



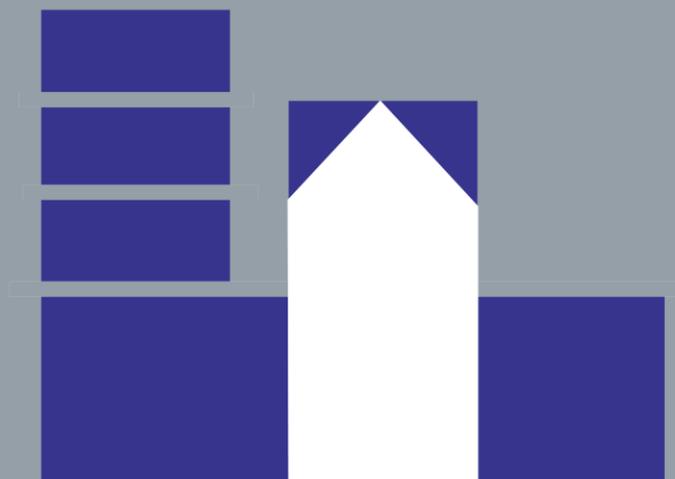
**FODDY**  
CONSULT

**Site Allocation:** A15 Land at Guildford Cathedral GU2 7UP

**Representor:** THE CATHEDRAL OF THE HOLY SPIRIT,  
GUILDFORD

**Topic:** 11.3 How is it intended to mitigate the  
effect of the site on the setting of the  
Cathedral?

**Date:** 9th May 2018



## **1. INTRODUCTION**

---

- 1.1 FoddyConsult has been instructed by The Cathedral of the Holy Spirit, Guildford (The Cathedral) with regard to responding to question 11.3 identified on the cover of this document as raised by the Inspector examining the Guildford Borough Submission Local Plan 2017.
- 1.2 The Inspector has confirmed his willingness to take a submission from the Cathedral regarding question 11.3.

---

## 2. THE SITE

---

- 2.1 The land at Stag Hill that is the subject of this response is located to the south and east of Guildford Cathedral as identified in red on the aerial photograph below and totals approximately 3.46 hectares. It is entirely within the ownership of the Cathedral.



- 2.2 Guildford Cathedral was constructed between 1937 and 1965, was consecrated in 1961 and is at the heart of the Diocese of Guildford. However, geographically it occupies an isolated position atop a steep hill on the outskirts of Guildford. Designed with the motor car in mind, the Cathedral's isolated location leads to difficulties in accessibility for pedestrians as well as serving to underline a sense of lofty separation from the town. It is a published long term objective of the Cathedral to reduce this physical separation from the surrounding suburb and town centre.
- 2.3 The land that is the subject of this response slopes away from The Cathedral to the south and east with the apex of Stag Hill being located immediately to the east of the Cathedral itself. The hill is predominantly heavy clay. On the surface it comprises very little other than rough grass, overgrown mixed hedging and some insignificant trees.

### **3. THE EMERGING ALLOCATION**

---

- 3.1 Emerging submission draft local plan policy reference A15, Land at Guildford Cathedral, confirms in principle support for using part of Stag Hill for residential development and carries a proposed allocation for 100 new dwellings (28 dwellings per hectare).
- 3.2 Comments on the emerging Guildford Local Plan were submitted to Guildford Borough Council (GBC) in July 2016 by the Cathedral and Linden Homes in support of a detailed planning application made by the Cathedral and Linden Homes for 134 dwellings in October 2015. (Appendix 1). The representation presented a qualified argument that without causing any 'significant harm' to the setting of the listed Cathedral, the available development site could accommodate a level of new development in excess of the suggested 100 dwelling reference and indeed up to a level similar to that included within the planning application for circa 134 new homes.
- 3.3 This submission continues to suggest that with the mitigation measures contained in this statement, the site has potential for a greater level of development than currently suggested in the draft allocation and as a benchmark it is suggested that without leading to any additional unacceptable harm to the heritage asset, the site capacity could be increased to say 134 dwellings; a figure tested through the recently determined planning application. (Appendix 2: GBC Planning Committee Report, Agenda item 5(1), planning application 15/P02284 - Land at The Cathedral Church of the Holy Spirit, Stag Hill, Guildford, GU2 7UP, 7th February 2017)

---

## 4. THE SITE & SETTING OF THE CATHEDRAL AND IMPACT OF THE PROPOSED DEVELOPMENT OF STAG HILL

---

### Description of Heritage Asset

- 4.1 The Cathedral was designed by Sir Edward Maufe in 1932/3. The building itself was the result of a competition to design a cathedral for the newly formed Diocese of Guildford. It is one of only three Anglican cathedrals built in England since the 17th century.
- 4.2 The Cathedral is an imposing structure sited on the crown of Stag Hill. The architecture is noted as being a "*modified gothic style with arts and crafts influences.*" Writing in 1932, Sir Edward Maufe noted that "*The idea has been to produce a design, definitely of our own time, yet in the line of the great English Cathedral; to build anew on tradition, to rely on proportion, mass, volume and line rather than on elaboration and ornament.*" The construction is of brick with stone dressing.
- 4.3 Today, the Cathedral sitting on a lush green hill is a visually prominent landmark that is very much representative of the town of Guildford. The building has a commanding presence in many views across the town both during the day and at night when it is floodlit.

### Significance of the Heritage Asset

- 4.4 Guildford Cathedral is a grade II\* listed building.
- 4.5 The significance of the Heritage Asset and its setting are key drivers in assessing the development potential of the land at Stag Hill. In this instance it is important to consider the degree to which the setting contributes to the special interest of the Cathedral and what impact the development of Stag Hill will have on the listed Cathedral. In order to do this, it is important to consider the history of the site in addition to the site as it stands today.
- 4.6 The Cathedral stands on land which was originally a royal forest and later formed part of the estate of the Onslow family. Historically, the Onslow family had been slowly selling off land to the north and west of Guildford for housing since the early 1920's, so establishing their involvement with the residential growth of the town. In 1936 they gifted a rectangular plot on the crown of the hill for the new Cathedral. Only later did the Diocese acquire additional land to the west and south for the provision of access.
- 4.7 It is agreed that Maufe's original competition design for the Cathedral, whilst showing a processional route predominantly for cars from the west and another for pedestrians from the south, did not further consider the general environs of the Cathedral in terms of additional landscaping. In 1954 a site plan drawn by Maufe does show the lodge buildings on Alresford Road as well as buildings to the south and north of the west end of the Cathedral. These buildings to the south were proposed as housing for the

11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?

- Provost, Precentor and Canon and the building to the north was identified as housing the administrative offices and a restaurant. We therefore interpret this to mean that Maufe's intention was that there would be additional building on the slopes of Stag Hill in addition to the Cathedral itself. A site plan of 1957 further supports this assertion in that the areas around the Cathedral and western approach are "*not to be built upon*", but the remaining parts of the site are left free of any designation / intention. The conclusion of recent paper by Asson Associates, based on research by the Cathedral Architect, Sub Dean and Precentor and several historic experts, is that "*There is no evidence that (Maufe) regarded other parts of the site sacrosanct or that he would have opposed appropriate development.*" (Appendix 3: Asson Associates - Edward Maufe and the Setting of the New Cathedral, 2015)
- 4.8 GBC contends that the open landscape surrounding the Cathedral is paramount to its setting. "*The open setting accentuated by avenues leading the eye to the building contributes to (the Cathedral's) significance. The buildings visual dominance as a symbol of the new diocese was paramount and the open and uncluttered nature of Stag Hill is an important feature of the site in both long and short views.*" (Appendix 2: Extract from GBC Planning Committee Agenda item 5(1), planning application 15/P02284 - Land at The Cathedral Church of the Holy Spirit, Stag Hill, Guildford, GU2 7UP, 7th February 2017)
- 4.9 Great weight is given to Historic England's (HE) contribution to the debate. Their view is that "*the setting of Guildford Cathedral does indeed make an important contribution to its significance. The question we debated was the extent to which Maufe conceived the Cathedral as an integral component of a much wider masterplan.*" (Letter dated 6th November 2015 to Asson Associates). In brief, HE's conclusion is that "*Maufe's concept (was) for a monumental building set atop a denuded landscape, with an austere approach to planting around the building.*" However "*an absence of architectural features beyond the southern and western approaches should not be interpreted as an absence of intent if, as we think, Maufe consciously intended the Cathedral to sit atop a denuded landscape to emphasize its prominence.*" Whilst this is clearly of paramount importance in assessing the degree of impact on the Cathedral any development of the slopes of Stag Hill might have, HE also acknowledges the weight that must be given to creating a sustainable future for the heritage asset as well as the public benefit of ensuring its continuance. HE acknowledges that these elements must be weighed against each other in accordance with the backdrop of planning policy, particularly NPPF para 129 concerning the need to minimise harm so as to avoid conflict between conservation of an asset and any aspect of the proposal; para 132 requiring clear and convincing justification for any harm to the significance of heritage assets and para 134 which requires a balancing exercise between the harm to be caused by and the public benefits arising from a proposal. (Appendix 4 contains all HE correspondence)
- 4.10 In short, HE's view, as summarised in correspondence dated 6th November 2015, 15th January 2016 and 25th January 2017 (Appendix 4), is that "*proposed housing on land south and east of the Cathedral would, in NPPF policy terms cause some harm to the significance of the grade II\* listed Cathedral. However, we understand that the development is necessary to create an endowment that would help secure the long*

11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?

*term financial security of the Cathedral which is a considerable heritage benefit that we think should be weighted accordingly under the exercise required by Paragraph 134 of the NPPF.*" (6th November 2015). In their letter of 25th January 2017 following certain amendments to the planning application scheme 15/P02284, they qualify this statement confirming that the reference to "some harm" is "in line with the requirements of Paragraph 129 of the NPPF and Historic England is satisfied that the requirements of this policy have been met." Further, they conclude that whilst the amended scheme "would cause some residual harm to the significance of the grade II\* Cathedral.....it would be less than substantial in NPPF policy terms."

- 4.11 Finally, HE also asserts that whilst Sir Edward Maufe's plans are important, what is of greater importance is "the way in which the setting of the Cathedral is appreciated today." This underpins the point GBC makes and is the basis for a proposed raft of measures aimed at mitigating the impact of development on the Cathedral.

#### Significance of / Impact on Wider Views

- 4.12 Significant consideration has been given to the importance of the site of the Cathedral and the immediate impact of potential development, but consideration must also be given to the wider setting in terms of the context of the town of Guildford as identified in 4.3 above.
- 4.13 The town of Guildford sits in a valley with Stag Hill being a visible presence from many vantage points within and across the valley. Guildford Cathedral is therefore a very visible and somewhat iconic edifice whose relationship with other heritage assets is important, most notably Guildford Castle (a scheduled ancient monument), the Jellico roof gardens (grade II listed) and the town centre conservation area. Whilst GBC asserts that development proposals on the slopes of Stag Hill will "have a clear impact on the longer views.....it is difficult to argue that this will cause substantial harm to the significance of this heritage asset." (Appendix 2: Extract from GBC Planning Committee Agenda item 5(1), planning application 15/P02284 - Land at The Cathedral Church of the Holy Spirit, Stag Hill, Guildford, GU2 7UP, 7th February 2017). GBC continues by commenting that "The Cathedral will still be seen on top of Stag Hill and the roofs of the new development will blend into the rest of the townscape." In conclusion, the Council assesses that such a proposal as the joint Cathedral / Linden Homes application (planning application ref: 15/P02284) will "cause less than substantial harm to the setting of the grade II\* listed Cathedral Church of the Holy Spirit in both the long and short views of the site." However within this bracket, they contend that the level of harm will be "considerable."

#### Significance of Conserving Guildford Cathedral

- 4.14 As touched upon by HE, Guildford Cathedral, as a grade II\* listed building, is in the top 8% of all listed buildings in England. It is therefore of national importance and both HE and GBC agree that "great weight" should be attributed to ensuring the building's conservation. GBC agrees that the Cathedral has provided "clear and convincing" viability and financial information concerning its need for an endowment fund, generated by the sale of land at Stag Hill for residential development to sustain the long term future of the building. This is an important public benefit which will help

11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?

secure the building's "*optimum viable use*." Without the ability to generate an endowment fund, the Cathedral's future is highly uncertain. The slopes of Stag Hill deliver the last available option to generate funds from the sale of a Cathedral asset.

---

## 5. PROPOSED MITIGATION MEASURES

---

- 5.1 It is clear that the issue of prime importance relates to respecting the Cathedral and its hill top setting. Landscapes and city/townscapes are by their very nature, evolving and should be celebrated for their layers of rich history combined with modern innovation. The town of Guildford has changed significantly since the Cathedral was first conceived with new residential development to the south and east of the Cathedral and University development to the north as well as the maturing of largely self-seeded vegetation. Additional contiguous development should therefore not necessarily be seen as out of character within the receiving townscape. However, the issue of mitigating the impact of such development is clearly of prime importance.
- 5.2 Drawing on the significant input from numerous technical experts, GBC, HE, the Cathedral Fabric Commission for England (CFCE) and other statutory bodies, the Cathedral has benefited from a wealth of expertise in terms of addressing the issue of mitigation. A number of general principles have therefore been established and discussed with GBC officers in this respect. Additional guidance has also been provided by HE and taken on board by the Cathedral. Each proposed measure for minimising the impact of development on the Cathedral will therefore be covered in turn in the ensuing paragraphs of this section.
- 5.3 The significance of the Cathedral's hilltop location has been discussed extensively. Whilst there is a precedent in terms of existing, though limited Cathedral owned residential accommodation already on the slopes of Stag Hill, it is felt that the very highest point of the hill, to the east of the Cathedral beyond the Memorial Garden, should remain devoid of housing. It is accepted by the Cathedral that some separation of development from the building itself is important to avoid harm in terms of the appreciation of the Cathedral itself as standing atop a verdant hill.
- 5.4 Also supporting this principle, it is acknowledged that housing immediately to the south of the Cathedral should allow for there being a degree of separation between it and the Cathedral itself to avoid seriously impacting the sense of the Cathedral rising up above the hill.
- 5.5 Following this theme, sight lines to the Cathedral, from surrounding vantage points will be preserved. It is therefore felt that roof lines should not be allowed to impact on significant views of the Cathedral particularly from the western and southern processional routes as well as from the Old Court Road / Alresford Road junction.
- 5.6 In terms of longer distance views, particularly from some of Guildford's other heritage assets, for example Guildford Castle and the Jellicoe roof gardens, the topography of the town and existing residential development already leads to a sense of there being housing which climbs up towards the Cathedral. However, retention of a sufficiently large enough green belt between new housing and the Cathedral as experienced in

11.3 How is it intended to mitigate the effect of the site on the setting of the Cathedral?

the existing long views will be retained as fully as possible. It should also be noted that GBC's 2017 approval of the Guildford Park Road scheme further undermines the misconception that Stag Hill is a lush, undeveloped hillside unobstructed by built development. GBC's own planning committee report states that "*the (Guildford Park Road) proposal would result in some harm to the setting of Guildford Cathedral, Guildford Castle and the Jellicoe Rooftop Gardens.*" In NPPF terms "*some harm*" is certainly of greater significance than "*less than substantial harm*" as noted by HE in respect of the previous Stag Hill proposals.

- 5.7 Whilst the lushness of Stag Hill can be debated, particularly in respect to the quality of vegetation growing upon it, it is felt that as part of a new residential development, an opportunity should be taken to better reveal the significance of Maufe's original landscape proposals by reinstating the lost avenue of trees south of the Cathedral as well as addressing the state of the poor quality steps leading up from the south. Improvements to this southern processional route in conjunction with a formal landscaping scheme would deliver a significant heritage benefit.
- 5.8 In terms of the proposed on site planting, a new development will allow for the provision of better quality landscaping and vegetation in place of the somewhat random, self-seeded poorer quality undergrowth and foliage as currently exists. Landscaping will be inclusive of quality tree and shrub planting, turfing and the wild flower planting of amenity areas to give the development a softer feel. As much of the well established tree and hedge planting as possible will be retained.
- 5.9 HE has already commented on the need for this site to deliver a bespoke design solution. Providing a quality new intervention in the historic concept of Maufe's design is deemed as acceptable without the need to necessarily hide away the new development. Design proposals will therefore deliver a bespoke product in accordance with the site allocation which will be sympathetic to the Cathedral's style: for example facades will include a number of feature brickwork panels to add interest; buildings will be predominantly detached to allow visual breaks in the massing and views through to the surrounding Guildford townscape; development will deal with the level changes in an attractive way with housing staggered up the hill and including split level up slope and down slope units; the layout, scale and appearance of dwellings will be combined with proposed surface treatments to assist in creating a sense of space; materials will be sensitively chosen to reflect the best of local design; the site will only be lit with low level bollard lighting so as not to detract from the night time lighting of the Cathedral; a sensitive boundary treatment plan which blends in well with the existing surroundings will also be incorporated.
- 5.10 Without a defined layout plan it is difficult to be more specific, but the Cathedral is eminently aware of the need to deliver a bespoke, sensitively designed scheme that not only respects the Cathedral building itself, the history of Stag Hill and the visual impact of Stag Hill, but which also respects existing nearby housing, delivers improved pedestrian permeability to the site and sustainable transport links and, most importantly for them, generates a sense of community around the Cathedral that is currently lacking and which marks Guildford out as being unlike many other cathedral towns and cities where the cathedral is very much at the heart of the community.

---

## 6. CONCLUSION

---

- 6.1 The 2015 planning application for 134 homes, for which the planning committee report is attached (Appendix 2), demonstrates that there is a development solution in order for a greater number of homes to be constructed on the slopes of Stag Hill, without causing any additional significant harm to the Cathedral or its setting, than the allocation in the submission draft local plan suggests. Consequently, it is requested of the Inspector that he considers amending the draft site allocation to reflect the fact this site may be capable of sensitively accommodating development to a level in excess of 100 dwellings subject to the appropriate impact assessment and incorporation of appropriate mitigation measures as outlined above.

---

## APPENDICES

---

<b>No.</b>	<b>Title</b>	<b>Author</b>
1	Comments on the Emerging Guildford Local Plan	Guildford Cathedral / Linden Homes / JTP / FoddyConsult
2	GBC Planning Committee Report, Agenda item 5(1), planning application 15/P02284 - Land at The Cathedral Church of the Holy Spirit, Stag Hill, Guildford, GU2 7UP, 7th February 2017	GBC
3	Edward Maufe and the Setting of the New Cathedral, 2015	Asson Associates
4	Letters dated: 6th November 2015 15th January 2016 25th January 2017	Historic England