



05 January 2022

National Trust

Planning Department
Millmead House
Millmead
Guildford
Surrey
GU2 4BB

Dear Sir/ Madam,

Planning application 21/P/02232 – Debenhams, Millbrook, Guildford, GU1 3UU – Demolition of existing building and erection of two buildings comprising residential accommodation (Use Class C3), retail floorspace (Use Class E) and cinema (Sui Generis), erection of a retail pavilion (Use Class E), together with car and cycle parking, plant and all highways, landscaping and other associated works.

Having reviewed the above planning application the National Trust wishes to object to the granting of planning permission for the reasons set out below.

The River Wey & Godalming Navigations are owned and managed by the National Trust. The Navigations form a visually important open corridor which passes through a rich variety of landscapes ranging from tranquil flood plain meadows to busy urban centres where there are constant pressures for development and physical change. The Navigations are also an important leisure asset providing opportunities for walking, cycling, rowing, canoeing and boating and range of indirect benefits including improved health and wellbeing.

In responding to development proposals the Trust will consider each proposal on its merits but will:

- seek to both protect and enhance the special historic and landscape character of the Navigations and their setting
- seek to enhance the quality and character of views from the Navigations
- seek to ensure that development proposals respect and respond positively to the individually distinctive characteristics of different parts of the Navigations
- where appropriate seek to emulate historic development patterns within proposals for new development

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- place a priority on the need for conservation whilst respecting the needs of those using or wishing to use the Navigations for leisure purposes
- have regard to the policies forming part of the National Trust 'Planning Guidance for development next to the River Wey & Godalming Navigations' (adopted by Guildford Borough Council) and to the planning policies of the local authority

In relation to the River Wey and Godalming Navigations between Unstead Road Bridge and Town Bridge, Guildford, the abovementioned Planning Guidance advises that the National Trust will, amongst other things:

- resist proposals for any increase in building height on existing developed sites adjacent to the Navigations or within the visual setting of the Navigations

The Wey Navigation in Guildford is a designated heritage asset along its route and runs through several conservation areas, including the Wey and Godalming Navigations Conservation Area and the Bridge Street Conservation Area in Guildford town centre. Therefore, in its consideration of the proposed development subject of this consultation, the Borough Council will need to have regard to the relevant saved policies in the Guildford Borough Local Plan 2003 which deal with conservation areas. Policy HE7 requires that new development should preserve or enhance the character or appearance of the conservation area and Policy HE10 advises that the Borough Council will not grant permission for development which would harm the setting of a conservation area or views into or out of that area.

The Borough Council will also need to establish whether the proposed development complies with the criteria set out in Policy G11 of the Local Plan which deals with the corridor of the River Wey and the Guildford and Godalming Navigations. In particular Policy G11 requires that development within the corridor should protect or enhance the special character of the River Wey and the Navigations including their visual setting, landscape and townscape. In addition Policy G11 requires that development should protect or improve views both within and from the River Wey corridor which contribute to its special character. Furthermore in the explanatory text to Policy G11 the Borough Council advises that it supports the objectives of the National Trust's Environmental Strategy which seeks, amongst other things, to protect and enhance views in the River Wey corridor.

In Guildford town centre the history of the River Wey is intertwined with the inter-relationship with buildings and their uses, which has resulted in the morphology of Guildford's buildings, street patterns and green spaces. The backdrop to views from the River Wey and towpaths is a complex tapestry of buildings reflecting the history of the town and, in part, its relationship with it. Given its height and massing the proposed buildings would be out of scale with, and unsympathetic to, the historical character of the area and would be a dominant and overwhelming feature in views from the River Wey as it runs through Guildford town centre. As such the National Trust is most concerned that the proposed development would harm the setting of the Wey and Godalming Navigations and Bridge Street Conservation Areas and would neither preserve nor enhance the character and appearance of these conservation areas as the relevant saved Local Plan policies (HE7 and HE10) require. In addition the

proposed development would obtrude into and seriously harm views within the River Wey corridor contrary to the provisions of Policy G11 and the Trust's Environmental Strategy.

The National Trust, therefore, encourages Guildford Borough Council to consider the impact the proposed scale and appearance of these buildings would have on the setting of the River Wey Navigations as it sits within two designated conservation areas and to seek amendments to the scheme to reduce the height and mass of the proposed buildings such that they would be in keeping with the character and appearance of the Wey and Godalming Navigations and Bridge Street Conservation Areas. In the absence of a reduction in the height and mass of the buildings the Trust considers that the application should be refused as being contrary to saved Local Plan Policies HE7, HE10 and G11 and the National Trust Environment Strategy and Planning Guidance on the River Wey Navigations.

The Trust would welcome the opportunity to comment further should any amendments to the scheme be put forward.

Yours faithfully,



Tristan Brown
General Manager, Wey and Godalming Navigations