



Mr John Buser
Guildford Borough Council
Millmead House
Guildford GU2 4BB

Guildford Society
24 Bury Fields
Guildford
Surrey GU2 4AZ

10th December 2021

Dear Mr Buser,

21/P/02232 | Demolition of existing building and erection of two buildings comprising residential accommodation (Use Class C3), retail floorspace (Use Class E) and cinema (Sui Generis), erection of a retail pavilion (Use Class E), together with car and cycle parking, plant and all highways, landscaping and other associated works. | Debenhams, Millbrook, Guildford, GU1 3UU

The Guildford Society has written expressing concerns on this development (8th October 2021).

This note is to lodge a formal **OBJECTION** to the scheme as it is presented.

We would like to amplify and build on our concerns as detailed in our letter of the 8th October.

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1/ Introduction

We observed in our letter of the 8th October that The Society agrees with Cllr John Rigg (Opinion piece Guildford Dragon) that the site is one of the most important sites to be brought forward for development in Guildford over the last few decades. Cllr John Rigg highlighted we need a 'good high quality viable proposal'. Our view is the current proposal will do lasting damage to the Town Centre, and we would question its long-term viability.

For a site this significance the Society is disappointed that the council have issued no Brief concerning the development of the site. It is notable that we have far more information on sites included in the Local Plan e.g. North Street, and in many cases far more extensive pre-application discussions e.g. Wisley Airfield. The Debenhams site becoming available has been likely for several years. The planning department must have developed a set of aspirations for the site, in case of redevelopment. These should be made public.

2/ Heritage

The town centre is of significant historic and heritage interest and value. It contains a large number of heritage buildings which make the town centre and riverside attractive and unique.

A new development on the Debenhams site needs to respect and enhance these Heritage assets. A major economic draw for the Town is the Heritage High Street and surrounding area. Society volunteers at the recent Heritage Open days were struck by the wide area people had travelled to Guildford to see the town – this is a major opportunity to be fostered.

The current proposals ignore this heritage and will damage it for ever if they proceed. The buildings size and height will dwarf and overpower Quarry Street (one of the oldest streets in Guildford), the lower High Street, Millmead on the opposite side of the river, and the Town Mill and Yvonne Arnaud Theatre.

We also note that the current submitted planning documents have no comment from Historic England.

3/ Scale, Height, & Massing

The current proposal is for two blocks with narrow gap between the two that from most aspects will look like a single block of the same mass as the existing Debenhams building but twice the height. This is an overdevelopment of this sensitive riverside site. The height will make the building visible from a wide area and overshadow nearby streets/buildings on both sides of the river and the river itself. The projects architects (Squires & Partners) have produced 43 views of the project including the SPD strategic views from many areas in and around the town centre. Many of these show the significant impact a scheme of this height and mass has detrimentally on the existing townscape and urban quality of Guildford as a historic gap town. The proposed buildings will wipe out permanently these and many of the much-loved views across our town and to the surrounding hills, an important part of Guildford's character as a gap town. Below are some of these views which will be lost or damaged.



All these views will be destroyed or significantly damaged by the height and mass of the St Mary's Wharf proposed buildings



Existing view



With SMW proposal

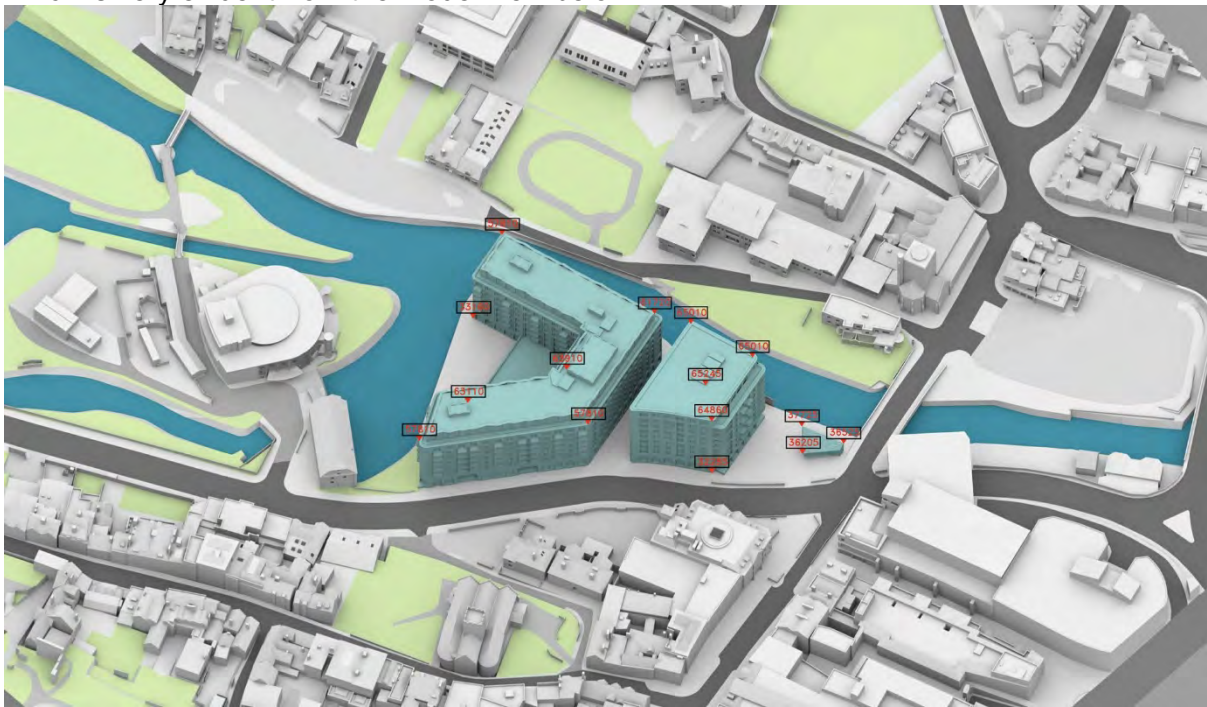
View of St Nicolas from bottom of Mount is significantly damaged by scale, mass & architecture of the proposal taking out for ever prominence of St Nicolas and cross town view of downs skyline

The Mass extends broadly to the existing Debenhams Buildings boundaries which with the height would makes Millbrook even more a canyon than at present and overshadows the riverside. Public Realm is limited with Native Land unsure if 24-hour access will be provided bringing into question how much is public realm.

The developer refers to the Billings Building as an exemplar for Guildford but ignoring that Billings is approximately 2-3 storeys. Although Guildford had an industrial area in Victorian times it wasn't a northern mill town. It should be noted most Victorian Mill/Warehouse buildings only rise to 4-5 stories and therefore using this reference is absurd.

Guildford doesn't have robust height or mass policies relying instead on a weak policy Local Plan policy S3 in the Local Plan plus a Town Views SPD. A high building on the St Mary's site sets the precedent for similar excessive heights on the sites at Millbrook, Millmead and other riverside sites in the town centre masterplan. These will physically and visually separate the riverside from the town with the river in a medium to high rise building corridor.

The proposed height and mass is excessive for a sensitive site in the centre of the town which is very evident from the model view below.



Guildford Borough Council's Guildford Economic Regeneration Plan (GERP) has in its Guildford Town Centre Stage 1 Strategic Spatial Masterplan Report proposals for sites across the town centre with the proposed heights they could accommodate. These are shown on the plan below. The heights undoubtedly have been considered in context with Guildford's heritage, views, landform and each site's location within the town. The sites either side of St Mary's Wharf are shown as 4 storeys (Millbrook car park) and 4-6 storeys (Town Wharf). This brings into question why GBC should even consider buildings of 8 and 9 storeys on a raised ground floor when their own plan is proposing buildings of half the height and similar to the existing Debenhams store.

1120 - Guildford ITT
Character Zones
Building Heights

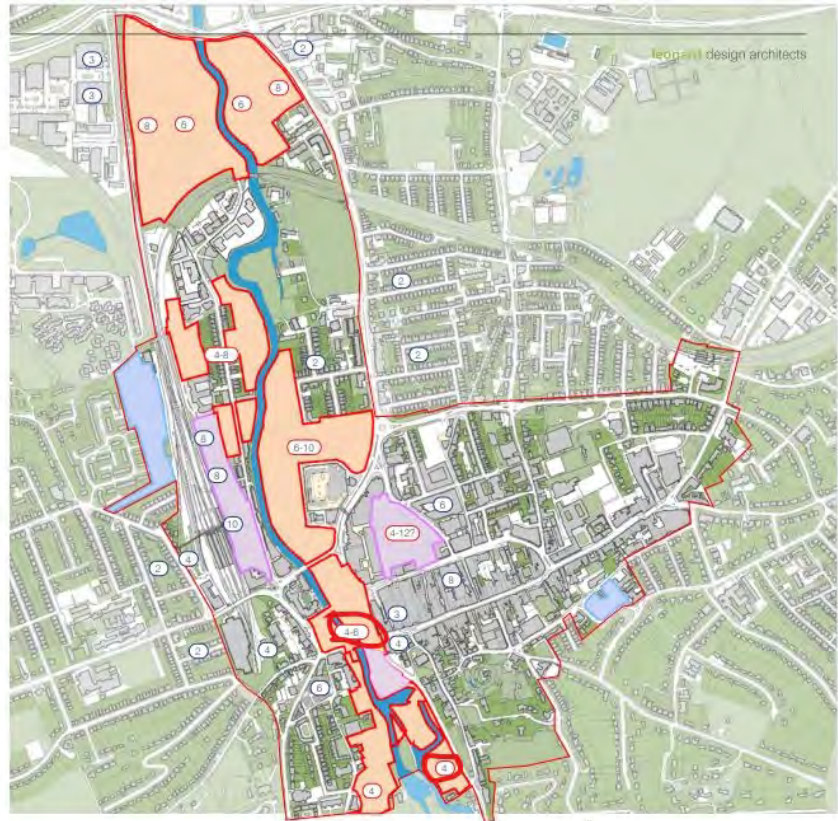
Guildford is defined by the River Wey and the basin it forms between the Castle and the Cathedral on Stag Hill. Existing buildings are generally low-rise, with 3-4 storeys along the high street, rising to 6-8 at House of Fraser and the Telephone Exchange. The police tower at the Onekew Street to Woodbridge Road roundabout rises to 9 storeys.

The new developments at Guildford Station and the upcoming North Street Redevelopment are setting a new benchmark for building heights in Guildford Town Centre. They range up to 12 storeys.

Stepping down to the riverside, with a reduced massing and stepping of green garden spaces, provides a soft edge.

Building heights subject to further planning.

Character zones missing needs to fit within its local context with parameters set to inform future design.



○ No. of storeys range
○ Context building storey heights

51

The much-discussed setback of the upper floor of 9 storey north block makes no actual difference to the massive detrimental impact the buildings have in virtually all views across Guildford and to the town centre heritage. Neither does it reduce the overshadowing of all the surrounding areas. It seems that the developers have made no significant change to their scheme regardless of widespread criticism of the buildings' excessive height.

4/ Precedent

If this proposal was to be approved it would set a precedent for other sites in Guildford, especially those along the Wey riverside. One of the key concepts in the GERP Town Centre Masterplan and of Guildford Society and Guildford Vision Group is improved access to the riverside. If 9 or 10 storey buildings are permitted along the riverside, this wall of buildings will separate the riverside physically and visually from the town proper. This will defeat the principle of 'access to the riverside'.

It is noted that up to now Town Centre plans have proposed buildings in the 4-5 storey range e.g. the Allies and Morrison Masterplan and GERP. It is unclear why the planning department appear so relaxed about a 8-9 storey building appearing in the town centre. Developers consistently argue that the Portsmouth Road Flats, Solum etc provide a precedent. This needs to be firmly challenged as other sites e.g. GBC Offices in Millmead, Millbrook, Odeon Site etc could all go to 8-9 stories.

5/ Architecture

Despite the Architects (Squires) making claims to have analysed and been influenced by key existing Guildford buildings and townscape, the design palette they are using is virtually identical to that used in their Paddington scheme which Westminster Councillors rejected because of its height, damage to heritage and conservation areas, lack of sunlight and single aspect with some apartments—see image below which shows that St Mary’s Wharf is a ‘cookie cutter’ version of Paddington. Also, their design for Mortlake Brewery uses similar principles and has been rejected by the Mayor partially because of affordable housing percentage but also “The increased height and density of the scheme around the historic Maltings building in an important riverside location would also have a negative impact on the open spaces in the area. Despite the hard work of the GLA team, the public benefits offered would not clearly outweigh the harm to the surrounding heritage sites and riverside views.”



St Mary’s Wharf



Paddington

Guildford has many buildings of great design quality based on a rich heritage of design that goes back through architects such as Lutyens, Voysey, Maufe, Shaw. In recent time we have had good architecture provide by Grimshaw and others at the University, the ‘Steamer Trading building’ in the High Street, and the new Crematorium. Guildford needs to demand architectural excellence for a building on such a significant site that is likely to be in situ for over 100 years. The current design is of inadequate quality, and some would describe it as banal.

We believe it is essential on a scheme of this magnitude that the development is modelled in the VU.City system, recently installed by GBC. Native Lands reluctance to comply with this is unacceptable. It is noted that JTP, Leonard Design Architects, and Hawkins\Brown are already contributing to the Vu.City system in Guildford.

6/ Public and Community Benefits

What level of public or community benefit does this highly important, town centre project provide for Guildford and its residents? Virtually none especially if the developer persuades the Council that for his viability there will be no affordable housing. It appears that there are no facilities within the buildings for community use and the pavilion appears to be small and eats into the already small space at the north of the development. The ground floor spaces will be commercial shops or restaurants.

Externally there is the much publicised 'sell' by the developer of new public realm, public spaces. What is this Public Realm and is it actually Public Realm? Some of this may not be truly public because the developer does not want the public using these spaces 24/7. The spaces could be controlled with gates so that at times the occupants of the flats are not disturbed by the public. There seems no commitment from the developer that these spaces are always accessible. What is this Public Realm?:

We note that the public 'square' at the North, is effectively smaller space than the exiting area as it is filled with access ramps (due to the raised height for flood reasons) and the proposed Pavillion at the North End.

The riverside walk is narrow (circa 2M Width) and likely to be constricted by tables/chairs from cafes or restaurants so pedestrian circulation by the public along the riverside will be problematic especially if waiting staff serving dinners are regularly crossing the riverside walk. We welcome the provision of the walkway continuing along the southern edge of the site but note the path becomes slightly narrower according to the plan. The turn at the southwest corner of the site looks problematic as the it looks as if pedestrians will be expected to walk into the arcaded segment that is likely to be used for Food and Beverage.

The 'street' between blocks is required primarily to allow apartments' elevations to have windows and an outlook It has ramps for emergency vehicular access and has little public value. From the model view above it can be seen that this will be a narrow canyon space predominantly in shade and overshadowed by the tall buildings either side. This has no value to the public as 'public realm', it is also not on a natural desire line into the site.

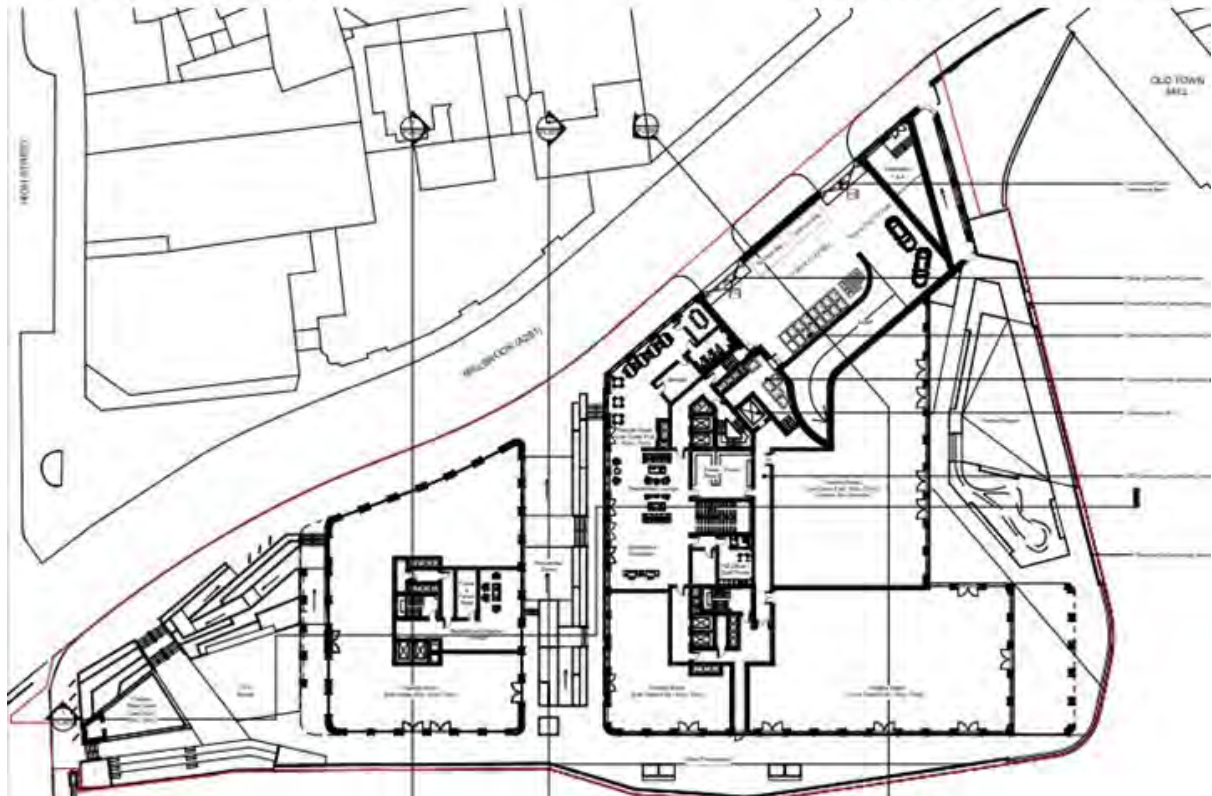
The Pocket Park is not easily accessible, limited size and might not actually be 'public' realm if locked off at certain times of day. It will have limited use by the public because of its size and quite obscure location.

Landscaping proposed is now minimal and makes mockery of the earlier consultation 'sell' that the scheme would allow a green corridor from the south into the town centre.



Existing Site Above

Redeveloped Site Below

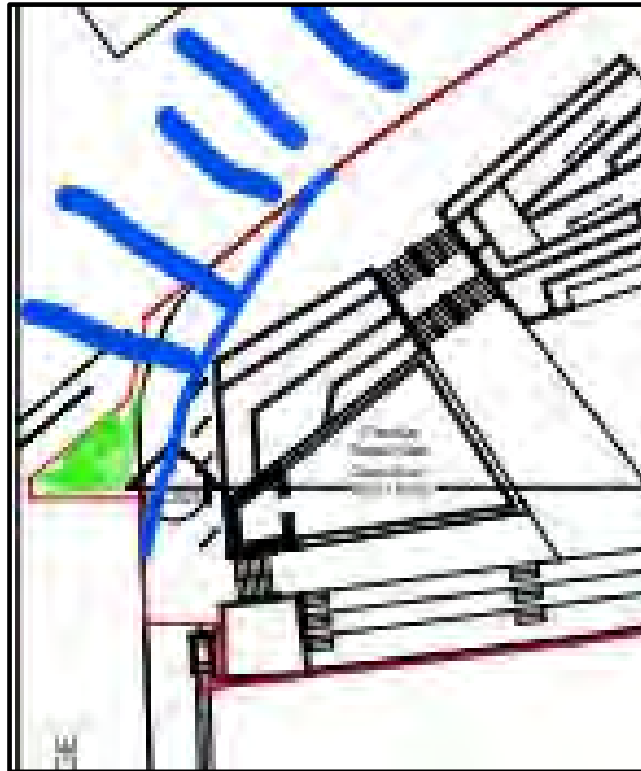


7/ Guildford Economic Regeneration Plan

We note that the GERP potentially interacts with the site.

Several plans are being evaluated to revise traffic in the Town Centre; one of these involves the raising and rebuilding of the Town Bridge to return it to use as a road bridge. This raises a issue at the northern end of the site. It is likely that the A281 will have to be raised and realigned to meet the revised bridge see the Blue area on the diagram below. This could also impact the viability of the proposed Pavillion on the site. This potential option needs to be modelled for impact prior to agreeing to the development.

We also note that part of the property (highlighted in green) extends across the Town Bridge access road – this looks a legal minefield that needs resolution as ‘Ransom Strips’ have caused major issues elsewhere in Guildford on other sites.



8/ Site Access

An issue with the site has always been poor access from the High Street; a reflection of its history of commercial timber yard. Two potential routes that were discussed early on were

- a) Reopening the tunnel under the A281. Although much has been made of the poor stated of the now buried tunnel surely there is a case to make the development more viable to look at re-opening; particularly if the A281 has to be raised?
- b) A potential bridge to the Yvonne Arnaud. This is not included in the proposals and probably will only be built if the Council funds it with council taxpayers' money.

9/ Housing and Viability

Although the housing provided on the site is to be welcome it is worth noting the following:

- a) The Town Centre area is providing with current consented and proposed schemes plus properties coming forward under PDR regulations circa twice as much housing than proposed in the Local Plan. Although 215 Dwellings are welcome, they are not essential, and a lower number could be appropriate.
- b) The developers in their Financial Viability Statement maintain that no affordable housing can be provided, we note that the council housing department have questioned this and consider approximately 86 of the dwellings should be classified as affordable. Having a development on this scale with no affordable housing cannot be countenanced.
- c) The Financial Viability Assessment assigns a value of £10.3 Million to the site as opposed to the £20M which the developer paid for the site. The £10.6million sum is equivalent with the amount thought to have been paid for the Debenhams site (roughly equivalent area) in central Staines. It looks as if Native Land to preserve a viable scheme has had to overdevelop the site; to the potential detriment of the Town.

10/ Sustainability

We note the proposed development will have a large amount of embodied carbon, due to the need to build a secondary basement within the existing basement to manage flooding and water ingress, plus a large concrete floor plate. This sits uneasily with the councils declaring a climate emergency.

The Society did propose repurposing the existing building as a multi-use facility including housing. The developers have examined this option, ([Debenhams is closing \(guildfordsociety.org.uk\)](https://www.guildfordsociety.org.uk)), but we suspect the cost of the site and government tax regulations have made this impossible

No mention is made of making the buildings flexible for changing needs e.g. might office or commercial demand profitably use the 1st floor etc. Any building with at least a 100year design life needs to have measures built in to be adaptable.

11/ Conclusion

Guildford has an unhappy history of vacant sites notably The Plaza site and North Street. We are not against redevelopment of the site.

The Society believes that housing is but one element in creating and sustaining a vibrant town centre. We welcome a mixed development for the site but being on a prime town centre the site should provide an effective Public Realm, including celebrating the riverside, properly connect to the rest of the Town Centre, and be configured to be flexible for the future.

With the Plaza sites and North Streets coming forward at last and other developments as we are, the Town Centre as noted above, is contributing in excess of the dwellings agreed in the Local Plan.

The Council should collaborate with Native Land to rethink the scheme to respect the Town Centre, provides more public and community gain, and develop a design that enhances the town and riverside. The site should be developed in the context of proper Town Plan and not approached on an isolated site basis.

This proposed development is a pivotal planning moment for Guildford if it is to develop into the 'Green Town, in the Countryside' (as proposed in the Allies and Morrison Masterplan), this poorly designed development should be refused. There will be a concern the existing building will deteriorate but other large empty stores across the country are being put to imaginative use either on a temporary or permanent basis.

Yours Faithfully

A handwritten signature in black ink, appearing to read 'Alistair Smith'.

Alistair Smith

Chair – The Guildford Society



- cc. Cllr Joss Bigmore – council Leader and Strategic Planning
- Cllr Tom Hunt - Development Control and Enforcement
- Cllr John Redpath - Heritage and Community Assets
- Cllr John Rigg - Town Centre Master Plan,
- Ian Doyle - Service Delivery Director
- Dawn Hudd - Strategic Services Director