



Mr John Busher
Planning Management
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*Please reply to: Dr John Baylis
Secretary of the Guildford Society Planning
Applications Team
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9th October 2022

Dear Mr Busher

22/P/01336 | A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising: Demolition of existing buildings; A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding; Erection of buildings ranging from 4 to 14 storeys

Case Officer: John Busher

The Society has examined this application in detail using the time and experience of its members, many of whom have professional backgrounds in Architecture, Planning, and Development.

The Society **Objects** to the application.

1. The Site needs Development

The site which covers part of the site outlined in Policy A5 in the current local plan is a complex triangular site which has remained dormant, being used mainly for carparking, for over two decades apart from the erection of Dominion house at the Northern end. The Society is supportive that a serious proposal by St Edward has now been bought forward for determination, and also commends the developers on the engagement we have had on developing the proposals. Having visited several St Edwards sites we have been impressed by the quality of construction and arrangement.

The proposed development has many attractive aspects including:

- A retention of basic road layout in the form of pedestrianised areas.
- Flexible Multi-use space on the ground floor to allow for development of active frontages.
- New public areas
- Proposals to make North Street more attractive through pedestrianisation.
- Sustainable Heating and Ventilation

2. Policies Guiding the Development

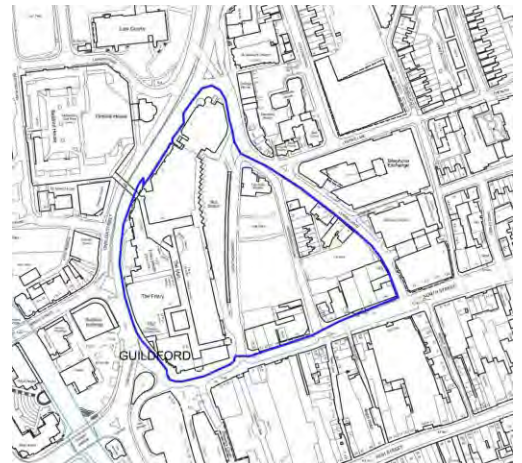
a. Policy A5

The original scope of Local Plan Policy A5 that refers to the site

Covered a wide area including a major frontage on North Street.

The St Edward North Street Plan is only covering a part of the allocated land in the policy

Plans are being developed or in progress for No1 Onslow Street (Red) and Norwich House (Yellow), other sites for commercial reasons have not been included in the Site. The Bus Station is utilising the space over the underground No1 Onslow Street parking area, which is difficult to build upon, together with a revision to the Bus Station Parking Bays and access.



- Red - No1 Onslow House Planning Applied for
- Green – Friary Centre
- Grey- Bus Station with No 1 Onslow House underneath
- Blue – St Edward North Street
- Yellow – Norwich House Planning Applied For

Key Considerations in Policy 5 include – “ If the forecast requirements for retail and leisure uses in the latest Retail and Leisure Study are updated in future either by the Council or by a study agreed by the Council then the balance of allocated uses for this site will be adjusted accordingly” St Edwards have commissioned the development of a Retail Planning Statement.

Question: Has this statement been adopted by the council as a correct view of the retail environment. If this has been adopted, it is a useful document as background for other town centre sites proposing new or reduced retail space.

The policy also proposed an additional 400 dwellings across the whole site. This now appears to have been allocated exclusively to the eastern sector of the site, with an uplift of 73 units partially in compensation for the Shopping area having been substantially reduced.

Question It would be useful for this major site that the Council updated the Policy A5 to describe the aspirations for the site which informs the parameters within which the applicant is now operating.

b. North Street

The plan area now covers a substantial portion of North Street. The society are not against revising North Street but believe it should be planned. Should a local SPD be developed to provide a strategic view for the street with details on mass and scale of buildings, use of buildings etc. As an example, rumours exist that one substantial property might be converted to a hotel – how is this to be accommodated on North Street when pedestrianised?

Question: Should a North Street SPD (or similar) be developed by GBC

3. Engagement

a) The Developers

The Society commends the developers on the level of engagement we have had on developing the proposals and welcome their use of a fully developed physical model to show the proposals.

We are concerned that like other developers St Edward have been using a highly dubious ‘Like Button’ on their website this can give a false positive. We have anecdotal evidence that on another development, a large number of likes came from a student party!!!

b) Visibility of Proposals

We note that Historic England were given access to a computer model VU-City, it is not clear who owns this virtual model, of the proposals. Figure 1 shows the station area, with the new Station Development and proposed Guildford Park Road. We are disappointed that this modelling has not as yet been used to inform the Public on how the development will look. See our comments on Leapale Road (Section 11b Below).



Figure 1 VU City - Guildford Station Area

We are also concerned that many of the Views consist of Wireframe outlines we would consider with computer modelling techniques that, at the very least, a representation of the buildings can be dropped into the Guildford Model for examination.

On schemes of this size and impact, all methods to explain and visualise developments should be used. The Council should be insisting on the availability of computer models for North Street.

We do object to the current proposals on the following grounds:

4. Mass and Scale of the Development

The society is happy to see the town evolve, as it must, but we believe the Mass and Scale of the development, together with its architectural treatment (See 7. Below) is an issue. The Society contends that the proposed Mass and Scale of the proposed development is fundamentally out of character with the town.

We note that Design South East have identified three views of concern stating that:

“ Most of the views of the site work well, however two views should be adjusted to avoid breaking the treeline: the Dapdune Wharf view (view 1) and the St Catherine’s Hill North view (view 3). Furthermore, from the Castle Motte view (view 7), the silhouette of the buildings together creates coalescence and distracts from the prominence of the view to the cathedral. To improve this view and avoid negative impact, different options should be explored for breaking down the scale of the flank elevations on the silhouette buildings. This could include introducing a different treatment of their edges and flanks.”

The Society agrees with the Design South East comments on these three views.

(Note: The views have been added as photographs of the completed scheme at Appendix A)

The Society has identified further views that we consider are unacceptable and invite DSE to reconsider in the light of our comments. The assessments they make are often finally balanced and we believe that on review they would properly agree that several further views are unacceptably affected.

Overall Townscape

- **Pewley Hill View 2** - Shows considerable impact from the development to the overall townscape.
- **Hogs Back View 4** - Combined with Solum and Guildford Park Road this shows North Street is the highest development in a ‘wall’ of new development stretching from North to South across the centre of the town
- **Stag Hill View 14** – The development is very visible and it is noted the view is taken from some way down the hill.

Pedestrian Views in the Town

- The Bars View 12
- Leapale Road View 18

Both the views demonstrate considerable impact on the town and illustrate the need to produce addition detailed views for surrounding roads notably down Leapale Road. With the focus on placemaking impacting existing areas with overly massive and intrusive buildings doesn’t seem sensible.

Woodbridge Road

- Woodbridge Road View 10

View of the proposed 14 Storey Building proposed for the north end of the site. The Northern Tall Block proposed for the site looks very problematic with its relationship to St Saviours, No 1 Onslow Street (itself subject to planning proposals 21/P/00539), and the BT buildings. Note if this view was shown from the eastern side of the road St Saviours would

be swamped by the proposed tower. No 1 Onslow Street is also proposed to have its façade changed in colour how this related to the proposed tower will impact the views down Woodbridge Road.

We have already seen Solum used as a precedent for higher buildings in the Town Centre. Block E sets an even higher precedent. The Owner of the Casino site is already quoted in the press as waiting for sites such as St Mary's and North Street to be determined. GBC Policies for the development in the Town need to be urgently clarified.

Objection: The Society believes the views demonstrate a major impact on the Town and surroundings and in particular the height of the buildings needs addressing. The lack of any simple building height policies in the Town Centre is an issue.

5. Heritage

We note the extensive application documentation details discussions with Historic England.

The notes describe the meetings.

“Pre-application consultation was undertaken with Historic England in May, June and July 2022. During a Teams meeting on 11th May the scheme was presented to Rachel Fletcher, Historic England's Inspector of Historic Buildings and Areas. The background to the scheme was presented with an emphasis on how the design had developed to take account of the heritage context including information on the use of materials. Photographs of existing views and VU:CITY models were also shared. The Teams meeting was followed by a site visit attended by Ms Fletcher on 7 th June 2022 during which the site and those designated and non-designated assets with potential to receive impact as a result of the Proposed Development were visited. Following the site visit wirelines and renders of the Proposed Development were shared with Ms Fletcher. It should be noted that at this time not all views were available and Ms Fletcher was only able to base her pre-app advice on those that were sent.

9.3.3 Ms. Fletcher's pre-application advice letter was received on 27th July 2022. The letter noted that as a limited number of views had been presented and the baseline was not shared the advice was similarly limited. The pre-application advice voiced Historic England's concerns that *'the height of the buildings in the scheme would cause harm to the appreciation of the significance of Guildford Town Centre Conservation Area from a number of locations, the Wey Navigation Conservation Area, Bridge Street Conservation Area, and Millmead and Portsmouth Road Conservation Area and would cause some harm to the significance of Guildford Castle (a scheduled monument) as a strategic high point to obtain long-range views.'*

9.3.4 The pre-application advice concluded that as Historic England did not have full information about impact on the historic townscape, they were not in a position to reach conclusions about the scheme. They did however feel it likely that *'the development would harm the appreciation of various conservation areas (including the Guildford Town Conservation Area and the Wey and Godalming Navigation Conservation Area), would affect views of the historic townscape from a number of areas, the experience from the Castle may well be harmed too as would that of St Saviour's church.'*

9.3.5 The pre-application advice concluded that based on the information provided Historic England anticipated that they would *'not be in a position to support the proposals, but are likely to raise concerns about harm from the scheme'* and that they would be *'likely to*

recommend reducing the height of taller elements of the proposals, whilst maintaining variety in roof heights, to a help reduce the harm the proposals would cause.'

The site contains the All-Bar-One Building, Figure 2 shows View 14 down Angel Gate; showing shows how the new site will create an indifferent background to this heritage asset.



Figure 2 View Down Angel Gate

As noted above in Section 4, View 7 shows the impact on the Cathedral. The Solum application in the end focussed on the impact of the views across the town to the Cathedral.

Objection - The Society believes more understanding is needed on the impact on heritage assets in the town.

6. Density

The National Model Design Code at Page 14 Town/City centre identifies that – “A typical dense city typology with over 120 dwellings per hectare (dph) and a strong mix of uses”.

The proposed development will have a density of circa 300 to 350dph. We have also looked at some of the dph figures for schemes in London and it is clear Guildford is exceeding, including the North Street proposal, many of the densities coming forward for London schemes.

Why is the historic core of Guildford going to be subjected to such a dense development which is more suited to a major City?

To summarise the proposed design is too high, too massive and imposes a very high density in the town centre. Guildford being a gap town is ill suited to having a development of this scale inserted into the town centre with its rich heritage. The taller blocks a detrimental impact on views across the town (See ‘Guildford Town Centre Views’ Supplementary Planning Document’) and into the town centre.

Objection: The Society considers the density is exceptionally high and completely out of character with the rest of the town centre.

7. Design

The Policy A5 states as requirements under Design, vitality and connectivity that:

Para (2) Development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes

Para (5) Provide a varied roofscape, minimising the impact on the skyline to protect views in and out of the site

Design South East has also commented that there should be a “Test a looser, less orthogonal (involving right angles) elevational approach on the larger buildings to help them feel less gridded and more informal, in keeping with the rest of the proposal.”

Objection: We don’t consider that the proposed development, at present, meets the requirements in the Policy.

The Tallest building in the proposed development Block E should be considered with reference to the National Model Design Code which states:

Tall Buildings Design Principles:

Tall buildings are, by their nature, one-offs and need to be designed to the highest architectural quality because of their prominence. They can be designed in a variety of architectural styles, but the following principles apply to all tall buildings:

Top: The top of the building and its impact on the skyline needs to be carefully considered. Services needs to be concealed and both the street views and the long views need to be considered.

Form: The form and silhouette of the building needs to be considered. The long and short elevations need to be well-proportioned in terms of their slenderness. Materials: The use of materials need to be consistent and simple.

Base: The tall building needs to follow the building line at street level. To do this it may rise from a base or plinth that is scaled to the surrounding buildings.

Public realm: Public spaces around the base of tall buildings need to be generous, well designed and contribute positively to the local context.

Objection: We don’t consider that Block E demonstrates these design principles

8. Traffic

We have a particular concern with Leapale road (See Section 11a. below).

The Society notes that Stagecoach and Safeguard have objected to the proposed bus station revamp on operational, resilience, future flexibility, and management grounds. These objections need to be addressed.

Surrey County Council have also a series of issues outstanding which need addressing.

The Society contends the transport modelling is limited in that it doesn’t appear to cover:

- The revised taxi flow at bottom of North Street
- Possible growth due to extra Park and Ride Sites, Modal Shift, use of On-Call Minibuses
- Is the bus station resilient at peak times – the use of space limited Nose-in Nose-Out parking bays.

The limitations of the bus station need to clearly be articulated e.g. can longer articulated/3 axle buses be accommodated if required in future?

Connections between and the Bus Station and the Rail Station are still dependent on existing pedestrian linkages (See Section 12b. below)

Parking, there is a loss of town centre car parking space (157 spaces + 6 blue badge) which would accord with the aim of modal shift. It is not clear if these 6 blue badge spaces are to be re-instated anywhere else in the vicinity?

9. Dwellings

We note the lack of Affordable Homes due to viability issues. On a site of this size in Guildford this seems to ignore the Local Plan aspirations for percentage of affordable housing.

There is no evidence that a sensitivity analysis on various options for the scheme has been performed that might show that in some cases affordable housing to be viable.

We urge the council to negotiate the provision of affordable housing (Policy H2 in the Local Plan Refers).

Objection: The lack of affordable dwellings needs to be fully determined.

10. Sustainability

As the proposed development is going to be in situ for a considerable time it is unclear unclear what consideration has been given to longer-term refurbishment and improvement, potentially involving retrofitting and rearrangement of dwellings. The viability study envisages individual units being sold on 999 year leases so the design and common areas need to allow for these maintenance and refurbishment aspects.

The frame of the proposed building is going to be a concrete frame. The use of concrete needs to be considered as it is a very heavy source of Carbon.

Objection: More consideration needs to be given to the long-term sustainability of the development.

11. Leapale Road

The Society has two concerns with the proposals for Leapale Road.

a. Traffic Operation.

Does it really work? The site has limited delivery space for Moving in/out and deliveries, compounded by access to Leapale Rd Car Park and the Car Park in the North Street Development.

The provision of a larger Layby is welcome but on a scheme of this size there should be allowance for one move every working day (500 dwellings occupied for 5yrs average, gives circa 200 moves (Out/In) per year.

On top of this a two-way flow of traffic including buses is to be allowed. Design South East also propose a cycle track.

Objection: A proper detail consideration of options for Leapale Road is required.

b. Design

Leapale Road although being widened is a still a narrow road with high buildings on both sides rising to 8 Stories. As an urban realm it could be very forbidding and unpleasant, compounded by an awkward SE/NE alignment.

Object: The design of Leapale Road should be properly illustrated via the use of agreed Views and/or VU-City

12. Other Issues

a. Viability

We won't comment on the details of the viability assessment. But do note that The Plaza Site, Solum, North Street, and St Mary's will all be selling units at the same time (assuming consent and Build outs happen to plan). Although the developments are different to a degree Guildford town centre will have a large number of single and double bed units coming to market. Compared to the Local Plan Guildford Town Centre will comfortably exceed its dwelling contribution on the planned/current build trajectory. However, the fact that a lot of units will be coming on stream at the same time is relevant so we might add

We fear that developers will slow their programmes so that a limited number of units only is "released" in order to avoid flooding the market and depressing prices. This housing will not be available for people to buy, but it will add to the number of consented units, which could perversely increase pressure for even more units in future plans. A greater range of housing type would avoid this. GBC should also consider what measures it can take to ensure a reasonably expeditious building program for this, and other reasons associated with noise and disturbance from construction work.

b. Permeability

The proposed plans have poor links east and west. The route through the Friary Centre which is a natural route to the station is only available during shop opening hours. There is also a route for pedestrians between Leapale Rd Car Park and the Telephone Exchange that could give good access to the east.

- GBC should examine opening a footpath from Leapale Road up the side of the BT property to Haydon Place & Martyr Road.
- Access through the Friary Shopping Centre is also desired

c. Ground Floor Use

The Society is pleased that Ground floors are being constructed on the basis that flexibility is critical as the use may vary over the design life of the development.

- Although not within the remit of St Edward we believe there needs to be a concerted effort to attract tenants into the development that will ensure that there is good footfall within the development. The Society believes GBC should be engaged actively in this process to ensure that at least some of the ground floor is used for public facilities Arts Centre, Museum etc.
- We also support the proposal to house a Doctors Surgery

Yours Sincerely

Alistair Smith

Chair - Guildford Society

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Appendix A

As mentioned in Section 3 above we are concerned that many of the Views consist of Wireframe outlines. The pictures show the wireframes as published in the Development Application and should be viewed on the application itself to see the Representative View.

The Society believes on a site of this critical nature that using computer modelling techniques that, at the very least, a representation of the buildings can be dropped into the Guildford Model for examination.

a. Dapdune Wharf View 1



b. St Catherines View 3



c. Castle Motte View 7



Note the North Street Site has been rendered in CGI not as a wireframe on the RHS of the picture.

d. Pewley Hill View 2



e. Hogs Back View 4



f. Stag hill View 14



Leapale Road View 18



Note the North Street Site has been rendered in CGI not as a wireframe .

g. The Bars View 12



Note the North Street Site has been rendered in CGI not as a wireframe .

h. Woodbridge Road View 10



Note the North Street Site has been rendered in CGI not as a wireframe .