. The view from the Hogs Back is a wide perspective and a clear location to appreciate the town in its wider landscape setting. Other views from around the town also show the Cathedral within its landscape setting.</p> <p>Views from the train line are fleeting and limited, and therefore do not qualify as an Important View.</p>	<p>Amendments proposed to cover reference to trees, landscape and seasonal changes, and open downland.</p> <p>Also proposing to amend colouring on certain wireline views to accentuate and show green landscape and backdrops.</p> <p>Amendments proposed to include policy context for the historic environment, all heritage assets including Conservation Areas.</p>
GTV19/20 Holy Trinity Amenity Group	<p>Welcome any policies that attempt to preserve or enhance the quality of the town centre, particularly its historic character.</p> <p>Views of the surrounding countryside are also important to emphasise the setting of the town.</p>	<p>The SPD focuses on Guildford Town Centre Views and how development within it might be perceived from certain key viewpoints, but within the context of the landscape setting that Guildford is situated within including the Surrey Hills Area of Outstanding Natural beauty.</p> <p>The SPD will be a material consideration in the</p>	<p>Amendments proposed to include policy context for the historic environment, all heritage assets including Conservation Areas.</p>

	<p>Some views of the town centre are only seen between houses on the elevated roads. Efforts are needed to prevent further loss, particularly from large side extensions, and to create new public viewpoints.</p> <p>Some locally listed buildings should be included in the “heritage assets” e.g. The Harvey Road Adult Education Centre and Stoughton Barracks</p> <p>Limits to heights needed.</p> <p>Viewpoint 4: a much wider view can be obtained between the houses on Poyle Road.</p> <p>Viewpoint 8: any redevelopment of Bright Hill must not impact the view and should provide an attractive walking route to the viewpoint. It is important to prevent scrub growth from screening part of the view.</p> <p>Viewpoint 9: the on-street parking that is allowed spoils the view and should be restricted.</p> <p>Viewpoint 12: vital that traffic is not reintroduced to the bridge</p>	<p>assessment of future planning applications and may be used to support evidence in appeal cases. It will provide guidance to planners, developers, designers and decision makers on how to manage change in key views with the aim to retain the character of Guildford. Other development plan policies will apply and take this into account.</p> <p>Local list buildings - Harvey Road Gallery / Stoughton Barracks – it is considered that that these buildings are not sufficiently worthy of being included in the list of Key landmark legacy buildings which are notable for their prominence in and around the town, and on longer views. The landmark legacy list is not to the exclusion of other buildings that may also have visual prominence or setting which may also be given consideration in development proposals; particularly on closer views.</p> <p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to retain the character of Guildford and what makes it special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>Viewpoint 04: Pewley Hill chosen as a half way</p>	<p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings</p> <p>Viewpoint 9: add on-street car parking as a detractor</p> <p>Viewpoint 12: amendment proposed to strengthen the fact that part of attraction on views from the Mount and towards the town is because Town Bridge is car free. This contributes to the historic linear view of the High Street, and its open character over the river is a valued feature</p>
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		<p>point and main route with the view into this side of town rather than the limited view between houses.</p> <p>Viewpoint 08: Comments noted and SPD addresses this.</p> <p>Viewpoint 12: SPD recognises that predominantly Town Bridge is closed to vehicles and used by pedestrians and cyclists.</p>	
GTCV19/24 The Guildford Society	<p>General agreement with comments that the following be added to the view management guidance across a number of the views:</p> <ul style="list-style-type: none"> <li>• Suggest that new development in town should be lower to create a more natural view bounded by hills (View 1.1)</li> <li>• Need to understand how this relates to Environment Agency plans for Floodwalls (View 1.3, 2.3, 3.3, 12.1)</li> <li>• Reference relevant sections of Townscape Character Assessment (View 1.4, 2.4, 3.5, 4.8, 5.8, 6.9, 7.10, 8.8, 9.9, 10.7, 11.8, 12.10, 13.11, 14.10, 15.8)</li> <li>• needs to be extended to cover buildings that although they don't impact skyline by their height clutter the landscape. Also roofs large flat roofs should be avoided (View 4.5, 5.7, 6.7, 7.8, 8.6, 11.4, 12.6, 13.8)</li> </ul>	<p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to retain the character of Guildford and what makes it special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>The SPD will be a material consideration in the assessment of future planning applications and may be used to support evidence in appeal cases. It will provide guidance to planners, developers, designers and decision makers on how to manage change in key views with the aim to retain the character of Guildford. All other relevant documents will be considered.</p>	<p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings</p> <p>Amendments proposed to include reference to the Landscape Character Assessment and the Townscape Character Assessment</p>

<p>GTCV19/17 Stoke next Guildford Residents Association</p>	<p>Should include the following additional view:</p> <ul style="list-style-type: none"> <li>• Historic northern Green Gateway</li> </ul> <p>St. Johns Church should be added as Legacy Landmark Buildings</p>	<p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional view is not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>Section 2.2 sets out key landmark legacy buildings and which are focal points in the key views. It is not to the exclusion of other buildings that may also have visual prominence or setting which may also be given consideration in development proposals; particularly on closer views.</p>	<p>Amendments proposed to include policy context for the historic environment, all heritage assets including Conservation Areas.</p>
<p>GTCV19/19</p>	<p>Pleased to see that important considerations on views are being made.</p> <p>Impact of Railway redevelopment on views</p>	<p>Support welcome.</p> <p>Guildford Station redevelopment has been approved on appeal. It has been shown in the SPD as approved, to illustrate its impact, and the importance in the future that due regard is given to key views identified within the SPD.</p>	<p>No change</p>
<p>GTCV19/16</p>	<p>Not clear on the purpose of identifying detractor buildings.</p>	<p>The SPD will be a material consideration in the assessment of future planning applications and may</p>	<p>Amendments proposed to include how heights,</p>

	<p>The document should provide clear policy guidelines as to heights (including that of trees), materials, density and use etc. applied to clearly defined geographic areas.</p> <p>Identifying 'important views' may lead to other views being given less importance.</p>	<p>be used to support evidence in appeal cases. It will provide guidance to planners, developers, designers and decision makers on how to manage change in key views with the aim to retain the character of Guildford. All other relevant documents will be considered including the NPPF and Heritage legislation to protect designated and non designated heritage assets and their setting.</p> <p>The purpose of the guidance is set out in section 1 of the SPD. It includes that the focus of the SPD is Guildford Town Centre. It sets out viewpoints that help to reveal Guildford's development and its relationship with the countryside beyond. Some views have been identified from locations outside the town centre, but generally are focussed towards the town centre.</p> <p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to retain the character of Guildford and what makes it special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>The views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p>	<p>bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings.</p> <p>Amendments proposed to include policy context for the historic environment, all heritage assets including Conservation Areas.</p> <p>Amendments proposed to refer to other views being valued and being a material consideration in planning applications.</p>
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<p>GTCV19/27 Downsedge Residents' Association</p>	<p>Highly supportive of the decision to write an SPD on Town Centre Views, and hope it will be used to protect the town from further unsightly development such as the Solum Development.</p>	<p>Support welcome.</p>	<p>No change</p>
<p>GTCV19/25 The Guildford Society</p>	<p>The Guildford Society welcomes the Town Centre Views studies and believes it is a valuable adjunct to existing policy.</p> <p>Section 3.1. should be strengthened regarding the consideration of other views.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>• Millbrook Looking north</li> <li>• Hogs Back looking east</li> <li>• Woodbridge Road looking south</li> <li>• North Street looking west</li> <li>• Farnham Road looking east</li> </ul> <p>The SPD should refer to the Townscape Character Assessment and Policy D1 of the Local Plan.</p> <p>The document should provide indicative height limits</p> <p>Council should make use of computer modelling / technology.</p>	<p>Support welcome.</p> <p>The views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to</p>	<p>Amendments proposed to refer to other views being valued and being a material consideration in planning applications.</p> <p>Amendments proposed to include Local Plan policy context.</p> <p>Amendments proposed to include reference to the Landscape Character Assessment and the Townscape Character Assessment</p> <p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings.</p>

		<p>retain the character of Guildford and what makes it special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>Modelling/ technology for views: Applicants will be expected to include accurate illustrative material, including verified views, with any application for development to ensure that the impact on the surrounding area can be fully assessed. This can include modelling technology and relevant to site and cases. The SPD does not exclude other sites being considered.</p>	
GTCV19/26 Historic England	<p>Welcomes the document as additional level of guidance and support and valuable tool in protecting town's historic legacy, and recognising inevitable pressure for change.</p>	Support welcome	No change
GTCV19/28 Guildford Residents Association	<p>Warmly welcomes the initiative, and congratulates on bringing forward as a priority.</p> <p>Selecting 'important views' will downgrade other views. The SPD should be much stronger in setting out that view assessment matters for all development in Guildford.</p> <p>Should include the following additional</p>	<p>Support welcome</p> <p>The views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic</p>	<p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings.</p> <p>Amendments proposed</p>

	<p>views:</p> <ul style="list-style-type: none"> <li>• North Street and railway track</li> <li>• Gosden Hill</li> <li>• Hog's back towards the town</li> <li>• view of river by Slyfield from Merrow Down</li> <li>• Tangier Road</li> <li>• River Wey</li> <li>• Gateway views that will be affected should be included</li> </ul> <p>High Street view should include detractor view of tower blocks.</p> <p>SPD should be more explicit about building heights, mass and bulk.</p> <p>Should include an annex mapping all trees identified in significant views.</p> <p>Detractors - should be more specific that these can both obscure and degrade.</p> <p>SPD should provide guidance on illuminated/night time views.</p> <p>Viewpoint 1: Need to ensure that any new development is not visible above the treed skyline. New development should also be less bulky than existing buildings (point 2).</p> <p>Viewpoint 3: Need to avoid tall bulky buildings around the periphery of Stoke Park that diminish the perception of the extent of the open space Stoke Park</p>	<p>assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>The High Street view that has been identified in the SPD is positioned so as to avoid inclusion of the 20<sup>th</sup> century high rise flats.</p> <p>Heights - The purpose of the guidance is set out in 1.1 of the SPD. The document is not to set parameters for heights but provides guidance on how to manage change in key views and within the list of important viewpoints identified with the aim to retain the character of Guildford and what makes it special, and to fairly assess the impact of development proposals on these important views. Section 4 expands further. It would not be appropriate to set a maximum height limit within a view cone as the changing topography requires a more nuanced approach. Each proposal will need to be assessed on its own merits in accordance within the context set by the relevant view management guidance.</p> <p>Both in Guildford and within the landscape views identified there are a significant number of trees and</p>	<p>to include general reference to the importance of considering the impact of development on night-time views.</p> <p>Minor change to text to strengthen trees, and landscape settings of Guildford and surrounding area, reference to seasonal views, including addition of Guildford Landscape Character Assessment</p> <p>Amendments proposed to include the consideration of the varied topography, open downland, treed landscape and visual links between town and country in Section 1. Amendments proposed in Section 4 to include that consideration will need to be given to how new development might better reveal heritage buildings and to reduce mass and bulk on skylines - including how this might be achieved - through changed</p>
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	<p>offers.</p> <p>Viewpoint 5: Add that building form and roofscape should reflect/not mask the rise and fall of the land (point 3).</p> <p>Viewpoint 7: Add that building form and roofscape should reflect/not mask the rise and fall of the land (point 4).</p>	<p>it would be an almost impossible task to map all trees. The purpose of the SPD includes showing the features of importance within the view cones which includes trees, green space and landscape setting. Important trees may be covered by TPO and trees within certain criteria within Conservation areas are protected. Planning policies apply to protect trees and landscape settings in consideration of new development including the planting of new trees as appropriate.</p> <p>Viewpoint 3 – the view description includes and addresses the importance of the open expanse of grassland, the clear views, the landscape setting and wooded backdrop here, and the uninterrupted views across the Stoke Park which need to be fully considered. The setting of Guildford Cathedral will also be considered under separate policy.</p> <p>Viewpoints 5 and 7 - amendment proposed regarding topography and roofscapes, however development within these views are also likely to be within the setting of a number of heritage assets where other policies will apply and protect.</p>	<p>massing, varied roofscapes, detailing and materials.</p>
<p>GTCV19/29</p>	<p>This is a welcome, well-written and well researched Supplementary Planning Document. Large and small views are important.</p> <p>SPD should include limits to heights and bulk of buildings. SPD should require that buildings which replace bulky ones need to rectify height and bulk issues.</p>	<p>Support welcome.</p> <p>Section 2.2 sets out key landmark legacy buildings and which are focal points in the key views. It is not to the exclusion of other buildings that may also have visual prominence or setting which may also be given consideration in development proposals; particularly on closer views.</p> <p>The purpose of the Views SPD is to identify views/viewing places that help to promote a better</p>	<p>Amendments proposed to include how heights, bulk and mass will be considered. Also to consider opportunities for the enhancement and improvement to the impacts of detractor buildings.</p> <p>Amendments proposed</p>

	<p>Identification of Landmark Legacy buildings should not diminish other heritage buildings.</p> <p>Should include the following additional views:</p> <ul style="list-style-type: none"> <li>• St Saviour’s Church seen from an alleyway leading off the High St.</li> <li>• Cooper Rd in Charlotteville to Pewley Bank</li> <li>• View of the AONB from Charlotteville conservation area</li> <li>• View of the river area from Old Milmead</li> <li>• Harvey Road gallery view from Sydenham Road</li> <li>• View from the passageway between Semiphore Road and Harvey Road leading to Bright Hill to the High Street.</li> <li>• View from London Road of the Cathedral across Stoke Park</li> <li>• Views from Pewley Down and Chantry Wood (AONB)</li> <li>• The approach view to Guildford by train</li> </ul> <p>Selecting ‘important views’ will downgrade other views.</p> <p>River corridor views should be protected for their natural beauty and avoid unsuitable lighting and materials.</p> <p>Viewpoints 3 and 4: Stag Hill should remain ‘green’.</p>	<p>understanding of Guildford, how it developed and its relationship with the countryside beyond, and to identify particularly important views of our historic assets that help us to understand the development of the town.</p> <p>A long list of 47 views were considered against the criteria listed in Section 3 in arriving at the final 15 Important Views. This is summarised in the Baseline Report &amp; Approach to View Selection.</p> <p>The suggested additional views are not considered to meet the relevant criteria. However, the views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>Views from the train line are fleeting and limited, and therefore do not qualify as an Important View.</p> <p>The views are not exhaustive and other views can be a material planning consideration as part of the planning application process.</p> <p>Section 4 – proposed amendment to include consideration of impact of new development on night time views and internal and external lighting.</p> <p>In viewpoint 3 the SPD does refer to the open expanse of the amenity grassland within the park foreground, clear views to Stag Hill and the Cathedral and its landscape setting and wooded backdrop.</p> <p>In Viewpoint 4 the SPD does refer to the valued features provided by the wooded context of the Cathedral and Stag Hill, also the skyline provided</p>	<p>to include policy context for the historic environment, all heritage assets including Conservation Areas.</p>
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		by mature trees, also acting as an attractive backdrop to the town and setting of the Cathedral and University campus.	
GTCV19/21 Guildford Vision Group	<p>This guidance should be included in a DPD rather than an SPD in order to carry more weight</p> <p>Should have 3D modelling undertaken on the town centre.</p>	<p>A number of sites within the town are currently being considered for redevelopment. Policies in the Local Plan Strategy and Sites apply whilst more detailed Development Management policies are still being developed. The SPD is a timely tool given the current circumstances and will be a material consideration in the determination of any applications where one or more of the views within it will be affected. It will provide guidance to planners, developers, designers and decisions makers on how to manage change.</p> <p>Modelling: applicants will be expected to include accurate illustrative material, including verified views, with any application for development to ensure that the impact on the surrounding area can be fully assessed. This can include modelling technology and relevant to site and cases. The SPD does not exclude other sites being considered.</p>	No change
GTCV19/23 Stoke next to Guildford	<p>Trees are important for climate change and air quality.</p> <p>Tree cover should not only be retained in selected views areas it must be increased. Should identify other Important trees within views as well as those presently TPO. Those meeting the criteria qualifying for TPOs can be put forward to have TPOs. Should add a list to the SPD.</p>	<p>Both in Guildford and within the landscape views identified there are a significant number of trees and it would be an almost impossible task to map all trees. The purpose of the SPD includes showing the features of importance within the view cones which includes trees, green space and landscape setting. Important trees may be covered by TPO and trees within certain criteria within Conservation areas are protected. Planning policies apply to protect trees and landscape settings in consideration of new development including the planting of new trees as appropriate.</p>	No change

<p>GTCV19/22 Stoke next to Guildford</p>	<p>SPD should require more trees to be planted throughout the town centre (e.g. North Street, Tunsgate)</p>	<p>The purpose of the SPD includes showing the features of importance within the view cones which includes trees, green space and landscape setting. Important trees may be covered by TPO and trees within certain criteria within Conservation areas are protected. Planning policies apply to protect trees and landscape settings in consideration of new development including the planting of new trees as appropriate.</p>	<p>No change</p>
<p>GTCV19/30 Surrey County Council</p>	<p>Thorough and worthwhile piece of work which should be broadly welcomed.</p> <p>Question the inclusion of the following views:</p> <ul style="list-style-type: none"> <li>• Viewpoint 4: Pewly Hill - already blighted</li> <li>• Viewpoint 7: Farnham Road - not particularly picturesque</li> </ul> <p>Both require a more prominent management strategy for proactive regeneration than has been presented if they are to be retained.</p> <p>Unclear how conflicts within this guidance and national/local policy will be resolved.</p>	<p>Support welcome</p> <p>The SPD views show Guildford and the environs of the town at a point in time, landmark legacy buildings, positives as well as detractors to inform what is there now and to provide guidance for future impact of development on the sites. It is a material consideration on any development proposals likely to affect one or more views. Other policies and SPDs will apply as appropriate.</p> <p>More detailed Development Management policies are currently being developed, and other SPDs may be prepared in the future.</p>	<p>No change</p>

**Table 3: Any other relevant matter**

<p>1. Section 1.1 Purpose of the guidance, (at paragraph 2) has been updated to include reference to the consideration of the varied topography and open downland, the importance of trees and landscape to the setting of the town, along with recognising the impact of seasonality. Further text has been added to elaborate on the context which creates strong visual links between town and countryside.</p>
<p>2. Section 1.1 Purpose of the guidance, (at paragraph 4) has been updated to reference managing change within each view, including reference to seasonal changes and its impact on views.</p>
<p>3. Section 1.2 Policy Context has been updated to reference:</p> <ul style="list-style-type: none"><li>• the Planning (Listed Buildings and Conservation Areas) Act 1990. This has occurred in order to more fully contextualise the SPD, demonstrating how it responds to and supports this Act.</li><li>• Guildford Landscape Character Assessment and Townscape Character Assessment. This has occurred as further context to the SPD.</li><li>• Local Plan Policies D1: Place Shaping and D3: Historic Environment. This has occurred to provide further local policy context to the SPD.</li></ul>
<p>4. Section 3 Selection of Important Views. The text has been updated in the final paragraph to clarify that the selection of views in the SPD does not mean that other views cannot be valued or be a material consideration in terms of specific development applications.</p>
<p>5. Section 4 Requirements for planning applications impacting important views. This section has been updated with to further clarify:</p> <ul style="list-style-type: none"><li>• the purpose of the SPD guidance in relation to height, mass and bulk of development. It seeks to place the SPD in the context of a suite of policies and other material considerations which will inform the assessment of the design of buildings in the town centre.</li><li>• the context for the inclusion of legacy landmark buildings, including that the list is not exhaustive.</li><li>• consideration of how new development might better reveal heritage buildings and to reduce mass and bulk on skylines - including how this might be achieved - through changed massing, varied roofscapes, detailing and materials.</li><li>• consideration of the potential for new development (which amends or replaces negative detractor buildings) to improve or enhance views, including reference to how this might be achieved.</li><li>• Consideration of the impact of any development on night time views.</li></ul>
<p>6. Section 5 Views analysis, Viewpoint 9: High Street, looking west. Reference has been included in the view description to reference the parked cars and vehicles along the High Street as a detractor.</p>

7. Section 5 Views analysis, Viewpoint 14: The Mount, looking east. Reference has been included in the view description to reference the contribution of the car free environment to the approach and view to the river crossing point and High Street.

8. The clarity of several graphics has been improved through, for instance:

- varying the colour shading in some cases to better reflect what is being illustrated;
- ensuring the consistency in “green elements” between the key and what is illustrated as well as including green shading where it was missing on certain wireline views.

9. Several minor editorial corrections have been made.