



**National
Trust**

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8th September 2014

Planning Department
Guildford Borough Council
Millmead House
Millmead
Guildford
Surrey
GU2 4BB

Dear Sir,

**Guildford Borough Local Plan – Strategy and Sites
Guildford Town Centre Vision 2014
Consultation Summer 2014**

The National Trust is pleased to comment on the draft of Part 1 of the new Local Plan. As you are aware we own and manage several properties within the Borough including the River Wey and Godalming Navigations, Shalford Mill, Clandon House and Garden, Hatchlands and land at Netley Park, Little Kingswood and Hackhurst Down. These properties are of significant economic, social, environmental and amenity value. The Trust has a statutory duty under the National Trust Acts to promote the permanent preservation of these properties for the benefit of the nation in the long term.

VISION

The draft Vision is brief and concise and we support this approach. However we consider that greater emphasis should be placed on building on, and protecting, the historic, cultural and environment assets that make Guildford special. The environmental and historic assets of the Borough are in large part, the foundation of its success. There is great potential to enhance these assets, not only for the amenity, environmental and cultural benefits this would provide, but also for the economic and social benefits that this would bring. The plan does indicate in some of the policies that the Borough now intends to take such an approach and we welcome this, but the intent is not always followed through in terms of detail and, for example, site allocations and proposed settlement boundaries. We believe that protecting

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and enhancing the environmental, historic and cultural assets of the Borough should be made explicit as a fundamental part of the Vision.

DRAFT POLICIES

Policy 6 – Making Places Better

The National Trust fully supports this policy. However since this is the key policy dealing with design in the plan we suggest that the wording of the third / fourth bullet points in the last section is amended to :

All developments will

- be expected to ensure that the scale, form, siting, materials and landscaping are appropriate to their setting and take into account the context in which they are sited

Policy 9 – Villages and Major Previously Developed sites

West Horsley

As stated in our representations of 7 November 2013 we object to the removal of West Horsley from the Green Belt. West Horsley is smaller in scale, and very different in form and character from East Horsley and its rural nature and proximity to Hatchlands Park are such that we believe it should be retained within the Green Belt.

A future aspiration should be to extent northward the current boundary of the Surrey Hills AONB to wash over Clandon, Hatchlands, West and East Horsley.

Send

We object to the removal of the village of Send from the Green Belt. The scale, form and open, rural character of the village is such that it makes a significant contribution to the openness of the Green Belt. In particular we object to the proposed extension of the village boundary to the west and north of the village along the River Wey where any development would severely adversely affect the setting and amenity of the river and the conservation area. This area is currently within the Corridor of the River Wey and also provides the setting to the village itself. The proposed boundary would affect almost 2 kilometres of the riverside. Development within this area would be totally contrary to policies for the protection of the setting of the conservation area and thus the policies of the NPPF as well as the stated intentions of the plan to protect and enhance both the riverside and the historic character and heritage assets of the Borough.

College of Law / Mount Brown

We object to the proposal to remove the Law College / Mount Brown from the Green Belt. This site lies within the AONB / AGLV and within the St Catherine's conservation area. This site is close to the River Wey and is visible from Shalford Park to the east of the river which
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lies within the Corridor of the River Wey. The redevelopment of this site could have a potentially major impact on the amenity of the River Wey and the setting of the River Wey Conservation Area, the AONB, the St Catherine's conservation area and the setting of the St Catherine's Scheduled Ancient Monument. The site makes a significant contribution to the Green Belt and lying on the periphery of the urban area it is crucially important to ensure it remains essentially open in character. Its removal is therefore not in accordance with paragraph 85 of the NPPF.

Policy 12 – Historic environment

We support this policy. In terms of detailed policies for the protection and enhancement of the historic environment we understand that these will be prepared as part of the 'Delivering development' document and we look forward to contributing to this, particularly regarding continued protection for the Corridor of the River Wey, which we believe is a useful and important policy. We also look forward to assisting with the preparation of any Conservation Area Appraisals that the Council is undertaking which include or affect National Trust property, such as the River Wey, West and East Clandon and West Horsley.

Policy 14 – Leisure and visitor enjoyment

We support this policy.

Policy 15 – Town Centre – Guildford Town Centre Vision 2014

We support the draft Vision for the town centre and Policy 15. As owners of the river bed and majority of towpath (but not adjoining land) and as the navigation authority we believe there is great potential to enhance the visual, amenity, historic and nature conservation value of the riverside and to integrate it more fully within the town centre. The implementation of this policy needs to be carried through in the development of proposals, and the determination of applications, for key town centre sites. We note the Borough will prepare an SPD for the Town Centre. We look forward to contributing to this document and trust it will be an early priority to secure the implementation of Policy 15.

The Trust has prepared 'Principles for development affecting the River Wey Corridor in Guildford Town Centre' which consists of 10 bullet points. These were attached to our previous representations and are appended to this letter. We believe that, in line with the emphasis in the Plan on protecting and enhancing the historic environment (Policy 12), on Green and Blue Infrastructure (Policy 19) and because of the importance of the river within the Town Centre, the Council should consider endorsing these key principles and append them to the Policy or add them in the supporting text. These principles are fundamental to the protection of the setting of the River Wey Conservation Area within the town centre.

All land and buildings owned by the National Trust in the centre of Guildford have been declared inalienable under the National Trust Act of 1907 and enjoy special protection.

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A separate more detail response to the Guildford Town Centre Vision 2014 concept document is attached as is the National Trust Guidance for Development Next to the River Wey and Godalming Navigations.

Policy 19 – Green and blue Infrastructure

We support this policy. The Trust welcomes the specific reference to the River Wey, our planning guidelines, which builds upon the earlier Environmental Strategy adopted in the existing local plan, and the reference to the fact that these have informed the Policy. The Trust's main focus is less about the type of development, residential or commercial, but that any development is mindful of and respects the historic character of the river corridor in terms of scale, design, materials, lighting and location.

SITE ALLOCATIONS

Town Centre sites

A large number of the sites allocated for development / redevelopment within the town centre lie either immediately adjacent to the River Wey and Godalming Navigations or are within the 'Corridor of the River Wey' (existing Local Plan Policy G11). These include

- 21 - Portsmouth road surface Car Park
- 22 - 1 and 2 Station View
- 23 - The Plaza, Portsmouth Road
- 24 - Guildford Railway Station
- 25 – Land at Bedford Road
- 29 – Jewsons, Walnut Tree Close
- 30 – 77-83 Walnut Tree Close
- 32 – Buryfields House
- 33 – Crown Court
- 34 - Debenhams
- 36 – Council Offices, Millmead
- 39 – Bus Depot, Leas Road
- 40 – Methodist Church, Woodbridge Road
- 42 – Riverside Business Park
- 48 – Slyfield Regeneration
- 49 – Bishops Nissan Garage, Walnut Tree Close
- 50 – Kernal Court, Walnut Tree Close
- 52 – Wey Corner, Walnut Tree Close

The number of sites only serves to emphasise the importance of the riverside in the future of Guildford Town Centre, the potential for enhancement and the importance of cohesive guidelines for development along the river. The Trust does not object to the allocation of these sites in principle but wishes to emphasise the importance of a cohesive strategy for development and for access. We wish to continue to be consulted on planning applications on these sites and any others affecting the River Wey.

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Site 73 – Land to the west of West Horsley (south)

The National Trust objects to the allocation of this site for housing. The site lies immediately adjacent to National Trust property at Hatchlands. The Trust also owns Barnside Cottages, immediately to the south of the site. Hatchlands is a Grade II Registered Park and Garden of Historic Interest and Hatchlands House is a grade 1 listed building. The site is currently unspoilt open countryside and rural in character and contributes to the setting of the village and the conservation area. The Trust believes that the development of this site for housing would have an adverse impact on the setting of both the Park and Garden and the amenity of the village and surrounding area and its allocation would be contrary to the principles for heritage protection set out in the NPPF.

As mentioned above consideration should be given to extend the northwards the boundary of the Surrey Hills AONB to wash over Clandon, Hatchlands, West and East Horsley.

Site 75 - Land at Tannery Road Send.

The National Trust objects to the allocation of this site. The site is largely green field and falls within the Corridor of the River Wey. It is therefore currently subject to Policy G11 of the Local Plan where the special character of the landscape and views are to be protected or improved. Only the extreme southern portion can be considered previously developed land. The development of the site for housing and a village car park would seriously compromise the setting and amenity of the River Wey and the conservation area and is contrary to the policies of the NPPF for heritage protection as well as the stated intention of the plan to protect and enhance the historic environment.

Site 77 – Land to the south of Clandon Station and north of Meadowlands

The National Trust objects to the allocation of this site for a secondary school. The location is a green field site adjacent to the conservation area in West Clandon and immediately to the east of Clandon House and Garden. Clandon House is a grade 1 listed building set within a grade II Registered Park and Garden of Historic Interest. The National Trust owns Clandon House and has covenants over much of the parkland.

The Trust is not convinced of the need for a new secondary school in this location. The proposal would be likely to have an unacceptable impact on the highway network and the resulting traffic flows would be likely to severely adversely affect the amenity of residents of the village. It appears that no assessment of alternative sites has been undertaken and no assessment of the impact of the proposal.

APPENDIX – SETTLEMENT BOUNDARIES

We request that in the forthcoming Submission Local Plan the River Wey Corridor is shown on the relevant settlement maps and the key diagram as in the current Local Plan. This would give added weight to the stated intention of the plan to protect and enhance the riverside.

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Send

We object to the proposed settlement boundary for Send. As stated above the proposed boundary would affect almost 2 kilometres of the riverside. Development within this area as allowed under Policy 9 would be totally contrary to policies for the protection of the setting of the conservation area and thus the Policies of the NPPF as well as the stated intentions of the plan to protect and enhance both the riverside and the historic character and heritage assets of the Borough. The open area on the north and west side of the village provide the setting for the village and for the River. There is an existing strong boundary along the northern side of the village. The existing settlement boundary should be retained.

West Clandon.

We object strongly to the inclusion of the proposed 'infrastructure site' as an inset from the Green Belt for the reasons set out above regarding the allocation for a new secondary school.

Yours sincerely

John Gibson
General Manager
River Wey & Godalming Navigations

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APPENDIX

Principles for development affecting the River Wey Corridor in Guildford Town Centre

- Seek to ensure that proposals for redevelopment on existing developed sites adjacent to the Navigations and the conservation area or within their visual setting, are appropriate in terms of building height, bulk, scale, form and materials,
- Resist proposals which bring buildings or other structures closer to the Navigations (unless historical precedent dictates otherwise) and support, in principle proposals which result in buildings being further set back from the Navigations,
- Seek to ensure screening of moving vehicles, parking and loading areas on sites adjacent to the Navigations,
- Resist proposals for development which include parking, loading areas and access roads adjacent to, or visible from, the Navigations,
- Seek to enhance access for all to, and along, the Navigations and to improve amenity for all users,
- Resist proposals which are likely to result in an increased risk of flooding, an adverse impact on the water table, or destabilise the banks of the Navigations,
- Seek to ensure that existing riverside trees are maintained and encourage new planting where appropriate,
- Seek opportunities to unify visually the design, materials and colour of waterway / riverside furniture, fencing and structures,
- Seek to prevent light and noise pollution in the waterway environment.
- Seek funding and support for ongoing maintenance.

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