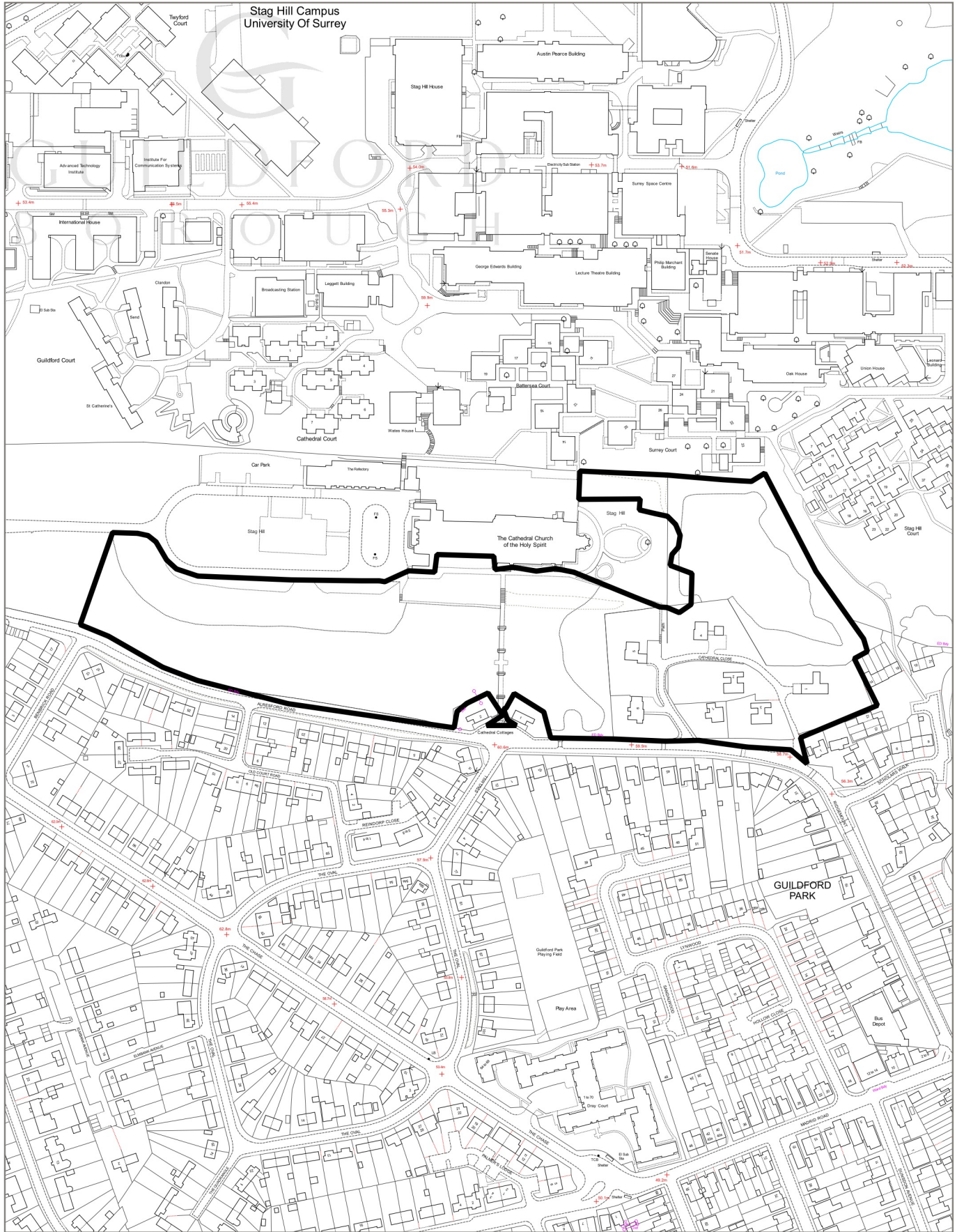


21/P/02333 - Land South And East Of The Cathedral Church Of The Holy Spirit, Stag Hill, The Chase, Guildford



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Print Date: 21/03/2023



Not to Scale



GUILDFORD
BOROUGH

21/P/02333 Land South and East of The Cathedral Church of the Holy Spirit, Stag Hill, The Chase, Guildford



Not to scale

App No: 21/P/02333 **Type:** F **13 Wk Deadline:** 20/03/2023
Appn Type: Full Application
Case Officer: Kelly Jethwa
Parish: Onslow **Ward:** Onslow
Agent : Mr James Lacey **Applicant:** The Cathedral Church of the Holy Spirit, Guildford and Vivid Housing Ltd c/o Agent
Vail Williams LLP
One Crown Square
Woking
Surrey
GU21 6HR

Location: Land at, The Cathedral Church Of The Holy Spirit, Stag Hill, The Chase, Guildford GU2 7UP

Proposal: Demolition of existing Cathedral Close dwellings and erection of 124 no. residential units (including affordable housing) with associated engineering works, access, landscaping, parking and ancillary works.

Executive Summary

Reason for referral

This application has been referred to the Planning Committee by the Joint Interim Executive Head of Planning Development because the development would affect a sensitive, prominent site in Guildford and is for a site allocation in the Guildford Local Plan: Strategy and Sites 2019-2034.

1. Key information.

- 1.1 The application site forms part of the site allocation A15 (Land at Guildford Cathedral, Alresford Road, Guildford) and is approximately 5.5 hectares in size and part of the site forms the seven houses in Cathedral Close and the remainder is undeveloped, public amenity space and areas with trees and hedgerows.
- 1.2 Vehicular access to the Cathedral is from Stag Hill to the west along a processional route designed by Cathedral architect Sir Edward Maufe. To the north of the site is the University of Surrey campus with teaching, administrative and accommodation. To the south there is pedestrian access from Alresford Road and Ridgemount with the formal southern pilgrimage route. This boundary has a mature hedgerow and trees that are protected with tree preservation orders. Vehicular access to Cathedral Close is accessed from Ridgemount.
- 1.3 The application site is along the slopes of the Grade II* listed Cathedral of the Holy Spirit, more commonly known as Guildford Cathedral. In parts there is a step gradient. The hill top location means that the Cathedral is visually prominent from wider views and is also where vistas across the town and countryside can be seen from.

14 The proposed site is allocated for approximately 100 new homes (C3), under site allocation policy A15 of the Guildford Borough Local Plan: strategy and sites (LPSS) 2019. The proposal would deliver a mixture of flats and houses with 57 affordable homes, accessible homes and accommodation for Cathedral staff.

2. Executive Summary.

21 The site allocation A15 at Guildford Cathedral has gone through the local plan process and the site has been accepted as suitable in principle for housing as part of the Local Plan: strategy and sites (LPSS) 2019. The Council currently has a five-year housing land supply of 6.46 years. This site is not identified for delivery in the next five years; however, the early delivery of dwellings on this site would make an important contribution to our ability to maintain a five-year land supply going forward. , If the site is completed this would also contribute to ensuring that the Housing Delivery Test remains greater than 75% of housing required. Achieving both of these things would ensure that the ‘tilted balance’/presumption in favour of sustainable development would not apply.

22 The proposed development would require new vehicular accesses along Alresford Road and Ridgemount to access most of the new homes. There would also be routes through the site suitable for use by cyclists including a new access to the east to facilitate a shorter route to Yorke’s Bridge. The roads on the development would have some on-street car parking and the gradient has been reduced. The site connectivity would integrate with the sustainable transport strategy and include highway improvement works. To facilitate alternative travel options there would be ample and accessible cycle parking and an on-site car club for two vehicles.

23 The proposal would involve the reprofiling of land along the southern slopes and would require a high degree of engineering, including drainage measures and retaining walls. This would lead to a shallower gradient for the road, an undercroft parking podium (to reduce the visibility of cars) and terraced gardens with retaining wall features. There would also be an opportunity to introduce surface water management measures to manage the existing water that pools at the bottom of the slope and additional discharge.

24 Most of the trees and hedges on the site boundaries would be retained and there would be enhancement to the hedgerow as a biodiversity net gain, for the creation of green corridors for wildlife through the landscape and biodiversity strategy.

25 The proposal would achieve a carbon emission reduction through fabric design, this would then be complemented by in-situ renewable energy sources to exceed 20% carbon emissions reduction, with no gas-fired boilers. In addition to this there would be a Site Waste Management Plan, electric charging points for vehicles and cycles, an onsite car club and water management. This would support sustainable design, construction and lifestyles.

- 26 There would be an increase in the local population using local services, community facilities and the local environment. There would also be financial contributions to increase capacity at schools for early years, primary and secondary education, additional floorspace at NHS primary care facilities, open space and policing in the locality. The package of S106 and S278 highway improvement works would amount to approximately £1.25 million. In addition to this, there would be tree planting undertaken along the western route to restore the landscaping envisaged by Maufe.
- 27 Due to the sensitivity of the location and setting of a nationally important heritage asset, the site allocation was for approximately 100 homes. The site allocation means that a degree of harm to the character of the area and the heritage assets were accepted, when the site allocation was adopted. However, any development on this site has to be of exceptional quality and the proposals would have to outweigh the harm to the significance of the heritage assets.
- 28 The development proposals would lead to less than substantial harm to the significance of a designated heritage asset and this has to be balanced against the public benefits arising from the proposals, in accordance with paragraph 202 of the NPPF. This exercise has been carried out in the report. Other planning harm has also been identified from the proposals due to the design approach, layout and appearance and how this would affect character of vicinity of the surrounding area and the placemaking qualities for those living and visiting the site.
- 29 A detailed planning balance has been undertaken and in summary, the harm to the significant of a designated heritage asset resulting from the proposals would not be outweighed by the public benefits identified as part of the proposals.

3. Formal recommendation.

That this application be **REFUSED**, subject to the following reasons for refusal:

31 Reasons for refusal:

1.	<p>The proposed development would harm the setting of heritage assets due to the resulting harm to the significance of the:</p> <ul style="list-style-type: none">a) close setting - from the intrusion and loss of separation by the built development into the eastern meadow, the visual prominence of the apartment blocks and roofscapes, the intensification of development on undeveloped parkland and encroachment of dwellings into the western processional route; andb) wider setting - encroachment of the built form into the 'green collar', that forms the foreground to the landmark silhouette in the townscape <p>The proposal would result in:</p> <ul style="list-style-type: none">i) less than substantial harm (middle of the spectrum) to the Cathedral Church of the Holy Spirit to appreciate the open spaces, monumental scale, topography, visibility, contrast with loss of the green foreground and loss of sky gap;ii) less than substantial harm (at the lowest end of that spectrum) to the two lodges to the south to appreciate the symmetrical arrangement in views from the south;iii) less than substantial harm (at the lowest end of that spectrum) to the Guildford Castle from the visual distraction and loss of the expansive town vista when looking towards Guildford Castle from the eastern meadows. <p>Special regard is given to the need to preserve heritage assets as required by Section 66 of the Planning (Listed Building and Conservation Area) Act 1990. Whilst public benefit would result from the development, including the provision of new housing and affordable housing, the endowment to the Cathedral resulting from the sale proceeds of the site and wider tree planting, this does not outweigh the harm to the significance of the heritage assets. The proposal would therefore be contrary to Policies D3 and A15(3) of the Local Plan: Strategy and Sites (2019), Policy D16 of the Guildford Borough Local Plan: Development Management Policies (2022) as well as Chapter 16 of the NPPF (2021).</p>
2.	<p>The proposed development due to the design approach, layout and appearance fails to take the opportunities available to respect the context and identity of the surrounding areas and the very special quality of the parkland around the Cathedral and the way it functions, shaped by the quality of the landscape and views in and out of the site. The proposals do not achieve the exceptional and innovative design quality required to respond to the sensitive setting of the Grade II* Cathedral nor reinforces locally distinctive patterns of development, which would raise the standard of design more generally in the area. The scale and site layout has been predominantly dictated by the quantum of development, resulting in the introduction of a visually prominent development from the surrounding roads, townscape and Cathedral parkland with little relatable expression of locally reflective character or a positive identity through the</p>

	<p>interpretation of local vernacular patterns of development, or sympathetic contemporary design. By virtue of this and the:</p> <ul style="list-style-type: none"> c) isolated location, style and appearance of the clergy housing, given their functional relationship; d) contrasting typologies of housing at the top of the Eastern Slopes, would not integrate well, thereby affected the hierarchy of streets; e) lack of a sense of arrival from the top of the central steps between the apartment blocks into the grounds around the Cathedral; f) the form, profile and rigid large block based apartment buildings; g) projecting balconies facing Ridgemount; h) single level gardens on the Western Parcel creates the need for larger retaining wall features; i) form, profile, setting, sectional relationship would not relate to Alresford Road; j) wayfinding and understanding of the parkland setting would be limited from Alresford Road; k) visibility of the westernmost houses on the Western Parcel from the western processional route; l) conflict between private and public thresholds where gardens and terraces have an aspect onto public open space; m) broad palette of four bricks; and n) Opportunities for informal car parking on the wide roads and verges; <p>This development would not establish an attractive, locally resonant sense of place within its own right or as a community on the slopes of the Cathedral.</p> <p>The submitted Design and Access Statement and Addendum does not provide a sufficient explanation of principles that could inform the design and layout including the work undertaken in the Landscape and Visual Appraisal (LVA) (December 2022). This absence of an appreciation of the analysis or interpretation of local architectural style, character, landscape, views or context setting fails to produce a design response adequate for this nationally important setting and parkland, that would provide a strong and positive response given what is so special and unique about this site and its hilltop location. The applicant has failed to take the opportunities identified during the Design Review process to improve the design quality of this proposal. This would be contrary to policies D1 and A15 of the Guildford Borough Local Plan: strategy and sites (2019), Policy D4 of the Guildford Borough Local Plan (2022), Landscape Character Assessment (2007) the NPPF (2021) and the National Design Guide (2019).</p>
3.	<p>The built form on the southern side of the Eastern Meadows would have a residual, adverse effects on the outward, south eastern view from viewpoint 15 in the Guildford Town Centre Views SPD and a Major adverse effect for visual receptor V11 (Stag Hill), as identified in the Landscape and Visual Appraisal (LVA) (December 2022). Furthermore, the proposed housing would compromise this unique and secluded area of open space as their courtyard gardens would open out onto the meadow. The proposals would have a harmful impact on the ability to enjoy and appreciate the</p>

	<p>landscape character and visual amenity from this elevated location which provides a vantage point over the town centre and would be compromised by the domestication and privatisation, further reducing its accessible as an area of public open space. This would fail to comply with the objectives of policies S3 and D1(4) of the Guildford Borough Local Plan: strategy and sites (2019), policy D4(3) of the Guildford Borough Local Plan: Development Management Policies (2022), Guildford Town Centre Views SPD (2019), Landscape Character Assessment (2007) the NPPF (2021) and the National Design Guide (2019).</p>
5.	<p>The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). In the absence of a completed planning obligation, the Local Planning Authority is not satisfied that there will be no likely significant effect on the Special Protection Area and 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). As such, the development would be contrary to the objectives of saved Policy NE4 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07), Policy P5 of the Guildford Borough Local Plan: Strategy and Sites, 2019 and with saved Policy NRM6 of the South-East Plan 2009. For the same reasons, the development would fail to meet the requirements of Regulation 63 of The Conservation of Habitats and Species Regulations 2017 as amended, and as the development does not meet the requirements of Regulation 64 the Local Planning Authority must refuse to grant planning permission.</p>
6.	<p>In the absence of a completed planning obligation the development fails to mitigate its impact on infrastructure provision. This includes the following:</p> <ul style="list-style-type: none"> • provision of 31 affordable homes in accordance with Council's approved tenure split; • provision of 13 homes for occupation as staff accommodation by the Cathedral; • A contribution towards SANG mitigation in accordance with the Thames Basin Heaths SPA Avoidance Strategy 2017; • A contribution towards SAMM in accordance with the Thames Basin Heaths SPA Avoidance Strategy 2017; • A contribution of £70,000 towards an improved pedestrian crossing at The Chase/St Johns; • A contribution of £40,000 towards mitigating traffic on local residential roads; • A contribution of £35,000 towards the improvement of two bus stops within the vicinity of the site; • A contribution of £7,000 towards speed survey studies within the vicinity of the site; • £14,000 towards the upgrading, improvement and/or potential re-routing of Footpath 6 from Scholars Walk to the University site; • £6,150 for the monitoring of the Travel Plan; • Implementation of two Electric Vehicle Car Club spaces;

	<ul style="list-style-type: none"> • to offer to each household of each residential unit free membership of the Car Club for two years; • A contribution of £130,632 to support sustainable travel choices, to the Yorkie's Bridge section of the Sustainable Movement Corridor (SMC); • A contribution to early years, primary and secondary education; • A contribution for additional floor space at primary care facilities; • A contribution to policing infrastructure; • Provision and maintenance of public open spaces for the lifetime of the development; • A contribution to off-site playing fields/sport provision; • A contribution to off-site play space provision; and • Implementation of new tree planting along the western approach to the Cathedral. <p>Accordingly, the proposal is contrary to Policies P5, H2, ID1 and ID3 of the Guildford Borough Local Plan: Strategy and Sites (2019), saved Policy NE4 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction on 24/09/07), saved Policy NRM6 of the South-East Plan (2009), Policy ID6 of the Guildford Borough Local Plan: Development Management Policies (2022); the Council's Planning Contributions SPD (2017) and the NPPF (2021).</p>
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32 Informatives

1.	<p>This statement is provided in accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Guildford Borough Council seek to take a positive and proactive approach to development proposals. We work with applicants in a positive and proactive manner by:</p> <ul style="list-style-type: none"> • Offering a pre application advice service • Where pre-application advice has been sought and that advice has been followed we will advise applicants/agents of any further issues arising during the course of the application • Where possible officers will seek minor amendments to overcome issues identified at an early stage in the application process <p>However, Guildford Borough Council will generally not engage in unnecessary negotiation for fundamentally unacceptable proposals or where significant changes to an application is required.</p> <p>In this case pre-application advice was sought and provided which addressed initial issues, the application has been submitted taking into account some although not all of the advice that was given. Further issues were identified during the consultation stage and determination process of the application. Officers have worked with the applicant to overcome as many of these matters as possible. However, there continue to remain significant concerns that after careful consideration and assessments by specialist consultants have not been overcome.</p>
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Officer's report

4. Site description.

- 4.1 The application site is within the urban area of Guildford, located to the north west of the town centre on land surrounding the Cathedral of the Holy Spirit, more commonly known as Guildford Cathedral. The site forms part of the slopes of Stag Hill and includes seven existing Cathedral staff dwellings at Cathedral Close. It is within the setting of the Grade II* Listed Cathedral, designed by Sir Edward Maufe R.A. F.R.I.B.A (1883 – 1974) an English designer and architect, the winner of the Guildford Cathedral Competition and due to its topography is a prominent site from many important viewpoints across Guildford.
- 4.2 The site is allocated under Policy A15 of the Guildford Borough Local Plan: Strategy and Sites (2015 – 2034) for approximately 100 homes (C3). This policy sets out the requirements for development.
- 4.3 Most of the site is undeveloped and open in character. The site area, excluding Cathedral Close, is designated open space.
- 4.4 There are several existing trees and hedgerows within the site boundary. There are five Oak trees served with tree preservation orders (TPO no.8 of 1993) which are located along the southern boundary of the site adjacent to Alresford Road and Ridgemount.
- 4.5 On the northern boundary of the site is Guildford Cathedral. Further north is the University of Surrey which includes several teaching and student accommodation blocks which abut the northern boundary of the Cathedral land. To the south of the application site is the residential area of Onslow Village which is designated as a conservation area. This is a mixture of two storey, detached, semi-detached and terraced properties. Further east of the site is Guildford railway station and the town centre beyond. There are bus stops in the immediate vicinity. There is vehicular access from Ridgemount to Cathedral Close and the main approach from Stag Hill to the west.
- 4.6 The site is located within the 400m – 5km buffer zone of the Thames Basin Heaths Special Protection Area (TBHSPA) and E1: Warnborough Wooded Rolling Claylands, landscape character area.

5. Proposal.

- 5.1 Demolition of existing Cathedral Close dwellings and erection of 124 no. residential units (including affordable housing) with associated engineering works, access, landscaping, parking and ancillary works.
- 5.2 For the purposes of assessing this planning application the site can conveniently be split into three distinct areas.

- 521 *Eastern Meadows:* This is to the east of the Cathedral at the top of the hill. It is currently accessible by car from Stag Hill to the west and the existing car park to the north of the Cathedral. These units are proposed around an existing open space (the “eastern meadow”) which is to the east of the existing Memorial and Children’s Gardens. Five detached, two-three storey houses for clergy and seven stepped level (two-three storeys), attached, market houses (accessed from Ridgemount). These units are proposed around an existing open space, including the Memorial Garden and Children’s Garden.
- 522 *Eastern Slopes:* The area north of Ridgemount, including Cathedral Close, the existing vehicular access which would be closed and a new one created using the other access to Cathedral Close, with a road on a gradient, winding up the slope. Co-joined apartment blocks of up to 3.5 storeys (with the top storey comprising accommodation in the roof or set in from the floor below) and duplexes over more than one floor. Car and cycle parking would be on-street and in podium levels. Two woodland courtyards (north-south) would be provided as shared amenity space. A podium garden walkway through the middle of the apartment blocks (east-west) would also be provided.
- 523 *Western Parcel:* To the west of pedestrian access from Alresford Road between the two tree/hedgerow belt, two new accesses at either end. Comprising 16 semi-detached and two and six detached houses, and terraced gardens. The buildings are two-three storeys in height. The layout of proposed development is linear; houses would front the new internal road. A community orchard is proposed to the north of the houses.
- 53 New pedestrian and cycle links will be provided through the site including an access point at the eastern boundary of the site to enable access through to the town centre (via Yorkies Bridge).
- 54 The dwelling mix

Proposed Mix	1-bed	2-bed	3-bed	4+-bed	Total
Total dwellings	23	66	14	21	124
Of which...					
Houses	0	0	9	21	30
Apartments	23	66	5	0	94
Affordable	21	24	7	5	57

13 of the affordable homes would be only available to be occupied by Cathedral staff and clergy.

55 Parking provision

551 *Cars*

66 spaces in the podium car park
29 spaces on-street for the apartments
60 spaces for the houses
2 spaces for visitors

Including 8 Spaces for accessible use

An additional two car club spaces – these are not shown on the plans and shall be secured by condition.

159 spaces in total

552 *Cycles*

One space per one and two bedroom properties – 104 spaces in Sheffield stands, stacks and two-tier stacks

Two spaces per 3+ bedroom properties – 60 spaces

Visitor cycle stands – 15 spaces

179 spaces in total

Including 6 spaces for large/cargo bikes

Sockets for charging of e-bikes

56 The scheme was the subject of engagement between officers and the applicant through a pre-application request, as part of a Planning Performance Agreement (PPA), which has continued through the application determination stage. Plans were first presented to the Council at the pre-application stage in October 2019. Several pre-application meetings and design focused workshops and other technical meetings have been held since.

57 This is a summary of the key recommendations from the Guildford Design Review Panel (DRP) held on 18.05.2019 with Design: South East, see Appendix 1:

- the scale, mass, and form of buildings must be delicately balanced;
- total number of dwellings will be needed to achieve this balance;
- The East Lawn (eastern meadow) should be left as an open, informal and sloped landscape;
- For the Eastern Slopes development in this location should be reduced in density and refined to fit with the topography;
- On the Western Slopes development here could be placed further south, replacing the hedgerow, to help minimise cut and fill; and
- opportunity of renewing Maufe's vision.

58 During determination of the application, the following amendments were made to the proposals. Public consultations were carried out on 01.01.2022, 09.12.2022 and 06.03.2023:

- Staggered clergy housing in eastern meadows
- Integral garages for the clergy housing
- Removal of three market houses from the eastern meadows, and relocated to the south
- Removal of a section of access road
- New housetype for southern part of eastern meadows
- New north-south pedestrian link from Ridgemount to the eastern meadows
- Pedestrian and cycle east-west link from Alresford Road to the eastern meadow and to the proposed Yorkie's Bridge connection
- Height reduction to the residential blocks on the eastern slopes
- Reconfiguration of Block E, including inset balconies
- Increased separation distance from Block E to existing Scholars Walk properties (32.8 metres)
- 11 fewer in on-street parking spaces
- Increased cycle parking, access to cycle storage area, additional space for charging e-bikes and the provision of bike runnels in areas with steps
- Additional tree planting to the west of the western phase
- Improvements to sustainability with an all-electric solution using 330 PVs and air source heat pumps (ASHPs), rather than gas boilers throughout the site
- Practice rooms for the Cathedral
- Some design refinements
- Inset balconies to Block E
- Increased green infrastructure
- Details on refuse collection strategy
- Details of on-site play space
- Details to show manoeuvrability of parking spaces
- Accessibility of cycle parking
- Provision of two car club spaces
- Floor plan changes to ensure compliance with Nationally Described Space Standards (NDSS)
- Updated covering note from the Cathedral
- Financial details of the works for repairs and maintenance to the Cathedral and the endowment

[officer note: between 09.12.2022 and 06.03.2023, when the public were formally consulted, some updated and additional drawings and details were submitted in relation to waste collection, biodiversity, housing mix, car and cycle parking, open space, solar panels, air quality, floor plans and Cathedral's covering note. These were mainly technical matters and points of clarifications that did not materially change the proposal and in the judgement of officers did not therefore warrant a public notification and consultation exercise. These documents have in any event been published on the Council website. Relevant consultees were re-consulted as required].

6. EIA development

6.1 The proposed development is not EIA development. The thresholds set out in paragraph 10(b) of schedule 2 (10)(b) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 are not exceeded.

7. Community engagement.

7.1 The applicant has submitted a Community Consultation Statement. This document outlines the programme of community engagement and public consultation.

7.2 A series of workshops were hosted in November 2019, including a community planning day hosted by the architects John Thompson Partners (JTP) on 30.11.2019 for members of the public, neighbours of the site, elected representatives and community stakeholder groups. This was supplemented with a digital campaign on givemyview.com.

7.3 In January 2020 a face-to-face event was held to report-back key themes and findings alongside an early masterplan presented to the community.

7.4 Delivery partners and architects met virtually in May 2020 with community stakeholder groups and neighbours to provide updates on the proposal and seek further feedback.

7.5 In September 2021 a virtual exhibition and Q&A session was held for the public, as well as an update for Council Members.

7.6 Promotional activities included invitations to local amenity groups, a webpage (where material was published), flyer drop, social media and press releases.

7.7 A webinar was hosted online by the applicant on 06.03.2023.

8. Relevant planning history.

Reference:	Description:	Decision Summary:
15/P/02284	'Proposed erection of 134 dwellings (including affordable dwellings) with associated vehicular/pedestrian access arrangements, estate road layout, parking, landscaping, engineering operations and ancillary works.	Refuse 20/02/2017
09/P/01567	Erection of six two storey one bedroom dwellings for Cathedral staff with associated landscaping and infrastructure works.	Approve 04/03/2010
04/P/01669	Conversion of existing two dwellings to four	Approve

04/P/00286	dwelling. Erection of 6 dwellings for Cathedral lay clerks, with commercial laundry/boiler (renewal of planning permission 97/P/1742)	08/09/2004 Approve 23/12/2004
99/P/01746	Erection of a detached four bedroom dwelling, details pursuant to outline application 97/P/1614 dated 10/02/98	Approve 17/10/2000
97/P/01742	Erection of 6 dwellings for Cathedral lay clerks, with communal laundry/boiler.	Approve 20/07/1999
97/P/01741	Erection of a dwelling for Cathedral sub-organist.	Approve 24/03/1998
97/P/01614	Renewal of Outline Planning Permission 92/P/1242 dated 08/12/92 for the erection of two detached houses and ancillary garages.	Approve 10/02/1998
97/P/01613	Renewal of outline planning permission 92/P/1241 dated 08/12/92 for the erection of three detached houses and ancillary garages.	Approve 03/03/1998
97/P/00446	Erection of a 48 bed nursing home with new access drive from Stag Hill.	Withdrawn 17/06/1997
95/P/01572	Relaxation of Condition 02(a) of outline planning permission 92/P/1241 dated 08/12/92, to extend the time by 2 years until 8/12/97.	Approve 23/01/1996
95/P/01546	Relaxation of Condition 2(a) of outline planning permission 92/P/1242 dated 08/12/92, to extend the time by 2 years until 08/12/97.	Approve 23/01/1996
92/P/01242	Renewal of outline planning application 89/P/1666 dated 12/12/89 for the erection of two detached houses and ancillary garages	Approve 08/12/1992
92/P/01241	Renewal of outline planning application 89/P/1665 dated 12/12/89 for the erection of three detached houses and ancillary garages	Approve 08/12/1992
89/P/01666	outline application for the erection of 2 detached houses and ancillary garages	Approve 12/12/1989
89/P/01665	Erection of 3 detached houses and ancillary garages	Approve 12/12/1989

85/P/01419	Erection of three detached houses with garages	Approve 10/12/1985
81/P/01301	Erection of two detached houses with garages	Approve 26/11/1981
81/P/01300	Outline application for the erection of three detached houses with garages	Approve 15/12/1981
GUI/7748B/22034B – 1965	Detailed plans for 3 houses & garages	Approve
GUI/7748/22034 – 1965	Outline application for 3 houses & garages	Approve
GUI/4072A/16607 – 1958	Erection of three detached houses and garages for Cathedral clergy	Approve 30/09/1959
GUI/4072/16607 – 1958	Erection of one house for the provost and two houses for the clergy	Approve 19/09/1958
GUI/2753/14658 – 1955	Erection of two cottages for the groundsmen at Guildford Cathedral	Approve 26/10/1955

9. Consultations.

Statutory consultees

91 Historic England: has concerns and has raised the following matters:

- Amendments have reduced the impact on the significance of the Cathedral.
- Eastern slopes out of character – design, height and density.
- Eastern meadow out of character – built form introduced into meadow
- Clergy housing – appears as suburban development rather than cloister form.
- Western slopes out of character – scale, layout and design
- Compromise the appreciation of the Cathedral and its prominence on Stag Hill.
- Delivery of heritage benefits from the endowment
- Harm to the significance of the grade II* listed Cathedral
- Formal arrangement on the Eastern Slopes
- Scale and design out of character with Alresford Road
- Alien new intervention
- Appreciation of the Cathedral undermined by the housing on the Eastern Meadows.

92 Cathedrals Fabric Commission for England (CFCE): The CFCE is a statutory decision-maker on this development under the Ecclesiastical Exemption and therefore will not be making a representation on this planning application.

[officer comment: The Cathedral's application to the Commission was approved on

24.05.2022, subject to a single condition relating to control of extensions, solar panels, loft conversions etc.]

- 93 National Highways: No objection, unlikely to have a material impact on the safe and efficient operation of the A3 part of the Strategic Road Network (SRN).
- 94 Surrey County Council, County Highway Authority (CHA): no objection, are satisfied that the proposed development would not result in a severe impact on the local highway network, subject to planning obligations of highway improvements and contributions to sustainable travel strategy and conditions and have made the following comments:
- Loss of on-street car parking and reduction in size of passing places acceptable.
 - Measures to deter 'rat-running'.
 - 20mph speed limit to improve safety and not affect the SMC.
 - Gradient of roads and access complies with Manual for Streets 2.
 - Lower parking requirement as this is a sustainable location served by alternative modes of transport.
- 95 Surrey County Council, Lead Local Flood Authority (LLFA): no objection and suggest conditions in relation to design of the drainage scheme and verification report for that system.
- 96 Environment Agency: No comment, the proposal falls outside the Environment Agency's remit as a statutory planning consultee.
- 97 Natural England: No objection, subject to appropriate mitigation being secured.

Internal consultees

- 98 GBC Environment and Regulatory Services (Environmental Health): no objection, subject to conditions and have made the following comments:
- EV charging facilities by condition
 - Construction works would have short-term impact could be managed under environmental health legislation and suitable conditions
 - Negligible impact on the Guildford Town Centre Air Quality Management Area (AQMA)
 - Development within the required guidelines and reasonable in terms of its impact on air quality
 - No history of contaminated land
 - Noise and dust could be managed through a Construction Environmental Management Plan (CEMP)
- 99 GBC Housing Development Lead: no objection subject to a S106 and raises the following matters:
- Accept clergy housing as affordable housing 'tied' to the Cathedral.
 - Broadly complies with quantum of affordable housing.
 - Support the mix which differs from the policy requirements due to the unique nature

of the site and the housing opportunities presented.

- 9.10 GBC Culture, Heritage and Leisure Services (Parks Asset Development Officer): has made the following comments:
- provides an increase in quantity of formal and informal play areas.
 - equipment in the woodland trails and formal play areas would meet recommendations.
 - the formal play areas would not meet the required standards.
 - unclear how older age groups would be catered for within the site.
 - close proximity to nearest residential property.
 - Exceeds the onsite amenity space requirement
 - In lieu contribution for playing fields/youth and play areas
- 9.11 GBC Operational & Technical Services (waste and recycling): no objection and suggest conditions:
- Waste collection strategy acceptable.
 - Cathedral housing subject to commercial waste arrangements and the bin stores are secured by condition
- 9.12 GBC Tree Officer: no objection, subject to conditions in relation to the Arboricultural Method Statement (AMS) and Tree Protection Plans (TPP) be adhered to during all stages of the development, supervision and pre-commencement site visit.
- 9.13 GBC Corporate Programmes: no objection subject to securing mitigation through a S106 agreement for delivering a direct link from the site to the Yorkie's Bridge section of the SMC.

Non-statutory consultees

- 9.14 Surrey County Council, Education Authority: no objection subject to securing mitigation through a S106 agreement for early years, primary education and secondary education.
- 9.15 NHS Surrey Heartlands ICS: no objection, subject to financial contribution towards a new primary care facility.
- 9.16 NHS Royal Surrey NHS Foundation Trust: no objection, have withdrawn submission for financial contributions as updates required.
- 9.17 Surrey County Council, County Archaeologist: No objection, subject to conditions and has made the following comments:
- Very unlikely that significant archaeological remains would be present.
- 9.18 SCC Minerals & Waste Planning: No objection, subject to a condition relating to a Waste Management Plan.
- 9.19 Surrey Police: No objection and has made the following comments:
- Condition to achieve a Secure By Design Accreditation.

- To reduce fear of crime, should relocate PROW (footpath 6) between Scholars Walk and Yorkies Bridge to the north
- 920 Surrey & Sussex Police: No objection, subject to financial contribution for staff set up costs, staff accommodation and vehicles
- 921 Thames Water: no objection, subject to conditions and have made the following comments:
- Existing foul water sewerage network infrastructure capacity.
 - Existing surface water network infrastructure capacity.
 - As within 15 metres of a strategic sewer requests a condition in relation to piling.
 - Expect measures minimise groundwater discharges into the public sewer.
 - Insufficient water network infrastructure, upgrades required
- 922 UK Power Networks: the development is in close proximity of a substation and have made the following comments:
- Comply with Party Wall etc. Act 1996.
 - Noise and vibration from substation.
 - Gap of at least 7 metres to the substation from dwellings.
 - High occupancy rooms face away.
 - Retain 24 hour rights of access
 - No storage of materials and underground cabling
- 923 Surrey Wildlife Trust: No objection subject to conditions and has raised the following matters:
- Agree to provide updated bat surveys as a planning condition.
 - Suggest condition in relation to reptile mitigation, tree planting and biodiversity net gain.
 - The use of Other Woodland; Broadleaved in the biodiversity metric calculation, would be suitable.
- 924 University of Surrey: Neither objects or supports. They have made the following comments:
- Noise and disturbance from student housing – proximity to residential development
- 925 AONB Advisor: has raised the following matters:
- Compromise the appreciation of the Cathedral and its prominence on Stag Hill.
 - Retains woodlands and green setting on the slopes as seen from The Mount.
 - Supports colour palette and building heights
 - Cumulative impact of town centre development
 - Some harm to AONB
- 926 Cooper & Withycombe, engineering consultants: no objection, subject to conditions for further investigation, assessment and stability modelling and have made the following comments:
- Comprehensive investigation and review carried out of the site and risks by the

applicant.

- Have identified mitigation measures.
- Further investigation of final retaining wall design

927 Hankinson Duckett Associates, landscape and visual impact consultants: have made the following comments:

- Assessment submitted a fair and proportionate in relation to the design proposal.
- Harm to the landscape character and visual experience of the site to the east.
- Benefits to the landscape character and visual amenity of the approach to the Cathedral to the west with a tree avenue.
- Reduction in some of the building heights to the south-east and addition of climbing plants would help to maintain the 'green collar' surrounding the Cathedral.
- Moderate adverse impact on the setting of the AONB.
- Some harm to 'important views' set out within the Guildford Town Centre Views SPD.
- Would not block views of the Cathedral in accordance with Policy A15(2).

Amenity groups

928 Twentieth Century Society: No comment.

929 Guildford Society: have made the following comments:

- Amendments an improvement.
- Good design.
- Lack of construction details.
- Additional view points for Landscape and Visual Appraisal.
- Use the Vu.City software.
- Increase in foot traffic if bridge from Guildford Business Park to the University of Surrey is built (21/P/01427)
[officer comment: this planning permission is extant however, there is no residential use approved on Guildford Business Park]
- Ensure commitment to Yorkie's Bridge alongside SMC
[office comment: planning obligation sought for direct pedestrian/cycle access]
- Vehicle types uses in traffic modelling
- Lack of construction traffic management details
- Glint and glare from solar PV panels
- Managing overheating of homes
- Commitment to endowment

930 Guildford Residents Association: have raised the following matters:

- Not in accordance with the site allocation.
- Harm to heritage asset.
- Out of character - scale and height.
- Alternative scheme preferred.
- Use the Vu.City software .
[officer comment: this modelling has been done and provided for the use of the council]
- Traffic congestion and inadequate highway capacity.

931 Friends of Stag Hill:

FOSH have commissioned these independent consultancies to prepare (i) a Traffic Assessment Report, (ii) Landscape and Visual Appraisals, (iii) Geotechnical Report

They have provided several responses on specific matters as well as a general response and all of these have been included in the summary below.

FOSH objects to the proposal on the following grounds:

- Inadequate car parking for an out-of-town centre location.
- Overspill parking into adjoining roads including from visitors.
- Risk to highway safety – gradient of the roads and access
- Vivid’s Transport Assessment has misinterpreted the results of the parking survey on the streets local to the site and significantly over-estimated appropriate parking opportunities.
- Alternative site access from western approach.
- Traffic congestion and inadequate highway capacity.
- Harm to the setting of heritage assets.
- Disagree with the conclusions of the Heritage Statement, namely that development is appropriate on the site, the heritage objection to the use of the Cathedral driveway and the location of the clergy housing in an isolated enclave at the top of the site.
- Memorial status of the land.
- Historic intention to preserve the open green space around the Cathedral.
- Not shared all historic correspondence
[officer comment: the applicant have been given the opportunity to respond and provided their response in the documents dated 02.03.2023]
- Public benefits do not outweigh the harm.
- Misleading housing density figures presented to compare the previously refused scheme with the current scheme.
- Current scheme has had no regard to the advice of the Design Review Panel report of May 2020.
- Overdevelopment.
- Not in accordance with the site allocation.
- Greater impact than the scheme refused under 15/P/02284
- Other brownfield sites available.
- Out of character - height, mass, density, external materials and apartments
- Use the Vu.City software
- Loss of trees and hedgerows
- Insufficient viewpoints representation and details
- Overbearing impact of eastern slopes development on Ridgemount properties, as confirmed by the FOSH commissioned visual impact assessment.
- Risk of land slips – occurred in 1988 during construction of Scholars Walk.
- Use of a 2014 report from the Linden scheme to assess site stability.
- Additional work required to assess slope stability including trial pits, boreholes, groundwater testing and further monitoring.
- Noise disturbance from heavy piling and engineering works.

- Requires a monitoring strategy for land instability.
- Risk of surface water flooding.
- Air quality affected during construction works.
- Dust pollution.
- Methodology and baseline data used for assessing impact on air quality.
- Inadequate cycle storage facilities.
- Threat to biodiversity and loss of habitats.
- Loss of open space.
- Open space strategy does not compensate for loss of existing open space
- Lack of infrastructure resources, such as schools, hospitals, GP surgeries.
- Insufficient affordable housing provision.
- Lack of water supply capacity.
- Lack of financial justification including the endowment.
- Lack of supporting viability information.
- Risk affordable housing provision will not be delivered.
- Affordable housing should be pepper potted.
- Wider landscape improvements can be done without development.
- Policy requirements being leveraged as public benefits.
- Lack of economic benefits
- Not truly affordable housing as includes Cathedral employee housing
- Affordable housing mix predominantly 1- and 2-bedroom flats
- Pollution from gas boilers
[officer comment: only solar panels and air source heat pumps are now proposed]
- Any financial gain does not justify the level of harm or compensate the loss of green open space or the land as an asset.
- No information provided on use of funding from the development.
- Cathedral Fabric Commission (CFC) authorisation should not carry weight in the planning process.
- CFC decision made following a closed meeting and documents not made public or available to GBC, including response to FOSH heritage submissions and research on the s202 test.
- Concerns regarding the accuracy of material provided to the CFC.
- Fail to strengthen community ties.

932 The Spires Management Company Ltd: object on behalf of the Scholars Walk Estate and raise the following matters:

- Greater impact than the scheme refused under 15/P/02284
- Out of character – height, density and design
- Exceeds local plan allocation of 100 units.
- Risk to highway safety – pedestrians and cyclists.
- Traffic congestion and inadequate highway capacity.
- Alternative site access from western approach.
- Air quality.
- Inadequate sustainable transport strategy.
- Overspill parking into adjoining roads.
- Noise and disturbance during construction.

- Noise and disturbance following occupation.
- Compromise the appreciation of the Cathedral and its prominence on Stag Hill.
- Harm to wildlife.
- Loss of trees/ hedgerows.

933 Angela Richardson MP: Objects and has raised the following matters:

- Overdevelopment
- Not in accordance with the site allocation
- Impact of views out from the Cathedral
- Traffic congestion and inadequate highway capacity.
- Alternative site access.
- Harm to the character of the area.
- Harm to the setting of the heritage assets.
- Mitigation for local infrastructure.
- Lack of financial justification.
- Poor design.

934 Extinction Rebellion, Planning Scrutiny Group: object and have raised the following matters:

- Use of gas fired boilers.
- Consider district heating.
- Measures to reduce energy use and carbon emissions.
- PV panels not facing optimal direction.
- Surface water flooding risk.
- Lack of grey water recycling.
- Loss and risk to trees.
- Unsafe and unsuitable cycle route.
- Inadequate cycle storage.
- Proximity to air pollution from the A3.
- Loss of open space.
- Harm to wildlife.
- Risk of subsidence.
- Inadequate facilities for clothes drying and co-working.
- Detached houses less energy efficient.
- Alternative scheme preferred.
- Lack of car club spaces.
- [officer comment: two on site car club spaces are proposed]
- Risk to highway safety – gradient of the roads and access.
- Alternative site access.

935 Guildford Bike Users Group (G-BUG): object and have raised the following matters:

- Reduce car parking to encourage modal shift.
- Additional cycle storage.
- Inadequate cycle storage.
- Risk to highway safety – lack of segregated cycleway on part of SMC.
- Risk to highway safety – gradient of the roads and access.

- Traffic congestion and inadequate highway capacity.
- Commend cargo bike and direct access storage.
- Lack of car club spaces.

936 Council for British Archaeology (CBA): have made the following comments:

- The communal and historical value of the gardens as a public memorial.
- Harm to the setting of a heritage asset.
- Financial justification needs to be balanced against the harm.

937 War Memorials Trust: have made the following comments:

- The memorial status of the land adds to the significance of the heritage asset.

938 The Vimy Foundation, Canadian Centre for the Great War: object and have raised the following matters:

- Site was the initiative of R.B. Bennett, Prime Minister of Canada from 1930 to 1935.
- As a place for reflection and remembrance of Canada's contribution during the conflicts that shook the first half of the 20th century.
- R.B. Bennett has local connection to Guildford as he lived nearby, he was honoured as 1st Viscount Bennett, of Mickleham in the County of Surrey and of Calgary and Hopewell in the Dominion of Canada for contribution to the Second World War air campaign to protect Great Britain.
- Continued commitment to the preservation of memorial sites honouring Canada's fallen military personnel.
- scheme does not respect the commemoration of Canadians killed during the First and Second World Wars.
- Alternative scheme preferred.

[officer comment: records were checked by the Cathedral who confirm that Viscount Bennett made a financial donation, and these monies with other donations were used to buy land from the Earl of Onslow. In recognition of this, the memorial ledger stone was laid. The land was not gifted by him and there are no legal covenants]

939 Historic Buildings & Places (HB&P) formerly, Ancient Monuments Society: have raised the following concerns:

- Out of character – design, scale and density
- Impact on the setting of the heritage assets
- Compromise the appreciation of the Cathedral and its prominence on Stag Hill.
- Loss of vegetative setting

10. **Third party comments.**

101 286 letters of representation have been received relating to the proposal. These raise the following objections and concerns:

- Overdevelopment.
- Not in accordance with the site allocation.
- No details of wider masterplan.
- Harm to the heritage assets.

- Memorial status of the land.
- Historic intention to preserve the open green space around the Cathedral.
- Compromise the appreciation of the Cathedral and its prominence on Stag Hill.
- Inadequate Townscape and Visual Appraisal (TVA) – impact during winter months.
- Harm to viewpoint identified in Views Study SPD.
- No development brief from the Council.
- Out of character - height, scale, massing, bulk, roof types, housing style, density, high-rise.
- Harm to neighbouring amenity: overbearing, overlooking and loss of light.
- No cross-sections of land levels against 1 Scholars Walk to properly assess impact.
- Noise and disturbance during construction – health fears.
- Loss of open space.
- Housing development should be focused on brownfield land.
- Ruins peace and tranquillity of Cathedral site.
- Light pollution.
- Littering concerns.
- No community benefits.
- Lack of infrastructure resources, such as schools, hospitals, GP surgeries, dentists, public transport.
[officer comment: planning obligation for financial contribution to education, healthcare and sustainable transport]
- Risk to highway safety - pedestrians, cyclists and from construction vehicles.
- Inadequate highway capacity - unsuitable for large vehicles.
- Increase traffic congestion.
- Alternative site access from western approach.
- Lack of segregated connectivity – pedestrians, cyclists and connection to SMC.
- No funding for Yorkies Bridge improvements.
[officer note: financial contributions sought for access to Sustainable Movement Corridor (SMC) as Yorkie's Bridge]
- No provision for charging electric bikes.
[officer note: e-bike charging points provided]
- Insufficient car parking.
- Developer should provide a car club.
- Overspill parking into adjoining roads including from visitors.
- Waste management concerns.
- Not truly affordable housing as includes Cathedral employee housing.
- Location of affordable housing.
- No need for development.
- Restrictive condition should be applied to stop the development from being student Lets / HMOs.
- Housing mix concerns.
- Empty housing in Guildford should be filled first.
- Sets a precedent for more housing around the Cathedral.
- Air quality.
- Loss of trees and hedgerows.
- Harm to wildlife.

- Embodied carbon.
- Insufficient tree planting details.
- Alternatives to gas boilers.
- Location of solar panels.
- Insufficient eco technologies / zero carbon living.
- Risk of land slips.
- Damage to infrastructure during construction.
- Water contamination concerns.
- Risk of surface water flooding.
- Sewerage and water supply capacity.
- Lack of community engagement.
- No viability case.

[officer comment: the proposals comply with policy requirements and have agreed to financial contributions so is not required]

- Cathedral should find other means of financial support.
- Lack of details on the endowment and income from this.
- Greater impact than the scheme refused under 15/P/02284.
- Vivid Homes build quality.
- No need for development.
- Consultation timing is inconvenient.
- Lack of community engagement since application submitted.
- Clergy housing isolated and hinder creating an inclusive community.

102 11 letters of representation have been received which raise the following points in support of the application:

- Principle of development acceptable.
- Allocated site in Local Plan.
- Much needed housing, including affordable housing.
- No negative impact on neighbouring amenity.
- Minimal loss of usable green space.
- Local primary schools currently undersubscribed.
- Sympathetic to views of the Cathedral.
- In keeping with the local area.
- Net gain in houses unlikely to have a major adverse impact on traffic.
- Financial case.
- Social benefits.
- Improvement over previous Linden scheme.
- Reduction in scale.
- Use of on-site renewable energy.
- Enable financial security for worship, community work and as a war memorial.

11. Planning policies.

The following policies are of most relevance to the determination of this application.

11.1 National Planning Policy Framework 2021 (NPPF)

Chapter 2: Achieving sustainable development

Chapter 4: Decision-making

Chapter 5: Delivering a sufficient supply of homes

Chapter 8: Promoting health and safe communities

Chapter 9: Promoting sustainable transport

Chapter 11: Making effective use of land

Chapter 12: Achieving well-design places

Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Chapter 15: Conserving and enhancing the natural environment

Chapter 16: Conserving and enhancing the historic environment

11.2 National Planning Practice Guidance (PPG)

11.3 National Design Guide (NDG) 2019

11.4 Guildford Borough Local Plan: Strategy and Sites (LPSS) 2019

The Guildford Borough Local Plan: Strategy and Sites was adopted by Council on 25 April 2019. The Plan carries full weight as part of the Council's Development Plan. The Local Plan 2003 policies that are not superseded are retained and continue to form part of the Development Plan (see Appendix 8 of the Local Plan: strategy and sites for superseded Local Plan 2003 policies).

Policy S1: Presumption in favour of sustainable development

Policy S2: Planning for the borough - our spatial strategy

Policy H1: Homes for all

Policy H2: Affordable homes

Policy P4: Flooding, flood risk and groundwater protection zones

Policy P5: Thames Basin Heaths Special Protection Area

Policy D1: Place shaping

Policy D2: Climate change, sustainable design, construction and energy

Policy D3: Historic environment

Policy ID1: Infrastructure and delivery

Policy ID3: Sustainable transport for new developments

Policy ID4: Green and blue infrastructure

Policy A15: Land at Guildford Cathedral, Alresford Road, Guildford

11.5 Guildford Borough Local Plan: Development Management Policies (LPDMP) June 2022

The LPDMP can now be considered to be at an advanced stage in production. The hearing sessions have been completed and the Inspector has now issued his final Inspector's Report and Schedule of Main Modifications, dated 27.02.2023. The draft plan is due to go before Full Council for adoption on 22.03.2023. Whilst it is not yet part of the statutory development plan, the policies are given full weight given their advanced stage and the fact that the policies can no longer be amended.

Policy H8: First Homes
 Policy P6/P7: Biodiversity in New Developments
 Policy P8/P9: Protecting Important Habitats and Species
 Policy P10: Land Affected by Contamination
 Policy P11: Air Quality and Air Quality Management Areas
 Policy P12: Water Quality, Waterbodies and Riparian Corridors
 Policy P13: Sustainable Surface Water Management
 Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness
 Policy D5: Protection of Amenity and Provision of Amenity Space
 Policy D5a: External Servicing Features and Stores
 Policy D8: Public Realm
 Policy D9: Residential infill development
 Policy D10: Noise Impacts
 Policy D10a: Light Impacts and Dark Skies
 Policy D12: Sustainable and Low Impact Development
 Policy D13: Climate Change Adaptation
 Policy D14: Carbon Emissions from Buildings
 Policy D16: Designated Heritage Assets
 Policy D17: Listed Buildings
 Policy D18: Conservation Areas
 Policy D19: Scheduled Monuments
 Policy D19a: Registered Parks and Gardens
 Policy D20: Non-designated Heritage Assets
 Policy D21: Enabling Development and Heritage Assets
 Policy ID5: Protecting Open Space
 Policy ID6: Open Space in New Developments
 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network
 Policy ID11: Parking Standards

116 Evidence base:

Land Availability Assessment (LAA) 2022
 Open Space, Sport and Recreation Assessment (OSSRA) 2017
 Infrastructure Delivery Plan (IDP) 2017
 SFRA Level 2 Addendum 2017
 West Surrey SHMA Guildford Addendum Report (SHMA Addendum) 2017
 Strategic Flood Risk Assessment (SFRA) 2016
 West Surrey Strategic Housing Market Assessment (SHMA) 2015
 Surface Water Management Plan (SWMP) 2014

117 Surrey Waste Local Plan (SWLP) 2019-2033

Policy 4: Sustainable Construction and Waste Management in New Development

118 Surrey Hills AONB Management Plan (AONBMP) 2020-2025

Planning Management Policy P6: setting of the AONB

119 Guildford Borough Local Plan (GBLP) 2003 (as saved by CLG Direction 24 September 2007)

Policy G1: General Standards of Development
Policy G5: Design Code
Policy H4: Housing in Urban Areas
Policy HE4: Development which affects the setting of a Listed Building
Policy HE10 Development which affects the setting of a Conservation Area
Policy NE4: Species Protection
Policy NE5: Development Affecting Trees, Hedges and Woodland
Policy R2: Recreational Open Space in relation to Large New Residential

In light of full weight being given to the emerging LPDMP, reduced weight should be afforded to the Local Plan 2003 policies especially where there are inconsistencies between policies.

11.10 South East Plan (SEP) 2009

NRM6: Thames Basic Heath Special Protection Area

11.11 Supplementary planning documents

Draft Parking SPD (2022) (intended to be adopted by Executive on 20.03.2023)

Healthy Streets for Surrey (2022)

Climate Change, Sustainable Design, Construction and Energy SPD (2020)

Planning Contributions SPD 2017 (updated in April 2022)

Thames Basin Heaths Special Protected Area Avoidance Strategy SPD (2017)

Landscape Character Assessment (2007)

Residential Design Guide (2004)

11.12 Other guidance

Surrey County Council Local Transport Plan (LTP4) (2022)

Surrey County Council Vehicular and Cycle Parking Guidance (2021)

Guildford Public Art Strategy 2018-2023

Historic England GPA3: The Setting of Heritage Assets (2017)

Guildford Children's Play Strategy 2016-2021

Guidance on the storage and collection of household waste for new developments (2017)

Surrey Landscape Character Assessment (2015)

English Heritage (latterly Historic England) Guildford Cathedral, St Blaise Guildford, Surrey: Twentieth-Century Setting and Landscape (2007)

12. **Planning considerations.**

The main planning considerations in this case are:

- background to application
- the principal of development
- housing delivery
- context and identity
- slope stability and engineering solution
- access, highway safety and capacity
- flooding and drainage
- air quality
- housing mix and type
- landscape and visual impact 10
- characteristic of well-designed places
- impact on the setting of heritage assets
- impact on residential amenity
- impact on trees and vegetation
- impact on ecology and nature conservation
- landscape strategy and open space
- climate change and sustainability
- contaminated land
- utility services
- economic and financial considerations
- other material considerations
- Thames Basin Heath Special Protection Area
- legal agreement requirements
- planning balancing exercise

121 Background

121.1 This application follows a 2015 scheme for 134 dwellings proposed by Linden Homes referenced 15/P/02284, which was refused by planning committee in February 2017. The application was refused on eight separate grounds:

- Poor quality, out of character, overly prominent and incongruous in both short and long-distance views due to the high density, scale, mass, bulk and height of the units proposed;
- Less than substantial harm to the setting of the Grade II* Listed Cathedral not outweighed by public benefits;
- Overbearing and oppressive impact, causing loss of privacy to 1 and 2 Scholars Walk;
- Loss of designated open space;
- Absence of a completed legal agreement covering affordable housing, schools and sustainable travel;
- Impact on the Thames Basin Heaths SPA and relevant SSSI.

121.2 No appeal was lodged and this application has been submitted by a different applicant.

The land is owned by Guildford Cathedral. The Dean and Chapter at Guildford Cathedral decided to appoint a registered provider of social housing to deliver both affordable and open market housing. They have been working with Vivid Homes since 2018, a regional affordable housing provider to develop the site.

- 1213 The Cathedral Covering Note (dated 24.02.2023) explains that development of the site is needed to generate funds to support maintenance of the Cathedral. Every five years the Cathedral commissions a Quinquennial Inspection (QI) by the Cathedral Architect (for a detailed survey of all aspects of a building's fabric), which is then costed independently. The most up to date QI was carried out in 2022 with works costing a total of £4,485,000. The Cathedral Chapter had hoped to set a balanced budget in 2023, however, this was not possible due to the economic downturn following the COVID-19 pandemic. In addition, immediate cash reserves have reduced to £295,000 (less than half of one year's anticipated expenditure).
- 1214 They have "never possessed endowments of any significance and [have] always struggled to fund repairs. This is not the case in other, older Cathedrals which have traditionally been able to retain endowments and property which has been part of their heritage and use the proceeds to fund the maintenance of the building and other costs."
- 1215 The Cathedral needs to establish a sufficient endowment for the future. The Cathedral Chapter has considered the argument of financial gain versus potential 'harm' very carefully and is confident that the land receipt generated from Vivid (and therefore the proposed planning application of 124 dwellings), is the minimum that is required to generate the required annual endowment. This was tested by the Charity Commissioners (the regulatory body responsible for these matters) when granting permission for the sale of the land. They were given the full details of the gift of land, including all associated historical correspondence. After a thorough assessment the Commission approved schemes allowing the Cathedral to sell the relevant land.
- 1216 The Cathedral have stated that the development would support housing delivery and improve accessibility and movement for cycling and walking from town to the Cathedral and University of Surrey.
- 1217 The Note refers to the Cathedral's Conservation Management Plan for the whole site area. The wider masterplan has not been shared however the details in the Note include:
- replacement buildings for the Shop and Café Restaurant;
 - replacement office accommodation - possibly combining facilities with the Diocese;
 - buildings for community activities; and
 - improving landscaping throughout the site.

This would allow the Cathedral to use its assets to engage more with the local community, increase interaction and this would then lead to investment that would secure the future of the Cathedral.

- 1218 The masterplan would have further cumulative effects to this sensitive, heritage site.

However, this information is not publicly available, and any additional development would require planning permission in its own right so would be assessed on its own merits. Nevertheless, this information is importance in ensuring that that these proposals are viewed in the context of the Diocese's long term aims. Which could be encapsulated in a whole site masterplan had been provided this would have allowed for a comprehensive and contextualised understanding of the current proposals. This approach could then have better informed the design process from the outset and would have been fully considered in the Design and Access Statement, this has not taken place and narrows the context in which the current development scheme would be seen. Given the Cathedral have ambitions for redevelopment and replacement of their existing on-site facilities, as stated above.

122 The principle of development

1221 Paragraphs 119 and 120 of the National Planning Policy Framework (NPPF) state that planning decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment; encourage multiple benefits from urban land; and support the development of under-utilised land if this would help meet identified needs for housing.

1222 The site has been identified as suitable for development through the adopted Local Plan: strategy and sites (LPSS). The spatial strategy for the future development of the application site is set out in Policy A15. The policy states that the site is allocated for approximately 100 homes (C3) and in summary requires development to:

- provide pedestrian connectivity
- maintain strategic views of the Cathedral
- be sensitive to the setting of the Grade II* listed Cathedral
- have a holistic landscaping approach
- provide green infrastructure

1223 The key considerations stated in policy A15, in summary are as follows:

- setting of the heritage asset
- views
- design scale and height of development
- impact on the green mound and silhouette
- loss of open space
- mature hedging
- urban context
- adjacent to district heat priority area
- partly in groundwater source protection zone 1 (SPZ1)

1224 The NPPF makes clear that in taking decisions on planning applications, Local Planning Authorities should apply a presumption in favour of sustainable development. 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 where specific policies in the Framework indicate development should be restricted.

- 1225 The principle of residential development should be considered acceptable, although this would be subject to other relevant planning policies and technical considerations. These are considered in detail in the proceeding sections of this report.

123 Housing delivery

- 1231 The land at the Cathedral is allocated for approximately 100 dwellings in the adopted LPSS. For this reason, the principle of residential development on this site is established. The in-principle suitability and sustainability of the site for residential development has been established through the plan making process. As part of the plan making process, the Council developed a spatial strategy that sought to meet the identified need for housing in full in the most sustainable way. In doing so, the land at the Cathedral was first identified in The Regulation 19 (2016) version of the plan. It was retained in the Regulation 19 (2017) version.

- 1232 The Local Plan Inspector noted that the housing allocations in policies A15 to A21 would provide a significant number of additional homes in sustainable locations within the town. "With sensitive design and appropriate scale, the Inspector considered that it would be possible to achieve the development of 100 homes on site A15 without harming the setting of Guildford Cathedral" (paragraph 196 of the Examination Report dated 27.03.2019). The current application proposes 124 units, which is considered by officers to be materially more than the 100 home approximation in Policy A15. The proposal would make an important contribution to bringing forward housing units in the next five years, including 46% of which would be affordable homes. It would also contribute towards achieving sustainable, inclusive and mixed communities. In addition, development of this site would provide financial benefits for the Cathedral and assist with its long-term operations in Guildford, as considered in further detail below.

- 1233 The Council is able to demonstrate a five-year housing land supply with an appropriate buffer. This supply is assessed as being 6.46 years based on most recent evidence as reflected in the Land Availability Assessment (LAA) 2022. In addition to this, the Government's recently published Housing Delivery Test indicates that Guildford's 2021 measurement is 144%. For the purposes of NPPF footnote 8, this is therefore greater than the threshold set out in paragraph 222 (75%). Therefore, the Plan and its policies are regarded as up to date in terms of paragraph 11 of the NPPF.

124 Context and identity

- 124.1 LPSS Policy D1 ('Place Shaping') requires new development to achieve high quality design that responds to the distinctive local character (including landscape character) of the area in which it is set. LPDMP Policy D4 ('Achieving High Quality Design and Respecting Local Distinctiveness') requires development proposals to demonstrate

how the development would achieve the ten characteristics of well-designed places as set out in the National Design Guide and demonstrate a clear understanding of the place comprising the site and the surrounding context within which it sits including the opportunities for design as well as any constraints upon it.

- 1242 The site is one of seven housing allocations in the Guildford urban area (outside the town centre). The allocation is significant due to its sensitive location and setting of the Grade II* listed Cathedral. For this reason, an understanding of and responding to its context, identity and character would be essential

Context

- 1243 'Context' concerns the location of a site or development and the attributes and character of its surroundings. Paragraph 39 of the NDG confirms, in summary, that development based on an understanding of the attributes set out in that paragraph would integrate more successfully and more likely to be acceptable to a local community. Paragraph 40 emphasises that well-designed places are; based on a sound understanding of the features of the site and the surrounding context; integrated into their surroundings so they relate well to them; are influenced by and influence their context positively; and responsive to local history, culture and heritage.
- 1244 The site occupied is outside the town centre, next to the Stag Hill Campus of the University of Surrey with suburban residential housing on the land to the south and east. When completed in 1961, (25 years after the laying of the foundation stone), this was the first Cathedral in the south to be built on a new site since the Middle Ages and is one of only three British Anglican Cathedrals to be built since the C16th Reformation (Liverpool on a new site and Coventry a replacement being the others).
- 1245 The history of the site: Appendix 9 of the submitted Heritage Statement (Commentary on the Maufe 'Masterplan'), the report by English Heritage on Guildford Cathedral, St Blaise Guildford, Surrey: Twentieth-Century Setting and Landscape (2007) and Cathedral Covering Note dated 24.02.2023 provide information on the acquisition of land for the development of the Cathedral. In her report Jackie Taylor states that Viscount Bennett (Richard Bedford Bennett, ex-Prime Minister of Canada, Viscount Bennett of Calgary and Mickleham (1930 – 1935/6)) gave the funds to acquire 20 acres of land offered by the Earl of Onslow at a favourable cost (in addition to the donation of the original site(s)) relying on papers in Maufe's archive and the Cathedral confirm this was combined with other donations. Viscount Bennett moved to England in the late 1930s and worked with Lord Beaverbrook (his neighbour in Surrey) in the British Wartime Government. This donation was originally intended by Bennett to be anonymous, however, the 'Cathedral Committee' sought to recognise this publicly and the association between Canada and the diocese of Guildford in the World Wars, has been commemorated in a ledger stone on the south elevation of the Cathedral. In the commentary in Appendix 9(Illustration A), on page 3 indicates that plots of land were acquired in the 1940s in two phases. In 1942 the land to the north and two plots either side of the south processional route were acquired. In 1943 a plot of land to the north-west of the Cathedral was acquired along with the eastern meadow plot which extended down to the former Guildford Park farm site. Without a plan of the precise

areas of land given by Viscount Bennett it is difficult to be certain, but it appears that these described above are the most likely areas.

- 1246 The Cathedrals response dated 03.02.2023 to the queries on the financial gift from Viscount Bennett, refers to a memorandum dated 23.03.1943 regarding the context behind why the Cathedral wished to acquire the land and their aspirations. The intention was management of the surrounding land by the Cathedral Committee and to use that land for their needs to provide ancillary accommodation.
- 1247 Part of this land to the north was sold off and forms part of the University of Surrey in the 1960s and part was later sold off for the Scholar's Walk development.
- 1248 The Cathedral, with its green spaces and slopes are visually prominent in the town due to the rolling topography and recognisable silhouette as a modern Gothic Cathedral in a parkland setting. The immediate approaches to the building have been designed to create drama and awe in which to appreciate its monumental scale. The green spaces allow for the Cathedral to be the dominant feature and the informal landscaping, also creates a tranquil place to appreciate the panoramic views over the town and to the countryside in the distance. Along the southern boundary are suburban detached and semi-detached homes on and accessed from Ridgemount and Aylesford Road and with the established hedgerow and five, mature Oak trees served with Tree Preservation Order (TPO no. 1993 No. 8, T1-T5) this has a more tranquil semi-rural lane character.
- 1249 In 1954 Maufe drew up a site plan that indicated the potential for additional buildings at the intersection of the circular driveway and at the west end of the Cathedral on the edges of what he called the west forecourt. These comprising buildings on the south side of the west forecourt and on the north side of the forecourt and responding to the axial approach to the west front. Also, clergy housing included a terrace and garden on either side. A verger's cottage and a groundsman's cottage were proposed at the edge of the roadside on the south end of the pedestrian pilgrimage route to the Cathedral's south entrance, these were built and are Locally Listed.
- 124.10 The western processional route was to be laid out with ornamental gardens, paths, and seating and allowed a leisurely and meditative approach to the building. The topography was specifically manipulated by Maufe for a gradient to accommodate vehicles from the west (using the newly constructed A3 bypass) and a different pilgrimage route by pedestrians from the south.
- 124.11 Guildford Cathedral, St Blaise Guildford, Surrey: Twentieth-Century Setting and Landscape (2007) report states that "Although detailed discussions of the Cathedral design are plentiful, no specific evidence has been found to indicate particular treatment of the surrounding site." Original designs suggest the intention was for the Cathedral to stand in a position of prominence surrounded by a rural landscape and the precinct on the forecourt. Forming a clear threshold from the built development on the hilltop and the surrounding countryside.
- 124.12 In 1964 as land was sold for the university the boundary was negotiated and "suggests

a desire to retain a degree of space around the building, providing a continued precinct that sets the Cathedral apart from any encroaching construction”.

- 124.13 The report concludes that as Maufe envisaged construction of buildings on either side of the west forecourt, he may not have opposed further buildings around the Cathedral with the west side remaining open.
- 124.14 The internationally recognised architect and landscape architect, Sir Geoffrey Jellicoe, produced an outline plan showing additional housing for the westernmost part of the site around 1954. In a concluding remark, the Design and Access Statement (DAS), page 17, asserts, “The Jellicoe drawings reinforce the view that there was an expectation on the part of the local planners that the surrounding land and the road network would be developed and that the Cathedral would therefore be seen within a suburban landscape”. The evidence for this is Jellicoe’s drawing, yet this shows housing only at the very far west end lower lying part of the site, addressing the roundabout in front. There is no supporting evidence, contrary to the assertion in the DAS, that Jellicoe’s vision would form a wider spread “suburban landscape” or be acceptable for residential development. The Cathedral landscape is shown by Jellicoe as mostly open, intact and undeveloped.
- 124.15 The undeveloped land surrounding the Cathedral, provides a break in the built environment and is designated as ‘Amenity Green Space’. Whilst this is privately owned, it has a public recreation value for walking and enjoying the spaces in the grounds and an amenity value as a ‘green collar’, viewpoints out to the town and countryside and tranquillity due to the undeveloped nature.
- 124.16 The open space of the southern slopes consists of two areas, the southern approach with its formal steps and defining Lodge Buildings at the street edge; and the east/west oriented slope above Alresford Road, separated from the western approach by a dense line of greenery. Any development in this area would be partly seen from various viewpoints on the main approach steps.
- 124.17 The hillside parallel to Alresford Road currently provides an attractive green link and movement route between the street hedgerow and upper level dense planting, it does not have the unique sense of a semi-wilderness space (as the Eastern Meadow), or particular views out towards the town centre.
- 124.18 Key application documents describe the site and its surroundings, provide detailed contextual appraisals and evaluate the landscape baseline and predicted impacts to landscape character and visual amenity. The Design and Access Statement (DAS) (October 2021) has a site analysis which consists of photographs (pages 30-47), two plans identifying ‘Constraints’ and ‘Opportunities’ (pages 48 and 49), neither of which particularly define spatial character; a heritage plan page 50 which includes the Maufe notes showing the Eastern Meadow as ‘Not to be built upon’; and at page 51, a summary plan which includes previous farm and hedgerow locations. The plans suggest that these have been done by different people without cross-referring information.

- 124.19 The applicant's declaration of social aims to "reinforce a community spirit" by "encouraging community inter-action" (DAS page 123) "with the Cathedral at its heart" and the DAS section, "Cathedral Morphology" (page 77 - 79) reference to the situation and character of a number of English Cathedral sites appears to be an appropriate starting point for considering how to deliver development. Yet there is no analysis or interpretation of the deeper nature and character of these historic complexes, or of the adjacent Guildford neighbourhood and wider context. In this disconnection, the applicant fails to demonstrate the purpose of the references in the DAS. The National Design Guide (NDG) expect proposals to be explained as inspired, informed and conceptually or otherwise related in master plan and architectural design to the historic landmarks and local references offered by applicants.
- 12420 The information shown is limited, practical only and not interpreted in a way that could inform a successful design approach. An example is the following statements made on page 51: "The proposed layout is strongly influenced by the axial geometry of the Cathedral and the historic landscape.... the proposed public open space of the eastern meadow is proportionally aligned with the eastern elevation of the Cathedral." However, as subsequently agreed in the DAS Addendum, the Eastern Meadow is described as an organic, 'wilderness space' and therefore, a 'formal garden' approach to this would be inappropriate, however it is hard to see how this very strong and obvious organic quality has not been noted and experienced in the initial analysis and therefore retained as part of the proposals.
- 12421 The site is described in the DAS as a 'disconnected and inaccessible hillside' (page 89 and earlier) which is not factually correct. It is easily accessed by car (as part of the Maufe's vision), as well as by cycle or foot – with some effort to ascend the hills – and is a well-used location in its context. This DAS assumption clearly informs a mistaken design approach at the outset.
- 12422 The Town Centre Views SPD describes the Cathedral as a 'Landmark Legacy building'. To the immediate east of the Cathedral are a series of three open spaces, enclosed to the east by a tree belt, which runs north-south through the site. The memorial garden area has a contemplative quality is reinforced by the timber cross, the memorial tree to the British Expeditionary Force or "Contemptible Little Army" who fought in France and Belgium in 1914 and the signage requesting respect. The children's garden is visually screened. There is some pedestrian activity although the visual presence of the Cathedral, the Lady Chapel and the wooden cross in particular is strong. The experience of the space is that it is intimate and calm.
- 12423 Beyond the tree belt to the east, the site opens out to an area of grassland, which forms the eastern crest of Stag Hill and affords views out to the surrounding countryside. This is accessed from the northern car park, from the pedestrian path through to the university, from the southern path alongside the Cathedral and up steps from Cathedral Close. It may well feel sheltered and enclosed, however, it is neither 'disconnected' nor 'inaccessible' and there are paths across the space. This is even stated in paragraph 5.15.4 of the Town Centre Views SPD.
- 12424 The eastern 'meadow' consists of two distinct spaces of different character. The first is

the relatively flat area of 'arrival' into the meadow area (from the west through the consecrated ground and children's garden) from where there is wide view, of more or less 270 degrees, providing a spatial experience of an informal 'wilderness' place surrounded by greenery. Some of the adjacent university buildings are apparent through the winter branches of trees, although these do not open onto or towards the space, nor do the lower but partly seen existing clergy houses. The focus of this space is the large free-standing oak tree to the east and the overall sense of the meadow is that of a secluded and 'semi-secret' field, albeit well-used by students, dog-walkers, moon-watchers and town-viewers.

12425 Moving south-east towards and past the large oak tree, the next distinct space opens up, providing clearer views towards the town centre to the south east. This area is smaller, contained by planting to the east boundary and to the clergy housing, then the land falls more steeply, creating a green 'apron' foreground to the views beyond. This is an attractive spot for experiencing views towards the town, the wider Surrey Hills AONB, the reflected sunset and a sense of being 'within, yet separate from' the immediate urban context.

12426 The viewpoint is of high value and in recognition of this, is one of the identified viewpoints (VP15) in the Town Centre Views SPD, as its elevated location provides a vantage point over the town centre where a number of landmark heritage assets and the town with the countryside beyond. There are long views out over Guildford to the south, where the open grassed ridgeline of the Surrey Hills AONB forms the skyline to the view beyond the edge of settlement. This location provides the clearest views as trees along the settlement edge and around the university screen views from the lower slopes.

12427 The eastern slopes below the meadow currently contain seven clergy houses set around the access lane Cathedral Close and sitting within relatively unmanaged but domestic planting. This area is an appropriate one for new buildings as long as the relevant impacts are understood and mitigated. The new buildings would occupy the space more densely, there would be a loss of greenery and open space, however as the 'open space' in this area is currently related to the residential buildings, it is not so much a loss of usable public space, but a visual loss of greenery in longer views from the south, east and west, as well as in closer views from the immediate south.

12428 The proposal, DAS page 120, records simple observations of the architecture and material of the brick Cathedral, including, "contrasting stone detail around doors and windows", "arched entrances and doorways", "simple flat topped tower", "low pitched roofs" and "vertically proportioned windows span the building height". Yet there is no deeper analysis, nor explanation of design that would interpret and relate these observations to inform the general arrangement, form and design expression of proposals.

12429 The existing landscape areas are tired, and the quality of these spaces is not commensurate with the importance of the Cathedral or its setting. Soft landscaping areas include a parkland landscape of mown grass with groups of trees, wooded enclosure and naturalised boundaries. This has not been well managed and is

overgrown in part and has self-sown trees that obscure the view of the Cathedral from the town and closer viewpoints. The hard landscape areas comprise concrete slab paving, concrete paths, access roads and tarmacadam surface parking.

124.30 In landscape terms, the DAS does not refer to any characteristics of the landscape character as set out in National, County and Local appraisals. The Landscape and Visual Appraisal (LVA) (December 2022) refers to the Guildford Town Centre Views SPD, Surrey Landscape Character Assessment and Guildford Landscape Character Assessment (GLCA). The weak link between these documents calls into question the extent to which the detailed appraisal has informed the design development, given the thorough work which has been carried out in the LVA. Especially because of the views out from the site and the wider views from where the Cathedral can be seen including the countryside.

124.31 The site is part of the western expansion of Guildford after WW2, this was developed as a suburban area and the surrounding housing typifies this grain. So, despite land being developed by the Cathedral or sold onto third parties the parkland setting has endured as a landmark building with green spaces.

124.32 The physical townscape has been influenced by the undulating topography of claylands and chalk areas influences the grid of roads, which are arranged to be perpendicular to the slopes or to run along the contours. The street framed views from these slopes focus from the east-west streets off Woodbridge Road across Surrey County Cricket Ground and from the north-south streets off Farnham Road, there is currently a visual connection between the Cathedral and the open space on Stag Hill. Other key views in the GLCA are from Guildford Park/Onslow Village (8A) towards the centre of Guildford and the Cathedral on Stag Hill which has a strong visual relationship. The view from Stoughton Road and Oak Tree Drive, Bellfields to the Cathedral and from Oak Tree Drive to the North Downs and panoramic views from Bright Hill and Pewley Hill.

124.33 The key architectural and historic interest of the Cathedral are:

- its intentionally designed visual prominence relying on mass, proportion and silhouette in addition to the elevated site;
- the originally simple landscape treatment based upon two formal approaches;
- the architectural power of the simple silhouette, bold massing and confidently handled, carefully considered, volumes; and
- the architectural drama of the open, western approach up Stag Hill.

124.34 The key aspects that contribute positively to architectural significance and the ability to appreciate the architectural and historic interest which form part of the setting of the Cathedral and to its significance are:

- Arrival sequences – car and pedestrian - both formally aligned with axial entrances;
- Division between formal and informal character of the landscape with a dividing line along the crossing point of the Cathedral;

- The informal setting to the east - responding to the ecclesiastic norm and maintaining a deliberately open character as a response to the intended visual relationship with the topography of the town; and
- The open nature of the western approaches with the Cathedral purposely originally designed as stand-alone without ancillary structures (of necessity in part) because at the time of the competition the diocese didn't own land to North or South.

124.35 These are the elements of the setting of the Cathedral that need to be managed:

- Retain and enhance pedestrian routes - east-west between the new development and existing dense planting and adding clear and attractive routes from the south into the Cathedral green spaces;
- Views towards the Cathedral and green spaces should be maintained;
- Views from the wider setting which enable an understanding of the reasons for the deliberate decision to place the Cathedral at what was then the edge of Guildford with the elevated topography enabling a visual and symbolic prominence across the town should be maintained; and
- The remaining informal semi-rural setting of the southern slopes extending down to Alresford Road and Ridgeway, illustrating the edge of town location of the Cathedral and retaining the remnants of the original character of the site require sensitive management.

Identity

124.36 'Identity' concerns the ways in which "buildings, streets and spaces, landscape and infrastructure combine together and how people experience them". This is stated at Paragraph 50 of the NDG which also observes that well-designed places, buildings and spaces have; a positive and coherent identity that everyone can relate with; have character that suits the context, its history, how we live today and in the future; and are visually attractive in order to delight their occupants and users.

124.37 The Cathedral was designed by Sir Edward Maufe he also built for banks, Oxbridge colleges, the Inns of Court, and the Commonwealth War Graves Commission including designing the Runnymede Air Forces Memorial.

124.38 The design of the Cathedral fused the historic example of the great English Cathedrals with a sense of modernity, which was part of Maufe's intention. The external appearance relied on mass, volume, and line rather than on the elaboration and ornament of the historic Gothic style. His chosen materials included pink/grey long and thin Roman type brick and stone, and reinforced concrete which eliminated the need for horizontal thrusts of vaults and arches supported on piers and walls. Reinforced concrete also added a fireproof element to the construction. The simplicity respects Gothic architecture and is infused with Scandinavian influences. The land around the slopes is a parkland, with tree planting, hedges, mown grass and paths formed along both desire lines and more formally with laid footways.

124.39 It should also be noted that Maufe's plan of 1954 (DAS page 48) includes a statement

on most of the Eastern Meadow area, saying: 'Not to be built upon'. While times and needs have changed, that is a strong indication that Maufe saw the Eastern Meadow as a space for openness and contemplation of the town in the view, rather than a space that would be absorbed into the town.

- 12440 It was listed in 1981 as Grade II*, so is in the top circa. 8% of listed buildings in the country. It was designed as a landmark building that could be seen from miles around as a symbol of the mission of the Guildford Diocese newly formed in 1927. When this was formed from part of the ancient Diocese of Winchester the historic diocese included most of Surrey and North East Hants, and touched on West Sussex and Outer London. The creation of a new diocese was in response to the growing population in the south east in the early part of the C20th.
- 12441 The topography of the Cathedral site slopes away steeply to the east and south. Scholars Close as a development is less distinctive, more generic in terms of design and more screened. To the south-east, on the mid and lower slopes, is a dispersed cluster of seven buildings associated with Cathedral Close, which sit within large plots, are treed and contain well established vegetation. From Ridgmont and Alresford Road the overgrown trees and hedgerows are the predominant feature. However, from longer range views, including from the Castle Motte and The Mount the distinctive green roof of the main dwellings can be seen. In these locations those enjoying these views will dwell and the green roofs are more apparent in the winter.
- 12442 The long-range views of the Cathedral from the surrounding town and countryside reinforce appreciation of it as a monumental structure with a strong silhouette. Whilst the lack of management of the tree growth has obscured some of the views over time, the predominantly open, green space allows for the building to be seen in its own context, quite separate from the historic town.
- 12443 The Cathedral's intangible associations with its surroundings and patterns of use add to an understanding and appreciation of its historic significance and, unless they can be physically experienced, development is unlikely to erode them. The intangible associations include those with the University of Surrey which is on land sold by the Cathedral in 1960s. Associations exist with other Onslow land including in particular Onslow Village which was an immediately pre-existing garden city expansion of the town. Pedestrian routes cross the Cathedral site from north to south physically linking both of these areas in a manner not originally envisaged by the architect.
- 12444 The history of the Cathedral and the surrounding land is set out in pages 13-17 of the Design and Access Statement (DAS, October 2021). There is an intellectual association with the church of Holy Trinity which acted as the proto-Cathedral until the present building could be built, that adds to the historic interest of both assets. The tangible representation of this connection between the two is represented by views from the eastern field on Stag Hill. There is also both an historic association with the existing clergy housing in Cathedral Close and a tangible element of the functional connection with the private approach from the south east and up the hill. Intangible associations between the ex-Prime Minister of Canada following his donation are recorded by a ledger stone on the Cathedral itself. There are also the associations with

the architect of the Cathedral, Edward Maufe and his role as architect to the Imperial War Graves Commission and the community relationship through the 'Buy-a-Brick' campaign to raise funds to which almost every schoolchild in Surrey contributed.

- 12445 Whilst privately owned the site is publicly accessible, there is a pedestrian access to the university campus along the northern boundary just beyond the car park, a footpath down through Cathedral Close. In addition to this there are informal access points through the hedgerow to desire lines across the parkland. The site has a degree of permeability as routes cross the site and provide shorter and direct routes to facilities in the town from the university for daily use. It is also a popular walking destination for those in the vicinity including dog walkers, those with young children and many others. This made it particularly popular during the COVID-19 pandemic lockdowns.
- 12446 Pages 48-49 of the DAS (October 2021) have the constraints and opportunities plans, the plan at this early stage has identified a number of higher-grade category 'A' and 'B' trees to be removed on the southern slopes, seeks to retain some groups of tree buffers and not others without much detailed justification. This then goes on to only recognise the east-west building lines not the north-south building lines, only identifies two views out from the Cathedral site and does not account for others inside and along the site boundaries looking in. As a site on a hill in a prominent location further investigation of the constraints and opportunities would have better informed the initial masterplanning work for the proposed scheme. This does not appear to have been influenced by the work in the LVA (December 2022) as the DAS addendum (December 2022) has no update to this.
- 12447 Returning to considerations of policy the context and identity of the site suggest this is a very special and unique place and any development needs to be very sensitive to strike the right balance in providing a high-quality sense of place whilst preserving the setting of the Cathedral as a heritage asset, its wider setting and the enjoyment of the informal grounds. The site allocation for approximately 100 new homes would have led to the change in character as there would be a change in the grain, scale and form of buildings built on the site compared to surrounding suburban, residential development and therefore, how the site would be experienced by those using the open spaces. However, this always has to be balanced with any public benefits and achieving the site allocation policy requirements. The topography of the site and architecture of the Cathedral offers bespoke opportunities for innovation and individuality. This has been paramount for the Council in guiding discussions and seeking to secure improvements to the proposals with the applicant, and in particular, in respect of identifying appropriate design parameters.
- 12448 The amended plans are a response to some of the matters such as building lines, maintaining a tranquillity in the Eastern Meadows, retaining views outwards as much of possible and reducing the impact of the scale and mass of the buildings.
- 12449 Overall, it is concluded that the development following the amendment has not fully taken account of the local context and identity of the site and surrounding areas to provide a sensitive and informed design response that would enhance the surrounding area through the landscape approach and provide an attractive and distinctive built

form. Accordingly, the application would fail to comply with policy D1 of the LPSS, policy D4 of the LPDMP, policies G1 and G5 of the saved Local Plan 2003, and Chapter 12 of the NPPF.

125 Slope stability and engineering solution

1251 The suitability for developing the site, considering the ground conditions and risks from land instability, is required to be addressed with site investigation information and there is an onus on the developer to deliver a safe site under paragraphs 183-184 of the NPPF. The PPG states the planning system has an important role in considering land stability and sets out the issues to be considered and include in a slope stability risk assessment report and land stability risk assessment report at paragraphs: 007 Reference ID: 45-007-20140306 and 008 Reference ID: 45-008-20140306.

1252 The proposed development would require significant reprofiling of the slopes with areas of cut and fill as it is not proposed to import any additional inert material for the work. The homes on the Eastern Meadows and Western Parcel would work more with the slope however, engineering would still be required even with the stepped house designs for the gardens and to set the buildings down. The Eastern Slopes would involve a more comprehensive change with distinct levels for the buildings and roads, including a podium level.

1253 The applicant has submitted Phase I Desk Study, Site Reconnaissance and Phase II Site Investigation Report, Flood Risk Assessment (FRA), Preliminary Slope Stability Assessment and Summary Technical Appraisal prepared between July 2014 to January 2017. This was all then reviewed by Geo-Environmental who produced the technical note dated 25.02.2022.

1254 The investigative works carried out included desk top studies, exploratory holes, testing to inform a preliminary slope stability assessment, some modelling of slope angles and soil sampling and testing.

1255 Stag Hill has slope angles that range from 6 degrees to 20 degrees and the proposed development would take place downslope. The ground conditions comprise predominantly clay and landslides were checked and identified outside the site boundary, although there could be unrecorded landslides.

1256 Current drainage measures are limited and water drains down the slope and pools at the bottom resulting in boggy conditions in the winter. Attenuation with on-site storage crates has been proposed, however, this would require measures to prevent storm water leaking in around the edges, which in the long term could increase the risk.

1257 Due to the ground conditions, piled foundations would be required with suspended ground floor slabs and the identification of numerous sub-horizontal to horizontal shear planes which could lead to landslides. This would require further technical assessment for the construction phase and final design of the development.

1258 The slope stability assessment found that the current slopes were the 'maximum safe

angle' and further steepening would lead to instability. Additional modelling and detailed stability analysis would be required. It also found that to ensure that the development was not compromised, the water table needed to be lowered as this would improve stability.

1259 Ground anchors are being considered, which would require ground water management to be installed at the construction phase. A consequence of this would be deeper cut backs for the foundations and retaining structures. This would have the benefit of improving stability at an earlier stage, reducing the need for as many temporary supports.

125.10 The next stage of investigation and assessment would comprise the following, which could be secured by planning condition:

- trial pits;
- deep boreholes with dual monitoring well installations and groundwater monitoring;
- geotechnical laboratory testing to inform the assessment for and design of foundations, roads, retaining walls, slope stability and buried concrete;
- soil sample testing;
- slope stability modelling; and
- Ground Investigation Report

125.11 Further clarification was sought from the applicant including matters raised by Friends of Stag Hill (FOSH), and they submitted 'Response to Additional Slope Stability Comments – August 2022' on 04.08.2022, in summary:

- Mitigation measures including the detailed design details can be secured by a pre-commencement condition;
- The recommendations would be taken forward to ensure the submitted scheme would be delivered and any amendments following the detailed design would be the subject to further consideration and approval;
- Tree removal would include retaining structures or mitigation where it is necessary to ensure no impact on slope stability or in a phased way;
- Likely that retaining walls would be put in on a permanent basis to avoid unnecessary temporary ground works;
- Two dew ponds at the bottom of the southern slope rather than on the slopes due to the steep slope;
- Surface water would discharge to the greenfield rate, which is an improvement on the existing situation;
- Ground water flooding risks would be reduced by a reduction in impermeable area and onsite storage;
- Collaboration between architects, landscape architects, heritage consultant, drainage engineers, lighting engineers, transport consultants, ecological consultants, arboricultural consultants, structural engineers, MEP engineers, civil engineers including geotechnical input, sustainability consultants and Vivid Homes;
- Compliance with the Construction (Design and Management) Regulations 2015 (CDM 2015) from the Health and Safety Executive;

- 125.12 The landscaping plans show that on the south-west side, the terracing would have predominately 70 degree gabion basket retaining walls to the rear gardens, extending to heights in excess of 3m. These walls are shown to employ ground anchors to enhance stability. The Western Parcel, in part follows the slopes of the existing site, other parts of this parcel would have terracing with solid retaining walls within the properties themselves, together with further gabion basket retaining walls.
- 125.13 All of the technical information was independently reviewed by Cooper & Withycombe, engineering consultants, they have confirmed that the work to date is comprehensive and the risks have been identified by the applicant, in accordance with the NPPF and PPG. The mitigation measures, further detailed design work and assessments are the next stage.
- 125.14 The proposed development would accord with the requirements in the NPPF and guidance in the PPG. The details submitted show that the initial investigative work has identified the risks to slope instability from the development and construction phase and has included necessary mitigation. It would be appropriate that additional intrusive site investigations as identified could suitably be secured by pre-commencement conditions. This would comply with policy P4 of the LPSS and policy P13 of the LPDMP to manage surface water and groundwater.
- 126 Access, highway safety and capacity
- 126.1 Paragraph 105 of the NPPF requires significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. Paragraph 111 explains that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.
- 126.2 Paragraph 112 states development should give priority to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitate access to high quality public transport, with, inter alia, facilities that encourage public transport use. In allocating the site in the LPSS the sustainability of the location in terms of patterns of movement were regarded as acceptable in principle and policy A15 requires pedestrian connectivity to support this.
- 126.3 Policy ID3 of the LPSS says that new development will be expected to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of sustainable transport modes, and establishing a set of steps for development to take into account in order to achieve this objective. The Sustainable Movement Corridor (SMC) forms part of the Infrastructure Delivery Plan (IDP) so would provide priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, linked by existing roads. Ridgemount and Alresford Road would be a part of the SMC.
- 126.4 Policy ID10 of the LPDMP seeks to facilitate the comprehensive cycle network and figure A2 shows that Ridgemount and Alresford Road are part of the primary route for

this and there would be a need to provide infrastructure to support this. Policy ID11 sits alongside the draft Parking SPD, for a balance between parking spaces, promoting sustainable alternatives and a more efficient use of land.

- 1265 A further document which is a material consideration is the Local Transport Plan (LTP4), 2022-2032 produced by the County Highways Authority (CHA). This identifies policy areas to deliver the CHA's objectives of 'avoid travel', 'shift travel mode' and 'improve energy and operational efficiency of travel', the latter covering 'efficient network management' as a policy area.
- 1266 A transport package suitable for the scale of development which focuses on provision of sustainable transport options for future occupiers is required. By providing access and infrastructure to support and encourage alternative modes of transport, thereby reducing the reliance on the private vehicle. Which in turn would manage car trips from this site onto the highway network and improve air quality.
- 1267 During the course of the application further matters were raised by the CHA in a letter dated 10.02.2023, regarding the provision of a car club, pedestrian safety, car parking space sizes, manoeuvrability, cycle storage and access and appliance access. The responses were provided from i-Transport in document, Ref: JCB/MS/ITL14217-011 TN dated 14.02.2023.

Access and internal road layout

- 1268 A transport assessment (TA) addendum 30.11.2022 has been prepared by i-Transport and submitted as part of the amended application scheme. The updated proposed access strategy for vehicles, cycles and pedestrians is described in the addendum and summarised below:
- A priority junction at the western end of Alresford Road, serving as an exit only for the Western Parcel of the site;
 - A more centrally located ingress for the western parcel;
 - The two-way priority junction at the Cathedral Close junction, which would serve the majority of the development; and
 - A private drive leading off the Cathedral upper car park (accessed via Stag Hill) to serve five homes for Cathedral staff.
 - An east-west cycle connection from Alresford Road through the site up to the eastern boundary with the university.

None of the roads in the site would be offered for adoption to the CHA.

- 1269 Cathedral Close currently has a gradient of circa 1:8 and the proposal would have shallower gradients of 1:15 for the western access and 1:12 for the eastern access. These accesses would be shared use for cyclists and pedestrians and the Manual for Streets (MfS), ideally requires the gradient to be no more than 1:20, with point 6.3.27 of MfS further clarifying that 'topography and other circumstances may make this difficult to achieve'. This is the case here and all measures have been taken to make

this safe and useable and the challenges of the topography were known when the site was allocated.

- 126.10 As noted above, the Western Parcel would have a separate entry and exit meaning that vehicles would travel in one direction (west) through the parcel on a new road which would run parallel to Alresford Road. The entry would be close to Stag Hill and the exit would be adjacent to Benbrick Road. While the plans illustrate that the access through the Western Parcel would be of tarmac construction, the middle section would have a paved raised table which would slow traffic, this would also create a legible access into the small area of open space which is proposed. The CHA has raised no objections to this arrangement.
- 126.11 Pedestrian access to this parcel would be gained from Alresford Road or to the rear from the Cathedral grounds. A pavement would provide entry into the site. However, this would then give way to a shared space where pedestrians, vehicles and other road users would all navigate their way through. Given the low vehicle speeds on this part of the site, which could be controlled by the raised table in the middle, no objections are raised to this arrangement.
- 126.12 The access into the Eastern Slopes of the site would be taken from Ridgemount further to the west and the existing western Cathedral Close access would be closed and amended to a pedestrian access. This would be the only vehicular access into this part of the site and would be two-way. The road would be a backward C shape, wrapping around the perimeter of residential units. The road would end in a cul-de-sac to the north-east of Block K. Access into the underground parking area would also be accessed from this road, the entry to which would be located between Blocks A and B.
- 126.13 Pedestrians would access the Eastern Slopes either from Ridgemount via a pavement which would follow the same route as the access road, or the access point where Cathedral Close currently is. Pedestrians could also access this parcel from the existing gate to the north of Scholars Walk, via the university or from the west through Cathedral grounds. No objections have been raised by the CHA with regard to either the vehicular or pedestrian access arrangements into this parcel of the development.
- 126.14 The proposed five clergy housing units along the northern boundary of the site would be accessed through the existing Cathedral car park. Given the limited number of movements associated with these units, this arrangement is deemed to be acceptable. Pedestrian access to these units could be gained from Ridgemount through the largest parcel or via the Cathedral grounds or through the pedestrian gate to the north of Scholars Walk.
- 126.15 A number of third-party representations refer to an alternative vehicular access from Stag Hill, as this would then negate the need for new access points onto Alresford Road and Ridgemount and a resulting reduction in traffic. Firstly, it must be noted that the scheme refused under 15/P/02284 was not refused due to highways safety matters arising from the proposed access arrangements, which were also to be from Ridgemount and Alresford Road. That scheme generated a greater number of car trips, and the access arrangements were acceptable in terms of highways safety and

capacity. The proposed scheme has a lower number of trips (one-third less), so there would be highway capacity. The junctions have been designed with the CHA and have been the subject of a road safety audit, so are safe.

- 12616 Providing an access to all of the units through the Cathedral land from Stagg Hill would require significant land level changes to parts of the site very close to the Cathedral building. This in turn would, have a negative impact on the setting of the heritage asset. In addition to this, there would be further concerns regarding the removal of more trees, the loss of open space etc. As such, an access through the site serving all of the proposed residential units is not a suitable alternative.
- 12617 In terms of access for cyclists, the applicant proposes a route through the site which would link through the university (north of Scholars Walk), across the site and onto The Chase. From this route cyclists would be able to access the various parcels of the development, or otherwise, they could still be accessed from Ridgemount and Alresford Road. Even with the additional traffic flows on Alresford Road and Ridgemount this would continue to be lightly trafficked road with slow speeds due to the narrow width of the road The Sustainable Movement Corridor (SMC) along Alresford Road and Ridgemount would provide a safe and suitable route for the majority cyclists to cycle on the carriageway in accordance with relevance guidance including LTN1/20.

Highway safety and capacity

- 12618 The submitted TA (dated October 2021) has undertaken a detailed assessment of traffic generation which included manual classified counts (MCC) and queue length surveys undertaken on 12.09.2019, between the hours of 07:00-10:00 and 16:00-19:00. Automatic Travel Counts (ATC) surveys were also undertaken at a number of locations, between 05.09.2019 and 19 .09.2019.
- 12619 The baseline inputs were based on multi-modal trip rates for 30 private houses and 94 private flats, rather than taking the affordable homes into account (which generate fewer trips and the Cathedral housing which would generate no/ few trips as these would be live/work homes). Also, the current traffic levels were based on pre-COVID-19 pandemic data when there was less working from home, than there currently is. Therefore, the modelling would air on the side of caution, to account for a worst case scenario.
- 12620 The modelling was then carried out on the roundabouts at the A3, Guildford Park Road and priority junctions including Benbrick Road and The Chase. This was checked by the CHA and National Highways, who found the methodology and results were sound.
- 12621 An estimated 741 daily trips are expected. Based on mode shares derived from census data (reference table 3.3 of TA) 415 of these trips would be by train, bus, cycle or walking.
- 12622 In terms of vehicular movements, the existing traffic flows on Alresford Road and Ridgemount are approximately two vehicles per minute. Speed surveys show that most

vehicles travel below the 30mph speed limit. As such, it is a lightly trafficked and slow speed route without any existing highways safety issue. The proposed vehicle trip rates have been provided at table 6.3 of the original TA. Traffic generated from the development would result in approximately 20 vehicular movements per hour (vph) on Alresford Road and Ridgemount, which is one vehicle every three minutes. This level of increase would not be noticeable. It would also ensure that the SMC along Alresford Road and Ridgemount would remain safe for cyclists to use the carriageway.

- 12623 The previously refused planning application, 15/P/02284, which proposed 134 dwellings would have seen a higher increase of vehicle trips associated with the site as there were more houses than flats, so resulted in 60-70 vehicles per hour at the morning and evening peak times. The current scheme would see a decrease in vehicle movements when compared to the 2015 application, with an expected 40 vehicles per hour only at peak times (see table 6.4, TA October 2021).
- 12624 The increase in vehicle movements would not have an adverse impact on the highway network as there would be satisfactory capacity to accommodate this.

Sustainable transport

- 12625 The proposed development is located in a sustainable location, as shown in the submitted site accessibility plan referenced ITB14217 Figure 5.1 (TA October 2021) prepared by i-Transport. The site benefits from access to alternative modes of transport to the private vehicle, including public bus routes. The University of Surrey, Guildford Cathedral, Royal Surrey County Hospital, and Guildford town centre are easily within walking / cycling distance of the site. Guildford railway station is easily accessible offering future occupiers with sustainable links further afield. A Framework Travel Plan (FTP) has been prepared (ref: JCB/MS/ITL14217-003D). This sets out a strategy to facilitate and encourage travel by walking, cycling and public transport. The FTP has been prepared in accordance with SCC's Travel Plan Guidance and would help ensure that residents take up opportunities for sustainable travel.
- 12626 A number of amendments have been made during the course of the application to improve on-site cycle infrastructure, for ease of access to cycles and cycle storage, as well as the need for larger / increased storage for adaptive and other cycle parking (i.e. trailer bikes, cargo bikes and disabled cycles). The amendments to the scheme include reducing the number of doors between buildings and cycle stores, electric doors to cycle stores, Sheffield stands with better clearance, level access to cycle stores with appropriate signage provided and space for charging e-bikes. The TA Addendum (reference ITL14217-008A, 30.11.2022) provides this updated cycle scheme. The scheme would include two-tier bike racks, to ensure that these are useable, a condition to require these to be of an assisted design, would be appropriate.
- 12627 There would be a stepped access particularly on the Eastern Slopes which would be harder to negotiate for those with mobility issues or differing abilities. The response to highways matters from i-Transport dated 14.02.2023, states that lifts would not be possible, however, the accessible homes are on the ground floor and the shallower gradients are available, just on a longer route. It would be beneficial to see ramps along

the stairs to make the site easier to travel through. This could be secured by condition.

12628 Along with the enhancement to cycle parking provision and improved access to bikes, the latest amendments to the scheme have introduced an east-west cycle connection from Alresford Road to the eastern boundary, which seeks to enable a future link across university land towards Yorkie's Bridge. A technical note 'Cycle Route Contribution Calculations' referenced ITL14217 and dated 20.02.2023 proposes a financial contribution of £130,632.00 via Section 106 agreement, towards the implementation of a new direct cycle route through the University of Surrey land between the application site and Yorkie's Bridge.

12629 In line with County's Vehicular and Cycle Parking guidance and policy ID11 of the LPDMP, homes would be provided with electric vehicle fast-charging points which would provide a sustainable mode of travel to / from the site. Additionally, the provision of e-bike charging points within the site would allow residents and visitors to travel to the site by a sustainable mode of travel. Given the topography of the area and the increased popularity of e-bikes, charging points would further encourage this mode of travel and would reflect the objectives of Surrey County Council's Local Transport Plan (LTP4) 2022 and could be secured by condition.

12630 The proposal includes for the provision of two designated electric vehicle car club spaces and associated charging equipment within the site, as well as free membership of the car club for two years for each household. Both of which have been negotiated as part of discussions with the CHA and would be secured through a S106 legal agreement.

12631 The FTP has a provision for sustainable travel vouchers of £150 for the first resident of each household which, could be put towards either a season ticket or cycles / cycling equipment, as the residents prefer. The FTP would be secured by condition and the monitoring cost would be required as a S106 legal agreement.

Parking provision

12632 The site is outside the 'Guildford Town Centre' boundary set out on the Policies Map of the LPSS and 'suburban' areas are defined as areas outside the town centre. This site is therefore, 'suburban' for the purposes of the parking requirements.

12633 The parking requirement in the draft Parking SPD (2022) and Surrey CC guidance are as follows (table 1):

	<u>GBC Draft SPD (2022)</u>	<u>Surrey CC guidance</u>
1 bed	1x 23 = 23	1x 23 = 23
2 bed	1x 66 = 66	1x 66 = 66
3+ bed	1.5x 35 = 52.5	2x 35 = 70
Visitor spaces		
Car club spaces		1
TOTAL	141.5	160

12634 The proposal would provide 159 spaces:

- 1x spaces per flat = 95
- 2x spaces per house = 60
- 2x visitor spaces = 2
- 2x car club spaces = 2

The car club spaces were agreed late in the determination process and therefore, the spaces are not shown on the submitted plans, and are undefined. Therefore, a condition would be required for details of these two spaces.

12635 The proposed provision of 159 car parking spaces, would be one space below the County guidance, which is a maximum standard and exceed the draft SPD by 17.5 spaces. The draft SPD (2022) proposes a lower maximum standard than the County guidance. Therefore, as the sustainable measures are not all in place a greater provision closer aligned with the County guidance would be suitable in this instance.

12636 The parking would be arranged as follows (table 2):

	On-plot	Garage	On street	Podium	Off-plot	Undefined
Total	43	7	33	66	8	2

Spaces would be provided in next to entrances, not visible from the road in the podium level, along the road side in a more traditional manner and in a parking court for the clergy housing.

12637 In the event, that the seven garages were not used for car parking, the remaining onsite parking provision of 150 spaces (excluding the car club spaces) would still be adequate and exceed the requirements in the SPD. Given, that this would result in the loss of a space for the houses, which would continue to have at least one other space and access to the onsite car club and sustainable transport measures. This would provide alternatives to the two car households, for a modal shift and to have only one car in the household.

12638 Most of the houses would have on-plot parking for short carrying distances, any on-street parking would be very close and was done to provide gaps, open spaces and account for the topography. The flats would have podium car parking accessible by stair cores or the ramps on foot, this would be secure and covered, whilst serving to accommodate the car parking in a more discrete way to ensure the scheme would not be parking dominated. The on-street parking would follow typical urban on-street spaces on the road in front of homes. For the urban grain on the Eastern Slopes this would be acceptable. There would be three spaces on the slope and further for the apartments, whilst this would not be ideal, as this would serve the flats which are less likely to be occupied by families this would be satisfactory in this instance.

12639 Details were requested for the turning for the parking spaces in the south-west corner of the Eastern Slopes and the undercroft parking spaces at the end of the parking aisles. The swept paths at Appendix B in the i-Transport response dated 14.02.2023 confirm that vehicles can enter and exit parking spaces in forward gear. Whilst this

would require multiple manoeuvres, given this would be in an undercroft area and not on the public highway, this would not pose a highway safety risk. This also accords with Manual for Streets guidance (ref: paragraph 8.5.53), “Where space is limited it may not be possible to provide for vehicles to get into the spaces in one movement. Some back and fore manoeuvring may be required. This is likely to be acceptable where traffic volumes and speeds are low.”

12640 It is noted that residents have raised concerns about overspill parking into the surrounding area. An overnight parking survey was carried out on 17.09.2019 (during term-time) and is in the Appendix E of the TA (October 2021), and on the surrounding roads the current level of on street parking was an average of 9% of available spaces being used, therefore, this is currently not an area experiencing parking congestion. Even if at times on street car parking does take place there is capacity and no evidence has been produced to contradict the parking survey.

12641 It is noted that the surrounding roads all include controlled parking zones (CPZs) and as the Council’s Parking Team are responsible for managing the CPZs, they have the authority to decline parking permits for owners/ occupiers of the proposed development on these surrounding roads. As such, this would prevent overspill parking and new residents using existing on-street parking spaces.

12642 Discussions have been held with Guilford Borough Council's Parking Team regarding the proposed on-street parking amendments. The Parking Team have confirmed that the loss of parking is to be reallocated and the disabled bay is being retained and, as such, are comfortable with the proposals. The passing places are being reduced from 15m to 10m but based on the number of bays being reduced this is considered reasonable.

12643 Car parking spaces should be a minimum of 2.4m by 4.8m. The proposed parking spaces measure 2.4m x 4.8m in accordance with the SPD.

12644 Disabled parking spaces should measure 5.0m x 3.6m. A total of 6 disabled parking bays are provided in the podium car park. The response to highways matters from i-Transport dated 14.02.2023, states that the effective length of all spaces is 5m because there is a 0.2m buffer between the parking space and wall. The disabled bays have a 1.2m hatched strip to facilitate access, and therefore provide a width of 3.6m. Two of the disabled spaces share a hatched stop, however, this is considered acceptable by the CHA and in accordance with Traffic Advisory Leaflet 5/95, Figure 4.

12645 The cycle parking requirement in the draft Parking SPD (2022) and Surrey CC guidance are as follows (table 3):

	<u>GBC Draft SPD (2022)</u>	<u>Surrey CC guidance</u>
1 bed flat	1x 23 = 23	1x 23 = 23
2 bed flat	1x 66 = 66	1x 66 = 66
3 bed flat/house	2x 14 = 28	2x 35 = 70
4+ bed house	2.5x 21 = 52.5	
TOTAL	169.5	159

12646 The proposal would provide 192 cycle parking spaces as follows (table 4):

	Level 00 (Podium)	Level 01	Level 02	Shed/ garages	Visitor
Total	68	28	8	60	28

12647 Excluding the visitor spaces there would be 164 spaces for the new homes, with one space for the apartments and two spaces for the houses in shed/garages. This would be between the two requirements and the provision of spaces for eight cargo bikes distributed in the bikes stores for the apartments would be a welcome addition to support using bikes for shopping trips etc. This would ensure that all the occupiers would have access to secure and covered cycle storage. No details of garden storage have been provided, so this shall be required by condition to ensure that this would be covered and secure.

12648 The details of the cycle parking including arrangements for accessing the cycle stores on the Eastern Slopes is provided at paragraphs 3.6.4 – 3.6.9 of the TA Addendum (30.11.2022). The stores would be close to entrances for ease of use and natural surveillance. The maximum number of doors the user would have go through would be two and all cycle stores are to be fitted with automatic doors / shutters as appropriate, have level access and 1.8m aisles to support ease of use. There would be two tier racks to maximise space, however, these can discourage use, so a condition for assisted two tier racks would be appropriate.

12649 In addition to this, there would be 28 visitor, Sheffield stands, in three locations around the Eastern Slopes. Whilst these would not be covered, as they would not be for overnight and longer-term use this would be acceptable and enable visitors to have sustainable travel options as well.

Off-site Highway Improvement Works

12650 Along with the enhancement to cycle parking provision and improved access to bikes, the latest amendments to the scheme have introduced an east-west cycle connection from Alresford Road to the eastern boundary, which seeks to enable a future link across university land towards Yorkie's Bridge. A technical note 'Cycle Route Contribution Calculations' referenced ITL14217 and dated 20.02.2023 proposes a financial contribution of £130,632.00 via Section 106 agreement, towards the implementation of a new direct cycle route through the University of Surrey land between the application site and Yorkie's Bridge.

12651 In terms of the improvements to the wider highway network it is noted that the CHA has requested contributions towards a number of projects. These include an improved crossing point at The Chase/St Johns to provide a safer route for pedestrians travelling to/from the site. The enhancement and improvement of two nearby bus stops in vicinity of the site, to include bus stop poles, accessible kerbing, timetable cases, bus shelters and the provision of RTPI (Real Time Passenger Information) displays would encourage travel by public transport rather than use of the private motor vehicle. The

contribution of £40,000 would go towards measures to prevent rat-running on adjoining roads by any vehicles accessing the new development. The contribution of £7,000 would go towards speed survey studies in the vicinity of the site which would allow for the exploration of further 20mph speed limit reductions in other roads close to the site. The improvements to Footpath 6 would give future occupiers an alternative route to the town centre or university.

12652 It is not considered that the development would have a severe impact on the Sustainable Movement Corridor (SMC). The proposed 20mph speed limit would also go towards a safer street environment. In addition to this, a number of S106 contributions could be secured which would provide a number of highway improvements within the vicinity of the site.

Refuse strategy

12653 I-Transport produced a Waste Collection Strategy Note (ref: JCB/BB/ITL14217-010A TN, dated 18.01.2023) drawing references ITB14217-GA-033 Rev B and 37 Rev B show a swept path analysis based on a large refuse. There would be satisfactory waste storage within 5m of the kerbside for houses on the Western Parcel, For the remaining homes, the bins could be taken to the kerbside along hardstanding routes to the access road during collection and only the bins from Blocks J/K and I (the Cathedral Block) would require a refuse collection point, to be used by the management company on collection days. The Cathedral homes would be serviced under a commercial collection arrangement and further details of this could be secured by condition. Operational and Technical Services (Waste and Recycling Team) have raised no objection to the refuse strategy, as it responds positively to previous concerns that were raised.

12654 It is noted that the Friends of Stag Hill (FOSH) have submitted a highways technical note (dated 07.04.2022) prepared by Motion (a highways consultancy). Responses are provided below, including comments from the CHA:

- Parking – the shortfall would be against the 2006 Parking SPD's maximum parking standard. Although this would be acceptable due to the sustainable location and the package of sustainable transport measures
- Gradient - Cathedral Close currently has a gradient of circa 1:8 and the proposal would provide a betterment on this with gradients of 1:15 for the western access and 1:12 for the eastern access. To be in accordance with Manual for Streets (MfS), pedestrian and cycle routes should ideally be no more than 1:20, with point 6.3.27 of MfS further clarifying that 'topography and other circumstances may make this difficult to achieve'.
- Impact on SMC – existing traffic flows on Alresford Road and Ridgemount are a maximum of around two vehicles per minute with low speeds, (assisted by its narrowness), so it is lightly trafficked with slow moving vehicles. The proposed development would result in one vehicle movement every three minutes at the peak hours and disperse north and south. This level of increase would not be significant. So the SMC route would remain safe and suitable for the majority cyclists and so segregation would not be necessary. Notwithstanding this, a contribution of £40,000 is proposed towards improvements to local roads (which could be invested in measures

- to reduce rat-running)
- Alternative access from Stag Hill – a road built through the Cathedral land from the west this would require greater engineering due to the gradients and this would have associated impacts on the heritage asset, landscape, trees and open space. This would also depart from Maufe’s vision for the site and could have an impact on VP15 in the Town Centre Views SPD.

12655 Overall, it is considered that the proposal would not have a harmful impact on highway safety and capacity in the area and considering the comments received from the CHA the proposal is deemed to be acceptable in this regard. The proposed development would accord with the objectives of policy ID3 of the LPSS, policies ID10 and ID11 of the LPDMP and the NPPF. There would be a genuine choice of transport modes and there would not be a severe impact on highway safety, or the residual cumulative impacts on the road network.

127 Flooding and drainage

127.1 Paragraph 167 of the NPPF requires that development should not increase flood risk elsewhere and at paragraph 169 major schemes should incorporate sustainable drainage systems (SuDS). In accordance with these requirements, policy P4 of the LPSS requires that development proposals demonstrate that land drainage will be adequate and not result in an increase in surface water run-off. Emerging LPDMP policy P13 deals with sustainable surface water management and sets out the requirements for all development, including major schemes. Development proposals are required to follow the discharge hierarchy and prioritise the use of Natural Flood Management (NFM) and Sustainable Drainage Systems (SuDS).

127.2 An updated Flood Risk Assessment (FRA) and Surface Water Drainage Strategy prepared by RSK has been provided following amendments to the scheme, document reference 680783-R1(0)-FRA (revision 2) dated November 2022.

127.3 Geotechnical investigations were undertaken at the application site in July 2014 and October 2015, as part of a previous planning application for the site. The reports submitted with the current application, follows the findings of those investigations. The key points related to flood risk are noted at paragraph 2.1.5.2 of the FRA.

Flooding and the main watercourse

127.4 The Environment Agency (EA) responsible for publishing flood zone map, shows that the site lies within Flood Zone 1, land assessed as having a low flowing risk (less than 1 in 1,000 annual probability of flooding from rivers or the sea). The Strategic Flood Risk Assessment (SFRA) states that the primary source of flooding within Guildford is from fluvial (river) flooding from the River Wey and its tributaries.

127.5 Fluvial flooding is likely to increase as a result of climate change. No model re-runs have been undertaken as part of this site-specific FRA, however, the impact upon the site should be negligible given its location within Flood Zone 1. The supplied EA data

represents the best available and up-to-date data for flood risk at the site. The overall risk of fluvial flooding is considered to be very low.

- 1276 The EA's surface water flood map shows that the site is at a 'very low' risk of flooding from surface water sources. The Surface Water Management Plan (SWMP) does not identify the site as within a surface water flooding hotspot.

Drainage

- 1277 There are areas at low risk (1 in 1000 years) of surface water flooding identified to the east of the lodge buildings and at the end of Alresford Road where it meets The Chase.
- 1278 The proposed development would lead to an increase in impermeable surfaces from roofs and hardstanding. Any increase in impermeable area, may lead to associated increase in surface water run-off rates and volumes, and has the potential to increase the downstream flood risk due to overloading of sewers, water courses, culverts and other drainage infrastructure.
- 1279 Given the steep topography of the site, development layout and existing root protection areas (RPAs), the applicant does not consider that the use of above-ground sustainable drainage features is achievable. From the information available from the site investigation, infiltration was also not considered by the applicant to be a viable option as part of the drainage strategy. After further clarification in the RSK letter dated 22.03.2022 the Lead Local Flood Authority (LLFA) are now satisfied with this conclusion.
- 127.10 Instead, the proposed drainage strategy for the site include a combination of permeable paving and attenuation including modular storage crates, which has been designed to provide sufficient attenuation to retain the 1 in 100 (plus 40% climate change event) while discharging at the agreed greenfield rates. The LLFA do not object to the proposal and request, should planning permission be granted, that conditions are applied to ensure that the approved scheme is properly implemented and maintained throughout the lifetime of the development. Thames Water have not raised any objection.

Groundwater

- 127.11 The SFRA states that groundwater flooding can be locally significant. However, the County wetspot database and EA flood risk incident databases do not attribute any recorded flooding incidents to groundwater.
- 127.12 Whilst the proposed development would not include full basements, there are extensive retaining walls that are integrated into new residential buildings and a podium level that are partially subterranean. These structures would interact with shallow perched groundwater, however, land drainage associated with these structures would minimise the impact on groundwater levels. The risk of flooding from this source is therefore considered to be very low. During construction, there is potential for changes to occur to the water quality and quantity within surface water and groundwater bodies.

However, through the effective implementation of a Construction Environmental Management Plan (CEMP) and early installation of surface water mitigation and ground anchors for slope stability, so that these temporary impacts would be mitigated against.

127.13 Due to the slope stability matters and engineering required, the management of groundwater is very important to ensure that over time this not compromised. The proposed water storage crates have the potential to be a source of this. Therefore, it would be appropriate to have a condition to required details of measures to reduce and eliminate leaks in and around the storage crates.

127.14 Chapter 14 of the NPPF requires that consideration be given both to risk to the site, and to risk elsewhere caused by the proposed development. Based on the understanding of the site setting and the proposed development, it would be constructed and operated safely and would not increase flood risk elsewhere. This is supported by the views of statutory consultees. The proposal would be in accordance with policy P4 of the LPSS, P13 of the emerging LPDMP and the NPPF.

128 Air Quality

128.1 Para. 181 of the NPPF requires opportunities to improve air quality or mitigate impacts should be identified. Policy ID3 at para 4.6.31 of the LPSS recognises that well-designed developments may actively help to enhance air quality and reduce overall emissions, therefore reducing possible health impacts. Policy P11 of the LPDMP, seeks for proposals to improve air quality and reduce the effects of poor air quality, not have adverse effects, include an Air Quality Assessment (AQA) with avoidance and mitigation measures as necessary.

128.2 The deterioration of air quality is intrinsically linked the use of fossil fuels and therefore traffic movements from the exhaust emissions and domestic heating associated with the building of new homes. Policy P11 takes forward the essential need for new development to avoid creating, or contributing to, poor air quality levels both within and outside the Borough boundary.

128.3 An AQA report has been submitted as part of this application, this has considered road traffic emissions during the operational stage of the development. The report is in accordance with the AQM guidance. The council's Environmental Health Officer has reviewed the data and is satisfied that the suitability of the site in terms of air quality and the impact of the development on surrounding receptors has been properly assessed. The AQA report concludes that the exposure to the named pollutants in both the new residential units and existing housing, is determined to be 'negligible'. The highest predicted increase for nitrogen dioxide at any existing receptor within the AQMA is 0.13 µg/m³. The annual mean objective level is 40 µg/m³.

128.4 In response to concerns raised by third parties and amenity groups, a supplementary Technical Note was submitted by the applicant dated 08.02.2023. The impact on air quality from construction traffic were reviewed and these were below the criteria set out by the Institute of Air Quality Management (IAQM), so were not included in the

report. This methodology was agreed by the Environmental Health Officer.

- 1285 The construction works would engender dust, and the impact has been assessed (although there are no formal standards or criteria for nuisance caused by deposited particles). Mitigation measure identified in the AQA follow best practice to manage this potential risk, further details could be secured as part of a condition for a Construction Environment Management Plan (CEMP).
- 1286 Delivery vehicles would have to use Alresford Road and Ridgemount Road. Existing traffic data from granted planning permission have been included in the modelling to see how this would change (the baseline data was from 2019 to ensure that the traffic levels were more representative compared to those in 2020-21 during the COVID-19 pandemic). The pollutant receptors along these roads have been predicted to be well below the air quality objective. So, there would be no adverse impact on human health.
- 1287 Whilst the Local Authority must be conscious of any development that affects air quality, the Environmental Health Officer is satisfied that the report has demonstrated that the site is being developed within the guidelines currently in place. Subject to the imposition of EV charging facilities to the required standard set by SCC, the development is reasonable in terms of air quality impact.
- 1288 Once the site is occupied there would be renewable energy sources to meet the energy demands. With no gas-fired boilers there would be no emissions.
- 1289 There would not be a materially harmful impact on air quality in accordance with Policy ID3 of the LPSS, Policy P11 of the LPDMP and the NPPF and conditions would mitigate and manage the impact from construction works and traffic movements.

129 Housing mix and type

Housing mix

- 1291 It is important to note that policy H1(1) of the LPSS is not intended to be applied in a prescriptive manner. It is a broad assessment of the needs required over the plan period and should be used to guide development proposals. However, in applying the mix consideration needs to be given to site specific matters, namely the site's size, characteristics and location, which together would shape the appropriate mix on particular sites.

- 1292 Total housing mix (table 5):

<u>Total Housing mix</u>	<u>No.</u>	<u>SHMA % req</u>	<u>Provided %</u>
1 bed	23	20%	19%
2 bed	66	30%	53%
3 bed	14	35%	11%
4 bed	20	15%	17%
5 bed	1		
Total	124		

1293 Proposed market housing mix (table 6):

Market mix	No.	SHMA % req	Provided %
1 bed flat	2	10%	3.0%
2 bed flat	42	30%	62.7%
3 bed flat	4		
3 bed house	3	40%	10.4%
4 bed house	16	20%	23.9%
Total	67		
Houses	19	28%	
Flats	28	72%	

1294 Proposed affordable housing mix, including 13 Cathedral homes (table 7):

Affordable mix	No.	SHMA % req	Provided %
1 bed flat	21	40%	36.8%
2 bed flat	24	30%	42.1%
3 bed flat	1		
3 bed house	6	25%	12.3%
4 bed house	4		
5 bed house	1	5%	8.8%
Total	57		
Houses	11	19%	
Flats	46	81%	

1295 Four of the houses on the western parcel had a room above the ground floor and due to its size and location could also be used as bedrooms, rather than the stated used including lounges and studies. Therefore, this has been included as a bedroom and accounted for as in the revised schedule of accommodation provided by the applicant.

1296 Overall, the housing mix would comprise a greater mix of two bed homes and less three bed homes. This is mainly due to the apartments comprising 75% of the housing typology which tend to comprise smaller bed homes. As this site is in a sustainable location on the edge of the town centre this provision would be suitable

1297 Due to the replacement housing for Cathedral staff and lower density homes on the Eastern Meadows and Western Parcel there would be a greater proportion of four and one five bed homes, to be sensitive to the setting of the grade II* listed Cathedral. Given this context, the greater number of larger homes would be justified.

1298 There would be two, one bed market flats, when SHMA guidance suggests 20% so 6/7 one bed market homes. Whilst a greater number of smaller homes are expected to be delivered in these locations by the town and transport hubs. There would continue to be housing choice and so this would meet some of the demand for one bed flats.

Accessible homes

1299 Proposed accessible homes (table 8):

	1 Bed	2 Bed	3 Bed	4 Bed	Total	Req. policy H1(4)
Accessible M4 (2)	4	15			19	12.4
Adapted M4 (3)	2	4			6	6.2

129.10 H1(4) requires 15% of new residential development (on sites of 25 homes or more) to meet the Building Regulations 'accessible and adaptable dwellings' M4(2) or 'wheelchair user dwellings' M4(3) standard to help meet future housing stock needs identified accommodation needs. The proposal would meet this requirement with 5% M4(3) - within Building Regulations (6 homes) and exceed the 10% M4(2) - within Building Regulations (19 homes).

Affordable housing

129.11 46% of the homes proposed would comprise a form of affordable housing:

- 13 'keyworker' homes tied to the Cathedral for staff and clergy
- 31 affordable rent homes – (70% of non-Cathedral staff homes)
- 13 shared ownership homes – (30% of non-Cathedral staff homes)

The affordable housing provision exceeds the requirement specified by Policy H2(2) of 40%.

There would be a 70%/30% split between affordable rent and shared ownership housing (excluding the Cathedral staff homes) as required by policy H2(4).

129.12 The Council's Housing Development Lead is satisfied that the 13 homes to be made available by Cathedral staff are capable of being regarded as affordable housing, under the terms of Tied Housing, by the Church of England. This would support the Cathedral to attract and retain staff in modern, well-maintained accommodation.

129.13 The housing mix would depart slightly from the SHMA, however, no objection has been raised by the Council's Housing Development Lead, as the scheme responds to the unique nature of the site and the housing opportunities.

129.14 There is a greater need for two-bedroom housing on this edge of town centre location than three-bedroom homes, so this would be acceptable, in this instance. Also, there are a greater number of larger four-bedroom homes, as these would replace the seven homes in Cathedral Close and there is a need for the Cathedral staff to have family homes with specific room requirements (including a separate space to see visitors).

129.15 It is recognised that a greater proportion of the overall affordable homes would be delivered as flats rather than houses. Consequently, result in clustering with a concentration of affordable housing on the Eastern Slopes. The housing type and clustering has been assessed by the Council's Housing Development Lead. They have raised no objection and would deliver socially inclusive housing.

129.16 Policy H2 does not have a requirement for social rent (where rents are linked to local incomes, making these the most affordable homes as the rents are significantly lower than private rents). The proposal does not include any social rent homes and the

Council's Housing Development Lead has not identified a specific need on this site. This would require a subsidy from Homes England to deliver and as this funding is not in place and the proposal meets the requirements of the policy, it would be unreasonable to require that this is provided on this site.

Custom/self-build housing

12917 LPSS policy H1(9) states that on developments over 100 units 5% of the total homes shall be available for sale as self-build and custom housebuilding. In this case that would amount to 6.2 of the new homes to deliver a wide choice of accommodation.

12918 The applicant would not provide any self-build and custom homes, due to the sensitive nature of the site due to the heritage assets, topography and hilltop location. In this case, the lack of this form of housing, although contrary to policy, is acceptable as certainty is needed on the design and appearance of the buildings on this sensitive site.

First homes

12919 Policy H8 of the LPDMP has an expectation for discounted market sale housing, this would be for a minimum of 25% of affordable homes, where this could be provided.

12920 The applicant has stated that this has not been incorporated into the design and viability which have been in progress since 2019. They affirm that the shared ownership homes would provide an affordable option for those wanting to get on the property ladder.

12921 In this case, there would not be an adverse impact on the choice of affordable housing options, which would be in accordance with policy H2 of the LPSS. There is also the housing for Cathedral staff which comprises a number of larger bedroom homes, to meet their needs. The affordable house typologies on this scheme would be less suitable for first homes which, given the price cap, is more likely to comprise of one bed homes.

12922 This policy offers flexibility on the delivery of this form of discounted housing and in this case is not required to make the scheme acceptable.

12923 As a result, whilst not strictly complying with the SHMA, the overall mix and typology of homes would be appropriate given the location and provide a range of housing choices for this location given the sensitive setting. It is concluded that the application would meet the requirements of policies H1 and H2 of the LPSS and Chapter 5 of the NPPF. This affordable housing would be secured by way of a S106 legal agreement.

1210 Landscape and visual impact

1210.1 Paragraph 130 c) of the NPPF seeks to ensure that developments are "sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such

as increased densities).” At paragraph 174 the ways in which development should contribute to and enhance the natural and local environments are set out. Paragraph 176 is concerned with conserving and enhancing Areas of Outstanding Natural Beauty (AONBs).

- 12102 Policy D1(4) of the LPSS requires a response and reinforcement of landscape setting and paragraph 4.5.9 explains that “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.” Policy D4(3) of the LPDMP requires proposals to respond to matters including views and natural features, then at paragraph 5.9 states that the use of Accurate Visual Representations (AVRs) and digital models are expected for this type of application.
- 12103 The Town Centre Views SPD identifies a number of important views, of particular relevance is viewpoint 15 (within the site) and viewpoints 3, 4, 6, 8 and 11 where the Cathedral is a landmark.
- 12104 The applicant has agreed viewpoints with the council and has produced a Vu.City model that has been reviewed.
- 12105 The site is not within a designated landscape and the area is underlain by the rural character area E1: Warnborough Wooded Rolling Claylands. There is a spine of green open space formed by the main A3 and its slip road physically links areas from the Cathedral, Stag Hill and the University of Surrey to the Royal Surrey County Hospital – this includes pedestrian links.
- 12106 The Landscape and Visual Appraisal (LVA) (December 2022) was updated and revised following feedback, this revised version has been reviewed. This has an assessment of landscape and townscape effects, visual effects and cumulative effect. This is based on 31 viewpoints comprising existing and proposed photomontages in summer and in winter.
- 12107 The Council have instructed an independent specialist (Hankinson Duckett Associates (HDA)) to review this and assess the likely significant impact on the surrounding townscape/landscape including the Surrey Hills Area of Outstanding Natural Beauty (AONB) to the south. They are satisfied that the LVA accurately described the baseline situation in terms of landscape character, features and existing visibility. The assessment of landscape and visual sensitivity is comprehensive.
- 12108 Six of the viewpoints used within the LVA and additional verified views correspond with ‘important views’, as set out within the SPD. These include (table 9):

<u>LVA viewpoint (VP)</u>	<u>Corresponding SPD viewpoint reference</u>	<u>Sensitivity assessment provided within the LVA for the viewpoint.</u>
13 PROW FP7	6	High (The Mount) / Medium (FP7)
15 Bright Hill	8	High
16 Pewley Hill	4	High

22 Stoke Park	3	High
25 Stag Hill (within the site)	15	Medium
17 Castle Motte	11	High

- 12109 The photomontage for VP11 (from Mountside), shows an improvement in distant views with successful mitigation. The use of climbing plants on the elevations of the apartment buildings would be a positive measure, as this would help to soften and break up the massing of the built form in distant views.
- 1210.10 The proposed development of the eastern meadows would be pulled back to the north and south. Development within this area remains sensitive to the existing landscape context and topography and would have residual adverse effects on one of the 'important views' (VP15) set out within the SPD; as reflected within the submitted LVA as Major adverse for visual receptor V11 (Stag Hill), which is considered to be significant. There would be harm to the views from Stag Hill, with the Major adverse effect stated, which is considered to be significant. The outlook from this location has been improved, however, not to the extent that it would change the assessment. In addition to this, the presence of domestic gardens and buildings in close proximity of this viewpoint, would change the way that it is experienced from an undeveloped informal space that lends itself to longer dwell times and a tranquil setting to one that would be afflicted by the domestic intrusion, with the associated lighting and noise as well as perceived and actual overlooking. This would cause this area to become a space that people would walk through quickly rather than spend time enjoying, greatly diminishing the value of this important viewpoint in the townscape.
- 1210.11 The assessment records a number of Moderate adverse landscape effects, with one Moderate / Major adverse effect regarding landscape receptor L2 – University of Surrey. Whilst this is accepted this has to be balanced with the potential benefits of the proposed reinstatement of the western avenue processional route (outside the site) on the character of L2. These proposals represent a benefit to the character of landscape receptor L2.
- 1210.12 Two further 'important views' (representative viewpoints 13 – footpath 7 from The Mount and 17 – castle motte) would experience Moderate Adverse effects as a result of the proposals. The reduction in some of the building heights to the south-west and addition of climbing plants would assist to maintain the 'green collar' surrounding the Cathedral. The assessment of Moderate beneficial effects for V4 – the Cathedral is agreed due to the tree planting proposed to the western approach.
- 1210.13 The assessment concludes that there would be Moderate adverse visual effects on views from the Mount (V8), within the Surrey Hills AONB as a result of the proposed development and that there are predicted Moderate adverse landscape effects on landscape receptor at the Chalk Ridge (L6), of the AONB. Both judgements are fair and proportionate and indicate that there would be adverse effects on the setting to the AONB as a result of the proposed development. The changes to the scheme have improved the mitigation with regards to the setting of the AONB.

1210.14 The submitted design would harm the landscape character and visual experience of the site to the east but would benefit the landscape character and visual amenity of the approach to the Cathedral to the west. The proposals would still result in Moderate adverse landscape and visual effects concerning the setting of the Surrey Hills AONB, as seen from the Mount (V8). However, the reduction in building heights and increased planting within the site would reduce the visual prominence of the proposals from the AONB and the proposals would continue to be seen in the context of existing development. Therefore, the harm would exist and has been mitigated as far as possible and this would be acceptable.

1210.15 The proposed lighting scheme shall be assessed below, however, the limited use of lighting columns would reduce the impact and ensure the Cathedral is the dominant feature. This is a site surrounded by the urban settlement and would be seen in that context. Therefore, this change in relationships would be acceptable, subject to a condition to ensure that suitable low-level lighting would be installed to respect the setting of the Cathedral.

1210.16 The proposed development, despite the amendments to the built form on the southern side of the Eastern Meadows would result in harm to an 'important view', viewpoint 15, Stag Hill (looking south east) as set out within the SPD in contravention with policy S3 of the LPSS, however the proposals would not block views of the Cathedral in line with policy A15(2). There would be benefits in terms of Green Infrastructure in line with Policy ID4. The proposed landscape scheme conforms with items 4-6 of policy A15.

1210.17 Therefore, the development on the Eastern Meadows would have a harmful impact on the outward view from viewpoint 15 in the Guildford Town Centre Views SPD and would fail to comply with the objectives of policy S3, D1(4) of the LPSS, policy D4(3) of the LPDMP and the NPPF. The proposals as submitted would have both adverse and beneficial effects on landscape character and visual amenity. The recorded residual landscape and visual harm should be considered within the overall planning balance for the scheme.

1211 Characteristic of well-designed places

1211.1 Local Plan Policy D1 requires new development to achieve high quality design that responds to the distinctive local character (including landscape character) of the area in which it is set.

1211.2 Having regard to the NPPF at paragraph 124 it is necessary, in the context of making effective use of land to consider, inter alia, the desirability of maintaining the prevailing character and setting of the area or of promoting regeneration and change. The National Design Guide (NDG) is also a material consideration. The NDG uses ten different characteristics to illustrate the Government's priorities for well-designed places. These characteristics include understanding and responding to site's context and its identity or character.

1211.3 The scheme has been reviewed by Paul Fineberg (architect and urban designer, Paul Fineberg Architect), Amanda Reynolds (architect and urban designer, AR Urbanism)

and the Council's Principal Urban Design Officer. The assessment below is based on their comments of the proposals.

Design and Layout

Eastern meadow

- 12114 This is unique and important space that would be highly compromised by the proposed housing. To the north the proposed clergy housing redefines the northern edge of the wide viewpoint, reducing the size of the space significantly and 'domesticating' it with both windows and patios of the new houses that would overlook the meadow, as well as residential gardens backing onto the open area. The clergy housing would compromise the public use of this space, also adding light spill and removing the meadow's secluded qualities.
- 12115 This location of the clergy housing – the 'work/live' buildings of the Cathedral staff – accessed through a parking area and down a 'rural lane' seems completely inappropriate for their function. Expecting parishioners and other visitors to navigate through to the rear of the Cathedral to use the clergy's services, while other services are all located appropriately to the front as part of the western courtyard envisaged by Maufe. This would cause a conflict and confusion between the largely leisure reasons for most current visitors to the meadow with the work of the church.
- 12116 A more appropriate location for this work/live function would be adjacent to the northern Cathedral arrival area, along with the existing ancillary structures – preferably as part of a redevelopment of this area, or alternatively, along with the other clergy housing, as part of the overall residential proposal, perhaps in a distinct cloister grouping. It is acknowledged that this suggested northern area is not within the site allocation, it is within the control of the Cathedral and therefore should be considered as a potential location for Cathedral-related uses, including housing, particularly where there is a 'work' component as a part of the residential use.
- 12117 Of even greater impact on the Eastern Meadow area would be the proposed housing to its southern side - north of the new access lane to the flatted blocks. In views from the meadow, the homes would appear as two storeys, with the top floor partially within the roof space. The main living rooms and courtyard gardens would open out onto the meadow, forming a positive frontage. These houses would also back their gardens onto the meadow space, further reducing its publicly accessible area while also domesticating and privatising what would be left of the open space. A further aspect of the negative impact here would be the intrusion of these houses, along with the easternmost ends of the flatted blocks, into the south-eastern view towards the town centre. As can be seen in the LVA View Point 25 pages 198 to 202 looking towards the town from this position, the view would be highly compromised by the proposed houses and would completely lose its open, semi-rural qualities. Fewer people would be likely to use this area in the way it is currently used, and the new residents would be likely to feel a sense of intrusion if they did so, with the resultant tendency to add tall fencing around garden spaces, further detracting from the meadow qualities of the open space, through a potential default privatisation of this space through the

introduction of domestic buildings and gardens.

- 1211.8 The DAS rehearses the important relation and compatibility of public and private space, noting under “Cathedral Morphology”, contrasting principles of enclosure and openness of spatial layout of other Cathedral complexes (DAS, page 78). However, it then does not explain which aspect of these design principles are employed in the design of housing that would relate well to the Cathedral and the wider site situation. These principles are unexamined, and the resulting relationship and difference of use of the private houses positioned within the setting of the monumentally scaled public building is unconvincing.
- 1211.9 Currently the view to the east and south-east from the eastern meadows includes the silhouette/north elevation of the existing easternmost clergy house on Cathedral Close through some dense planting. This house is two storeys in height and although those proposed would also be this height from the meadow side, the proposal would bring the built form much higher up the hillside, intruding further into the field of view. The current view of the town centre looking east and south east from the eastern meadows, without housing defining it, would be unobtainable from anywhere near the oak tree and viewers would need to descend lower down the hill, towards the access lane, at which point the view starts to be obscured anyway by growth lower down the hill. The view and the magic that is experienced from seeing this vista would be lost.

Southern slopes

- 1211.10 The layout in this area would be somewhat confused to the north with two unrelated typologies sitting uncomfortably across the proposed access street from each other. The houses on the north side of the close would be poorly located given their impact on the meadow and views out. They are a different typology to the apartment blocks so, do not integrate as successfully and appear as an alien addition. The amended plan for this area reduces the number of houses although, this would not go far enough, nor does it consider the townscape character or cross-section of the street proposed in this area.
- 1211.11 Front door access to the houses and to the apartment blocks would be from the lane which circles the new blocks, rising up the hillside, with landscaped parallel parking along the apartment blocks frontage. The four northernmost houses (two, semi-detached blocks) are set back considerably from the street edge with parking spaces in front of them, while the terrace of three houses adjacent front the street more closely with both garages and parallel street parking provided. There appear to be pavements both sides of the overly generous carriageway. Overall, this approach creates a very poor townscape experience, with the lower parts of the route following the ‘semi-rural lane’ pattern of built form (apartment blocks) one side and hedgerows/planting on the other, while upon arrival at the upper level this would open out into an unnecessarily wide and car-dominated suburban street, which dominates the view towards the Cathedral (see CGI page 31, DAS Addendum).
- 1211.12 The other three houses, would be set further forward to the street, would have garages beneath and parallel parking in front of the block. These houses would have a more

appropriate relationship to the street in townscape terms, however as previously stated, they project too far east into the town centre view from the meadow above. The width of the close, building to building, is approximately 22.0m and 16.0m – 22.0m would be an overly wide space standard for the character of a minor lane to cul-de-sac. Consequently, the generous space could well attract informal car parking by visitors, residents who chose to not use their garages for parking and encourage additional car ownership.

- 1211.13 In this context, following the street cross-section pattern, dense planting should be added – a new hedgerow referencing the earlier one alongside the farm as noted on the summary plan (DAS page 51). This would also retain and enhance the meadow's secluded qualities.
- 1211.14 The top of the central steps between the apartment blocks should be an important point at which the visitor experience switches from ascending through a relatively enclosed, intimate, green and stepped townscape, into a more open public space with a dramatic 'arrival view' of the Cathedral to the upper north-west. Instead, the housing to the north of this area would impede views towards the Cathedral and the calm experience of this space, where you would want to move through quickly, rather than dwell.
- 1211.15 The design approach for the main apartment blocks on the steep slopes would be an effective use of the available land (cf: Swiss hillside housing design in C20th), even though this approach would require significant engineering input.
- 1211.16 The stepped path provides an alternative route to the access road. The route would have natural surveillance from the rooms of the apartments and be lit by integrated low-level lighting. The steps incorporate landings with seating forming small 'pocket park' spaces. The south facing aspect and presence of benches would make these are attractive areas and contribute to the making these spaces that would be active and functional, not just a thoroughfare.
- 1211.17 The split-level, layered approach to this arrangement is walkable with pedestrian entrances to the buildings directly from the street, access through the buildings to the communal gardens and also direct access from the street to the gardens. This would allow for pedestrian permeability including those with accessibility issues. As the accessible, adaptable and wheelchair user dwellings would be in the ground floor apartments, to provide access to the communal gardens and service areas from street level.
- 1211.18 The DAS addendum states that 90% of these homes would have dual aspect outlooks, of which 48% would have triple aspect outlooks. This would ensure that access to daylight and sunlight would be at an acceptable level.
- 1211.19 While the location of the access to the parking removes much of an obvious disturbance (vehicle presence and noise) from the upper slope environment, as the undercroft entrance/exit openings would be located near the access into the site, thus heavily reducing vehicle use beyond the entry area.

121120 This suggests that all the rest of the access street, rising up the hillside to the east, could be re-prioritised as shared surface, with pedestrian/cycle priority and removing the footpath on at least one side of the road if not both, this would require consultation with the County Highways Authority. However, would be a way of creating a more organic street hierarchy.

Western parcel

121121 The development proposed on the long slope parallel to Alresford Road would have visual impacts on the southern approach space, as well as on views in and out of that area towards the Cathedral.

121122 A considerable amount of open green space on the Alresford Road slopes area would be lost however, some of the qualities of this space would be retained in a smaller area to the north of the proposed houses. The proposal shows a row of houses located on a new access lane to the north of the existing hedgerow along the street boundary. The proposal follows the cross-section typology of housing one side and hedgerow the other, mirroring the existing housing to the south with the new buildings stepping further up the hill in relation to the existing hedgerow and the new access lane. In this context, this would be the most appropriate approach and would reduce any impacts on the existing housing.

121123 The houses in this location could potentially use a stepping hillside design more effectively – lower ground floors could back into the slope and/or gardens to the north could be stepped to reduce levels of retaining and lift rear sections of the north-facing gardens towards a greater amount of light and sun. The roof terraces, would benefit from the sun, although further design consideration should have been given to screening potentially visible paraphernalia, particularly in views from within the Cathedral grounds.

121124 The presently clearly defined semi-rural edge boundary to the south would be essentially lost, as by reducing the area of the pastoral landscape setting of the Cathedral to place new housing, a special design needs to be demonstrated.

121125 All views north or north-east into the site from Alresford Road necessarily look into dense green planting at present and at the eastern end of the slope these also include the Cathedral rising above the trees and hedgerow, as can be seen in LVIA View Point 6 page 144 and 145. In the interests of preserving and enhancing the green landscape setting of the Cathedral, this part of the development should emphasise its semi-rural context and better frame the views, while also enhancing the existing hedgerow planting and improving pedestrian access into the site.

121126 Along Alresford Road there are northern views that would look naturally through the new breaks in the hedgerow line, which would consist of the two proposed vehicle/pedestrian access points, one at each end of the new lane, and one central pedestrian access point in line with Old Court Road to the south.

121127 In order to retain and enhance a clear understanding of both the Cathedral's green

setting and the semi-rural street, these views should look directly into greenery and clear pedestrian legibility for wayfinding. As currently proposed, the house placements would provide short visual termination to these views, while the westernmost housing and parking arrangement would also block any possible pedestrian connection onto the hillside at this point.

121128 There would be a small central public space proposed, approximately at the centre on the axis from Old Court Road to the south of this space. A view north (through the trees) and pedestrian path from Alresford Rd into the open space at this point should be provided and would provide an attractive new public connection into the Cathedral grounds.

121129 A significant group of trees (including tree 262) which project north from the main hedgerow line is also to be removed from this area, this is regrettable as this would have provided a visual green centre and provide an organic, meandering feel compared to the more linear layout along with enhanced access to the cross-hillside pedestrian route.

121130 The proposed housing would be seen through the trees from the top of the steps by the Cathedral in winter views, as would the housing to the east, (see LVIA View Point 24 page 197 and 199), which to some extent would be unavoidable, however this should be minimised at the closest points to the southern approach slope. The eastern end house intrudes strongly into the Cathedral setting views from both Alresford Rd looking north-east and from the Cathedral looking south, and this house should be removed.

121131 The two western-most houses, would be unacceptable as this would be visually dominant from the entrance view north and would impede pedestrian access. They are also be a visual distraction in the important western approach view, sitting in an open grassed area just beyond the existing grand oak tree. These houses should also be removed and any development on this slope, so should be pulled back towards the east to where the slope of the hillside starts to turn towards the west.

Building design and appearance

Clergy Houses to the north

121132 These would be work/live buildings; however they have been designed to express a completely residential character. The standard of design relating to form, brickwork and detailing is attractive although this would not necessarily appropriate for their function and location, as this relates the buildings more to the idea of a grand suburban tradition, which has no connection to the Cathedral style or experience, than to their work function, Cathedral style or to local Guildford vernacular housing.

121133 The proposed parking arrangement comprises garages and open surface spaces, when there is also a large parking area immediately adjacent to the clergy housing which suggests that two parking spaces per house would not be necessary if some of these spaces could be utilised.

- 1211.34 In terms of materials and detailing, the scale and form of the buildings (main gable and terrace over ancillary lower structure), and the brick design and detailing results in attractive housing, with a largely single brick type used effectively. The narrow gaps between houses seem to add less value to the built form and would be less economical than terrace rows. The design of each house as a partly three / partly two storey building would still create a satisfying rhythm if the houses were to form a single terrace.
- 1211.35 The chimneys shown are 'real', serving fireplaces shown in the living rooms. However, the energy source is not known given that there would be no gas fired boilers. However, there are measures under Building Regulations to ensure that this would be suitable. Whilst chimneys are a traditional feature of Surrey homes as the least visually prominent buildings in the site, their value on these buildings is less well reasoned.
- 1211.36 Full height windows and vertical detailing within this southern area is described in the DAS addendum as providing echoes of, 'the verticality of the Cathedral's openings and fenestration'. Bays have been introduced, which would help define individual plot widths.
- 1211.37 While the brick detailing is carefully considered and attractive, the use of exposed gutters and rainwater pipes would seem to undermine the high-quality aspiration, and these could be usefully designed out.

Apartment blocks

- 1211.38 The concept layout for these buildings is appropriate, the stepping nature of the plan forms and heights of blocks has been effective. The central steps up the slope would also be effective, however the views up as the route kinks to the east should be checked for clarity of wayfinding, while the blocks which relate to each other diagonally across the centre of the steps seem to be too close together to comfortably allow this space to feel public.
- 1211.39 The heights of some of the taller blocks has been reduced. Blocks F-K are the most sensitive in long views in the submitted scheme and particularly the ones along the north and higher up the hill. The reduction in one storey in blocks H and I is therefore welcomed and reduces somewhat the "top heavy" impact. This would mitigate the negative impacts in both long and close views, although the extent of the buildings to the east in plan would still be intruding into views to and from the Eastern Meadow and should be re-structured in plan and form to reduce its eastern extent.
- 1211.40 The roof forms vary between flat and pitched and while the Cathedral itself reads as if it has a flat roof (behind the parapet), the proposal buildings are domestic and should express more relevant residential forms. Surrounding homes do not have a flat roofed style, and although local student housing blocks of flats do have simple flat roofs, these are not appropriate forms to be emulating considering the setting.
- 1211.41 The apartment blocks have been designed to read like the traditional layers of houses along the slopes in old Guildford, as well as the newer, more recent houses in the

foreground, and the proposed variation of heights, block sizes and inset balconies do work together along with the given topography to provide an appealingly stepped townscape to a certain extent.

- 121142 The disposition, form, profile and rigid large block based design is unexplained in its design concept relation either to the Cathedral, and / or the local and wider site context. For example, the apartment building general arrangement, form, and mix of flat and pitched roof profile as well as details including window design and proportion do not appear derived from, and thus contradict the stated aim of architecture principles identified in the DAS, page 120. This refers to the “simple flat-topped tower”, “low pitched roofs” and “vertically proportioned windows span the building height”. What is presented appears random in its relation to context. Steps could be taken to improve this and achieve the ambition described.
- 121143 The majority of the roof forms proposed seem to be flat with fewer gables shown, to the overall detriment of the architectural aesthetic. See LVIA View Point 1 page 136 and 137, when these are read in conjunction with local gable forms and the clean lines of the Cathedral tower. The proposal does not reflect local forms and there is a balance to be had with copying existing suburban architecture, although the greater use of gable elements would reference the local context.
- 121144 Although the planning statement asserts, point 7.42. “the apartment buildings have been broken down to a series of smaller elements articulated at roof level”, these individual blocks nevertheless would aggregate in too-strong grouped form, that would be prominently aligned west to east with Stag Hill. The apartment block form would impose quite strongly on views of the Cathedral crowning the hill, as shown in image render views from the south or south east (9.18 VP11 and 9.25 VP17). It is acknowledged that the development would compete and to an extent diminish the appreciation of the symbolic nature of the Cathedral. However, in allocating the site for this number of new homes, there was always going to be an increase scale and built form on this, on the previously developed part of the site and whilst there would be a significant change as a consequence of the site allocation. The approach has not been thoroughly explained to show relatable referenced to the existing context and identity.
- 121145 For the lower forms currently shown with flat standing seam metal cladding on both roofs and walls, these could have had pitched roofs without increasing the tallest blocks or overall height, instead introducing more interest, complexity and greater reflection of local character to the structure. The materials used would need to reflect local roof and wall materials.
- 121146 Projecting balconies disturb the closed stepped forms and undermining the ‘hill town’ form created by the overall apartment development (see VP1 as above). These should be redesigned as inset spaces, where facing the street, if possible, particularly to the south.
- 121147 The materials shown add an unnecessary layer of complication to a proposal with a complex form and structure. A simplification of the cladding materials would help the overall view impacts. Four brick types would be too broad and the brick colours seem

to depart significantly from the calm red brick of the Cathedral. Using fewer (just two or maybe three in small areas) brick types/colours would make the development simpler and allow the forms to stand out more.

1211.48 The standing seam metal roof/wall cladding has been apparently chosen to reflect the copper of the Cathedral roof, however the Cathedral roof is largely invisible from ground level and a small element in longer views. At present the bright green oxidised roofs of the 1960s clergy housing stand out very strongly in distant views, distracting from the Cathedral itself. The metal to be used on the proposed apartment complex has not been stated in the DAS and is unlikely to be copper (too expensive).

1211.49 The overall design impression given by the standing seam cladding, while not in itself an unattractive material, is that it is not appropriate for such an important heritage site where the focus of views and immediate context should be on the Cathedral itself. The flat roofed blocks express an industrial look while the gabled forms reflect aspects of 1970s architecture, which is not particularly relevant in this context.

1211.50 Together with the multi-coloured brickwork and projecting balconies, there is too much variety in terms of finishes and the overall image would be more effective if it were calmer and simpler, allowing the stepping forms and subtler colour shifts to express the architectural vision.

Houses on the western parcel

1211.51 The layout of generally paired houses is a logical reflection of those opposite on the other side of the hedgerow. The mix of lower flat roofs (with terraces) and gables facing different directions is a good mix of forms, although not particularly related to those locally. There is no logic or explanation provided for the two clergy houses at the eastern end to be detached.

1211.52 Whilst new housing was deemed acceptable through the site allocation it would have to relate well to other parts of the development, yet the proposed houses appear starkly unrelated to their context of existing neighbourhood homes in terms of form, profile, setting, sectional relationship of dominance across Alresford Road and detailed design expression. Steps should have been taken to address this to rebalance the impact of proposals on existing neighbourhood houses.

1211.53 Parking for these houses is provided mostly to the sides of the semi-detached blocks with just a few spaces on the street. This seems to be a significant waste of the limited amount of space along the length of the north side of the street, by occupying it with cars. If more parking was provided on the lane in landscaped parallel parking locations (as proposed in limited locations currently), the houses could be accommodated closer together with less space between the proposed semis. There would be about 6.0m between them as there are generally stacked car parks to two houses - assuming 3.0m each. The glimpses of the Cathedral would be seen both between semis and over the lower two storey elements (as now) as the view is upward and there could be the potential to regain some of the removed houses.

1211.54 The existing housing is largely finished in white render, which is not a recommended finish (due to long term maintenance, discoloration and use of silicone), therefore, the use of brick cladding is welcome. However, as with the apartment blocks there seem to be too many brick types used and there is also a concentration of intricate detail which seems unnecessarily complicated. The two most relevant brick types here seem to be the red multi and stone-coloured brick and if the houses were restricted to these two, they would express a calmer image.

Streets and Parking

1211.55 The proposed streets to the western and eastern slopes are set out as minor lanes, however they both appear to be wider than necessary, considering the small amount of vehicular traffic they would carry. The carriageways would be approximately 5.0m wide plus parking generally on one side or both. Footpaths are shown on one or both sides of the eastern slopes housing, whereas the amount of traffic would suggest that pedestrian-priority shared spaces would be comfortable (beyond the access/egress points for the larger area of housing) and a maximum of one footpath/side would be required.

1211.56 The advantage taken of the topography to provide an easily accessed single undercroft parking area for most of the apartments would be a positive and very useful solution to a significant amount of the parking provision in this area. The balance of the parking should be carefully designed in a landscaped on-street context. Parallel parking, with tree planting controlling spaces and numbers is a positive way of providing street parking particularly if these spaces are unallocated. They can then be flexible spaces and be used by visitors when not in residents' occupation, thus removing the need for special visitor parking.

1211.57 Integral garages may well not be used to park cars, even when transparent shutters are used. This is partly because the spaces are too small to be easily used and with the current ever-increasing size of cars (SUVs etc), this problem is worsening rather than improving.

1211.58 Most people want to park on the street outside/close to their house and on a road with low levels of traffic such as this site there is a risk of informal parking on the verges and footways. The width of the roads would encourage this practice, which would have a detrimental impact on other highway users, including pedestrians, cyclists and those using pushchairs. Narrower carriageways reduce informal parking as drivers recognise that they cannot park without blocking the road. The Western Parcel may not need footpaths as the vehicle numbers would be low enough for shared surface, subject to agreement with the CHA.

1211.59 Also, providing controlled parking along the street edge also stops informal parking in these locations as they cannot double park. Street-based parking also provides for more flexible use of parking as some cars would always be 'out', allowing spaces to be available for deliveries and visitors etc. There would always be the potential for a bit of temporary informal parking with drop-off/pick-ups (like taxis or deliveries), although this would be less problematic than longer term visitors or second/third cars

belonging to residents.

1211.60 Pedestrian connections through the site need to be carefully thought about and enhanced in the context of the overall loss of open space. There is the potential for good access and routes through the site, along with improved wayfinding, however this currently needs further thought, particularly in terms of access into the Eastern Meadow and Western slopes from the south.

Bin and cycle storage

1211.61 The houses in the Eastern Meadows and Western Parcel would have bin/recycling storage within separate compounds adjacent to the access road and to the back of driveways within integral structures. Detailed elevations and hardstanding surface plans shall be required to ensure that these would not be unduly prominent in the street scene.

1211.62 For the Eastern Slopes cycle and bin storage would be located within the building envelope with direct access to cycle stores from the street. There would be natural surveillance and would be close to access points for ease of use. Locating these within a buried 'undercroft' is a good response to the slope and the sensitive context.

Solar panels

1211.63 Solar panels would be slimline and where on the pitched roof slope would be fitted to the west facing roof plain so they would be unlikely to be prominent in views from the surrounding area.

1211.64 The remaining solar array would be on flat roof areas on a angles frame, due to the higher parapet wall to accommodate the green/brown roof, they would not be prominent from street level and withing the grounds of the Cathedral, although from wider views in the town may be seen. As these are becoming a more common feature this would not be detrimental. Further details on the profile of these have been provided and could be secured by condition.

1211.65 The council have sought advice from two architects and urban designers and the Council's Principal Urban Design Officer. Below is a summary of the scheme against the ten 10 characteristics set out by the National Design Guide (NDG). The scheme fails to fully address the constraints and opportunities.

1211.66 The proposals would deliver in terms of these NDG characteristics:

- accessible and easy to move around – subject to conditions and financial and planning obligations for servicing, highway safety and sustainable travel options, would be safe and accessible
- mixed and integrated uses – mix of tenures and housing types, all of consistent design quality and well related external amenity
- functional, healthy and sustainable homes –provide a good internal environment
- efficient and resilient use of resources – measures to conserve land, water, energy and

materials

- made to last – well performing external materials and management of communal spaces

121167 The proposals would not achieve these NDG characteristics:

- enhance the surroundings – the DAS does not show a sound understanding of this special site and the design response would not integrate into its surrounding
- attractive and distinctive – collectively and individually would not have a positive and coherent identity, that would inspire a sense of pride and delight for the new and existing community that would suit its unique context
- enhanced and optimised for nature – whilst the proposal would create new and interconnected public spaces, enhances existing natural features and manages water, the eastern meadow would be completely changed with tree loss and a degree of formality
- a coherent pattern of development – the choice of building types, forms and scale of buildings and how they interact with public spaces and the highway. Also, how the pattern of streets relates to the built form along their length
- Inclusive public spaces – existing areas of parkland would not remain inclusive

121168 The proposals have been assessed in terms of placemaking and design grounds to not exhibit the characteristics of well-designed places, and therefore fails to comply with policies D1 and A15 of the LPSS, policy D4 of the LPDMP, the design code in G5 of the saved GBLP, guidance in the Guildford Landscape Character Assessment and the National Design Guide (NDG) and NPPF.

1212 Impact on the setting of heritage assets

12121 Heritage Assets are defined in Annex 1 of the NPPF, relevant to this application, they include listed buildings, the setting of listed buildings, monuments and locally listed buildings.

12122 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 ... 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.

12123 The case law concerning the duties in the Act are summarised in Appendix 1 to the Judgment of Holgate J in the Save Stonehenge case at paragraphs 4 to 9 (see R (Save Stonehenge World Heritage Site Ltd v Secretary of State for Transport [2021] EWHC 2161 (Admin)). The Barnwell judgement (Barnwell Manor Wind Energy Ltd v Northants DC, English Heritage, National Trust & SSCLG [2014] EWCA Civ 137) makes clear that “preserving” means “doing no harm” and that decision makers should give “considerable importance and weight” to the desirability of preserving listed buildings and the setting of listed buildings, and the character and appearance of conservation areas. A finding of harm to the setting of a listed building, or to the character or appearance of a conservation area gives rise to a strong statutory presumption against

planning permission being granted.

- 12124 NPPF Chapter 16 sets out the framework for decision making in planning applications relating to heritage assets and this section of the report takes account of the relevant considerations in these paragraphs. Paragraph 195 sets out that ‘local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.
- 12125 Paragraph 197 sets out the requirements of the three matters that should be considered regarding sustaining and enhancing the significance of heritage assets; the contribution to sustainable communities and making a positive contribution to local character and distinctiveness.
- 12126 Paragraph 199 of the NPPF says that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to its conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 12127 Paragraph 200 says that ‘any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification’.
- 12128 Paragraph 201 relates to where a development would lead to ‘substantial harm’ to a designated heritage asset. Recent judicial authority on the meaning of substantial harm can be found in *The London Historic Parks and Gardens Trust v The Minister for Housing* [2022] EWHC 829 (Admin), particularly at paragraphs 32 to 54, to which Officers have had regard. In this case, neither Historic England nor the Council’s Heritage Consultant consider there to be any instances of substantial harm.
- 12129 Paragraph 202 requires that where a development proposal would lead to ‘less than substantial harm’ to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 121210 Site allocation policy A15 required development to be “sensitive to the setting of the Grade II* listed building (Guildford Cathedral).” This would also include protection of views to and from the heritage asset where they contribute to significance or the ability to appreciate significance.
- 121211 Policy D3 of the LPSS is consistent with the NPPF and requires ‘development of the highest design quality that will sustain and, where appropriate, enhance the special interest, character and significance of the borough’s heritage assets and their settings and make a positive contribution to local character and distinctiveness will be supported.’

121212 Policy D16 of the LPDMP follows on from policy D2 and requires an evidence-based heritage statement. At paragraph 5.270 defines “Setting” and the ability to appreciate and experience the significance from its surrounds and at paragraph 5.401 the understanding of significance and how the setting contributes to this is crucial. Relevant considerations for the impact on significant are provided at paragraph 5.283 and include:

- Changes to historic layout
- Intrusion into/disturbance of key views to and from the building/site
- Impact on the relationships between buildings

121213 The policy D16 identifies a balanced approach to changes to historic environments “for them to be sensitively sustained and managed through development, adaptation, active use, and repair” and should not be “at odds with the historic environment and an asset’s significance.

121214 Policy D20, specifically covers non-designated heritage assets and its setting.

121215 Saved Policy HE4 of the GBLP is concerned with the setting of a listed building, however, this does not reflect the NPPF paragraph 202 balancing exercise. Saved Policy HE10 states that planning permission will not be granted for development which would harm the setting of a conservation area, or views into or out of that area. Again, this policy must be applied in the context of NPPF paragraph 202. Given that the Saved Policies listed above do not conform with the need to balance as set out in the NPPF, these policies are afforded limited weight.

121216 The PPG at Paragraph: 013 Reference ID: 18a-013-20190723 refers to the need to consider the implications of cumulative change when assessing any application which may affect the setting of a heritage asset. In this case, the sale of plots of land from the original Cathedral estate since the 1960s.

121217 The applicant has submitted a Statement of significance and Heritage Impact Assessment (SoSHIA) which includes Appendix 9: Commentary on the Maufe ‘Masterplan’ and the Setting of the Cathedral written by John Bailey of Thomas Ford & Partners (2015) and, these have been reviewed by Dr Nigel Barker-Mills of Barker-Mills Conservation, acting as the heritage consultant to advise the Council on this application.

121218 One initial concern raised with the approach of the Statement of significance and Heritage Impact Assessment (SoSHIA) statement at paragraph 1.8 which states, “Indeed, as also explained in this report, because of this ‘blur’ between ‘heritage’ and ‘landscape’ issues there is probably little, if anything, to be gained from drawing too firm a distinction between the two.” In response the Council’s Heritage consultant advised that the distinction between the two is that heritage issues with regard to setting have a statutory duty attached to them, which is not the case for landscape issues in this case and therefore it is important and necessary, to be clear and distinct between the two when identifying and considering impact as part of the planning

balance. A more appropriate approach would be for a firm distinction between the two and the landscape proposals should be developed using a good understanding of the original landscape design where it survives.

121219 The SoSHIA commences with the historical background and description of the development of the Cathedral, which draws upon both primary and secondary sources. The concluding part of this section of the report considers the qualities of the open spaces around the Cathedral including views across through and from the site. The approach is reliant upon the analysis in the landscape assessment and is entirely descriptive. It is solely concerned with views, and it does not contain any analysis of other aspects of the experience of the spaces. These aspects include environmental conditions, for example noise, tranquillity, etc. Functional/intellectual associations and patterns of use and their contribution, from a heritage perspective, as part of the setting of the listed Cathedral are also relevant but not considered. The commentary does identify how in closer views the Cathedral is now less visible despite the original design intention of appearing dominant over a wider area.

121220 The identification of significance is stated to be provided in detail in Sections 4 and 5 of the SoSHIA. However, it appears to be an assessment of the significance of the setting itself, rather than what it contributes to the heritage significance of the listed building.

121221 There appears to be a confusion between positive contributors to the heritage asset (the Cathedral) and positive contributors to the significance of the setting. It is self-evident that all views of the Cathedral enable an appreciation of its architecture, be that partial or more comprehensive, and designed or fortuitous. It is certainly true that not all views will be equal in importance, but it does not seem credible to take as an approach that being able to see the Cathedral is not a positive element of setting that contributes to the ability to appreciate the significance of the heritage asset.

121222 Section 4 of the SoSHIA does not provide a description of the key attributes of the asset itself (that is the Cathedral) which forms Step 2 of the Historic England GPA3: The Setting of Heritage Assets. It is therefore difficult to establish how the applicant has then subsequently approached the contribution of the setting to those attributes.

121223 Section 5 assesses the proposals, identifies what are described as the heritage issues and identifies the level of heritage harm but only in binary terms. The analysis appears to describe the evolution of the scheme following earlier advice (largely from Historic England) but without a clear focus on how those amendments have minimised the impacts.

The heritage assets

121224 The designated and non-designated heritage assets comprise:

- Cathedral Church of the Holy Spirit (Guildford Cathedral) – Grade II* listed;
- Guildford Castle (tower and shell keeps) - Grade I listed and a Scheduled Monument
- Jellicoe Roof Garden - Grade II* listed park and garden

- Church of Holy Trinity - Grade I listed; and
- Two lodges to the south – locally listed;

These would experience harm to their significance by the proposal. That harm would be “indirect”, in that this would arise from the impact of the proposal upon the contribution made by setting to the significance, or ability to appreciate the heritage significance of those assets.

121225 The Council’s heritage consultant has undertaken a high-level analysis using the stepped approach set out in the Historic England GPA3: The Setting of Heritage Assets which, whilst not the only way to approach consideration of setting, represents best practice.

Assessment of heritage significance

121226 This is an assessment of the contribution of setting to significance, or the ability to appreciate significance. For that to be identified it has to first address the key attributes of the heritage asset itself. Once this has been done the contribution of the setting to that significance can be identified.

Cathedral Church of the Holy Spirit (Guildford Cathedral) – Grade II* listed

121227 Section 9.4 ‘Context and Identity’ of this report provides details that are relevant to the significance of the Cathedral, under The Revised Principles of Selection for Listed Buildings sets out in the general principles for listing buildings and indicates that:

- from 1850 to 1945, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary;
- careful selection is required for buildings from the period after 1945, another watershed for architecture.

121228 A summary of the heritage significance of the Cathedral:

- Historical Interest - illustrating the evolution and reorganisation of Winchester Diocese as part of population growth in the south east – Guildford was one of three dioceses replacing the original one;
- Historic (community) Interest – related to land ownership and parcels donated by Lord Onslow; the current family still live in Guildford and own land locally (Clandon Park);
- Historic (community) interest – ‘buy a brick’ scheme that provided funding to complete the Cathedral post-WW2;
- Architectural Interest – An example of the longevity of the Gothic style in the English tradition of ecclesiastical architecture;
- Architectural Interest - The manifestation of the Gothic style in relation to European tradition – influenced in this case by examples both at Albi in the South of France, a Cathedral constructed in brick, and Maufe’s interest in combining the freshness of Swedish design with English tradition;
- Architectural Interest - Position of the Cathedral within oeuvre of Maufe. The Cathedral

is regarded as his masterpiece and was widely admired at the time. Other Surrey Buildings include All Saints Weston Green; the Air Force Memorial Egham Runnymede; Magna Carter Memorial Runnymede 1957 and the RAF Shelter at Brookwood Cemetery. The majority are listed and/or in Registered Landscapes;

- Architectural Interest - in particular the confident and considered use of proportion, mass, volume and line for architectural expression including obvious symbolism in terms of siting and plan form;
- Architectural Interest - Designed prominence of the silhouette, and within that the tower, which because of mature planting is the most widely visible element of the composition today;
- Historic and architectural Interest - designed for approach by car and therefore its role as part of the wider, Inter-war expansion of Guildford;
- Historic and architectural interest - discrete arrival sequences of distinctly and intentionally different character and carefully controlled. That from the west more open and expansive, that from the south pedestrian and deliberately evoking the pilgrimage tradition;
- Artistic Interest - Primarily in the careful and sparse use of sculptural and engraved decoration employing contemporary design approaches; and
- Artistic Interest - the Cathedral is historically illustrated from the south and the west, only occasionally from the east. Very few, if any, illustrations of the north. Artistic (cultural) interest also includes the iconic scene in the Omen, an acclaimed film of 1976 which uses the topography and architectural drama of the Cathedral when approached from the west to great artistic effect.

121229 These associations add to an understanding and appreciation of significance and, unless they can be physically experienced, development is unlikely to erode them. The intangible associations include those with the University of Surrey which is on land sold by the Cathedral in 1960s. Associations exist with other Onslow land including in particular Onslow village which was an immediately pre-existing garden city expansion of the town. Pedestrian routes cross the Cathedral site from north to south physically link both of these areas in a manner not originally envisaged by the architect.

121230 There is an intellectual association with the church of Holy Trinity which acted as the proto-Cathedral until the present building could be built, that adds to the historic interest of both assets. The tangible connection between the two is represented by views from the eastern field on Stag Hill. There is also both an historic association with the existing clergy housing in Cathedral Close and a tangible element of the functional connection with the private approach from the south east and up the hill.

121231 Intangible associations between the ex-Prime Minister of Canada, Viscount Bennett and his donation are recorded by a ledger stone on the Cathedral itself. Appendix 9 (Illustration A) page 3 indicates that plots of land were acquired in the 1940s in two phases from Lord Onslow; there is little doubt that this land was purchased using donations including that from Viscount Bennett, although there is no definitive plan of the land acquisition. In commemoration of this and Viscount's work during WW2 to strengthen collaboration between the UK and Canada a ledger stone is laid into the Cathedral. The stone laid refers to "the gift of the land" and the intention of the acquisition is to "commemorate the association between Canada and the Diocese of

Guildford in two World Wars.” The Cathedral state that there are no legal conditions or restrictions imposed on the gift, nevertheless, it is abundantly clear that the land was intended for the public good and in commemoration of wartime associations. It is regarded by the Vimy Foundation and the War Memorials Trust as, effectively, a war memorial and in the view of the Council’s heritage consultant, it is hard to argue against that description.

121232 There is further evidence available for the intended purpose of the land within the Cathedral Archives and the Friends of Stag Hill (FOSH) have made specific reference to extracts from letters exchanged between the Cathedral and the donor, Viscount Bennett in their letter dated 02.03.2023. The Council have not been provided with copies of these original documents and they are not referenced in either the DAS or the SoSHIA produced by the applicant. At this time, there is no reason to believe that the extracts provided are either incorrect or have been taken out of context to change their meaning, although copies would be useful to confirm this. On the basis of the information currently provided, it was not envisaged by Viscount Bennett that the land he was enabling the Diocese to acquire was for the purpose of development.

121233 The gift of the land by Viscount Bennett sits within a rich ecclesiastical tradition and is of historic interest. It is part of a C20th version of that tradition, which included in this case the public ‘buy a brick’ scheme and the contribution of the land Lord Onslow. The association of the land with Viscount Bennett and its intended purpose of providing a setting for the Cathedral and a commemoration of historic associations in two world wars contributes to the historic interest of the Cathedral. It enabled the architect’s vision as illustrated in his plans and sketches, of a mighty ecclesiastical monument astride the hill with open space around it, to be realised and appreciated from what was intended to be publicly accessible land.

121234 Whilst the applicant has provided evidence that the donation was made anonymously and there is no letter in the copies of documents submitted to show Viscount Bennett’s wishes for the purpose of the land, however, his letter to the Bishop dated 26.03.1943 confirms agreement to the memorandum 23.03.1943, which does not explicitly state that the land around the Cathedral should be free from development. Although, there was a clear intention by the Bishop, to recognise the war time relationship with Canada, in his approaches for the donation in a letter dated 06.10.1942.

121235 There are also the associations with the architect of the Cathedral, Edward Maufe and his role as architect to the Imperial War Graves Commission.

121236 Views of a heritage asset are not all equal and their contribution therefore needs to be assessed based upon how they contribute to or enable an appreciation of the intended architectural effect and impact of the Cathedral, the intended original character of the setting and landscaping and then, the evidently different existing character of the parts of the setting. Within this framework views from the west and south to and from the approaches make the most significant contribution, with long distance views from the east and south also making major contributions. In particular, long-distance views that enable the whole or majority of the silhouette of the Cathedral to be seen atop its hill are particularly valuable. Those views to the east of the Cathedral, both to and from it

were intended for both aesthetic and functional/symbolic reasons, providing a visual connection between the Cathedral, the predominant ecclesiastical building of Guildford with the historically pre-dominant secular building of the town, the Castle.

Guildford Castle (tower and shell keeps)

121237 Guildford Castle was deliberately sited to dominate the town and control a crossing point of the River Wey. The motte, on which the first timber palisade was placed was raised 7 metres above the surrounding land, which was already elevated above the river. Parts of the near-circular shell keep which encircled the top of the motte survive. Guildford is a particularly unusual survival, having been converted to both a shell keep and a tower keep, and with elements from each of its constructional phases existing. The castle is embedded in an historic urban context and experienced as part of an obviously historic county town.

121238 A summary of the heritage significance:

- Architectural Interest - an unusual example of a military building typology illustrating changing ideas in construction on one site;
- Architectural/technological Interest - the choice of site elevated above the river and further enhanced by constructing the motte;
- Architectural Interest - Masonry materials sourced locally that would have been in stark contrast to other buildings in the town when the shell, and then the tower keeps replaced the timber palisade;
- Architectural/artistic Interest - internal decoration including fireplaces;
- Historic Interest - a building intimately associated with a major event in English history, the Norman invasion;
- Historic Interest - A favourite royal palace and the principal building of the town in the medieval period; and
- Historic Interest - the subsequent private and civic uses of the structure in the C17th to C19th.

121239 The intangible associations between the castle and Stag Hill include the historic use of the latter site as a royal park or hunting when Guildford Castle was a favoured royal residence in the C13th. From the eastern end of Stag Hill, the topography of the historic town is clearly revealed, including the relationship of the Castle with the High Street and the Holy Trinity, although the original clarity of the view has been affected by vegetation and later, modern development.

121240 The best way to appreciate this strategic siting and intended dominance of the monument and listed building is looking at views from the castle and its motte out to the north, west and south. The visual prominence of the important ecclesiastical buildings of Guildford is particularly noticeable with the stone towers of St Mary's (pre-Conquest) and St Nicholas rising above the tile and slate below and linking visually to the mighty brick tower of the Cathedral on its hill beyond.

Church of Holy Trinity - Grade I listed

121241 The original medieval church stood on the same site and whilst possibly a Norman foundation it is documented that the “living” was granted by Henry I to Merton Priory in the C12th. The new church was designed by James Horne of London and built between 1749-1763. The Palladian style design was similar to Horne’s church of St Catherine Coleman in Fenchurch Street London.

121242 The intangible associations are from when in use as the proto-Cathedral in the 1920s the Weston Chapel at Holy Trinity was the location for the meeting to select the first Bishop of the new diocese of Guildford.

Two lodges to the Cathedral

121243 These were part of the original design as proposed by Maufe. How far he influenced the detailed design and final appearance of the buildings is not clear, although it is unlikely that he had much direct input. The lodges were in use by the 1950s and remain in the ownership of the Cathedral.

121244 The materials and general appearance of the lodges have some affinity with the Cathedral and their role as part of the processional arrangements for pedestrians approaching from the south is of both architectural and historic significance. The lodges are therefore at least to be regarded as non-designated heritage assets in terms of the NPPF.

121245 The lodges are positioned deliberately at angle framing a semi-circular enclosure off the Alresford Road. The lodges flank the central arched iron gate and steps that mark the beginning of the pedestrian approach to the south side of the Cathedral. The primary visual relationship is with the Cathedral that visually dominates, despite being in the background and elevated above the gateway.

121246 The primary intangible associations are with the Cathedral, and the approach, although it is not obvious externally that they are occupied by Cathedral staff. The lodges are appreciated as detached from the road.

121247 The views of the lodges from the south framing the gateway at the foot of the processional route illustrate their designed siting and intended relationship with the Cathedral above. This has survived the subsequent changes to the setting of the principal listed building since its construction. When looking east from the western half of the southern slopes the side of the lodge is appreciable and the link formed by the processional route as it climbs the hill can also be experienced.

Assessment of the impact to the heritage assets

Cathedral Church of the Holy Spirit (Guildford Cathedral) – Grade II* listed

121248 The harm to the Cathedral relates both to its significance and the understanding of its historic and, to a lesser extent, its architectural interest as a building deliberately sited on a prominent and green ridge at the edge of the town; as well as affecting the contribution made by the setting to appreciating that interest. The demolition of the earlier, planned, clergy housing and deanery which make a positive contribution to

understanding how the site functioned from shortly after the completion of the Cathedral also remains. This harm relates primarily to historic interest and a record of the buildings to be demolished would be a proportionate response. This could be secured by condition.

121249 Eastern Meadow - Although these are distinct character areas within the setting and these are different in terms of their appearance, both provide tranquil spaces that reinforce an understanding of the physically separate nature of the Cathedral, with the intentional visual connections to the historic town. The eastern gardens were identified by Maufe as not to be built upon, but the eastern field is beyond that annotation. The current character and experience of the spaces would be transformed by the proposed development.

121250 The amendments have sought to reduce the previous formality of the proposals and to increase the width of the retained open space by setting back development on the south side. The revised position and stepped building typology would reduce the apparent mass of as seen from the open space. However, the currently semi-rural, isolated character of the space and the sense of separation would be lost through overlooking and the introduction of domestic activity, including light spillage, as demonstrated in CGI views 1 and 2. The applicants do not accept that the space is currently well used (page 8 table 1.1), this is deemed to be incorrect. They also exaggerate the “negative” qualities, as the site photographs provided in the first version of the DAS reveal. This space is a sensitive one both historically and in terms of its contribution to appreciating the Cathedral.

121251 There is currently a visual and sense of separation between the meadow and the consecrated ground to the immediate east of the Cathedral. This would be weakened with the loss of trees and the walking routes. This would fail to sustain the significance of the listed building and would affect not just the field but also the associated gardens immediately east of the Cathedral reducing their contribution as contemplative and memorial spaces associated with the spiritual role of the principal building.

121252 An important amendment has been the re-positioning and change in mass of the homes along the southern side of the meadow. In particular at the eastern end as this would reduce the impact on the currently available views east and south from Stag Hill to the historic town centre. There would still be some visual distraction to an appreciation the Castle from this part of its setting arising from the new development, although the relationship between the Castle, Cathedral and Holy Trinity would still be legible. The intangible historic associations between these three hugely significant heritage assets which are illustrated by this intervisibility would therefore, now be sustained more effectively, albeit that harm would still be caused.

121253 The clergy housing – would be seen from within the car park although they would be sited on lower ground as the hill falls slightly towards the east. The change from a current wooded boundary to one with an access road and residential development in relatively close proximity to the listed building may be a concern in landscape terms. Although in terms of heritage, the impact on the contribution of this part of the setting to significance or ability to appreciate significance is neutral.

- 121254 Southern Slopes – this part of the setting would have the most appreciable impact upon the character and contribution of the setting, both in terms of how the sense of the land being associated with the Cathedral is understood and also in terms of visual prominence. The increased density, formal terracing and apartment typology would be out of character with the immediate context and the development extends right up the full extent of the hill.
- 121255 The current understanding of the relationship of the Cathedral with its topography and associated clergy housing would be lost entirely. The tower of the Cathedral becomes an isolated object with an arbitrary visual relationship with the development below. The harm whilst less than substantial in terms of the NPPF is clearly at the middle of the spectrum.
- 121256 The amendments have resulted in a reduction in the built form and provide for a more generous relationship between development and landscape. The removal of the upper road and reduction in the amount of re-profiling of the existing topography are also an improvement. The amendment would also remove part of the impact upon the silhouette of the Cathedral tower in VP1 as shown in the revised DAS addendum.
- 121257 However, the very significant change in character in this part of the setting of the Cathedral would remain apparent and particularly when approaching from the east along Ridgemount and Alresford Road. The wider section drawings also show that the dissonance between the profile of development and the topography of the hill remains and is particularly evident in this, the steepest part of the site.
- 121258 Western Parcel – Currently this part of the setting of the Cathedral offers limited views of the Cathedral itself because of the dense tree belt along the northern side, however, it does provide more expansive views south east and west which enables an understanding and appreciation of the topography that informed the site selection for the building. The rural character and experience of being somewhat separate from both the development to the south and the “busyness” of the formal western approaches, is probably the closest to what was historically the case for much of the later C20th. The decision to “leap” Alresford Road and bring development up the hillside inevitably radically changes the topography and associated character reducing the edge of town feel of the site. The intention to use gabion walling, native hedging and provide a Community Orchard are all commendable in principle, but nevertheless the transformation of what is important open undeveloped space would be readily appreciated.
- 121259 No amendment has been made in response to the concerns regarding the impact of the development upon the experience of the Cathedral from the critical, western, processional approach. Instead, additional landscaping has been proposed, the reasoning for the built form has been cited as the existing character of development to the south, outside of the cathedral site. However, this fails to understand the context of the site and the western approach. It is this character and its contribution to significance that has to be sustained, supported by statute, as part of the setting of the Cathedral and therefore the harm arising from the impact of the western end of

development on the western parcel of land has not been addressed.

121260 The impact of development upon the existing character of the setting and in particular the ability to experience the Cathedral in an undeveloped context would be significant. At present it is still possible to experience the Cathedral in a largely green and tranquil setting to the south west between the Alresford Road and the tree belt that runs along the south side of the western approaches. This last, relatively undisturbed, parcel of the setting would be developed for housing. Although a section of green space would remain, its character would be very different and the influence of the suburban nature of the new development would be extensive.

121261 Views - Not all views are of equal importance and those that make a particular contribution include where the composition within the view was a fundamental aspect of the design or function of the heritage asset - for example the western approach. A distinctive feature of the physical surroundings of the Cathedral is the contrast between long distance views from the west and south, to and from the approaches, which make the most significant contribution and the more glimpsed views of the Cathedral from its immediate setting. The close views are typically of the central tower and only occasionally is the whole of the southern elevation visible from the immediate south.

121262 Appendix 8 of the SoSHIA provides a further heritage viewpoint analysis based on verified views prepared as part of the Landscape and Visual Assessment (LVA) Addendum prepared by Macgregor Smith. The purpose of this appendix appears to be to try and provide a discrete heritage analysis of impact as distinct from landscape impact. The views included in this appendix only show the existing night time condition and not the night time condition following development. The effects of light spillage are therefore not shown and without that evidence it is difficult to assess the credibility of the conclusions on impact. In the vast majority of the assessment the approach is to provide a very short description of the baseline or existing view with no explanation of how this contributes to significance or ability to appreciate significance. Therefore, the relative importance of the view in terms of its contribution as part of the setting. When harm is identified it is categorised as less than substantial, but without any indication of where on the scale that sits; apart from View 24, where harm is identified but even the level of that harm is not indicated. It is assumed that in light of the conclusion of the heritage statement that there is less than substantial harm overall, it is the same conclusion with regard to this view.

121263 From the south, below and along Alresford Road, the views of the Cathedral that are currently available would be affected by the roof scape of the new housing. At the moment one can appreciate the Cathedral as a monumental structure, including elements of its volume, mass and silhouette as it appears in glimpses between and behind vegetation. The DAS addendum provides illustrations of what are described as Cathedral Glimpses (5) in connection with the Western Parcel of development (pages 64 and 65) which shows that in relation to views 3, 4 and 5 there would be some loss of visibility of the Cathedral. This represents harm to the contribution made by the setting to the Cathedral and erodes the ability to appreciate its architectural volumes.

121264 Two, more formal verified views are particularly important. The first is VP1 looking west

along Scholars Walk at the junction with Ridgemount (Appendix 1 Heritage Viewpoint Analysis pages 6 and 7). Currently, in winter, the roof of the chancel and the tower can be seen. The proposal would reduce the degree of visual obstruction, although not entirely remove this and the visual prominence of the new development in this view has also been reduced. However, the ability to read the tower with the lower section of the Cathedral would still be lost which would cause harm.

121265 In the summer condition, the Cathedral tower alone can be seen against the sky with a green foreground and the contrast enhances the visual prominence of the building. As part of the proposed development much of the green foreground would be removed to be replaced by views of the upper storeys and roof lines of parts of the Eastern Slopes development (page 9). Although the development would appear subservient in this view, the contrast between green vegetation and built form would be permanently lost and a roof gable range cuts across the lower section of the south side of the tower. This would represent less than substantial harm, in the ability to appreciate the architectural scale of the Cathedral; albeit that the impact has been slightly reduced by the amendments.

121266 The second, VP6 Old Court Road/Alresford Road junction looking north east is one of the few places where it is possible to get a better sense of the scale of the whole Cathedral because the west end gable is visible in winter views and can be seen in relation to the central tower. In summer this relationship is almost entirely obscured by trees. Although the view was not designed as a "set piece" and is not part of one of the formal approaches to the Cathedral. Furthermore, due to changes to the setting of the Cathedral that have happened over time, that dramatic and open relationship has become lost, so that this is one of the few remaining places where the scale of the building can still be discerned in relatively close proximity to the site beyond Stag Hill itself.

121267 The introduction of new development in the foreground of the view would be particularly prominent in winter and less so in summer. The visual prominence of the new development would distract from the Cathedral and would cause harm to an ability to appreciate its architecture and the relationship of the building to its site. The change to the winter view from this location represents one of the single-most harmful impacts on the visual appreciation of the Cathedral from its close setting.

121268 The third view of importance is that from the western approach to the Cathedral, described as a key "set piece" by the applicant (VP8 pages 16-19). The earlier assessment in the SOSHIA by the applicant pointed out the importance of protecting this view and the sense of the Cathedral as isolated and dominating the site. An ability to appreciate the sky gap between the tree belts behind the large Oak is the critical issue, particularly in winter. The sky gap would disappear to be replaced by the end of the western parcel of development in the view illustrated and therefore this key, set piece would not be protected. The degree to which the development could be appreciated as you pass along the processional route may well be reduced by the partial re-instatement of the formal planted avenue, however, the opportunity was not taken to set the western edge of the proposed development further back so that it would not be visible from this important approach.

121269 VP19 connects two heritage assets, the registered landscape designed by Sir Geoffrey Jellicoe on top of the House of Fraser building in Guildford High Street and the Cathedral dominating the top of Stag Hill. There is also an intellectual association between the two assets as Jellicoe was involved in plans for the extension of Guildford around the Cathedral site. The current appreciation of the Cathedral from this elevated location in the town centre has the building set above the green “collar” of vegetation immediately below it with the eastern meadow in front of the Cathedral. The development on the south eastern slopes would be visible in front of the Cathedral and reduce the sense of green space, although this would be down the slope and so be appreciated in relationship with the existing roofscape of development along Ridgemount. The development in the Eastern Meadow would have a greater impact, clearly eroding the expanse of green space and whilst this would still be below the Cathedral the sense of the Cathedral as a structure separate from the town and dominating the hill would be eroded. Whilst the development does not challenge the primacy of the Cathedral in this view, it would encroach and therefore represents a distraction. Rather than the impact being neutral, as identified in the Heritage Assessment, there would be some low-level harm to the ability to appreciate the Cathedral from the terraces of the roof garden.

121270 South Lodges - The views of the lodges from the south frame the gateway at the foot of the processional route. When looking east from the western half of the southern slopes the side of the lodge would be appreciable and the link formed by the processional route as it climbs the hill would also be experienced.

121271 The development would continue to be seen behind the western lodge and this would affect the appreciation of the current symmetrical arrangement in views from the south. In views south from the Cathedral itself looking down the slopes towards the lodges, the presence of the new development would be reduced by the strengthened planting.

121272 Southern Approaches - The edges of the eastern and western parcels of development have been deliberately aligned with the east and west ends of the Cathedral building lines. Currently, the undeveloped nature of these slopes adds strongly to the visual presence of the Cathedral and its sense of separation. The use of further landscaping to strengthen existing tree belts to the eastern boundary provides some mitigation. Further planting of the eastern edge of the western parcel would also be mitigation, particularly in the summer.

121273 However, the encroachment of development either side of the open space immediately adjacent to the pedestrian processional route would remain appreciable and in the long-distance view from The Mount the clarity between the Garden Village in the middle ground, backed by a green “belt” below the Cathedral, which provides the important visual separation would continue to be eroded. The green space would become more constrained, and its boundaries aligned with the built form of the Cathedral itself in a way not previously seen or indeed intended. In this view the space loses some of its generosity. The harm is less than substantial in terms of the NPPF and towards the lower end of the spectrum.

121274 Until the letter from FOSH dated 02.03.2023, no evidence had been put forward that part of the purpose of the gift was to ensure that open green space would be available and ensure that views of the Cathedral from the town and countryside would not be impeded by any buildings. Therefore, to provide “breathing space” for the new building; even if this was not legally covenanted. It is clear that greater emphasis needs to be placed on this role of the land and, therefore, how development in principle affects this function. It also needs to be seen in the context of the evidence that the architect, Maufe explicitly regarded the eastern meadow area as not to be built upon.

121275 In light of the evidence regarding the historic interest of parts of the land identified for development, the level of harm to the Cathedral is, would be greater than that previously attributed to the development. The change in character from open spaces providing a ‘green collar’ to protect and preserve the Cathedral, so that it would remain separate from encroaching development to residential development. Would not appear compatible with what is known about the intentions the Bishop in the middle of the last century when the land was acquired. Therefore, the proposal would be an insensitive treatment of land that commemorates wartime associations.

Conclusion on harm to the heritage assets

121276 The Cathedral of the Holy Spirit in Guildford is a heritage asset of more than special importance and is in the top circa 8% of buildings nationally. The key attributes of its architectural and historic interest relate to its spatial qualities evident in its design including, simple massing, silhouette and intentionally prominent siting, taking advantage of the local topography which was used to advantage in the controlled way the building is approached. The connections to the historic town of Guildford, tangible and intangible, are important aspects of its significance.

121277 The proposed residential development would cause less than substantial harm to the heritage significance of the Cathedral. This arises through indirect impacts upon the contribution made by the setting to the significance of the Cathedral and the ability to appreciate that significance. Although most of the impact could be expressed by reference to views, the impacts also include other aspects of setting that contribute to the particular characteristics of an ecclesiastical building. This includes the sense of tranquillity, areas of enclosure, and in this particular case, the sense of the edge of town location.

121278 The development represents a significant change and incursion into the setting of the Cathedral that would radically change its appearance and character, primarily along the southern slopes of the site adjoining Ridgemount and Alresford Road. The proposal is the latest and by far the most significant step in a process of erosion of setting and the disposal of elements of the historic curtilage of the listed building that started in the 1960s.

121279 The ability to appreciate these views of the Cathedral and its hilltop location, with the ‘green collar’ would be affected due to the extent and scale of development, so whilst the tower would remain prominent the rest of the building would be submerged into the residential development on the slopes and affect the views to see the Cathedral as

separate and visually dominant.

121280 Those previous disposals have already changed the character and contribution made by the setting to the ability to appreciate the Cathedral both in close and longer views. The PPG advises that cumulative change may need to be considered. In this case cumulative change has already taken place and this latest scheme should not be seen individually or in isolation from these earlier developments. It is recognised that there are circumstances where a number of small changes that are insignificant individually can together result in harmful change, including from other development proposals. That is not the case here, as each of the relevant developments are not insignificant but a direct consequence of the Cathedral selling land off and they range from the smaller scale Scholar's Walk to the large scale University of Surrey. Each has been assessed and have resulted in some harm to the heritage asset in question.

121281 The proposals are the latest and by far the largest in a process that has seen the setting of the Cathedral reduced and eroded. An approach which disposes of parts of the setting for development which causes harm has to be justified.

121282 Less than substantial harm is caused to the following assets:

- Guildford Castle - at the lowest end of that spectrum
- Cathedral of the Holy Spirit - middle of the spectrum
- Jellicoe Roof Garden – no harm
- Church of Holy Trinity – no harm
- Two lodges to the south – at the lowest end of that spectrum

Amendments to the Western Parcel that would preserve the visual dominance of the Cathedral from a key processional approach would reduce the harm further and conserving the eastern meadow area as undeveloped would also significantly reduce the identified harm.

121283 There would be less than substantial harm to Guildford Castle when seen from the view to from the eastern meadow to the south and east, this currently provides an expansive view of the town and allows key landmark building to be picked up. The development would result in a degree of visual distraction when looking towards Guildford Castle from the eastern meadows.

121284 Some very limited harm is also caused to the ability to appreciate the southern lodges, which are non-designated heritage assets. A balanced approach is required by the NPPF when considering this impact, based upon the scale of any harm or loss and the significance of the heritage asset affected. On that basis the harm is at the lowest end of the spectrum.

121285 The proposal would conflict with saved Policy HE4 in the GBLP and policy D16 of the LPDMP which relates to development that affects the setting of a listed building. It would also conflict with policy A15(3) of the LPSS, which requires the development to be sensitive to the setting of the Grade II* listed building (Guildford Cathedral) and would not protect views to and from the heritage asset. Whether there would be

compliance with policy D3 in the LPSS or with the NPPF would depend on whether the identified harm is outweighed by the public benefits. This is a matter to which shall be considered below.

Archaeology

121286 The application site is not within a locally defined County Site of Archaeological Importance or an Area of High Archaeological Potential.

121287 The application was supported by a desk-based archaeological assessment produced by the applicants' archaeological consultants, RPS, informed by all available sources including the Surrey Historic Environment Record, in order to provide a thorough overview of the archaeological potential of the site and surrounding area.

121288 The report identified a low archaeological potential at the study site for all pre-Post Medieval past periods of human activity at the study site, with a specific potential identified at the south east corner associated with an historic farmstead. Previous geotechnical works at the site have been archaeologically monitored and did not identify any archaeological finds or features. The steep sloping ground is likely to have been unsuitable for historic occupation. If present at the site, archaeological remains would most likely be of up to a local significance only. The proposed development is unlikely to impact upon any highly significant archaeological remains that might preclude development.

121289 The assessment includes the results of archaeological monitoring of trial pits excavated across the site. This work involved the monitoring of 21 trial pits located across the site revealed no evidence of archaeological deposits and confirmed that it is very unlikely that deposits suitable for archaeological survival are present.

121290 Therefore, the Country Archaeologist is satisfied that it is very unlikely that significant archaeological remains would be present on the site. So, any further archaeological investigations would not be required in his case.

1213 Impact on residential amenity

12131 Paragraph 130 f) of the NPPF requires "places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience." One of the key characteristics in the National Design Guide (NDG) is, Homes and buildings – functional, healthy and sustainable for occupiers and the surrounds.

12132 These principles are taken forward in policy D1 of the LPSS, policy D5 of the LPDMP and saved policy G1(3), which requires protection from unneighbourly development, to avoid having an unacceptable impact on the living conditions of new properties in terms of privacy, overlooking, visual dominance, overbearing effects, access to sunlight and daylight, artificial lighting, noise, vibration, odour, fumes and dust. Policy D5 also requires all new build residential development, including flatted development, are expected to have direct access to an area of private outdoor amenity space.

12133 The proposed development would not have a frontage onto an existing road, however, homes on the Eastern Slopes and Western Parcel would face homes on the opposite side of Ridgemount and Alresford Road to the south. There is also residential development in Scholars Walk to the south east. There are the two cottages at the southern pedestrian access and the more recent development of homes along Scholars Walk to the south east. To the north are blocks of student accommodation following the topography of the land.

12134 The proposed homes would be on open space and the layout takes into account the need for connectivity and legibility so that pedestrian permeability, so that the site can continue this function for existing and new residents. Therefore, the relationship between public and private thresholds has to be sensitively considered.

Occupier amenity

12135 Policy H1(3) of the LPSS requires all new development to conform to the nationally described space standards (NDSS). It is noted that four flats would not meet the NDSS as some bedrooms were undersized. However, the applicant has now amended these bedrooms and has submitted a matrix showing the requirements and how their units compare. All the homes would either meet or exceed the total NDSS gross internal area (GIA) requirement, including the storage areas. So overall, there would be satisfactory space for storage furniture and circulation space.

12136 It is acknowledged that the site contains a large number of trees both around the perimeter of the site and within the area to be redeveloped. Dwellings on the Western Parcel would face the trees which align the northern side of Alresford Road. These would be separated from the proposed dwellings by the new access road and while the trees would result in some overshadowing of the front elevations of these dwellings, given the distance of separation, the impact would not be significant and would not materially reduce the amenity of these properties. The same arrangement exists for the apartment block on the Eastern Slopes. They would overlook a number of very large, mature trees, however, as above, they are separated from the front elevations of the apartments by the new access road. The trees would provide screening between the apartments and the properties on the other side of Ridgemount and would also provide an attractive outlook for the future residents. Any loss of light that the trees would cause, would not result in a poor living environment for the future residents. There are also a number of large trees which are located to the north of this parcel. Plots EM01-07 would be able to see these trees from their rear windows / outdoor areas, however, due to their orientation they would not cause any overshadowing issues.

12137 The ground floor flats with a private deck and openings to habitable rooms abutting would abut communal pocket parks, communal areas and entrances, so they do not directly face these publicly accessible areas. There is no provision of railings or privet hedges to create a private threshold, so that the occupiers could use this internal and external spaces with a degree of privacy. Therefore, it would be appropriate to required details of privacy measures by condition.

- 12138 The access ramps to the undercroft car park would have activity all day/night long, the configuration would result in bedrooms having a shared wall to these, the proximity to each other would restrict the occupant's ability to open windows. However, this would affect two bedrooms and to reduce headlight disturbance there would be a small projecting wall and to reduce the glazed area affected the windows would be two panes. As this would affect such a small proportion of the flats and measures have been taken to reduce the impact, this relationship would be acceptable.
- 12139 A review of the layout of the new units has been undertaken with regard to ensuring the proposed dwellings do not result in overlooking, privacy, or daylight / sunlight issues within the new development itself. The proposed layout ensures adequate separation distances between new units.
- 121310 The scale and configuration of the flatted blocks on the eastern slopes has been considered; where blocks are three and a half storeys they have been separated from neighbouring two / three storey blocks with the podium gardens. This would reduce any material overbearing impact to the flats in the adjacent smaller blocks.
- 121311 Windows of habitable rooms are largely offset from adjacent properties or there would be suitable distance. This ensures that there would be no significant overlooking. It is noted that this is an urban grain and scale of development, and the proposal has been assessed on the basis of an urban environment has a greater degree of mutual overlooking and smaller gaps between neighbouring properties.
- 121312 All the proposed dwellings are expected have access to private and / or communal outdoor space. Some of the proposed gardens and balconies are small, although all would be at least 4sqm, and some are north facing so would experience overshadowing much of the day. However, future occupiers without their own private amenity space would also have access to satisfactory outdoor amenity space when taking into account the site as a whole. The flats would have the woodland courtyard in close proximity, this has benches and pocket parks. It is acknowledged that there would be a absence of a covered area, however the surfaces would allow year round use and the overshadowing of this area from the buildings would also have the effect of creating a sense of privacy and enclosure to support the functions as communal amenity space. The application submission is supported by a landscaping scheme which shows new or improved amenity areas; namely the community orchard, woodland courtyards and the eastern meadow. The implementation of the proposed landscaping could be secured by condition.
- 121313 The eastern most house (HT-6) on the Western Parcel would be close to the existing sub-station on site. As there would be a separation distance of at least 18m there would be no loss of amenity from noise and vibration.
- 121314 It is noted that there are several areas within the site where new private gardens would abut areas of the Cathedral grounds which are open to the general public. These include the dwellings in the western parcel as well as units EM01-07 off Ridgemount. To ensure that the proposal does not result in littering of the public areas of the site

from the dwellings an Open Space Management Plan would need to be agreed and secured through conditions. The proximity of the dwellings to the public open space would also result in increased overlooking, noise from rear gardens and a loss of privacy to those who are using the public grounds. This could result in the owners/occupiers putting up additional screening measures and discouraging visitors from walking by these areas and enjoying the Cathedral grounds as they currently do, diminishing the value of public amenity space.

1213.15 In terms of car parking, it is acknowledged that the Eastern Slopes includes a number of on-street car parking spaces. While these spaces have the potential to cause disturbance and noise to the adjacent residential units it is noted that they would all be separated from the elevations of the dwellings by a pavement and a small buffer zone of hard and soft landscaping. As such, the on-street car parking spaces would not result in any harm to the amenity of the proposed units.

1213.16 As noted above the proposed units along the northern boundary of the site would be for the clergy. These five units have a similar layout and design to the market housing. The dwellings would also include a small south-facing area of private open space to the front. While it is acknowledged that the garden areas are very small, the clergy would have access to the rest of the Cathedral grounds. As such, the private area of open space is considered to be acceptable in this instance. The clergy housing would also have trees to their north, east and west. However, the distance of separation is such that there would be no impact on their internal amenity as a result.

1213.17 The buildings with more than three storeys would not have lifts, this would affect six of the flats. Whilst this would affect those with mobility condition, as this would relate to a small number of homes and there would accessible homes available on site, the lack of lifts would be acceptable.

Neighbouring amenity

Construction phase

1213.18 There may be potential for noise, vibration, dust and disruption during the construction phase. This would include the impacts of piling, which may be required during the construction process. Appropriate site-specific mitigation measures have been suggested as part of the Air Quality Assessment in relation to dust emissions. In addition, a Construction Environmental Management Plan (CEMP) could be secured by condition to adequately mitigate any of these impacts on existing occupiers.. The construction phase is temporary and can also be controlled under the statutory nuisance provisions of the Environmental Protection Act 1990 if necessary. This includes the impact from the proposed piling works.

Scholars Walk

1213.19 Numbers 1, 2, 12 and 14 Scholars Walk have a shared boundary with the application site. The separation distance from Blocks E and F to the shared boundary would be between 20m and 48m. Much of the existing vegetation would be retained, with

additional planting proposed (drawing no. 1248-005 P3 Landscape Plan). Therefore there would not be a harmful overbearing impact.

121320 The amended scheme has reduced the height and bulk of the most prominent elements of the apartment buildings on the eastern slopes. Block E would be the closest part of the development to 1 and 2 Scholars Walk. The block has been reconfigured as part of amended plans received in December 2022. The block is located at a diagonal to the rear of 1 Scholars Walk. At its nearest point Block E is located 20.55m from the shared boundary with 1 Scholars Walk, and 32.9m to the dwelling itself. Section B-B on drawing JTP_MP_XX_DR_A_1507 rev P2, shows that there would not be a direct line of sight and the boundary vegetation would provide a buffer to the screen the rear gardens from the activity in the buildings and the roadway. Therefore, whilst there would be an increase in the built form the gaps between buildings and the juxtaposition would reduce a material loss of amenity from overlooking, noise and disturbance.

121321 Block E would be situated on land which is higher than the dwellings in Scholars Walk. Its southern elevation would contain a number of windows and the south-eastern corner of the block would have inset balconies on two levels which would have openings facing east and south. While there is likely to be overlooking of some Scholars Walk properties, it is noted that the windows would be to the west of the Scholars Walk properties and as such, they would only offer oblique views of the surrounding properties. Given this, as well as the significant distance of separation and the boundary screening, the proposed windows in Block E would not result in such a loss of privacy to the Scholars Walk properties which would justify the refusal of the planning application. The proposed balconies would be relatively modest in size. The opening which faces south would be very narrow which would limit its use and potential for overlooking views. The opening in the side elevation would face south and as such, while views to the south would be possible, these would be at an oblique angle and as noted above would be a significant distance from the boundaries of the Scholars Walk dwellings.

121322 It is also acknowledged that Block E (in particular) would be visible from the rear gardens and windows of the Scholars Walk properties. Some residents have submitted images with their objections to illustrate this. While the new buildings would be visible from Scholars Walk, even taking into account the elevated position of the proposed blocks, they would not have any materially harmful overbearing impact or cause a loss of light. Therefore, in an urban environment, the design of Block E and its relationship with its existing residential neighbours would be acceptable.

121323 The existing vehicular access to Cathedral Close, currently abuts the shared boundary with 1 Scholars Walk, this would be replaced by a pedestrian access. The approach section would be to the east would be set back 5m from the shared boundary and the route up and down from t1 Scholars Walk would be approximately 9m where it would be adjacent to the rear garden and detached garage, this would be an improvement on the existing relationship. The main vehicular route to the eastern slopes would wind up the slope to the east along the shared boundary with properties in Scholars Walk. This would introduce additional vehicular movements with some increase in noise.

However, the shared boundary within Scholars Walk to the roadway would range between 12m to 26m. This gap and the intervening landscape buffer would reduce the impact of headlights and engine noise, even from an elevated position. It is acknowledged that there would be an increase in noise from the access, although this would not cause any material harm to the amenities of these neighbours.

Ridgemount and Alresford Road

121324 The proposed homes on the Eastern Slopes and Western Parcel of the development would face onto the existing linear development along Ridgemount and Alresford Road. Separation distances between building to buildings (as shown on Sections B – B, C – C and D - D on drawing JTP_MP_XX_DR_A_1506 and 1507 rev P2) would be approximately 40m-45m to the houses on Ridgemount and 28m to Alresford Road. Therefore, any harmful impacts with regards to overshadowing impacts, overbearing impacts and overlooking would not occur, even taking into account their elevated positions. The proposal also retains and enhance existing trees and hedgerows along both roads, with the new access route and development behind. This would provide some visual screening.

University of Surrey

121325 The clergy housing would be located close to the northern boundary of the site and on the other side of this boundary there are student housing units on the university campus. It is noted that the clergy housing would be separated from the closest building for the warden by at least 22m building to building and to nearest student accommodation 22m to 27m building to building, which would be a satisfactory distance of separation. In addition, it is noted that the boundary between the sites contains a large number of trees which act as a screen and the university buildings are set at a lower level. Furthermore, it is noted that the student housing is not occupied in the same manner as a typical residential home, so are more likely to be vacant outside of term times. Students also have the benefit of shared communal spaces within their buildings, as well as large areas of open space. While there may be some overlooking between the sites, this would not be materially harmful to the amenity of the student units. As such, the proposal is deemed to be acceptable in this regard. There may be some noise and disturbance when the student units are occupied, however, the university has management systems in place should there be a nuisance.

121326 Having regard to all of the above, it is concluded that viewed as a whole the development proposed would not give rise to unacceptable impacts on the living conditions of future occupiers of the development. For these reasons the development complies with the objectives of policy D1 of the LPSS, Policy D5 of the LPDMP, policy G1(3) of the saved GBLP and the NDG and NPPF.

1214 Impact on trees and vegetation

12141 Paragraphs 174(b) and 180(c) of the NPPF places great value on trees and woodland. Policy ID4 of the LPSS includes parks and open spaces, private gardens, agricultural fields and allotments, hedges, trees and woodlands, green roofs and walls,

watercourses, reservoirs and ponds. Policy NE5 of the saved Local Plan 2003 also seeks to protect trees, hedges and woodland. Policy P6/P7(6) of the LPDMP seeks to retain trees and new planting to connect and/or extend canopies and policy P8/P9(5) safeguards significant trees, requiring development proposals for sites that contain significant trees to incorporate them and their root structures and understorey in undeveloped land within the public realm, and to provide green linkages between them.

- 12142 The arboricultural quality of the site is that the trees are almost all of deciduous broad-leaved species and are mostly native or naturalised. There is a mix of self-seeded and planted specimens; the latter having been part of the landscaping of the site following completion of the Cathedral in the 1960s.
- 12143 An Arboricultural Impact Assessment prepared by SJA Trees reference 19340-01c and dated December 2022, has been submitted in support of the application. The tree survey and tree categorisation are as per the requirements of BS 5837:2012 Trees in Relation to Design, Demolition and Construction. The Council's Tree Officer agrees with the categorisation.
- 12144 The British Standard (BS5837:2012) states that trees in categories 'A', 'B' and 'C' are all a material consideration in the development process, the retention of category 'C' trees, being of low quality or of only limited or short-term potential, would not normally be considered necessary should they impose a significant constraint on development. 'U' category trees are in such a condition that they are unlikely to contribute beyond 10 years and may be removed as part of good arboricultural practice, irrespective of any development proposal.

Tree removal

- 12145 The Tree Survey Schedule found at Appendix 2 of the Arboricultural Impact Assessment and accompanying Tree Removal Plan referenced 19340-051b detail the trees, groups of trees, shrub masses, and hedgerows growing within or immediately adjacent to the application site. The proposed development would require tree, as well as hedgerow, removal. The extent of the tree and hedgerow removal is shown in the TRP. This includes the removal of 69 individual trees (10 of which are category 'U'), 7 groups of trees and 2 hedgerows. No category 'A' trees or tree preservation order (TPO) trees are to be removed. The majority of the tree removal would take place within the site, leaving the boundary trees in situ, except for tree group nos. G101 and G108 which would be partially removed from the eastern slopes and western parcel respectively and part of G10 from the eastern boundary of the overall site. The retention of the majority of existing hedgerow and trees along the site boundaries, and in particular beside Ridgemount, would help maintain the wooded character apparent in parts of the site.
- 12146 This is a summary of the trees on the site with a visual amenity value:
- mature English Oak trees numbered 81, 82, 147, 230 and 231 (all TPO trees fronting Ridgemount / Alresford Road);
 - eight other Oaks numbered 41, 45, 47, 49-50, 111, 129, 262;

- one Ash no.305;
- Grey Poplars no. 46 and 142-146; and
- mixed deciduous groups of trees numbered G9, G104, G108 and G109 - located on the north and south boundaries of the site which provide effective screening and contribute to the green infrastructure of the site.

Whilst there are no category 'A' trees or TPO trees would be removed, there are a number of category B and C trees (nos. 46, 142-146, G108, 262 and 305) which make a positive contribution to the site that are proposed to be removed.

12147 The grey poplars nos. 142-146 have been assessed as category 'C' trees and are mature specimens which are tall in height and readily visible from some viewpoints. The AIA notes that these are a short-lived species, 60-100 years, and that nos. 142-146 are approximately 47 years old. The report also notes their potential susceptibility to wind damage due to the location and species. The loss is accepted however, regrettable as they do provide existing amenity value which would be lost as structural landscaping in a prominent location on the southern slopes by the pedestrian approach and new tree planted would not reach this maturity for many years.

12148 The semi-mature oak tree no.262 assessed as a category 'B' specimen is set slightly north of the remaining boundary trees along Alresford Road. Whilst not part of the boundary row of trees it still contributes positively in spatial terms. A small area of G108, adjacent to no.262, is also proposed to be removed. The loss of these trees, and in particular no.262 is regrettable. The applicant has responded in an email dated 22.02.2023 that given the lifespan and health of these trees along with the required layout changes to retain the trees, that would have highways impacts and likely other more significant tree losses along Alresford Road, the loss is justified. The AIA also provides justification at section 4.2 of the report, outlining the health, longevity and location of each specimen of value proposed to be removed.

12149 Most of the main arboricultural features of the site would be retained. The loss of the noted 'B' grade trees proposed to be removed is disappointing but would not be significantly noticeable in the overall sylvan character of the site. The proposed tree and hedgerow removal would be mitigated against with the tree planting scheme that has been proposed (drawing number 1248-010 rev P2). The Tree Officer is also satisfied that there would be appropriate separation between dwellings and retained trees and therefore future conflicts should not arise.

Tree Preservation Orders

121410 Five individual trees on site are covered by a tree preservation order (TPO). Guildford Borough Council Tree Preservation Order no. 1993 No. 8, T1-T5. They are identified in the tree survey as no. 81, 82, 147, 230 and 231. The trees are located alongside Alresford Road and Ridgemount.

121411 Concerns were raised with the previous application 15/P/02284 in relation to the proposed proximity of dwellings and gardens to TPO trees no.230 and 231 and the

significant pruning that would be required. The current application has a revised layout that locates built form further northward. The front elevation of the apartment blocks are no less than 12m from canopy extent of these trees to ensure that no pruning is required.

1214.12 The proposal would result in incursions into the root protection areas (RPAs) of no. 230 and 231. The incursion areas would not exceed the recommended percentage set out in paragraph 7.4.2.3 of BS 5837. Comprehensive tree protection measures, proposed in the AIA, these would be in place to ensure the protection of these TPO trees and ensured by condition.

Pruning

1214.13 The proposal would require the pruning of five English oak trees (nos. 48, 52, 53, 255 and 260) and one field maple (no. 307) to ensure that none of the proposed vehicular or pedestrian accesses would be impeded by tree canopies, with a margin for future growth, and to allow adequate working space during the construction period.

1214.14 The extent of the pruning proposed is found at Table 5.2 of the AIA. The works would comply with the recommendations of British Standard BS 3998:2010, Tree work – Recommendations. The pruning is assessed as being minor. The branches to be removed are small in size and the pruning works would be largely screened in views by retained trees and their canopies. The tree pruning would be visible in some areas of the site; however, the pruning would have a negligible effect on the appearance of the trees when viewed from outside the site itself

Tree Protection

1214.15 The Arboricultural Report indicates limited encroachment into the root protection area (RPA) of 17 trees and one group of trees that would be retained. The incursions into the RPAs of trees nos. 45, 47, 49, 51, 54, 230, 231, 247, 253, 307, 436 and G9 would be by proposed foundations, roads, footpaths or drainage solutions. Given the nature of these elements a degree of excavation would be required. The tree species impacted by encroachment into their RPAs have been identified as good to moderate at tolerating root pruning and disturbance (see Table 8 of the AIA) and suitable rooting areas would be available within the scheme. Soil and rooting environments within the RPAs could also be enhanced to promote improved root growth by de-compaction, aeration fertilisation or mulching. Paragraph 7.4.2.3 of BS 5837 recommends a 20% maximum incursion into currently unsurfaced ground. In all but three cases this recommendation is met with incursion areas extending to no more than 16% of individual RPAs.

1214.16 The AIA report states that to reduce any potential impacts on the trees noted above, excavation within these RPAs would be undertaken manually, under the direct control and supervision of an appointed arboricultural consultant, so that any over dig into the RPAs is avoided, and any roots encountered can be treated appropriately and in accordance with the outline Arboricultural Method Statement (AMS) (Appendix 1 of the

AIA) and relevant British Standard. The footpaths proposed would also be constructed entirely above the existing soil surface using a cellular confinement system as its subbase to minimise compaction and ensure adequate tree protection.

1214.17 The submitted outlined AMS explains how risks to trees would be managed on site. This includes pre-start meeting with the site manager and relevant contractors along with the Council's Tree Officer. The AMS makes clear that no site clearance, ground preparation or demolition would take place until tree protection fencing, ground protection and construction exclusion zones (CEZs) are in place. The erection of appropriate protective fencing and the installation of ground protection is shown on the TPP at Appendix 4 of the AIA and would be suitable to prevent other incursions into the RPAs of retained trees during construction. Consideration has also been given to the RPAs of the trees outside of the application site. Their protection would similarly be enforced by the erection of protective fencing to the same specification as onsite, prior to the commencement of construction, thereby safeguarding them from incursions by plant or machinery, storage or any other construction related activities which could have a detrimental effect on their root systems. The tree protection measures would reduce the risk to the trees during construction and can be safeguarded by condition.

1214.18 The Tree Officer is satisfied that the development proposals would be in accordance with the British Standard - BS5837:2012. Satisfactory protection would be provided to ensure all retained trees are *protected* throughout development in the form of barriers and/or ground protection and loss of most of the trees has been justified. As a whole it is considered that the proposal is in accordance with policy ID4 of the LPSS, P6/P7(6) and P8/9(5) of the LPDMP, policy NE5 of the saved GBLP and the NPPF.

1215 Impact on ecology and nature conservation

1215.1 Paragraph 180 of the NPPF sets out the principles that should be applied to habitats and biodiversity. One of the key characteristics in the National Design Guide (NDG) is, Nature – enhanced and optimised to contribute to the quality of a place. Policy ID4 of the LPSS seeks to contribute to biodiversity. Policy NE4 of the saved GBLP safeguards protected species.

1215.2 Policy P6/P7 of the LPDMP is for strategic delivery of biodiversity in new developments and policy P8/P9 relates to the protection of important habitats and species.

1215.3 The updated submission provides a Biodiversity Management Plan (February 2023), Biodiversity Calculations (Report) (February 2023) and Biodiversity Metric 3.0 Calculations (February 2023) prepared by ecologists Enims which have been assessed along with the previously submitted Preliminary Ecological Appraisal (Revision August 2021), Reptile Report (December 2019) and Final Bat Report (August 2021).

1215.4 No part of the site or the immediate surrounding area is covered by a statutory nature conservation designation. The application site does, however, lie within the 400 metre to 5 kilometre buffer of the Thames Basin Heath Special Protection Area.

Designated and protected species

- 12155 The bat report undertaken by Enims confirms the presence of an active bat roost within the site and that this roost would be subject to loss or disturbance as a result of development. A total of seven bat species were recorded during the activity surveys between October 2019 and July 2020.
- 12156 The reptile survey carried out in 2019 recorded no reptiles on site, however, previous targeted reptile surveys in 2014 provided evidence that the boundary grassland habitat at the site supported reptile species; namely the slow worm. A total of one slow worm was recorded over the course of the 2014 surveys. This was recorded as a single male at adult life stage. The recorded slow worm number in 2014 suggests a very low population of this species was present. Given the more recent findings of the 2019 survey, combined with the relative wider habitat isolation and regular mowing of the grassland within the Cathedral grounds, so it is unlikely that anything greater than a low population size would be present. Therefore, further mitigation measures are not required.
- 12157 Of concern to Surrey Wildlife Trust (SWT), is the data from 2019-2020 which should be considered out of date, or at the limit of validity. This is particularly important as one of the buildings has a high suitability as a bat roost. The applicant seeks to secure updated bat surveys as a planning condition. British Standards BS42020 states that the use of planning conditions to secure ecological surveys after planning permission has been granted should only be applied in exceptional circumstances. Such cases include (a) where original survey work will need to be repeated because the survey data might be out of date before commencement of development, (c) where adequate information is already available and further surveys would not make any material difference to the information provided to the decision-maker to determine the planning permission, but where further survey is required to satisfy other consent regimes i.e. an EPS licence and (d) to confirm the continued absence of a protected species or to establish the status of a mobile protected species that might have moved, increased or decreased within the site.
- 12158 SWT have confirmed that based on the assessment provided by Enims and in line with BS42020, that should planning permission be granted, the applicant should be required to submit the results of the updated bat survey as a planning condition; prior to applying to Natural England.

Habitat

- 12159 A habitat survey was carried out in 2019 and a Phase 1 habitat map of the application site is provided in Appendix A of the Preliminary Ecological Appraisal at Figure 3. This identified a number of habitats present within the site including semi-natural broadleaved woodland, plantation broadleaved woodland, dense scrub, scattered broadleaved trees, semi-improved grassland, amenity grassland / introduced shrub mosaic, hedgerows, buildings and hardstanding.

1215.10 The Preliminary Ecological Appraisal identified parcels of deciduous woodland habitat, as depicted in Figure 3 of Appendix A, albeit of poor species diversity. In the western parcel of the site a plantation broadleaved woodland has been identified, although this would not meet the criteria for a habitat of principal importance. It does still have value as suitable reptile habitat and has a screening function between the Cathedral and the southern area of the proposed development; it would be retained in the scheme. The semi-natural broadleaved woodland identified in the eastern meadows contains some mature oak trees of considerable value, including to reptiles, bats and nesting birds. The grassland and scrub habitats identified as present on site are common across the UK and are likely to exist locally in better quality and / or in larger areas. Nevertheless, on-site habitats of semi-improved grassland and scrub offer suitable foraging and dispersal habitats. The woodland habitats provide hibernation and refuge opportunities so although connectivity to the wider landscape is poor, the immediately surrounding garden habitats provide habitat for slow worm.

1215.11 The proposal would include the retention of the woodland areas in the western parcel and eastern meadows, as well as the scrub and tree habitat along the southern boundary of the site. A reduction of grassland habitat would occur which has the potential to reduce the food availability in the area, however, the retained habitat is proposed to be enhanced as shown in the Landscaping Plans 1248-201 Rev P2 to 1248-206 Rev P2 and detailed in the submitted Biodiversity Management Plan (February 2023). This includes, but is not limited to, ground flora planting, woodland creation, biodiversity roofs, orchard planting, new species rich hedgerows as well as underplant existing hedgerows, a dew pond / wet grassland, log piles, bee posts, nesting boxes and bat boxes. The variety of native plant species proposed would increase invertebrate biodiversity, which in turn should increase food availability for foraging bats.

1215.12 No land loss of statutory or non-statutory nature conservation sites would occur as a result of the development and no sites lie adjacent to the application site. The existing habitats themselves are unexceptional examples of their type and any loss is unlikely to have a significant impact on the species diversity of the local area.

Biodiversity net gain

1215.13 Paragraph 174(d) of the NPPF states that 'minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures' should be a requirement of both plan making and decision taking.

1215.14 It is noted that biodiversity net gain (BNG) targets are being proposed at both a national and local level. Within Section 98 of the Environment Act 2021, there is provision for achieving a 10% Biodiversity Net Gain (BNG) within a development, with the particulars being covered under Schedule 14 of the Act. However, secondary legislation is required under Section 4(6) of Schedule 14 of the Act before the BNG requirement becomes a legal requirement; this has yet to be completed. Hence, currently there is

no legal requirement to demonstrate a 10% BNG.

1215.15 The local requirement of 20% currently carries full weight as part of policy P6/7 of the LPDMP. Parts of policy P6/7 were the subject of a main modification, and these were accepted following public consultation and the letter from the Local Plan Inspector dated 27.02.2023.

1215.16 Biodiversity calculations have been submitted with this application. This has demonstrated that through the proposed on-site improvements a net gain of 1.97% for habitat units and 100% for hedgerow units could be achieved. In addition to the quantifiable habitats included in the calculations provided in the Biodiversity Calculations Sheet (dated November 2022), the following enhancement habitats are also proposed (see Biodiversity Management Plan Appendix E):

- bat roost boxes
- bird nest boxes
- reptile hibernacula and invertebrate log piles
- nesting bricks.

1215.17 The proposal would also introduce extensive tree planting and other planting to enhance the existing hedgerows and the open spaces around the buildings (reference Landscaping Plans 1248-201 to 1248-206 Revision P2 prepared by Macgregor Smith Landscape Architecture). This would include native species, which would add to biodiversity value.

1215.18 A woodland habitat review was submitted by enis dated 10.020.2023. They have concluded that there is no habitat on site, which would qualify as being a Habitat of Principal Importance. The MAGIC Map does identify the presence of this habitat type on-site; however, it should be noted that Natural England do not ground truth all woodland habitat listed on the Priority Habitat Inventory. SWT have agreed that the use of Other Woodland; Broadleaved in the biodiversity metric calculation, to be suitable.

1215.19 The applicant has demonstrated that the proposal provides a measurable net gain in biodiversity, subject to the implementation of measures described within the Biodiversity Management Plan reference EN994-10. The development proposals would be in accordance with the Conservation of Habitats and Species Regulations 2017, Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and the Wildlife and Countryside Act 1981. This is in accordance with policy ID4 of the LPSS, policies P6/P7 and P8/P9 of the LPDMP and policy NE4 of the saved GBLP. As well as the National Design Guide (NDG) and NPPF. In this regard, however, the impact on the Thames Basin Heaths SPA, shall be assessed below.

1216 Landscape strategy and open space

1216.1 Paragraph 98 of the NPPF states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health

and well-being of communities. This theme runs strongly through the National Design Guide (NDG) with cross-over between a number of the ten characteristics. Policy D1(7) of the LPSS requires linkages between green spaces and high-quality landscaping. Policy ID6 of the LPDMP is based on the Open Space, Sport and Recreation Assessment (OSSRA) 2017 which seeks to deliver a range of typologies of open space and proposes locally developed standards that aim to meet these identified needs.

Loss of public open space

- 12162 The application site (excluding the existing Cathedral Close) is Amenity Green Space under policy ID6. This category includes spaces open to free and spontaneous use by the public but are not laid out or managed for a specific function such as a park, playing field or recreation ground. This type of space is also not managed as natural or semi-natural habitat. Amenity Green Space can serve a variety of functions dependant on their size, shape and topography.
- 12163 The site is allocated for residential development, so the loss was accepted as part of this and policy A15(5) requires the “provision of sufficient integral green infrastructure to enable connectivity of spaces and habitats.” However, there would be a net loss of public open space on this site.

Landscaping

- 12164 The Landscape Design Statement (LDS, October 2021) outlines landscape proposals for the site, which include features such as woodland play, meadow, orchards, native tree planting and ‘woodland courtyards’. The scheme is broadly reflective of the guidance set out Guildford Landscape Character Assessment (GLCA) for Area 10A.
- 12165 The LDS also includes a framework for the wider Cathedral site, which illustrates opportunities to enhance the western approach in line with Maufe’s vision, this has now been confirmed and is shown on drawings 1248-030 rev P1 and 031 rev P1. This would ensure greater compliance with Policy A15 and an enhancement of the wider parkland.
- 12166 The LVA (Landscape and Visual Appraisal, December 2022) does not mention this benefit within the character analysis of landscape receptor L2 and the proposed changes are not identified on the submitted photomontages for VP8, which would have been helpful. The reinstatement of the avenue of trees along the western approach represents a substantial benefit to the landscape scheme and would go a considerable way to balancing the negative landscape effects currently recorded to the east of the Cathedral.
- 12167 In addition to the proposed informal mown paths, a north-south footpath link would provide a viewing point to enjoy framed views over the town. Further to the north, the path would form a link to the university, Cathedral administrative buildings and café, which lie outside of the application site area.
- 12168 On the Eastern Meadow boundary vegetation would be removed and a formal east-west geometry would be imposition. Whilst the central section of meadow would be

retained and enhanced with native meadow species and a mown path, the development would change the character of this area. However, one of the distinct areas of the meadow would be lost. The informal setting would be compromised by the arrangement of rear courtyards and increased activity. The large Oak tree would become more prominent however, the seclusion currently enjoyed would no longer exist.

- 1216.9 On the southern side of the meadow, the proposed dwellings would require the removal of boundary trees and shrubs. The vegetation contributes to the informal character and frame views out towards the town. Whilst additional boundary planting has been introduced, the building line pulled back and the scale of the buildings reduced (facing the meadow), the view point would still be interrupted and how the space is experienced.
- 1216.10 The Eastern Slopes would have woodland courtyards with variations in level, play equipment, flexible furniture and fixed benches and picnic tables would provide intimate semi-private space for the flatted development, which would complement the open parkland and wooded character of the wider Cathedral grounds. Play equipment and seating is well positioned to avoid conflict between internal and external uses. The proposed tree and shrub planting is appropriate to the woodland character; scale of the courtyards; and would provide seasonal interest and colour.
- 1216.11 The woodland courtyards would mainly serve those without private amenity, as well as provide a pleasant environment for social interactions. This area would experience overshadowing from the blocks of flats, therefore, for parts of the day the courtyards would be in shadow with only glimpses of sunlight through the gaps in the buildings. Whilst this would be on two levels, to break up the space, in the absence of any sunlight and daylight report, the overshadowing effect would make this a colder area and the sense of enclosure could affect its functionality. However, due to the limitations due to the engineering of this site this would be acceptable given the provision of balconies and the wider parkland available to use.
- 1216.12 The retention of the majority of existing hedgerow and trees alongside Ridgemount would help maintain the existing wooded character. The introduction of native meadow planting and a dew pond adjacent to the hedge line would form a semi-natural transition to the more formal edge of development. Natural play equipment within the woodland belt to the west would have the potential to add interest and open this area to greater activity. The success of these proposals would be reliant upon intervisibility to reduce the opportunities for anti-social behaviour. The application does detail for how this area would be designed and managed. This could be included in the landscape management strategy for the longer-term maintenance of planting, by condition.
- 1216.13 The landscape proposals for the Western Parcel include a pocket park, orchard and woodland walk. The informal orchard planting would provide a transition between the parkland landscape and the domestic character of the proposed dwellings. The pocket park would provide a communal focus and gathering point for this linear area of housing; and access to the wider parkland. The woodland walk, mown grass paths, natural play equipment and benches would add activity to the rear of Alresford Road.

The success of the woodland walk would be dependent upon how well this area is visually permeable. Insufficient surveillance and visual permeability could attract anti-social behaviour and make it an unsuitable location for children's play. The overall management and maintenance strategy, which could be secured by condition would be vital to the success of this area.

1216.14 There is no change to the proposed built form at the western most end of the Western Parcel, instead additional screening has been integrated into the revised proposals, helping to assimilate the proposed development into the landscape. There would be residual harm – as identified within the submitted LVA, however this would be slightly lower than in the previous version. There would still be an encroachment of the built form and screening treatments can have the impact of creating a barrier to hide development.

1216.15 The use of shade tolerant plant species is commended, although the inclusion of at least one additional shade tolerant tree species may be beneficial. This shall be secured by condition in the landscape management strategy.

1216.16 There are some discrepancies between the retained and proposed features and the proposed surface water drainage strategy, particularly with regards to the locations of proposed below-ground storage tanks. The applicant has indicated that the drainage attenuation tanks would be of sufficient depth to support new tree growth above them. However, as the landscaping scheme is an important element of the proposals and to ensure that they can be delivered a planning condition would be required for a range of tree pit details, to include tree planting above proposed underground storage tanks and within the courtyards of the development on the south-eastern slopes in particular.

1216.17 The proposal would engender an increase in artificial light, this would increase illumination levels, compared to the existing situation. The applicant has submitted an External Lighting Report (ARUP, Rev 02, November 2022). The use of low-level lighting options has been considered throughout the site, with the use of lighting in handrails, bollards, benches and planters.

1216.18 The roadways would have 6m and 5m high lighting columns, a rectangular side-throw optic and back shields have been recommended, to angle the light on the road surface and reduce light spill, this could be secured by condition. Some of the roads would be lightly trafficked and whilst the columns would be suitable along the Western Parcel and lower part of the Eastern Slopes they would be more prominent near the top of the Eastern Slopes where they would be visible from the Cathedral and meadow, therefore alternative lighting solutions would be suitable and further details would be required by condition.

Open Space

1216.19 Policy ID6 of the LPSS would supersede policy R2 of the save GLP when adopted. The open space standards for R2 are set out in the Planning Contributions SPD 2017, this is based on the superseded PPG17: Planning for Open Space, Sport and Recreation. As follows (based on an occupancy rate of 2.5 per home for the net

increase of 117 new homes, 292.5 additional people) and policy ID6 uses the occupancy rates in the latest census (table 10):

	Policy R2 requirement per 1,000 people	Policy R2 scheme requirement	Policy ID6 requirement per 1,000 people	Policy ID6 scheme requirement	Amount proposed on-site
Playing fields/sport pitches	1.6ha	0.47ha	1.35ha	0.33ha	0ha
Play space	0.8ha	0.23ha	0.08ha (0.05ha children's/ 0.03ha youth)	0.02ha (0.01ha children's/ 0.01ha youth)	0.02ha as LAPs
Amenity/Natural Green Space	0.4ha	0.12ha	1ha	0.22ha	1.8ha
Allotments	0ha	0ha	0.25ha	0.06ha	0ha
TOTAL	2.8ha	0.82ha	3.4ha	0.62ha	1.82ha

121620 Open space should be available for all year round recreational and amenity use. Some of this open space is included in the woodland areas, the applicant has included this as part of the children's play space provision, as it would be for informal, natural play. This would be more suitable for older children and is not fully accessible and compliant with design guidance for play space in the Council's Planning Contributions SPD, Appendix 5, and Play Strategy, Appendices B and C, therefore, it cannot be included in the onsite play space facilities.

121621 The undeveloped land to the north of the Western Parcel, the southern approach and meadows would remain informal and would be used for amenity space, whilst the woodland courtyards would create additional amenity space, this would exceed the requirement for the development and is a response to minimise the loss of public open space and for development to be sensitive to the setting of the Cathedral.

121622 There would be three local areas of play (LAPs) close to the proposed housing and whilst two would be in the woodland courtyards, due to their location they would have a sense of privacy. The other would be close to the community orchard, where there would be footpath links through the slope so would be more publicly accessible for use by the wider community.

121623 The LAPs would all have a range of timber, naturalistic equipment for younger children and the LAP in the community orchard would be enclosed by post and rail fencing. However, a greater variety of equipment would be beneficial, particularly where the play area is well contained, as well as more accessible play features. Each of the proposed LAPs are close to a property boundary, there would be gaps of at least 5m to properties and their private amenity areas. Except for the play area next to Block K, however, as this would be set at a lower level this would reduce any potential conflict.

121624 The SPD and Play Strategy Appendix B indicate minimum recommended sizes for these primary types of play space, with a minimum of 100 sqm (0.1 ha). The three

proposed LAPs would provide a total of 0.02 ha, making the activity area zone of each one less than the minimum standard. There is also guidance in the SPD and Play Strategy on other characteristics of LAPs like signs and guard rails which are not referred to in the POS Addendum or other submitted documents for all the LAPs. Therefore, further details of play areas and equipment would be required by condition, to satisfy the Parks Asset Development Officer.

- 121625 Due to the site constraints the absence of playing fields and youth facilities is accepted. Therefore, this would need to be provided offsite, to ensure that this shortfall would be met. The Council have identified projects in the locality that would allow for recreation opportunities for youths and adults as well.
- 121626 With the exception of playing fields (for which an off-site contribution is required), the total amount of open space proposed for the scheme would comply with the policy ID6 standards for the types of open space that are required under Policy R2 (i.e. compliant for play space and amenity/natural green space).
- 121627 Policy ID6 also requires allotment provision, and consideration of provision of community growing space (see policy para 6). It also requires for open space provided to be multifunctional and deliver a range of benefits (e.g. biodiversity, flood risk management, climate change) (policy paragraph 10). Some of the play space proposed in this scheme meets the requirement for multifunctionality through both its intended location and design by fulfilling the role of natural green space, providing biodiversity, as well as its primary role as play space.
- 121628 Policy ID6 states that open space should also be linked up as much as possible, providing footpaths and cycle routes where possible and be safe and secure for all community members (paragraph 10). The close proximity of the play areas (which are described as being a minute's walk from the majority of new residents) provides an element of safety for these spaces. There are also trails proposed through the areas of woodland and passing alongside the new homes, as well as linking to existing open space beyond the site itself.

Public realm & public art

- 121629 LPSS Policy D1(6) and LPDMP Policy D8 requires the creation of a high-quality public realm, this can include public art as well. The Public Art Strategy 2018-2023 seeks to deliver public art commissions. The Landscape Design Statement (LDS, October 2021) page 54 identifies proposed locations for initiative, however, does not propose a detailed scheme. The space could be safeguarded and these could be delivered by the developer and include community engagement. Further details would be secured by condition.
- 1217 Climate Change and Sustainability
- 1217.1 The NPPF emphasises the need to support the transition to a low carbon future in a changing climate and new developments are required to meet the requirements of paragraph 154 through suitable adaptation measures, including through the planning

of green infrastructure and reduce greenhouse gas emissions. Paragraph 157 then states new development should comply with local requirements for decentralised energy supply and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

- 12172 Policy D2 of the LPSS requires new development to take sustainable design and construction principles into account, including by adapting to climate change, and reducing carbon emissions and Policies D2(3) and (11) requires sustainability and energy statements to be submitted, which the applicant have provided. The Council has adopted the Climate Change, Sustainable Design, Construction and Energy SPD in December 2020.
- 12173 Policies D12, D13 and D14 of the LPDMP carry full weight and build on policy D2. In the context of the Council declaring a climate emergency in July 2019 and the UK having a legally binding target of reducing all greenhouse gas emissions to net zero by 2050 with an interim target of 78% reduction against 1990 levels by 2035.
- 12174 Following adoption of the LPDMP D14: Carbon Emissions from Buildings (1), (2), (3), (4), would supersede D2: Climate Change, Sustainable Design, Construction and Energy (5), (6), (7), (9).

Energy

- 12175 A fabric first approach is required under Policy D12(1) in accordance with the energy hierarchy. Through the use of low energy design and energy efficient fabric. Then Policy D2(1), (5), (9) of the LPSS and Policy D14 of the LPDMP require measures for low and zero carbon and decentralised energy.
- 12176 It is acknowledged that the site adjoins a combined heating and power (CHP) distribution network. The density of the development and prevalence of apartments indicates a heat network could be feasible. However, the scheme proposes to meet the heating demands of the development through highly efficient electric technologies. Electricity generation has decarbonised to the point that electricity is considered to be around 35% lower in carbon than mains gas. Electricity is expected to decarbonise further and is projected to reach net zero carbon by 2035. This negates the benefit of the gas fired CHP network despite the high efficiency of CHP.
- 12177 The proposed u-values and air permeability are good, which demonstrate the fabric first approach has been followed. Conditions would be needed to ensure that these values would be equal to or better than those stated to achieve air tightness and fabric u-values.
- 12178 In addition to this, air source heat pumps (ASHPs) would be installed into all houses and exhaust air heat pumps into all apartments. Supplemented by 330 x 350W n photovoltaic panels on the flat roofs of the apartments (gently inclined on racks and orientated towards the south) and on non-prominent roofs of the houses.
- 12179 There would be no on-site carbon dioxide and nitrous oxides emissions. However, as

there is some uncertainty on the fuel for the fireplaces in the clergy houses a condition shall be required.

1217.10 All units will be fitted with 100% dedicated low energy/ LED light fittings; all kitchen appliances, where supplied will be A+ and A rated (washer dryers would, where fitted be to the highest available environmental standard).

1217.11 Each building would achieve in excess of 20% carbon reduction, with a site wide reduction of 58.90%, with individual units ranging between 43.16% and 81.48%, (based on electricity rather than gas which increases the Target Emission Rate (TER) baseline, therefore inflating the reduction figure).

Embodied carbon

1217.12 Efforts to minimise embodied carbon emissions is required to be demonstrated under Policy D12(2) of the LPDMP, due to the cumulative energy needed to grow/extract, transport and manufacture construction materials, the use of locally sources materials reduces this impact.

1217.13 The applicant confirms that Green Guide materials rated B-A+ would be prioritised in the specification. Local materials would be preferred with evaluation of suppliers. Wood to be certified and insulation to have zero ozone depleting potential.

1217.14 It would be appropriate to secure by condition details of the lowest embodied carbon ratings for the building materials where possible. Given that the site is in a sensitive location and high-quality materials would be required to respect the heritage assets.

Waste

1217.15 Policy D2(1)(b),(2) of the LPSS and Policy D12(4) of the LPDMP recognise that demolition and engineering works involve materials to be imported or exported from the site

1217.16 The applicant has indicated measures to ensure that over 80% of construction waste would be diverted from landfill. However, further details are required and a Site Waste Management Plan (SWMP) would be secured by condition.

Water efficiency

1217.17 New development is required to conserve water resources under Policy D2(1)(e) of the LPSS and Policy D12(6) of the LPDMP, due to water stress in the south east region.

1217.18 Water reducing bathroom appliances would be fitted and the daily water consumption per person would be less than 105 litres (excluding external water use) on the sample calculations, which would be the enhanced standard required by Building Regulations and an improvement on the 110 litre per person per day required by the policy.

1217.19 The policies and SPD support the use of water harvesting and grey water reuse systems, however, it is not a requirement. Gardens would have water butts for

rainwater harvesting. Grey water recycling was considered and discounted in the given the owner/occupier's resistance to the appearance of the recycled water and the cost of the systems would not currently make them a viable option. They have therefore not been included in the proposals.

121720 The proposals are in compliance with relevant policies relating to water efficiency and reuse and have gone as far as practically and viably possible to incorporate water efficiency measures taking into account the topographical and engineering challenges on this site. These measures should be considered alongside the numerous other sustainability measures which have been incorporated into the proposals.

Climate change adaption

121721 Policy D2(1)(c), (4) of the LPSS and Policy D13 of the LPDMP seek to apply the cooling hierarchy and passive heat control and managing surface water in new buildings and open spaces.

121722 This is a potential urban heat island area and there are a large number of south facing windows. All the dwellings would have to comply with the Part O (overheating) of the Building Regulations which, was introduced in June 2022, cross ventilation would be possible in dual and triple aspect flats and shading from south facing protruding balconies.

121723 However, many habitable rooms are south facing with no shutters, overhanging eaves or deeper depths of reveal are incorporated into the design of the buildings. So, to ensure that the homes are not at risk of overheating, an assessment (to comply with CIBSE TM59 or equivalently) would be required by condition.

121724 The Flood Risk Assessment (FRA) takes climate change into account in consideration of drainage requirements and includes rainwater butts.

Sustainable design and lifestyles

121725 Policy D2(1)(c), (e) of the LPSS seeks to ensure that there are sustainability measures to offer choices.

121726 Some information on sustainable design e.g. orientation and window design has been provided. Although, given that the site is highly constrained by shape and topography, the design options are limited, in this instance.

121727 The houses would have private gardens for drying clothes outside. Not all of the flats have a balcony that could be used, so this would not be available for all occupants and the open spaces have not been designed for this use. Given the topography and constraints of the site this would be acceptable, as it would affect predominantly the lower occupancy one and two bedroom flats rather than the family homes.

121728 In terms of travel, there would be a high provision of secure and covered cycle storage, sustainable travel vouchers, electric charging points for vehicles and bikes and two car

club spaces to encourage sustainable modes of travel to offer other ways to make short journey or to possibly live here without a motor vehicle.

1218 Contaminated land

12181 A Contamination Assessment (ref 132648/NBA/GEOL01 dated 23.09.2021, prepared by RSK Land and Development Engineering Ltd) has been submitted.

12182 The assessment is based on the submitted ground investigation reports: LEAP Environmental - Phase 1 and 2 Geo-environmental Site Investigation 2/10/2015 ref LP00593; and LEAP Environmental – Preliminary Slope Stability Assessment 25/11/2015 ref GD/15/LP1061.

12183 Testing was only within the area of Cathedral Close and included 7 samples tested, which produced 1 elevated arsenic concentration and 1 Benzo pyrene elevated concentration. The Contamination Assessment used the conceptual site model produced by LEAP and visual observations during the site investigation for the wider site. The assessment found a low likelihood of contamination being present and that significant remediation would not be required, except for the Cathedral Close area.

12184 Given that no samples were tested outside of Cathedral Close, confirmatory testing for the undeveloped areas of the site would be necessary. Further investigation works within Cathedral Close, once final ground levels are known, should also be undertaken as advised in the Contamination Assessment. Any remediation required shall be fully detailed to restore the site to a standard suitable for use, including works to address any unsuspected contamination. This could be secured by condition including a remediation strategy as required.

1219 Utility services

12191 Paragraph 114 of the NPPF supports the expansion of communications infrastructure and the improvement and provision of utility services is required under policy D1(11) for digital communications. The applicant has submitted a Foul Drainage & Utilities Assessment (133648-R1(5) dated November 2022 and prepared by RSK).

12192 The main telecommunication provider BT have underground network apparatus in Alresford Road and Ridgemount. A duct route traverses the site toward the Cathedral. The Foul Drainage & Utilities Assessment does not anticipate difficulties in providing telephone or broadband service from the existing BT network. Fibre to the Premise (FTTP) is required and there is capacity to cater for this, further details could be required by condition.

12193 The foul drainage assessment notes that there are no public sewers on site, instead that public sewer records from Thames Water show the nearest foul sewers are in the residential roads to the south of the site. The drainage map extract at Appendix E of the Foul Drainage and Utilities Assessment indicates that there is a private foul drainage network serving the existing dwellings in Cathedral Close. Another private foul sewer gravitates southward from the Cathedral building. In view of the topography

of the site, a gravity connection to the existing public sewers at manholes on Alresford Road and at the junction of Ridgemount and Cathedral Close have been proposed. Appendix G of the Foul Drainage and Utilities Assessment shows the main drainage routes proposed. Thames Water have confirmed that there is adequate capacity in the foul sewer network (check updated response)

12194 In terms of electricity, the Utilities Assessment notes that UKPN have confirmed that low voltage supplies for the Western Parcel could be taken from the existing sub-station in Alresford Road. However, to meet the additional electrical demand for the Eastern Slopes an offsite network reinforcement would be necessary, comprising an upgrade of the existing transformer in the aforementioned Alresford Road sub-station. The required payments for this would be a separate process with the statutory undertaker.

12195 Scotia Gas Networks (SGN) operate the gas network in the area, and there is a low-pressure network in the surrounding roads. The energy strategy for the new development would not require gas supplies.

1220 Economic and financial considerations

12201 Section 70(2)(b) of the Town and Country Planning Act 1990 (as amended) requires that a local planning authority must have regard to an economic or finance consideration where this is a material consideration.

New homes bonus

12202 Local finance considerations may include any grant or other financial assistance that has been, that would or that could be provided to the authority. This would include schemes such as the New Homes Bonus (NHB). The extent to which a local finance consideration is material to the application would be dependent on whether it could help to make the development acceptable in planning terms.

12203 If planning permission was granted the Council would receive additional NHB payments. However, the NHB would be paid on completions rather than permissions granted and given the length of the likely build process due to the engineering works, there is potential for the NHB scheme to change. However, given how long it has been place (since 2011) and no proposed consultations or indication that this would significantly change in the next five years. There is some confidence that monies would be received by the Council. Moreover, any NHB received is unlikely to be directly related to making the application acceptable in planning terms and accordingly should not be given weight in the planning balance.

Economic benefits

12204 The applicant has set this out at paragraph 9 of the 'Summary of Planning Benefit' dated 02.02.2022. This refers to construction jobs, then once occupied local spending and workforce potential for both the local economy and workers for the Cathedral.

12205 No financial values have been attributed to these. Although an increase in the local population during construction and the occupation would have some impact on local spending and activity in the economy.

1221 Other material considerations

1221.1 The proposed endowment would not be a local financial consideration, however. this would be a “other material considerations” under 12.20.1 Section 70(2)(b) of the Town and Country Planning Act 1990 (as amended).

Endowment

1221.2 The sale proceeds resulting from the disposal of two parts of the site for development (known as the ‘green land’ and ‘red land’) would generate an endowment for the Cathedral. The endowment income from the sale of the ‘green land’ would secure a financial contribution to the Cathedral that is proposed to be used for repair and maintenance works, and to support the long-term future preservation of the Cathedral, financially. The income for the ‘red land’ could be used for other charitable purposes. The future repair and maintenance works that are proposed to be funded by the income from the endowment cannot be secured as a planning obligation. The financial and regulatory framework that the Cathedral has to operate under to comply with the Charity Commission and Charities Act and the objectives of the Charitable Trust would control how the income from the endowment would be spent. Consequently, the endowment funds would have to comply with the following requirements:

- the capital land receipt would be endowed, meaning the monies received from the sale of the land would be invested for the long-term use of the Cathedral, providing a revenue stream in perpetuity;
- only to use the income derived from the endowment for a charitable purpose, (which may not be exclusive to the maintenance, repairing and improving of the Cathedral);
- not allowed to use the capital sum of the endowment to carry out all outstanding works for the next five years (amounting to £3,585.000) – the Cathedral would have to apply to the Charity Commissioners, to spend the capital at any time; and
- yields from the endowment would be made available on an annual basis to fund scheduled works for maintenance and repair.

1221.3 Therefore, the capital funds would not be available to use and would instead have to be invested. Only the income arising from this may be used over a number of years as part of the rolling programme of works, which are identified in the Quinquennial (QI) Report produced every five years for the care and repair of a church building.

1221.4 The operating deficit has been reduced despite difficult circumstances in the last two years and the hope is that a balanced budget can be achieved by 2026. This seems a realistic aspiration. Currently repairs for the Cathedral are funded from what is described as the “general fund” and the endowment is intended to relieve pressure on that fund.

1221.5 The QI report has to set out the urgent works required in the next 12 months, although

there are potentially associated costs of setting up for works etc. which would increase this figure. Any funds from an endowment would not be available within this initial 12 month period, so the assumption is that this work would be funded from existing resources.

1221.6 The Council would have no ability to exert influence over how the income from the endowment would be spent, as there would not be a S106 planning obligation in place and the income from the endowment has the potential to be directed to charitable purposes, other than repair and maintenance of the Cathedral.

1221.7 Over the next five years the endowment has the potential to meet between 23% to 33% of the cost of the works for the repair and maintenance works for the Cathedral.

1222 Thames Basin Heath Special Protection Area

1222.1 The application site is located within the 400m to 5km buffer zone the Thames Basin Heaths Special Protection Area (TBH SPA). This is a European designated site and is afforded protection under the Conservation of Habitats and Species Regulations 2017, as amended (the Habitats Regulations). The Habitat Regulations designate the Local Planning Authority as the Competent Authority for assessing the impact of development on European sites and must ascertain that the project would not have an adverse effect on the integrity of the site, alone or in combination with other plans and projects, either directly or indirectly, before granting permission.

1222.2 The TBH SPA is designated for its internationally important habitat which supports breeding populations of three rare bird species: Dartford Warbler, Woodlark and Nightjars. The Conservation Objectives of the TBH SPA are to ensure that the integrity of the site is maintained or restored as appropriate, and to ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring:

- The extent and distribution of the habitats of the qualifying features, the structure and function of the habitats of the qualifying features;
- The supporting processes on which the habitats of the qualifying features rely;
- The population of each of the qualifying features; and
- The distribution of the qualifying features within the site.

1222.3 Natural England are currently advising that all residential development within 5km of the TBH SPA has the potential to impact on these species, either alone or in combination with other development, through increased recreational use of the sites by people. Natural England also advises that development within a 400m to 5km zone around the site is likely to be capable of being mitigated.

1222.4 The Council adopted the TBH SPA Avoidance Strategy in 2017. This seeks to provide a framework to secure mitigation against the impact of residential development and to allow development to take place where otherwise it would be restricted by the TBH SPA requirements. The Strategy advocates development providing or contributing to Suitable Alternative Natural Greenspace (SANG) to attract people away from the

TBHSPA, access management measures and monitoring of the TBH SPA to reduce the impact of people who visit the SPA, and habitat management of the TBH SPA which would improve the habitat for the ground nesting birds. On smaller sites the Strategy requires contributions to an off-site SANG. However, larger applications would be required to deliver bespoke SANG solutions. In addition to the provision of the SANG, the applicant would be liable to provide Strategic Access Management and Monitoring (SAMM) contributions in accordance with the avoidance strategy.

12225 In addition to this, the Appropriate Assessment has to assess other potential impacts referred to in application documents including the potential impact of cat predation, construction and operational noise impacts, surface and ground water impacts, and air quality impacts on the TBH SPA. It is concluded that these factors would not give rise to a likely significant adverse impact, either alone or in combination with other development. Natural England has raised no objection to the proposal on these grounds.

12226 Having regard to all of the above, it is considered that the impact of the development on the TBH SPA could be mitigated and that, should this mitigation be secured, it would be possible to conclude that the development would not have a likely significant adverse impact on the protected site. However, should this application be refused, a legal agreement would not be secured, and the development would fail to comply with the objectives of policy P5 of the LPSS, policies NE1 and NE4 of the saved GBLP saved policy NRM6 of the South East Plan 2009. For the same reasons the development complies with the requirements of Regulation 63 of The Conservation of Habitats and Species Regulations 2017, as amended.

1223 Legal Agreement Requirements

12231 Policies H2, ID1 and ID3 of the LPSS relate to the provision of affordable housing and infrastructure, saved Policy NE4 of the saved GBLP is concerned with species protection and in this regard is relevant to safeguarding of the habitat in the Thames Basin Heaths SPA. Whilst the regional strategy was revoked Saved Policy NRM6 of the South East Plan was saved as this was concerned with development near the Thames Basin Heaths SPA. Policy ID6 of the LPDMP relates to the need to provide or fund open space. The Planning Contributions SPD update, amplifies and provides guidance on how the Council apply the policies of the GBLP relating to planning contributions.

12232 A notional population for the proposal has been estimated of around 261 residents and a net increase of 117 new homes and 241 residents. This equates to a net population increase of 2.16% within the Onslow ward and 0.16% across Guildford Borough as a whole (based on the Census 2021). This would comprise a combination of new and existing local residents to this area.

12233 The three tests set out in Regulation 122(2) of the Community Infrastructure Levy (CIL) Regulations 2010 require S106 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.

12234 The following matters would be required to be secured to mitigate the impact of the development and to make the application acceptable in planning terms.

Affordable Housing

12235 To secure the on-site provision of affordable to comprise the tenure of 31 (70%) for affordable rent and 13 (30%) for shared/affordable ownership (30%) homes.

Cathedral staff accommodation

12236 There would be 13 homes tied to Cathedral to provide accommodation for the clergy of the Church of England, to replace the 7 houses in Cathedral Close. These have been accepted by the Council's Housing Development Lead as a form of affordable 'key worker' housing, as it is linked to a specific housing needed by the Cathedral to serve the community. To secure this and contribute to the on-site provision required by policy H2 of the LPSS.

SANG and SAMM

12237 The proposal would not deliver a SANG to mitigate the impact of the development, so a financial contribution (SAMM £95,948.99 and SANG £720,323.01) would be secured through a legal agreement, to mitigate the impact of this development in accordance with the avoidance strategy. At this time, a SANG has not been identified, therefore, a Grampian condition would be required to ensure that no development commences until the scheme as secured suitable SANG capacity.

12238 The proposal would be required to provide Strategic Access Management and Monitoring (SAMM) contributions. This would include the provision of wardens in the TBH SPA, off site access and public rights of way improvements and a package of education measures to inform the public of the fragility of the habitat. In accordance with the TBH SPA Avoidance Strategy.

Highway improvements

12239 Financial contributions have been sought to encourage the use of sustainable transport by improving bus stops, the onsite provision of a car club including two years' membership for occupants and a residential travel plan that would require monitoring, these would improve the travel options for people who would be living at the site and would mitigate the impacts of the scheme.

122310 Off-site highway works include contributions towards improvements footway/cycleway infrastructure which would encourage occupants of the site to access local facilities by these sustainable modes of transport. The highway improvements would comprise improved pedestrian crossing at The Chase/St Johns, mitigating traffic on local residential roads, speed survey studies within the vicinity of the site and works for the

upgrading, improvement and/or potential re-routing to Footpath 6 a public right of way (PROW) from Scholars Walk to the University site which would improve highway safety for all users.

1223.11 The proposed works would mitigate the impact of the scheme on the highways network and provide improved infrastructure to support the scheme.

Corporate Programmes

1223.12 There is a pedestrian/cycle access point on the eastern boundary that would provide access for a shorter route to Yorkie's Bridge and the northern end of the town centre. This shorter route would require land that is not in the applicant's ownership to deliver. Therefore, a financial contribution is sought for this be brought forward by the Council or the University of Surrey. This would improve connectivity and provide infrastructure improvements to support sustainable travel choices, to the Yorkie's Bridge section of the Sustainable Movement Corridor (SMC) and would mitigate the additional pedestrian and cycle movements associated with this development.

1223.13 Technical Note entitled "Cycle Route Contributions Calculation" dated 20.02.2023 estimates that there would be a net additional 138,684 non-vehicular trips per annum from the site. Considering the other non-car transport improvements requested by County Highways Authority, the net difference would amount to £130,632.

1223.14 The contribution would either be used for this new link to Yorkie's Bridge, improvements to walking and cycling connections between Yorkie's Bridge and town centre or the upgrade of footpath 6 to a bridleway.

Education

1223.15 It is expected the proposed development would yield approximately and additional 8 early years children, 17 primary pupils and 13 secondary pupils. There is not sufficient capacity within existing schools and the development must mitigate the impact of development on school places.

1223.16 The provision of education facilities to serve the needs of the development is required. Financial contributions would be sought for off-site works to increase capacity for places. Surrey County Council would use this at:

- early years - additional early years places, the location of which would be determined prior to commencement of the development
- primary years - additional places, the location of which would be determined prior to commencement of the development within a 3 mile radius
- secondary years - additional places, the location of which would be determined prior to commencement of the development within the 5-mile radius

1223.17 The capital projects have not been identified due to statutory consultation and notification processes, commercial sensitivity and political oversight. However, the funds would be used to deliver increased educational capacity, which is directly related

to the increase in new housing.

Healthcare

122318 There would be additional use of primary care facilities provided by GP practices. The net increase in households is linked to the number of GP consultations and takes into account age bands, visits and visit durations, this has then been used to calculate the additional GP rooms required and then multiplied by the build costs. The additional new residents would lead to up to 202 new patients. This would require a further 17.54sqm of additional floorspace.

122319 NHS Surrey Heartlands Integrated Care System (ICS) have requested a financial contribution towards delivering a new primary care facility in order to support meeting future need for primary healthcare in NW Guildford.

Policing

122320 The development would require additional policing, as the development would place an additional burden on local policing and would potentially lead to an increase in crime, on the application site or in the local area. Whilst the detailed design of the development can help minimise opportunities for crime through Secure by Design Principles, Surrey and Sussex Police have advised that additional infrastructure would be required to police the new homes. Accordingly, they have advised that the additional costs of policing the site should be secured through a legal agreement. This would include contributions to police officer start-up costs, police equipment and uniforms, training and recruitment, support staff start-up costs, training and recruitment, accommodation for staff and a police vehicle.

Open space

122321 The on-site provision of public open space would have to be provided and maintained to ensure that there would be opportunities for play and recreation. This shall be secured by legal agreement to ensure that it is maintained in perpetuity.

122322 There would be a shortfall in on-site play space and playing fields, required by policy R2 of the GBLP and the Planning Contributions SPD 2017. Therefore, an off-site financial contribution for sports grounds and playing space would be necessary in lieu of on-site provision for the net increase in people.

122323 The Council's Parks Asset Development Officer have confirmed that that the contribution of £172,270.59, based on the 2022/23 SPD tariff for playing fields/sport provision; would be used to improve facilities for a kick about/multi sports area at the Oval play space and pooled to replace one half of the Multi Use Games Area (MUGA) at Onslow Recreation Ground.

122324 For the additional play areas, given the on-site play space proposed, the contribution should be equivalent to an additional 0.05ha of on-site space, i.e., a fifth of the full amount of payment in lieu of appropriate on-site play space provision. This equates to

£28,068.00, based on the 2022/23 SPD tariff. This contribution would be used for the replacement and addition of play equipment at Oval play space and additional play equipment at Bannisters Field to increase its size.

122325 This would provide improved facilities to support the increase demands on play, sports and leisure activities for the growing community.

Landscaping

122326 Within the blue line of the application are the wider grounds of the Cathedral, it is proposed to have new tree planting along the western approach to the Cathedral to follow Maufe's original vision for the site, in accordance with drawing no. 1248-030 and 031 rev P1.

122327 This is required as a planning obligation as the application site for the housing would be in different ownership and/or management than the remainder of the grounds.

1224 Planning balancing exercise

The benefits

12241 For clarity, the following scale shall be applied when weighing the benefits from lowest to highest: limited, moderate, significant, substantial.

Five-year housing land supply

12242 The Council has a housing land supply of about 6.46 years. There is also no evidence that the deliverable sites in the supply would not come forward during this period. The application site is part of a site allocation in the LPSS, to deliver the identified need so the principle of development is not in question as this has been scrutinised through the plan-making process. Heritage constraints were identified as an issue by the LPSS Inspector and would require sensitive design and appropriate scale.

12243 It is to be noted that policy A15 uses the word "approximate" in reference to the number of houses the allocation is expected to deliver. . The number of homes in the allocation were derived from a capacity exercise, reflecting on the previously refused scheme for 134 homes. Whilst policy S2 establishes that the overall housing requirement is a minimum figure, the unchallenged evidence indicates that there is a considerable supply headroom across the whole trajectory.

12244 The proposed construction works would engender a considerable amount of engineering works due to the topography and clay subsoil. Furthermore, the housing would be delivered in phases as the five clergy houses in the Eastern Meadow, would have to be built first to allow the occupants of Cathedral Close to be decanted. Details of the implementation period are not known at this stage, however, there is potential that this could take more than five years. Nevertheless, it is not a necessity in terms of the supply or delivery of land in the short term, which does not depend on the application site, as set out in table 1 (page 11) of the Land Availability Assessment

(LAA) 2022. The fact that the site is not within the Council's five-year housing land supply does not mean that it would not be beneficial if it were to be delivered sooner. It is Government policy to boost the supply of housing, and the proposed delivery from the application site would be in accordance with this objective. Nevertheless, the Council has a favourable land supply position throughout the plan period. Given the proposed housing provision on this sustainable allocated land would be a benefit, **significant** weight would be attributed to this.

Affordable housing

12245 The proposed development would deliver the full policy level of affordable housing. The tenure split and housing mix would meet identified needs in accordance with the Strategic Housing Market Assessment Addendum (2017) and policies H1 and H2 of the LPSS. This would support in meeting an acute need for such housing within the Borough and that the situation is deteriorating year on year. The provision of 57 affordable homes, the 44 homes for affordable rent and shared ownership would be a benefit of **substantial** weight.

12246 The remaining 13 homes would be only available to the Cathedral for occupation by staff so that they can be housed within the community that they are serving. So, whilst meeting a need it is one associated with the operational needs of the Cathedral, rather than be available to the wider public. Therefore, this would carry **significant to moderate** weight. The weighting reflects the importance attributed to this policy compliant scheme, given that the delivery of affordable housing in the town centre and Guildford urban area has been in low supply.

Housing mix

12247 The housing mix, which would comprise 1, 2, 3 and 4 bedroomed homes, one five bedroom house, with houses and apartments. There would also be 25 accessible and adaptable dwellings, this would exceed the policy requirement of Accessible M4(2) homes. This would be a benefit of **moderate** weight.

Endowment

12248 The endowment income from the sale of the 'green land' would provide an income of £180,000 a year for the next five years and in perpetuity a varying amount. This would meet 23% of the costs for works related to repairs and maintenance to the Cathedral building for the next five years. However, the Cathedral would still have to find the remaining £2,685,000 (77%) of the funds for the works over the next five years. It should be noted, that the endowment would not be available to spend on the urgent works identified to be done in the next 12 months, so would be funded from other sources until the endowment had accrued an income, at least one year after receiving the capital from the land receipt. There would be a substantial funding shortfall and whilst a worthy contribution, this would not provide the high degree of financial security that would have been envisaged, as a result of the site allocation. The long-term endowment income for the maintenance of this landmark building for the nation and community it serves is given **moderate** weight.

1224.9 The remaining 'red land' would generate an income of £60,000 a year for the next five years and in perpetuity a varying amount. This income may be used for "a proper purpose of the Cathedral." However, whilst the Cathedral state that they would also use this income on the works for repairs and maintenance of the Cathedral. The Cathedral currently have a budget deficit. Therefore, as the funds are not specifically ring-fenced and in the absence of a S106 planning obligation the Council have no influence on this matter and the monies could be used for other purposes. Therefore, due to this degree of uncertainty on the use of the endowment income from the 'red land' for the maintenance of Cathedral, this is given **limited** weight.

S106 financial contributions

1224.10 There are various provisions that would be necessary to meet the needs of the development. These include the financial contributions in accordance with the TBH SPA Avoidance Strategy towards education, healthcare, policing and off-site open space. These would provide proportionate mitigation rather than benefits.

1224.11 There would be other provisions that would also offer some wider advantage to the established population. These would include off-site highway improvement works improved pedestrian crossing at The Chase/St Johns, mitigating traffic on local residential roads, speed survey studies within the vicinity of the site and works for the upgrading, improvement and/or potential re-routing to Footpath 6 a public right of way (PROW) from Scholars Walk to the university site and to improve connectivity. These would be benefits of **moderate** weight.

1224.12 The Sustainable Movement Corridor (SMC) is a council project to provide sustainable travel choices through the town and to new housing including the strategic sites. The financial contribution would be used to improve connectivity and provide infrastructure improvements, to support sustainable travel choices, to the Yorkie's Bridge section of the Sustainable Movement Corridor SMC. Whilst it would be necessary to provide highway improvements to support sustainable modes of travel, this would also provide a wider benefit by helping to enable delivery of this infrastructure project. It is a benefit afforded **moderate** weight.

Surface water management

1224.13 The existing site does not have much in the way of surface water attenuation and due to the clay sub soil, pools at the edge of the site. The proposed measures would manage the surface water and reduce the risk of flooding. This would be an improvement on the existing situation; however, the site is not identified as having a high risk of surface water flooding. The improvements are required to mitigate the increase in impermeable areas from the proposed development. So would provide proportionate mitigation rather than benefits.

On-site open space and landscaping

1224.14 The avenue of trees along the western approach route which were shown in the plans

of Maufe's original landscape concept, would be reintroduction with two formal lines of semi-mature trees (35-40cm girth). Whilst this is outside the red line of land in the applicant's control, the delivery of this can be secured through a planning obligation and would be proportionate and meet the requirements of Regulation 122 of the Community Infrastructure Levy Regulations. This would have a wider public benefit and **significant** heritage benefit in enhancing the setting of the listed building.

1224.15 The restoration of the southern approach, improving the lighting and surfaces for the pedestrian route would make it more visually prominent and attractive, as well as addressing the impact of lack of maintenance and disrepair that has occurred over time. This would benefit the wider public visiting the site. So would carry **moderate** weight.

1224.16 The applicant has agreed to deliver a public art strategy, this would enhance the public realm and add interest to the site, which would be located throughout the site on the amenity open space. This is afforded **moderate** weight.

Biodiversity net gain

1224.17 There would be a biodiversity net gain of 1.97% for habitat units and 100% for hedgerow units. The gains in terms of hedgerow units would represent an environmental benefit of **significant** weight.

1224.18 The proposal would introduce extensive tree planting and other planting to enhance the existing hedgerows and the open spaces around the buildings. This would include native and a drought tolerant species. This would add to biodiversity value and provide attractive amenity areas for the new homes. This would not be linked to biodiversity and is instead the green infrastructure required to mitigate the loss of Amenity Green Space, so would provide proportionate mitigation rather than benefits.

Climate Change and Sustainability

1224.19 The buildings would follow the energy hierarchy thereby achieving a site wide carbon reduction of 58.90% and have water efficiency measures. This would ensure that the buildings would have reduced energy and water consumption which would contribute in a small way to the wider demand for resources. This would be an environmental benefit, so this is given **moderate** weight. However, there is also a requirement under the changes to Parts G and L of the Building Regulations.

1224.20 The installation of air source heat pumps (ASHPs) and photovoltaic panels on roofs to provide energy would mean that there would be no on-site carbon dioxide and nitrous oxides emissions. This would have a wider environmental benefit in having no greater impact air quality, this is given **moderate** weight. This would also comply with Part L of the Building Regulations.

1224.21 The scheme would deliver electric charging points for all car parking and some cycle, measures to support the use of public transport and on-site and off-site cycle infrastructure, car club spaces and membership and safe and secure long term cycle

parking including cargo bikes. Whilst the benefits for this have not been qualified the facilities and onsite provisions would strongly support sustainable lifestyles and a modal shift from petrol and diesel motor vehicles to low/zero carbon emission choices and improve air quality. This would have both **moderate** social and environmental benefits.

Economic

122422 The development would generate employment during the construction period. Furthermore, there would be a reliance on associated goods and services that would help support local businesses and tradespeople. Whilst a modest proportion of the occupants (mostly those that would own/occupy the affordable housing, 57 homes or 110 people of the 262 (42%)) would be moving from within the boroughs not all would be from within this locality, so the new population would generate additional income that would increase spending in the local economy to support local shops and services. These are economic advantages of **moderate** weight.

New homes bonus

122423 The New Homes Bonus is intended to incentivise housing growth, at this time the income would not be ring fenced by the Council for projects that might benefit the local area. Council Tax may generate significant revenue, although this is necessary to deliver local services and infrastructure to support the new development. These are neutral factors in the planning balance. No weight is afforded to these matters.

The heritage balancing exercise

122424 There would be less than substantial harm to the significance of the heritage assets comprising the setting of the listed building and monument. This harm would be in the middle of the spectrum for the Cathedral and at the lowest end of that spectrum for Guildford Castle and the locally listed lodge buildings to the south.

122425 Paragraph 199 of the NPPF makes clear that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The importance of the asset is also relevant and the fact that the Cathedral is a Grade II* listed building and Guildford Castle is a Grade I listed building and a Scheduled Monument, so this has to be given due regard in terms of the harm to their significance.

122426 Great weight is afforded to the harm identified and it would be reasonable to take account of the nature of the scheme and the importance of the assets, as long as the principle of applying great weight is adhered to.

122427 The site is within the setting of the listed buildings and Scheduled Monument it is likely that any development would result in less than substantial harm to their significance. The principle of development is not in question as this is an allocated site. However, the allocation was not informed by any detailed site-specific heritage assessment for the local plan process. Although consideration was given to the heritage assessment

carried out by the Design and Conservation team during the previous application 15/P/02284 (by Linden Homes for 134 homes), which was submitted with a heritage statement (dated March 2015 prepared by Asset Heritage Consulting Ltd). The findings in the report on the Setting and Landscape (2007) by Jackie Taylor for Historic England were also considered. This site allocation was accepted by the Local Plan Inspector, who stated that approximately 100 homes could be delivered “sensitive design and appropriate scale.” It was always expected that a further detailed heritage assessment was expected to be undertaken when subsequent detailed proposals came forward as part of a planning application. One of the most important matters that has been raised through the public consultation exercise, as part of this application has been the historic interest of the land itself as commemorative or memorial spaces, and the intention of the land around the Cathedral as an integral element to the setting and significance to the heritage asset.

1224.28 Guidance in the Historic Environment PPG (Paragraph: 020 Reference ID: 18a-020-20190723) does seek to explain the concept of ‘public benefit’ stating that “public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.” It is acknowledged that the proposal does result in a number of public benefits, and these have been set out and discussed above at paragraphs 12.24.2 to 12.24.23.

1224.29 In accordance with paragraph 202 of the NPPF the harm identified shall be weighed against the public benefits. The package of public benefits overall can be afforded significant weight, as they are wide ranging and long-lasting. Of particular note would be the endowment, affordable housing and re-planting of trees along the western processional route. This would assist in meeting the works for repairs and maintenance costs to ensure that the Cathedral is preserved for the future. The wider public social, environmental and economic benefits would have a positive impact on the people that live, work or visit the area. Delivering a range of housing choices, on a site allocation in a sustainable location.

1224.30 However, these would be insufficient in this case to outweigh the degree of harm that would arise to the significance of the setting of this Grade II* listed. The exercise that has been undertaken under paragraph 202 of the NPPF is not an even balance and the great weight and importance attributed to the identified harm to the heritage assets tips in favour of their conservation, notwithstanding the public benefits. The scheme would therefore fail to accord with paragraph 199 of the Framework, and policies D3 and A15(3) of the LPSS and policy D16 of the LPDMP.

Final overall planning balancing exercise

1224.31 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions

to be taken in accordance with the development plan unless material considerations indicate otherwise. This requires a broad judgement regarding whether the development accords with the plan read as a whole. Paragraph 11 of the NPPF also states that 'plans and decisions should apply a presumption in favour of sustainable development...For decision-taking this means...approving development proposals that accord with an up-to-date development plan without delay'. While the proposal would comply with a number of policies within the plan, overall and taken as a whole, the development would fail to accord with the development plan. Therefore, the presumption is that the application should be refused.

1224.32 The other harm identified above must be considered and balanced against the other planning benefits of the proposal. As already set out above, paragraph 202 of the NPPF requires a balance of the heritage harm against the public benefits of the scheme. That balance has been carried out above, and the conclusion reached is that the public benefits of the scheme do not outweigh the heritage harm. However, the other harms resulting from the proposal must also be assessed, together with the heritage harm, and these should also be balanced against the benefits of the proposal. This final balancing exercise shall be carried out below.

1224.33 As before the weight to be afforded to each harms/ benefit, from lowest to highest: limited, moderate, significant, substantial. Then having attributed such weight, an overall judgement would then be required regarding the balance of harm vs benefit.

1224.34 As noted above, the less than substantial harm identified to designated heritage assets carries substantial (great) weight and considerable importance in the planning balance. Given the full analysis in relation to heritage harm above, that exercise is not here repeated, whilst other identified planning harms are considered below.

Landscape and visual impact

1224.35 The introduction of built form on the southern side of the Eastern Meadows would have residual adverse effects on one of the 'important views' (VP15) set out within the Town Centre Views SPD; as reflected within the submitted LVA (pages 198 and 199) as Major adverse for visual receptor V11 (Stag Hill), which is considered to be significant. There would be harm to the views from Stag Hill looking south east, with the Major adverse effect stated, which is considered to be **substantial**. As it would affect the ability to see the wide expanse of the vista of the town and pick out key landmarks identified in the SPD. The outlook from this location has been improved, however, not to the extent that it would change the assessment.

1224.36 The new homes and their private amenity areas would affect the ability to enjoy this space as a viewpoint, as fewer people would be likely to use this area in the way it is currently used. Also, the new residents would be likely to feel a sense of intrusion if they did so, with the resultant tendency to add tall fencing around garden spaces, further detracting from the meadow qualities of the open space, through a potential default privatisation of this space.

1224.37 22 visual receptors have been identified that would be sensitive to the proposed

development. Nine of these would experience a moderate adverse to major adverse effect. Consequently 13 of the 22 views would have a minor adverse or negligible effect. Therefore, harm has been identified to over 40% of the views, thereby reflecting the wide-reaching effect due to the increase in the built form, the reduction in the prominence of the Cathedral and its silhouette and the loss of the degree in separation created by the 'green collar'. The amendments to reduce the scale and mass of the tallest buildings, climbing plants and tree planting have softened the effects so that there would be moderate effects in the short term (year one) and long term (year 10). Development to deliver the site allocation would result in a degree of harm, therefore, this is afforded **moderate** weight.

Characteristic of well-designed places

- 122438 The development has been assessed against the 10 characteristics set out by the National Design Guide (NDG). The scheme fails to fully address the constraints and opportunities.
- 122439 The starting point is a full understanding the context of the surroundings and how they could be enhanced so that the existing community would be more accepting of the proposals for cohesion. The DAS contains details of the existing built development, land condition, topography, landscape, biodiversity, flood risk and movement. As a result, in some aspects the proposals have made been able to fulfil and contribute to these components of good design. However, where the scheme has fallen short, has been in responding positively to the existing built development, visual impact, views inwards and outwards and the use of the public space. So that the proposals would be able to integrate into the wider surroundings physically, socially and visually. There is a detailed record of the history of the site and how this has been shaped by local history, culture and heritage, however, the links created are weak so that the new development would not be regarded as the heritage of tomorrow. It is in these areas that the scheme has not met the objectives for placemaking in those characteristics of the NDG.
- 122440 The 'Identity' is one of the most important characteristics to this site, due to the Cathedral, the diocese and the amenity open space. This is the most sensitive site allocation in the LPSS, any development here has a duty to respect the special nature of this site and what makes it so distinctive. This includes its features, composition of the building, relationships between buildings, views, vistas and landmarks, roofscapes, scale and proportions of streets and buildings. Whilst it is possible to see the kernels of these matters being acknowledged in the DAS and in particular the LVA, the resulting scheme has a building form that jars with the Cathedral and surrounding residential development that local communities cannot identify with. Whilst there is scope to have a different scale and density and the three-character areas do provide variety, as you move through the site. The way in which this has been provided results in a scheme that does not overall provide the outstanding design quality required, for this unique site.
- 122441 Pages 48-49 of the DAS (October 2021) have the constraints and opportunities plans, this can be compared to 'Response to Issues Annotated Proposed Plan' produced by

consultant architect and urban designer, Amanda Reynolds (AR Urbanism) which has identified a far greater number of views, movement connections and landscaping features. Furthermore, this does not appear to have been influenced by the work in the LVA (December 2022) as the DAS addendum (December 2022) as the update to DAS does not reflect the assessment carried out in the LVA.

122442 As such the proposed development would result in harm to the parkland around the Cathedral and the way it functions, shaped by the quality of the landscape and views in and out of the site. As well as harm to the character of the area due to the visual prominent built form, due to the scale, layout and the lack of relatability.

122443 This shall be afforded **substantial** weight.

122444 The public benefits of the scheme and the weight attributed to them have been set out at paragraphs 12.24.2 to 12.24.23.

Overall planning harm v benefits balance

122445 The benefits of the proposal are wide ranging in relation to social, environmental and economic benefits and would be long lasting; particularly in relation to housing delivery, affordable housing provision and biodiversity net gain. The proposal would have a transformative impact on how the grounds of the Cathedral are experienced on site and seen from within the town given its dominant hilltop position, with the introduction of residential development in three parcels of land from two to three and a half storeys in flatted blocks and houses on the open amenity space, that forms a parkland setting. The land around the Cathedral has already experienced the cumulative effects of disposals of land for development. Consequently, the remaining land available that has been allocated for development is on the more sensitive parts of the site.

122446 The harm resulting from the proposal is to the heritage assets, the highly valued Grade II* listed Cathedral and Grade I listed Guildford Castle. As set out in the report above, the heritage harm is not outweighed by the public benefits of the proposal. The other harm would be the visual impact from the viewpoint on the eastern meadows looking towards the town and harm to the character of the open amenity space and character of the area from the visually prominent development due to its scale and layout.

122447 Overall, the benefits associated with the proposal do not outweigh the identified harm, including harm to the two designated heritage assets and result in other harm to viewpoints and vistas and the design approach, layout and appearance would not create an outstanding development in this special site allocation, that could be regarded as a heritage legacy for the future. The proposed development would not accord with the development plan read as a whole and other material considerations would weigh against the grant of planning permission, in accordance with section 38 of the Planning and Compulsory Purchase Act 2004 (as amended). The proposals would fail to comply with policies S3, D1, D3 and A15 of the Local Plan: Strategy and Sites (2019), policies D4 and D16 of the Guildford Borough Local Plan: Development Management Policies (2022). As such, the proposal is deemed to be unacceptable and is therefore recommended for refusal.

13. Conclusion.

- 131 The proposal would deliver 124 homes on this site allocation in the grounds of the Grade II* listed Guildford Cathedral on a visually prominent hilltop in the town. The existing seven homes in Cathedral Close would be demolished and replaced with new flats and housing on three parcels of land with different character areas. There would be vehicular accesses from Ridgemount and Alresford Road to serve all except the five clergy houses, which would be accessed from the existing car park adjacent to the northern boundary of the site. There would be pedestrian and cycling connectivity within the site and off the site as required by policy A15(1) and a large package of measures to support sustainable travel choices. There would be no gas fired boilers with a fabric first design and onsite renewable energy generation as a response to policies relation to sustainability and climate change and requirements under the new part L of the Building Regulations. Extensive tree planning would take place for connectivity of spaces as required by policy A15(6) including the restoration of an avenue of trees along the western approach.
- 132 The quantum of development would exceed the approximation in the site allocation. and is a highly sensitive location in terms of the impact on the significance of heritage assets and its visual prominence in the townscape and countryside beyond The site also has a viewpoint identified in the Guildford Town Centre Views SPD (2019), from where an expansive vista looking over the town can be appreciated.
- 133 The scheme was amended during the course of the application to address concerns raised by officer The main changes related to the change in the built form and arrangement along the southern edge of the Eastern Meadows and a reduction in the scale and mass of the tallest flatted blocks on the Eastern Slopes. There was also a positive response to on-site cycle infrastructure and accessibility and the provision of car club spaces and membership. These amendments have resulted in improvements; however, they did not overcome the harm that has been identified.
- 134 The proposal would result in less than substantial harm to the significance of heritage assets due the harm identified to the setting of the Grade II* listed Cathedral, ability to appreciate the two lodge buildings to the south and visual distraction to the view over the town and the landmark of Guildford Castle. Other harm related to unsuccessful placemaking due to the quantum of development, visually prominent development, layout, appearance and the harm to an important view point with a vista over the town and how this could be appreciated and enjoyed due to proximity of residential development. This would fail to comply with policies S3, D1, D3 and A15 of the LPSS, policies D4 and D16 of the LPDMP as well guidance in the Guildford Landscape Character Assessment and the National Design Guide and the NPPF.
- 135 A comprehensive balancing exercise which considers the benefits of the development has been carried out. These include (but not limited to), housing delivery, affordable housing and biodiversity net gain. The proposal would also enable the Cathedral to gain an endowment which would provide some financial security however, this would only meet less than a quarter of the cost of the works to the Cathedral for repairs and maintenance. The detailed assessment carried out has demonstrated that the harms

identified would not be outweighed by the identified benefits that the proposal would bring.

136 As a result, the recommendation is that planning permission should be refused.

137 Therefore, as a legal agreement has not been secured, it is necessary to include reasons for refusal in relation to a lack of mitigation in accordance with the Thames Basin Heaths SPA Avoidance Strategy and the mitigation required through planning obligations.

Report of the Guildford Design Review
Panel

Land to the south of Guildford Cathedral

18th May 2020

The design review panel

Reference number	1394/300420
Date	30 th April 2020
Meeting location	Online via Zoom
Panel members attending	Richard Portchmouth (Chair), Architecture, Urban Design Louise Goodison, Architecture, Historic Environment John Pegg, Landscape Architecture, Urban Design Kevin Radford, Architecture, Urban Design Kay Richardson, Historic Environment, Landscape Architecture
Panel manager	Sogand Babol, Design South East
Presenting team	Ian Fenn, JTP LLP Laura Stafford, JTP LLP Lily Tsolakidi, JTP LLP Rupert Grierson, Macgregor Smith Jamie Cusack, Macgregor Smith
Other attendees	Matt Evans, Macgregor Smith James Lacey, Vail Williams LLP Sarah Isherwood, Vail Williams LLP Paul Thomas, Vivid Homes Tim Asson, Asson Associates Kevin MacKenzie, Dalmore Land Nick Doggett, Asset Heritage Consulting Maria Vasileiou, Guildford Borough Council John Busher, Guildford Borough Council Louise Blaxall, Guildford Borough Council Rebecca Souter, Guildford Borough Council Paul Fineburg, Guildford Borough Council
Site visit	This review was carried out during the Covid-19 outbreak in 2020. Independent site study including desktop research prepared by Design South East and a digital walk-around (in a similar fashion to that which would have been conducted on-site) was carried out prior to the review.
Scope of the review	As an independent design review forum, the scope of this review was not restricted.

Panel interests Panel members did not indicate any conflicts of interest.

Confidentiality This report is confidential as the scheme is not yet the subject of a detailed planning application. Full details of our confidentiality policy can be found at the end of this report.

The proposal

Site location	Land to the south of Guildford Cathedral, Alresford Road, Guildford, GU2 7UP
Site details	The site is formed of two parcels of land flanking the southern pedestrian path toward Guildford Cathedral from Stag Hill, across Alresford Road. The easterly parcel boundary extends to include the Garden of Remembrance to the east of the Cathedral.
Site context	The Cathedral is a Grade II* twentieth-century building and one of only three Church of England Cathedrals constructed in the twentieth century and the last Church of England Cathedral consecrated on a new site, in 1961. Designed by Sir Edward Maufe, the Cathedral marries Gothic tradition and twentieth-century construction techniques – it is the first modern Cathedral conceived and built with a simple aesthetic design and decoration, while notably innovating high level cast in-situ concrete. Onslow Village, a sloped suburb consisting of 1920's housing and beech hedged residential streets modelled on the ideas of the Garden City movement, lies to the south of Alresford Road.
Proposal	This is a proposal for up to 130 dwellings including affordable housing and associated landscape works. It is intended that the sale of 50% of these homes will provide financial endowment for essential repairs and maintenance of the Cathedral.
Local planning authority	Guildford Borough Council
Planning context	The site is allocated in the new Guildford Local Plan (2015-2034) for circa. 100 homes. Some additional expectations include improved pedestrian connectivity, retention of strategically important views of the Cathedral, sensitivity to the setting and a holistic approach to landscape. There are a number of protected Oak trees on the southern arrival gates and a public footpath through Scholars Walk terminating at the south-eastern corner of the site.
Planning history	There is a historic scheme for 134 dwellings proposed by Linden Homes which was refused at committee, with the key reason cited as the poor quality of the proposal, which was considered to be out of character with and harmful to the immediate context. The application is a material planning consideration, but the new applicant team and

authority have agreed to approach the site anew in pre-application discussions.

Planning authority perspective

The authority seeks the panels view on whether or not the proposal protects and improves the Cathedral setting, if strategic and important views are being respected, if connectivity with the wider town is improved, and if the new line of trees and treatments on the southern route are a barrier to views towards the wider town and the Hog's Back. The authority's view is that in the original Maufe vision for the Cathedral, the authentic experience of arriving was on the west by vehicle, and the south by foot.

Engagement

Stakeholder engagement identified a desire to ease traffic and congestion to the south and improve biodiversity.

Summary

This special and sensitive site requires an extraordinary level of dialogue, investigation, understanding, vision and rigour. The applicant team have begun to rise to this need through their work, which demonstrates sensitivity and clarity of conceptual thinking.

A good start has been made and there is confidence in the team. However, there are elements of the proposal that require a fundamental rethink owing partly to the depth of conceptual considerations involved.

Key recommendations

1. This site is in a unique and transitional position sitting between the Cathedral and wider town, which predicates how a proposal here must be designed. Where a development can sit and the scale, mass, and form of buildings must be delicately balanced to mediate between the two starkly differing contexts. A reduction in the total number of dwellings will be needed to achieve this balance.
2. The appropriateness of any buildings to the east of the Cathedral is questioned and considered a challenge to the setting. A formal, plateaued landscape is at odds with our interpretation of Maufe's original intent in terminating the formal east-west axis on the east through the rounded apse of the Cathedral. The East Lawn should be left as an open, informal and sloped landscape.
3. The proposal for Eastern Slopes appears to compete with that of the Cathedral both in plan and longer views. Development in this location should be reduced in density and refined to fit with the topography to fulfil an aspiration for an organic development and the need to create a transition in scale towards the town.
4. It is important that the Western parcel relates better to the community of Onslow south of Alresford Road. Development here could be placed further south, replacing the hedgerow, to help minimise cut and fill, which would otherwise harm the landscape and setting to the north.
5. The opportunity of renewing Maufe's original intent of a "green skirt" around the Western Approach and connecting with the University in the north should be explored as should the reversion of the north-western carpark into a green space, or alternatively its screening.
6. The symbolism and narrative of the Cathedral building itself should be understood in more depth to reflect on how its qualities could enrich the architectural proposal.

Detailed comments and recommendations

1. Landscape, orientation and connectivity

- 1.1. While the importance of the avenue approaches to the Cathedral from the west and south is well-documented and sacrosanct, it should be noted that the eastern aspect of the Cathedral, as seen from the town across an informal, open and hilly landscape, is considered to be of similar importance. This is evidenced in the presence of the Cross on this side of the building and the historic watercolour illustration which depicts the Cathedral upon a hillside of the valley within which the town sits. The character of openness from this orientation must, therefore, be maintained to preserve the integrity of the Cathedral's setting.
- 1.2. The Cathedral sits on a clay outcrop of the chalk ridge that carries one of the earliest pathways known in southern England. The building is located on a bluff, overlooking the valley of the river Wey carving its route through the North Downs. This strategic crossing accounts for the origins of the town of Guildford. The relationship between the town and the Cathedral is still a work in progress that any design proposals need to address. The seven values presented by the Cathedral in the review, and particularly "connection" are considered of key importance. More work is needed to ensure the proposal relates to Guildford, the wider town and beyond in an appropriate manner. Key Recommendation 1 suggests one approach that addresses this concern. The southern slopes and steps are part of a wider contextual pilgrimage journey. This narrative and route must be fully understood and respected in the proposal.
- 1.3. We question the suitability of remodelling land immediately to the east and the principle of development here. In addition, we suspect that study of the boundaries of sacred spaces within the Cathedral's setting would support the view that the east is not a suitable place for positioning new buildings, as they could interfere with the way the building is understood and valued socially.
- 1.4. The presence of well-developed vegetation and canopy cover on what was once intended to remain open grassy hills is recognised. However, we feel that the addition of more trees and vegetation exacerbates this change in character, to the detriment of the open landscape character. We support the selective thinning of vegetation on the east whilst maintaining the ecological value of this landscape. The avenue of lime trees on the west is welcomed, however it is preferred that the tree planting starts slightly further east of the junction to enable a better landscape connection between the southern community and university.
- 1.5. The proposed zig-zag wheelchair accessible southern route will likely result in a visually intrusive outcome due to the extent of the earthworks required to

accommodate the path, effectively infilling the existing open slope and ascent to the Cathedral. We recognise the importance of the southern route, however, the team are invited to consider a more enjoyable and shallower accessible route from the south-east maintaining the 'pilgrimage' route as originally implemented. A less forboding and more natural ascent via an alternative and additional route from the south east with a gentler gradient would arguably be more user friendly for those who are less mobile.

- 1.6. The opportunity of adhering to Maufe's original intent with a "green skirt" around the Western Approach and connecting with the University in the north should be explored. The gable end of the education centre is visually prominent, this can be played down by screening, the conversion of the north western car park to green space and composing the new avenue to draw the eye to the Cathedral instead.

2. Landscape, water, biodiversity and ecology

- 2.1. The hedgerow to the south of the Western Approach parcel does not appear to be of significant ecological value but is being retained in its entirety with development pushed further north into the hillside. The retained hedge appears as a weak median strip separating 4 lanes of traffic. This approach should be reconsidered. It is more important that the western proposal has a strong visual and social relationship with Onslow south of Alresford Road. Development here could be drawn onto Alresford Road. In addition, a satisfactory response to the rear of the properties should be addressed in a revised proposal. We welcome commitments made for physical improvements to Alresford Road.
- 2.2. Existing ecological corridors and connections are interrupted by the removal of trees and introduction of a road to the north of the East Lawn. This should be reviewed, with the ecological link maintained. This may be achieved at upper levels through careful planting and detailing.
- 2.3. The proposal could make better use of water to contribute to a sense of place and for amenity, for example, by being designed into and around the southern path. A comprehensive strategy should be developed that moves away from engineered tanking solutions, using rain gardens more effectively for slowing and maximising the value of water.
- 2.4. A review of the Eastern Slopes proposal should look to remove parking structures and increase the landscape value of the site. The resulting detailed design proposal should justify that a landscape priority east-west corridor through the Eastern Slopes is possible given the proposed deck area.

3. Form and architectural language

- 3.1. The role of the Cathedral architecture and its relationship with the site context could be elaborated upon. It has a prominent, intelligible but layered massing with many intended perspectives and symbolic features linked with their orientation. The building and its heritage should be interrogated with more depth and responses to these unique qualities outlined.
- 3.2. Care should be taken to ensure the flank elevations and gables of buildings are carefully designed and work coherently with the ascent up the southern route and in longer views, particularly from the south and east.

4. Community

- 4.1. Engagement with the communities of Stag Hill and Onslow Village are needed to inform the design process of this scheme. Visual, physical, social and symbolic connections with Stag Hill should be developed in partnership between the Cathedral and Council. The relationship with Onslow Village should be strengthened.
- 4.2. While not necessarily within the scope of this project, policy and streetscape improvements for the Royal Processional route taken down the High Street and over the Town Bridge might be a consideration for the Council, in order to influence and futureproof any forthcoming design proposals on Stag Hill.

5. Materials and detailing

- 5.1. The approach to materials and detailing was not discussed in great detail at this review. Our advice is consistent with paragraph 130 of the National Planning Policy Framework (2018), which states: *“Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).”*
- 5.2. In order to be consistent with this national policy, the applicant team and local authority should note Design South East’s general guidance on material quality and detail. At planning application stage, the quality of the detailing should be demonstrated through large scale drawings at 1:20 and 1:5 of key elements of the building/landscape and should be accompanied by actual material samples which should be secured by condition as part of any planning approval.

6. Energy strategy

- 6.1. The approach to energy efficiency was not discussed in great detail at this review. We welcome elaboration on the strategy at subsequent discussions with the authority or panel.
- 6.2. Our guidance is that at the planning application stage the proposal must produce a clear energy strategy which details how the development will optimise thermal performance, minimise the demand for energy, supply the remaining energy requirements efficiently and optimise the use of renewables in order to align with the Government's emerging zero carbon policy. This strategy should be informed by detailed modelling work informed by respected calculation methods.

Confidentiality

If the scheme was not the subject of a planning application when it came to the panel, this report is offered in confidence to those who attended the review meeting. There is no objection to the report being shared within the recipients' organisations. Design South East reserves the right to make the contents of this report known should the views contained in this report be made public in whole or in part (either accurately or inaccurately). Unless previously agreed, pre-application reports will be made publicly available if the scheme becomes the subject of a planning application or public inquiry. Design South East also reserves the right to make this report available to another design review panel should the scheme go before them. If you do not require this report to be kept confidential, please inform us.

If the scheme is the subject of a planning application the report will be made publicly available and we expect the local authority to include it in the case documents.

Role of design review

This is the report of a design review panel, forum or workshop. Design review is endorsed by the National Planning Policy Framework and the opinions and recommendations of properly conducted, independent design review panels should be given weight in planning decisions including appeals. The panel does not take planning decisions. Its role is advisory. The panel's advice is only one of a number of considerations that local planning authorities have to take into account in making their decisions.

The role of design review is to provide independent expert advice to both the applicant and the local planning authority. We will try to make sure that the panel are informed about the views of local residents and businesses to inform their understanding of the context of the proposal. However, design review is a separate process to community engagement and consultation.

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The logo for Design South East, featuring a stylized yellow shape that resembles a speech bubble or a map outline of the region, with the text "Design South East" inside in white.

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