

## THE PLANNING GROUP

### **Report on the letters the group has written to Guildford Borough Council about planning applications which we considered during the period 1 July to 31 December 2019**

*During this period the Planning Group consisted of John Baylis, Amanda Mullarkey, John Harrison, David Ogilvie, Martin Taplin, Peter Coleman and John Wood. In addition Ian Macpherson has been invaluable as a corresponding member.*

#### Abbreviations:

GBC:	Guildford Borough Council
AONB:	Area of Outstanding Natural Beauty
AGLV:	Area of Great Landscape Value
NPPF:	National Planning Policy Framework
HTAG:	Holy Trinity Amenity Group
SPG:	Supplementary Planning Guidance

The Planning Group met every three weeks at the GBC offices.

During the period under review there were a potential 1,039 planning applications we could have looked at. We sifted through these applications and considered in detail 72 of them. The Group wrote twenty seven letters to the Head of Planning Services on a wide range of individual planning applications. Of those applications eleven were approved as submitted; four were approved after amending plans were received and those plans usually took our concerns into account; three were withdrawn; seven were refused and, at the time of writing, two applications had not been decided. Only one of the refused applications was appealed and that appeal was dismissed.

Any reader who wishes to see how this six month period compares with previous periods should look at the “Summary of Outcomes” which follows the appropriate report on the Society’s website at <http://www.guildfordsociety.org.uk/planning.html> .

Whilst the planning case officers at GBC do generally take our letters into consideration naturally they do not always take the same view as us. However, we are pleased to report that roughly half of the applications, where a decision had been made or the application was withdrawn, were either refused or alternatively were only approved following subsequent amendments to the original application to take account of our objections.

The details of our letters follow below and if any reader wishes to look at any of the applications, the plans, the design and access statements, the officer’s report to the planning committee and the decision notices they can find all the information required at <http://www2.guildford.gov.uk/publicaccess> . Type in the application number at the

bottom of the page that opens, click “Search” and click on “Documents” when the Summary page has been loaded. You will then be able to click on the information you are seeking and it usually downloads a pdf document.

During this six month period under review there was one application to which attention should be drawn to the reader. This was 19/P/01974 for the well known casino and nightclub site in Onslow Street in the centre of Guildford. The application and the outcome is well documented on pages 8 and 9.

## **PLANNING APPLICATIONS we considered from 1 July to 31 December 2019**

### **19/P/01130: 240 High Street, Guildford, GU1 3JF**

This application appeared to be for one externally illuminated fascia signage to the front of the building. Although the application said ‘externally illuminated’, the signage drawing of the application says they are “Internal LED Illuminated”, and we interpret the drawing as showing that this is indeed the case. The GBC Design Guidelines imply that such lighting is generally unacceptable in Conservation Areas and we are not aware of any precedents in the Upper High Street. We therefore objected to the application.

*(Refused for much the same reasons as our objection)*

### **19/P/01200: Guildford College Stoke Park Campus,**

We felt unable to support this proposal to regularise continuation of a previous temporary parking consent for 85 spaces. We did not believe the applicant had made out a case for a further three years. The site of the Application should be returned to landscaping in order to restore a campus setting and to provide the visual, social and aesthetic functions necessary to students’ well-being.

*(Approved. Whilst our letter was dated 15 August and was uploaded onto the GBC website on 20 August that latter date was the same date the case officer wrote his report recommending approval. In that report he stated that no third party letters of objection had been received. The standard consultation expiry date was 2 August and thus our letter was too late. A delay of a fortnight is not normally a problem.)*

### **19/P/01210: 20 The Street, West Horsley**

This was an application for 24 dwellings on a site allocated in the Local Plan. We made some observations of wider significance which could be incorporated in appropriate future SPDs. We believe that sustainability issues should be considered at the outset in such schemes. So, for instance, whilst the currently required number of units may have solar panels, the design and construction should be such as to facilitate their future installation by occupiers of other units. Electric car charging points should be provided to all the isolated parking spaces i.e. those that are not within the curtilage of an individual

unit, to ensure that all occupiers may readily avail themselves of an electric vehicle. This scheme could be large enough to justify facilities aimed at encouraging car sharing or pooling for the benefit, not only of its residents, but also those in the wider community, and subsequent phases. We believe all such opportunities should be pursued vigorously. We believe supply of television, satellite and data services should be considered at the outset and where technically possible communal receivers or cable systems be employed to avoid a plethora of aerials and dishes being added to the exterior of the buildings once occupied.

*(Approved by the full planning committee following receipt of 44 letters of objection contrary to the case officer's recommendation for approval. Condition 20 of the decision notice specified that all houses must have electric car charging points provided. In addition one of the potential access points has been removed but the other has been retained as it is needed for an entry into the rest of the allocated site.)*

### **19/P/01256: New Look, 14-16 Friary Street**

This application proposes reconfiguration, refurbishment and change of use of "New Look". This building is very prominent when viewed from North Street and we objected to any further commercial signage or advertising, particularly to the introduction of high-level signage zones. With a limited number of occupying businesses to promote there should be no need for additional areas of advertising. We advocated the introduction of public art where the applicant has shown high-level signage.

*(Approved. In his report the case officer noted our concerns and stated "The changes would also have a positive impact on Friary Passage, improving lighting and attractiveness. It is of note that the provision of signage zones are for indication only and the actual advertisements to be displayed within these areas will be subject of separate advertisement consent applications.)*

### **19/P/01313: 11 Annandale Road, Guildford**

This application proposed demolition of the existing buildings and the erection of 2 residential buildings comprising 12 one bedroom apartments. We objected because it did not include any affordable homes. Uniquely, the GBC website file for the application includes the full viability assessment which seeks to show that affordable housing is not viable. The proposal is out of character in this area of predominantly single family homes and a mix of dwelling sizes should be provided. The proposal is an overdevelopment of the site having an excessive footprint on this small plot, insufficient parking provision and insufficient amenity space.

*(Approved by the full planning committee following receipt of 103 letters of objection contrary to the case officer's recommendation for approval. In response to our objection that the application did not include any affordable homes the case officer noted: "the viability appraisal of the proposal identifies that 40% provision of affordable housing would make the development unviable. Contributions for off-site affordable housing have been secured". £10,345 has been specified in the Section 106 Agreement – this would appear to be a very small amount to pay for 12 units.)*

**19/P/01415:** Chinthurst Farm, Chinthurst Lane, Bramley

The developer for this proposal of 18 dwellings had signalled that affordable housing would not be viable. We commented that it appeared, except for virgin green field sites, developers are likely to claim this in practically every case. We urged the Council to examine most carefully applicant's viability statements, particularly where it is claimed that provision of affordable housing is not viable.

*(Refused. There were a significant number of objections including from SCC Highway Authority, Surrey Hills Area of Outstanding Natural Beauty Advice, Shalford Parish Council, Wonersh Parish Council, Bramley Parish Council, CPRE Surrey, The Guildford Society and a further 119 individuals. The case officer's starting point for objection was the greenbelt issue as well as the harm to the AGLV.)*

**19/P/01480: Just Tyres, Walnut Tree Close**

We wrote objecting to the previous application 18/P/02100 for 90 student units. Our objections still stood as the present application makes unreasonable proposals in order to squeeze in two more studio flats.

*(Approved.)*

**19/P/01508: 22 St Omer Road**

We objected to the previous application 18/P/01724 and it appeared that our objection had resulted in amended elevations. However the elevation drawings of this application show them as not reduced. We objected and asked that the drawings be amended as in 18/P/01724.

*(Withdrawn)*

**19/P/01529: Boxgrove Court, 144 London Road**

We did not support the previous application 18/P/02387 for six flats. We welcomed the reduction in height in the new application but in all other respects continued to object. We considered that flats like these should have some private amenity space such as a balcony.

*(Withdrawn)*

**19/P/01552 and 19/P/01551 (LBC): RBS/Guildford Institute, 10 North Street**

This is the RBS bank, a Grade 2 listed building and one of the most distinguished and distinctive buildings on the north side of North Street. We objected to this application for new signage on the grounds that the proposals are garish and quite out of character. In particular we objected to the illuminated coloured strip and to the use of vinyls on the ground floor windows with no apparent restriction on their colours or content.

*(Refused. The case officer agreed with us.)*

**19/P/01559: The Old Hall, Send Marsh Road, Send, Woking,**

This proposes the erection of a new care home following the demolition of an existing home. We did not agree that the proposal will not affect the greenbelt; we did not consider that they have made out an adequate case in this regard. We believe a development of this scale in this location merits the preparation of a proper environmental impact statement dealing objectively with effects on visual amenity and openness of the greenbelt as well as traffic, since the care home is likely to be staffed 24/7 quite possibly utilising part-time staff.

*(Approved. The case officer accepted the significant increase in the size of the building would be harmful to the greenbelt but considered there were sufficient mitigating circumstances, particularly the increasing need for bed spaces to care for the elderly, that an exception was justified.)*

**19/P/01570: 26-29 Woodbridge Meadows**

This proposes reconstruction and enlargement of the Porsche show rooms and garage. The major visual impact will be the large area of car parking separating the building from Walnut Tree Close. The design provides a uniform building situated further back which will serve to increase not only the extent of parking but its perceived dominance. We advocated improvement of the visual linkage between the site and the river meadows opposite by adding planting and trees amongst the lines of parked cars; also possibly along the frontage.

*(Not yet decided)*

**19/P/01623: Honey Brothers, New Pond Road, Peasmarsh,**

We believed the site signage proposal is excessive in this rural location opposite the crematorium. Two much smaller signs of similar design to that proposed would meet the applicant's legitimate requirements. The signs should be illuminated only during business hours.

*(Approved following receipt of amended plans for the signs)*

**19/CON/00035: Boxgrove Primary School: Consultation by SCC**

We expressed surprise at the county council's apparent non-compliance with conditions, in particular the travel plan. We considered it important that public and educational bodies in particular set a good example in adopting coherent travel plans and complying with legal requirements. We trusted that such a plan meeting current requirements will be devised and subsequently monitored for compliance.

*(Approved)*

**19/P/01709: Ramada Jarvis Hotel, Guildford Road, East Horsley**

It is not clear to us whether this proposal for six houses is in the East Horsley Village settlement boundary or not. If the site is outside the settlement boundary then we object to this application on the grounds that it will be detrimental to the openness of the Green

Belt. If the site is within the boundary we do not object but would like to see some safeguards: we would like all the trees along the A246 boundary to be protected with a group TPO. In addition the openness of the view of the site corner on passing the Ramada Hotel from the Guildford direction should also be protected. We also had comments on the site layout.

*Refused. The site was judged to be within the East Horsley Village settlement boundary but the application was refused because there were significant concerns about the design and layout impacting the context and character of the surrounding area; and because of the proximity of the proposed dwellings to the existing hotel where there could be adverse impacts from noise and disturbance to future occupants of the development.)*

**19/P/01726: Land at Church Street Effingham**

Twenty dwellings are proposed. We urged that measures be taken to preserve the character of the adjacent Church Street and grade 2\* listed church, including an open aspect across the amenity space and the frontage of the amenity space to the apartments, retention of vegetation along Church Street, limitation of future permitted development rights relating to rear garden fences or walls and for a group TPO to be placed on the trees on the church boundary. A very powerful letter of objection has been submitted by consultants employed by the residents of Effingham place and Ambledown.

*(Not yet decided)*

**19/P/00839: Land to the rear of Littledene, 2 Guildown Avenue**

We considered that the minor amendments recently submitted do not go nearly far enough to overcome the objections set out in our previous letter of 5<sup>th</sup> June. In particular, the reduction in height of 600 mm is insufficient.

*(Refused and appeal dismissed.)*

**19/P/01761: Elmsleigh Farm, Send Barns Lane, Send**

We considered that the consent for 6 houses granted for 17/P00680 should be treated as joint with the 8 houses proposed in the present application regarding the provision of affordable housing. This technique of splitting sites in this way and hence avoiding the requirement for affordable housing is to be deprecated. We noted that other LAs have taken measures to prevent this and asked what measures Guildford has taken and whether a contribution can be demanded from at the present application.

*(Withdrawn)*

**19/P/01825: 17 and 19 Epsom Road, Guildford**

Despite the four main amendments listed in the Planning Statement, we considered that the new proposals still do not overcome the criticisms by the Inspector in the failed appeal of the previous 18/P;01330. For example, the proposed aluminium glazing bars are out of character. The very strong horizontal elements, particularly at fascia level, are

also out of character and are harmful in that they merge the identities of the original two buildings.

*(Approved. Our concerns were noted but the Council's conservation officer did not raise an objection.)*

**19/P/01849: 17 and 19 Epsom Road, Guildford**

We objected to proposed fascia signs in the same way we had objected to the shopfronts in which they sit (19/P/01825). The signs are anodine acrylic material and detract from the street scene aesthetic. They should step down the slope whereas they form a uniform horizontal strip.

*(Approved. Whilst our letter was dated a few days before the case officer wrote his report it is possible it had not been received before it was written because no mention was made of our letter in the report. Nevertheless amending plans were received reducing the width of the proposed fascia signs.)*

**19/P/01857: Location: Dryden Court, Lower Edgeborough Road, Guildford**

We objected to this application for a block of six flats because it provides far too little amenity space to the rear. Such space as there is seems to be given over entirely to parking and hard standing, apart for a small heavily shaded strip behind the garage block. We also considered that the full height windows in the front elevation are out of character.

*(Approved, following receipt of amending plans which satisfied our concerns)*

**19/P/01863: 12 Albury Road, Guildford**

We objected to this application for a block of eight flats on several grounds. It does not comply with several of the amendments suggested by the Council in its pre-application advice. We enumerated these and emphasized that the number of units should be reduced for the reasons set out by the Council. Furthermore the proposed front door does not provide a "defined central entrance point" as claimed in the D & A Statement. We also objected to the balconies to the front, and considered that the excessive fenestration is not appropriate to its domestic character. We also considered that too many trees have been sacrificed.

*(Refused. The case officer largely agreed with us.)*

**19/P/01902: 6 Tunsgate**

It would seem to us that the tenants of 4 Tunsgate should not be given permission to use the pavement in front of 6 Tunsgate, as requested in this application, unless there is a condition that the permission lapses if the Tenants of 6 Tunsgate wish to use this pavement for their own café.

We wrote on 28th October 2018 concerning 18/P/01996 after a very useful discussion with Becky Souter and we urged "the production by the Council of guidance for the

location of outdoor seating in Tunsgate”. We recommended that any guidance includes this issue.

*(Approved. We are not aware that any guidance for the location of outdoor seating in Tunsgate has been produced.)*

**19/P/01944** (alterations to the existing shopfront) **and 19/P/01945** (two internally illuminated signs): **13 Friary Street, Guildford**

This building, previously Jamie Oliver, is highly distinctive and situated opposite the renowned and listed Rodborough Building, the Electric Theatre and appears in the foreground to motorists approaching St Nicholas Church on the one-way system. It was designed by Trevor Dannatt, one of the most important figures in British Modernism.

We urged the Conservation Officer to make a thorough appraisal of the merits and historical significance of the building, the opportunities for its conservation and increased contribution to the sense of history derived from the variety of interesting buildings and original uses nearby. We therefore questioned the McDonald’s wisdom of trying to superficially modernise the external appearance, and we did not feel the signs should be internally illuminated.

*(Approved. Both the conservation officer and the case officer felt that the alterations and the internal illumination of the signs was acceptable.)*

**19/P/01959 and 19/P/01960 (LBC): Yvonne Arnaud Theatre, Millbrook**

We found there was insufficient information within the application to permit a proper assessment of the proposed telecommunications upgrades. We would expect any new or replacement equipment to be sympathetic to the character of this landmark building and asked the conservation officer to make a proper assessment of the proposals.

*(Approved following receipt of amended plans and details which satisfied our concerns.)*

**19/P/01974: 1-5 The Quadrant, Bridge Street and The Casino Nightclub, Onslow Street, Guildford**

This application was for the demolition of all buildings and for the erection of a 10 storey building plus two basements for use as a shop (A1), financial and professional services (A2), restaurant and cafe (A3), drinking establishment (A4), office (B1a), nightclub, casino, assembly and leisure (D2) including cinema, concert hall and bingo hall, and student living accommodation. This was possibly the most controversial application in this six month period.

We objected to the proposal in the strongest possible terms on multiple grounds, some of which were:

1. The proposal represented a huge overdevelopment that would be substantially overbearing; it is totally out of scale with its surroundings notably the listed Rodborough Building and associated conservation area.
2. The pedestrian crossing of Onslow Street is notoriously busy (and recently fatal) and will continue to be the principal route between the train station and town



centre including the bus station. Commonsense suggests that the design and siting for development of this site should respect the opportunities at Bedford Wharf but as proposed it is an impediment to pedestrian flows.

3. A major concern, often overlooked by the public passing comment, is the real flood risk to which the site is exposed since the night club proposal includes a double basement. There are many instances around the world of high mortality tragedies at nightclubs due to the combination of high occupancy, intoxication and disorientation creating panic that overwhelms evacuation strategies in an emergency. The risks are heightened because customers may be occasional, thereby unfamiliar with the surroundings, and in a party mindset, in contrast for example to employees in familiar surroundings where disciplined behaviour is the norm. Floodwater would overwhelm this nightclub far faster than any fire.
4. We believed student living particularly inappropriate juxtaposed with nighttime leisure, the more so given the applicant's long-standing campaign to establish a casino. Access arrangements to the student accommodation are insufficient.
5. Successful casinos typically rely on wealthy overseas visitors which are rare in Guildford. To be viable here therefore would necessitate growing the market with a strong likelihood of a focus on exploiting synergies with the nightclub and the other functions catering for young impressionable adults. To contemplate a casino here would be wickedly irresponsible.
6. The proposal is for a tall building in the historic part of the town centre, in the conservation area and opposite the Grade II listed Rodboro buildings. The development would also affect the significance and setting of several heritage assets in the surrounding area.
7. Basement bike parking on this scale is unrealistic due to dependence on a single lift and likely peaking of demand.
8. The layout of the student accommodation is poor and lacks natural light to the common areas which is important for orientation as well as making the space welcoming and human.

*(Refused. In addition to agreeing broadly with the objections we raised it was considered the proposed development would result in a prominent, isolated tall building of considerable mass and scale which would be visually dominant and detract from the Guildford as a historic, river valley, county town.)*

**19/P/02019 and 19/P/02029 (LBC): Molton Brown, 42 High Street**

We objected to the size of this proposed hanging sign which should respect that of the established dimensions of 600x600 millimetres.

*Approved. The Council's Conservation Officer commented that the size and position proposed are similar to others in the street. The method of a hanging sign is welcomed as opposed to the projecting style. Therefore, the proposal would preserve the character and appearance of the listed building and the conservation area and as such was found to be acceptable in this regard.)*

## **DECISIONS ON APPLICATIONS PREVIOUSLY REPORTED BUT NOT FULLY RESOLVED AT THE TIME OF THE LAST REPORT**

### **19/P/00167: Wanborough Business Centre, West Flexford Lane, Wanborough**

We objected to this application for a change of use and for the construction of eleven houses because we were concerned about creeping development in a greenbelt location. The local plan now includes significant green belt site allocations calculated to meet 140% of the latest assessed demand so development should be focused there save in exceptional circumstances. This was not such a case.

*(Refused and appeal dismissed. The Inspector agreed that it was an inappropriate development in the greenbelt.)*

### **19/P/00407: Plot 5, Guildford Business Park, Guildford Business Park Road, Guildford**

We strongly objected to this application for a seven storey student block of 360 units which we considered to be over-large, totally out-of-scale and inappropriate to its setting. We also objected to the adverse impact which the proposals will have on viewpoints from both the south (e.g. locations such as Pewley Downs, Bright Hill, and Guildford Castle) and certain closer views from the north. From various viewpoints the excessive height of the proposed development will seriously intrude on the profile of the Cathedral. Any redevelopment of this site should be no greater than the height and bulk of the approved office scheme.

*(Refused and an appeal is now running)*

### **19/P/00839: Land to the rear of Littledene, 2 Guildown Avenue, Guildford**

We objected to this application for a large new house because its height will be excessive and higher than any of the previously permitted houses on this side of The Mount; it will be overdevelopment of this site, being the first to be seen on this side of The Mount after the graveyard; it will make an excessive impact on views looking up The Mount and it will impact adversely on the skyline.

*(Refused and the appeal dismissed. Our objections were the principal reasons for refusal.)*

### **19/CON/00023: 81 Commercial Way, Woking**

This was a consultation application for a 39 storey block in the centre of Woking standing apart from the blocks of up to 34 storeys now being built. We decided to write a comment via the Woking planning website on the Woking application PLAN/2019/0611. We noted that the height and bulk of the building proposed would be greater than that of any of the high buildings under construction in Woking. These buildings are in a single

cluster and make a distinct and contained intrusion on the skyline as seen from many points near Guildford. We objected to the creation of a second cluster as an unwelcome further intrusion on the skyline. If there is to be a second cluster, we consider that it should be subservient to and lower than the present one, and that no building in Woking should exceed the height of the North Downs ridge near Guildford, which is approximately equal to the height of the highest buildings in the present cluster. We also objected to the proposed internal lighting of the upper floors as it would be very visible from Guildford after dark.

*(Refused in March 2020 mainly because of the height, scale, bulk etc; because it would harm the setting of the adjacent Grade II listed building (Christ Church); and because the development would fail to deliver sufficient affordable housing.)*

### **18/P/01668: 1-5 The Quadrant and The Casino Nightclub, Onslow Street, Guildford**

We objected to this application for a 14 story building in the strongest possible terms. It proposed a development which was grossly excessive and completely out-of-character with Guildford both in terms of its enormous height and the way in which it overhangs the boundaries of the site. Even in comparison with the massive Solum development, this proposal is far too high and it will have a serious adverse impact on views from both within and across the town centre and from viewpoints outside the town including the Surrey Hills AONB.

The use of extensive glazing on the elevations of parts of the upper floors would not only be incompatible with the historic character of the town but, in the hours of darkness, light from this glazing will cause light pollution and result in the structure standing out in an inappropriate way.

In addition to other uses the development proposes 10 floors of student housing. We considered these student units will be provided with inadequate communal facilities and that many of the units are substandard as they will only receive natural light from a totally inadequate light well. Given the amount of student accommodation currently being constructed or proposed in the area of Walnut Tree Close we are very much concerned that a further increase in student accommodation as proposed in this application will lead to an imbalance in the nature of housing in the area. A further deeply troubling concern is the juxtaposition of a considerable amount of student accommodation in such close proximity to a casino and nightclub. That specific concern is in addition to our view that, in principle, we consider a Casino to be an inappropriate use for Guildford Town Centre.

We also commented forcefully on inadequate bike storage in the basement and on serious risks from flooding.

*(Refused and an appeal was commenced. A long way down the track the appellants withdrew the appeal and in September 2019 the council made a costs application against the appellants. It will be interesting to see the outcome. As at September 2020 a decision had not been made.)*

John Wood

October 2020