



Please reply to: Dr John Baylis
Secretary of the Planning Group
58 Warren Road
Guildford
GU1 2HH

Email: jandmbaylis@btopenworld.com

Mr Neil Taylor,
Interim Director of Development,
Guildford Borough Council,
Millmead House,
Millmead,
Guildford, GU2 4BB

20th December 2015

Dear Mr. Taylor,

Application Number: 14/P/02168

Location: Guildford Railway Station, Station View, Guildford GU1 4UT

Proposal: *A mixed use redevelopment comprising 438 residential dwellings (Class C3 use); station retail/financial and professional services/food and drink and leisure floor space (Class A1/A2/A3/Sui Generis and D2 uses); station and general office floor space (Sui Generis and Class B1 uses); station improvements including new station building with booking hall and concourse (Sui Generis use); replacement station and office car parking, new residential car parking, cycle parking, a Station Plaza including new public realm with hard and soft landscaping, new access and servicing arrangements, plant and associated works.*

We wrote at length to Chris Mansfield on 21st December 2014 objecting to Solum's original application 14/P/02168. This letter contains our objections to the revised application submitted by Solum in November 2015.

We are not opposed to the principle of development of the railway station and its surrounding Network Rail owned and controlled land, but we do not see the proposals as delivering major station improvements, nor as part of a cohesive plan for the whole area (including owned land beyond the red line), nor as a desirable precedent for developments on this scale. We reject the arguments for the scaling back of local benefits such as affordable housing on viability grounds in contrast to the emerging TCMP.

We continue to believe that at over 48,000 sq. m. floor area, which is slightly larger than the original application, this is the largest planning application ever received for the town centre. By comparison, the application in 1973 for the present Friary and that by Westfield in 1974 to extend the Friary were each about 32,000 sq. m. We continue to consider that the



massive bulk of the development now proposed by Solum would adversely alter the character of the town.

We are of the view that any major development at the Station should make a very significant financial contribution towards helping to solve Guildford's severe infrastructure shortcomings that will be aggravated by a development of this size. The development should considerably enhance the connectivity between the station, the town centre and the residential areas to the west.

We continue to object strongly to the planning application and consider it should be refused by the Council for the reasons set out under the headings 1 to 8 below.

In summary, we would like to see a new application from Solum which delivers:

- (i) A significantly lower intensity but viable development
- (ii) A scheme in full accord with wider plans for the area
- (iii) A considerably greater affordable housing provision
- (iv) A much larger section 106 contribution

1. The application is not in accord with the policies of the 2003 Local Plan

Guidance in the adopted Local Plan is contained under two sections. Firstly, there are the General Policies of the Plan (Policy G1 to G12) and, secondly, the policies which relate to the eight town centre redevelopment sites of which Policy GT8 relates specifically to the Railway Station.

Starting with GT8, we must accept that the Plan acknowledges (Para 9.52) that "*major development*" on this site is consistent with sustainability.

However, that position needs to be considered in the context of the fact that the defined area to which Policy GT8 relates is very large. Furthermore, it is clear from the other parts of Policy GT8 that GBC sees any proposals for "*major development*" in the context of a wider setting. For example, paragraph 9.58 makes clear that any "*Development will have to comply with Policy G11 which promotes improvements to the townscape and landscape, enhancement of views and improvements to public access to the river.*" In addition, paragraph 9.54 states that "*The Borough Council will require any proposals to incorporate improved pedestrian, cycling links between the station and both the town centre and surrounding residential areas to the west.*" Paragraph 9.55 states that "*Development proposals will also be expected to introduce enhanced transport interchange facilities at the railway station. In particular links between bus and train services should be improved, with better facilities for pedestrians and cyclists.*"

We do not see how these proposals can be considered to take account of the context provided by their wider setting. These proposals do nothing to promote improvements to public access to the river. They do not "*incorporate improved pedestrian, cycling links between the station, and the town centre and surrounding residential areas to the west.*" Access for pedestrians and cyclists to the trains via the ramps, the subway or the bridge are to remain without improvement. In limiting development to just the area between the operational railway land of the railway platforms and Walnut Tree Close these proposals are 'cherry

picking' the (relatively) easier land which is available for development, and do nothing within the station itself to “*enhance links between bus and train services with better facilities for pedestrians and cyclists*”. Where are the lifts or escalators to facilitate the movement of passengers between the entrance to the station and the many platforms? Where are the lifts for disabled passengers?

We consider that GBC should be encouraging Network Rail to formulate their long term plans for the station so that such improvements can be achieved as planning conditions relating to any approval. Solum should be told that it is premature to entertain their scheme until it forms part of a wider package of improvements for the station and the surrounding area. These are the levers which the Council have.

Policy G6 refers to ‘Planning Benefits’ and the use of Section 106 Agreements to secure contributions to achieve new highway infrastructure, etc. However we would say that it is clear from the content of the Local Plan that any proposals for the Station are expected to be formulated in the wider context of the needs of the area surrounding the station. These proposals do little or nothing to improve connectivity to the town centre or the residential areas to the west except to make ‘a financial contribution’ to the proposal by GBC to improve the Walnut Tree Bridge over the River Wey.

Turning to the wider General Policies of the Plan, paragraph 9.60 of Policy GT8 itself makes clear the need for any proposed development “*should be in scale with the surrounding development*”. These proposals do not comply with that requirement. There are large commercial developments in the vicinity of the station but none are anything like 10 stories in height. Solum are seeking to build a development of up to 10 stories in height which, to us, appears to be far too big and far too high having regard to desire to maintain the character of the town. Furthermore, if this development gets approved it will significantly raise the bar in terms of what is deemed acceptable in terms of height and bulk within the town centre.

Policy G5 (1) refers to “Context for Design” and refers to the need for new development to respect “...*topography, established views, landmark buildings...*” etc. Paragraph 4.34 gives sound guidance. It states:- “...*Some buildings are landmarks, known to the public and easily recognisable. These should be given proper regard to ensure that they are retained and their settings preserved*”. Policy G5 (6) deals with “*Important public views and roofscape*”. And the relating paragraph 4.39 points out that “*The topography of ...Guildford Town ... allows many fine views, vistas and skylines.*” And goes on to say “*Important public views must be protected*”

This proposed development of up to 10 storeys in height does not respect the topography or the “*fine views and skyline*”. The high buildings will interfere with established views. They will seriously diminish the views over the town towards the Cathedral from the higher viewpoints to the east – e.g. the castle, from Harvey Road, The Chantries, and the House of Fraser’s Roof Garden. This is not a question of whether the tall buildings will be below the sight line or whether they will obscure the view of the Cathedral. It’s a matter of the need to preserve the prevailing character of these existing views. High buildings are just not appropriate in Guildford if the special character of the town is to be preserved and maintained.

Policy G5 (2) makes clear that new buildings should “...respect scale, height and proportions and materials of the surrounding development.” And paragraph 4.35 emphasises that policy in stating “The scale and height of new development is extremely important”. Almost in anticipation of the submission of unsuitably large developments such as what has been proposed for the station, paragraph 4.35 goes on to conclude: “Some buildings in the town Centre are too big for the area and they should not be seen as a precedent for allowing similar bulk of building on redevelopment or other sites”.

Reverting to GT8, paragraph 9.56 notes that the site is located close to existing dwellings in Walnut Tree Close. “Redevelopment of the site should not have a detrimental effect on the amenities of the occupiers of surrounding properties.” We note that buildings B and C are now combined into one building 7 stories high. We have a particular concern with building B&C which is across the road from the Bridge Street Conservation Area and the Billings. The key characteristics of the Billings are flat elevations three to four storeys high, broken by windows composed of small panes, with brick detailing and division into bays by the use of pilasters above ground floor level. Typically, bays are 5-10m wide. Policy HE10 says that permission will not be granted for developments which would harm the views into or out of that area. The juxtaposition of 4 and 7 storeys on opposite sides of the road, fails this test. We would expect the Walnut Tree Close frontage of building BC to be no more than four stories, to respect the Conservation Area.

We can only repeat our view that “... if this development gets approved it will significantly raise the bar in terms of what is deemed acceptable in terms of height and bulk within the town centre”.

2. The application is not in accord with the policies of the Guildford Town Centre and Hinterland Masterplan Report – final draft report for consultation October 2015.

Page 56 of the Masterplan expresses the importance of this issue very well. It says:

“Integration with the Historic Landscape

Part of Guildford’s appeal is the nature of the town stepping down the hillside to the river crossing and the views it offers. For centuries this relationship between the town and its landscape has been a defining feature of its character, with the graceful cascade of rooftops down the hill to the river crossing punctuated by the towers of churches and the castle. A challenge for future development is how to meet current needs whilst working with this attractive character. The Masterplan strategy advocates avoiding the need for tall and bulky buildings which would have a negative impact on Guildford’s character.”

We consider that the height and bulk of the Solum proposal fail to meet the above challenge and we would draw attention to that same section of the Masterplan which make the important point how views between key buildings, such as the castle and the Cathedral, “...are very vulnerable to the impact of taller buildings”..

The same section of the Masterplan goes on to refer to the views of the Cathedral itself and points out that these views are very vulnerable to the impact of taller buildings.



The quote from the Masterplan refers to the challenge for the future as being how we “...meet current needs whilst working with this attractive character.” Whilst we must respect the importance of meeting current needs, we must not allow the way in which those needs are met to destroy the very character of the town as threatened by this proposal.

The Town Centre Masterplan in its chapter on the Station Area identifies site ‘M’. This site is the Solum site. It is listed on page 107 as providing 211 dwellings. The sketch of the illustrative masterplan on page 106 for the site shows nine separate buildings, as opposed to Solum’s two. The ‘Station View’ illustrated on pages 104 to 105 of the Masterplan shows residential buildings of 5 ½ storey height and buildings rising to 7 storeys behind them in the area of the station. This scale is in accord with the Masterplan’s proposals for other town centre sites. The Solum proposals are wholly alien to the Masterplan concepts of what the town centre should be like in terms of height, bulk and massing of buildings.

3. Transport

We welcome the improvements to the forecourt following the July workshops, with extended space for buses large and small, and dedicated “kiss & ride” section. However it must be understood that we consider that the earlier version was very inadequate, and has now been replaced by one that is barely adequate. In particular we object to the absence of any measures to improve conditions across the tracks or on the west side of the station.

Public transport facilities on Guildford Park Road on the west side are totally inadequate, considering that most of the 40% of the growing number of foot passengers recorded as accessing from there will have arrived by bus. It is also a major departure point for the University, another growth element. It is therefore totally unacceptable that improvements in this area must wait for a Phase 2, incorporating a new station footbridge “*if and when Network Rail bring this forward*”. Some appropriate interim measures are required promptly to provide space for bus lay-byes and taxi drop-off points to relieve congestion and to improve pedestrian safety in the area.

Turning to other matters:

(a) The revised forecourt still has a substantial flight of ‘ceremonial’ steps. In the absence of any east-west cross-sectional drawings it is difficult to see how the disabled and those with buggies and/or wheeling heavy luggage can be expected to negotiate the serious changes in level between the drop-off points at street level and the platforms.

Furthermore we consider that shelter provision is inadequate and inconveniently positioned for the two bus stands as well as for the adjacent mini-bus pick-up points, compared with the three large fully specified canopies provided for taxi passengers.

(b) It seems that a golden opportunity has been overlooked for taking advantage of Guildford’s unique platform subway and ramp system, which could probably be accessed direct from street level, below Buildings A2 & B. This point was raised at the workshops and would satisfy a serious need in the interim until a Phase 2 produces lifts from a new bridge to

each platform. Why should Guildford's elderly and disabled have to travel to Woking, Epsom or Wokingham in order to have a lift to take them to the platform?

(c) It is questionable whether the proposed improvements to the Bridge Street junctions will be sufficient to encourage all the operators of bus routes to and from the south (Cranleigh etc.) to divert from Bridge Street into the new station forecourt and exit via Walnut Tree Close. No real improvement to the queuing at the exit from Walnut Tree Close can be expected until this can be signal controlled in conjunction with Farnham Road. It should be noted that a complete re-design would be necessary, in order to allow a right turn on exit, if parts of the gyratory are to operate two-way, a decision which might be taken during the construction of the proposed Station project, if approved.

(d) The Society still considers that a second rail and river crossing is an important road improvement project which should be considered as part of an overall scheme to improve the movement of traffic within the town. A new bridge over the river and railway will in addition provide a flood free crossing in the town centre and a relief crossing should the existing bridge over the railway ever become blocked, need repair or need replacing. Approval of the present application would preclude the achievement of a new crossing.

4. The application fails to supply sufficient affordable housing

Paragraph 9.57 of the 2003 Local Plan makes reference to Policy H 11 on affordable housing. This generally requires 30% affordable housing, subject to “*material planning or marketing considerations*”. The draft Local Plan: Strategy and Sites July 2014 states for the site (number 24) “*The site can provide a mix of uses, including new homes of which at least 40% will be affordable homes*”. The Guildford Town Centre and Hinterland Masterplan Report – final draft report for consultation October 2015 in its chapter on Viability states that in the case of residential development “*40% of housing is affordable as per the draft local plan*”. Solum refer to 35%, see below.

The Solum application originally proposed 13% of affordable housing only. Furthermore, Solum proposed that all of it should be ‘intermediate’ housing, despite official guidance that the majority should be socially rented. In the revised application Solum propose even less, only 10% intermediate, despite the increase in GIA. This is far too low and therefore completely unacceptable. 30% should surely be the minimum.

The Council has recently consulted on its proposed development of Guildford Park Car Park site, just across the tracks from the Solum site. This site requires terracing, road infrastructure and the construction of a 439 space multistory public car park, so it has similarities with the Solum site. The Council propose 160 dwellings on the Guildford Park site “*around half of which will be retained as Council housing*”. The claim by Solum that they can afford only 10%, and that as ‘intermediate’ rather than social housing, appears to be ludicrous and a firm ground for refusal.

5. Viability

Solum's claims

Solum claim that they have subjected their proposed development to a viability assessment and state in their Planning Statement Addendum:

5.16. Whilst the current GLP 35% affordable housing policy requirement is noted the Planning Obligations SPD confirms that ensuring scheme viability is a relevant consideration when determining the level of affordable housing to require on individual sites. This position is consistent in this respect with the NPPF and Planning Practice Guidance which confirms that where the viability of a scheme is in question e.g. as a consequence of infrastructure contributions then LPA's will need to be flexible in seeking planning obligations to ensure the deliverability is achieved. In policy terms therefore GBC's policies do contemplate circumstances where a reduced level of affordable is permissible subject to independent scrutiny.

5.17. It is important to recognise that the Solum scheme is not a standard residential-led development scheme. It is exceptional in that a substantial level of infrastructure will be delivered as a first step to the comprehensive improvement of Guildford Station. It is the residential and commercial elements of the scheme which, in effect, will pay for the:

- 1 new Station and Railway Buildings;*
- 2 new Station Plaza and external works;*
- 3 replacement BTP and SWT offices;*
- 4 replacement station car parking; and*
- 5 new/improved commuter cycle storage.*

5.18. There is a direct relationship between the cost of delivering these improvements and the ability of the Solum scheme to deliver a policy compliant level of planning obligations including affordable housing. However it is also important to recognise that there is no other mechanism other than through the Solum proposals to deliver these station improvements.

5.19. The revised proposals thus deliver the maximum level of affordable housing whilst ensuring viability. On this basis the Solum proposals can be seen to comply with GBC affordable housing policy as expressed in the GLP and the Planning Obligations SPD.

11.4. A FVS was submitted with the 2014 planning application and this has been assessed by an external expert on behalf of GBC. Solum is advised by GBC Officers that the key assumptions and the conclusions of the Solum FVS are accepted by the external expert.

11.5. An Updated FVS (UFVS) has now been prepared. This reflects the amended design of the scheme and incorporates up to date residential/commercial values and build costs and also takes into account the need to make a contribution to avoid harm to the Thames Basin Heath Special Protection Area.

11.6. As a consequence of the above the UFVS finds that the maximum level of affordable housing that can be sustained by the revised scheme is now 10% (i.e. 45 units out of 438 units) wholly in the form of intermediate housing (previously 13% i.e. 57 units out of 445 units) the phasing of which is to be agreed with GBC.

11.7. Discussions with GBC Officers have allowed agreement to be reached on the heads of the Section 106 agreement. It is intended that these will include:

- 1 Affordable Housing provision to be determined by viability;
- 2 A financial contribution to the Thames Heath SPA to mitigate harm arising from the proposed residential;
- 3 A Employment Skills and Training Plan;
- 4 Land to be safeguarded along Walnut Tree Close to allow for additional bus stops to be provided in the future if needed;
- 5 A safeguarded strip of land through Building A2 to allow a connection to be made to a future footbridge across the railway tracks in the event that Network Rail bring this forward – timeframe to be agreed;
- 6 Off-site highway works to be subject of a section 278 agreement;
- 7 A Sustainable Travel contribution of £250,000 to a new bridge over the River Wey;
- 8 A contribution (level to be agreed) to ‘way-finding’ measures; and
- 9 A Monitoring fee of £5,000.

Commentary

We take issue with the above Solum statements on the following grounds:

(a) The reference to ‘*exceptional*’ circumstances is in the Society’s view deliberately misleading to give greater emphasis to the scheme than it merits and to place an unwarranted presumption in favour of a non-Local-Plan-compliant application.

The only reason for building the replacement car park (item 4 in 5.17 above) is because the land is to be used for non-railway purposes; the station Plaza and external works (item 2 in 5.17 above) are premature pending the integrated Transport Plan and required modal shift scheme implementation (including GTMS); the new station buildings, replacement offices and cycle storage are only a relatively small part of the overall station improvements that are required.

Accepting these ‘*exceptional*’ circumstances ignores almost all of the benefits the comprehensive regeneration of the station should bring to Guildford, its local residents, commuters and other transport users through development of and at the station.

(b) We do not believe that there is “*no other mechanism other than through the Solum proposals to deliver these station improvements.*” Network Rail must have very many station improvement schemes elsewhere that are financed from their capital investment programme and not from profit on car park re-development. Of the above list 1-5 we consider that items 1, 3 and 5 should not be charged to the scheme in the context of viability analysis. They would not be required if development were restricted to the present car parks. We also note that there is no ‘new station’, there is only a slightly larger station concourse.

(c) We do not know how much Solum are paying for the site, but note that in the Guildford Borough Council Local Plan Viability & Affordable Housing Study Final Report prepared by Peter Brett Associates

LLP the benchmark land value for Guildford is £3,000,000 per ha. If a much higher figure has already been paid, then there is a difficulty with viability assessment. If a figure has been agreed subject to planning consent, then it should be of the order of the above £3,000,000 per ha, or perhaps a little more because this is a town centre site.

(d) We also refer to Appendix 4 of Item 4 of the GBC Executive of 29th September 2015. This item is the Town Centre Master Plan (TCMP) item and the Solum site is shown as site M. The Appendix 4 shows site M would deliver a surplus of £8,663,000, and that with only 211 units (Solum propose 438), 40% affordable housing (Solum are now offering only 10%) and a CIL of £500psm residential (which Solum will escape) - see Appendix A to the Appendix 4. There is thus a huge discrepancy between the above Appendix 4 findings and Solum's claims, notably as concerns provision of affordable housing.

Appendix 4 was a Council paper prepared by Bilfinger GVA, who we understand are, like Peter Brett, a reputable firm. Its findings and analysis are presumably accurate and robust. The benchmark land value is given as £6,000,000 for a plot area of 1.52 ha, about £4,000,000 per ha, compatible with Peter Brett's figure.

In summary:

	Solum	TCMP	Notes
Site area	2.2ha	1.52ha	No reason we can see for the difference
Res area	42,597 sqm	21,852 sqm	
No of Res units	438	211	Very consistent with res areas: average dwelling area the same
Non Res area	6,050 sqm	3,852 sqm	
Total area	48,647 sqm	25,704 sqm	

It therefore appears that GVA's calculation shows that a much lower density (and hence lower height and mass) scheme than that proposed by Solum would be viable.

(e) As noted in section 4 above the Council has recently consulted on its proposed development of Guildford Park Car Park site, just across the tracks from the Solum site. This site requires terracing, road infrastructure and the construction of a 439 space multistory public car park, so it has similarities with the Solum site and includes infrastructure costs similar to those of Solum's items 2 and 4 (see (a) above). The Council propose 160 dwellings "around half of which will be retained as Council housing". This is considerably above the Local Plan requirement of 35% quoted by Solum. We repeat that the claim by Solum that they can afford only 10%, and that as 'intermediate' rather than social housing, appears to be ludicrous.

(f) The list 1-9 of section 106 agreement items contains almost nothing beyond what is common in large housing schemes except for the £250,000 for the new bridge. We believe that Solum's scheme can afford

to provide much more for the town and that the Council should be pressing Solum for further contributions, especially as Solum escape the proposed future CIL which even on TCMP figure of 21,852 sq m residential development would produce nearly £11,000,000. With Solum's figure it would produce over £21,000,000.

(g) We understand that in London, if you believe applicants, there has never been a recent viable application that can afford to make significant contributions to essential infrastructure or more than 10% affordable housing. We gather that London planning committees now treat the viability cases presented by developers as works of semi-fiction designed to minimise requirements to contribute to the infrastructure needed to support development. This behaviour would seem to be spreading to Guildford. We read that London Local Authorities are seeking means of requiring more realistic viability assessments. We note that Islington LB now has a letter from DCLG which it holds confirms that Planning Authorities should start from defining the planning requirements, and then let the developer fit round these as-best-can. Guildford should refuse Solum's application and adopt this procedure.

(h) In summary, we believe the Council should take a tough line with Solum on viability and should seek to obtain a better deal for the town in:

- (i) A lower intensity but viable development
- (ii) A considerably greater affordable housing provision
- (iii) A much large section 106 contribution

6. Timing

Further to the reasons 1 to 4 above, this major scheme of redevelopment is premature whilst the town is in the process of actively preparing its local plan which will include planning guidance for the future development of the town centre. Arguments in the context of neighbouring developments have been set out in detail by our Chairman in his letter of 7th December to Sue Sturgeon.

In order to be part of the integrated transport model and modal shift required for the entire town to function in the future, this proposed development provides neither an answer nor the scope to provide one and must therefore be premature.

7. Previous consultations and changes in Solum's proposals

In addition to the objections to this application as set out above, it is relevant to note that Solum's public consultation of Feb 2012 indicated a single 9 storey block and eight separate other buildings of between 5 and 8 storeys. Strong objections were made to the 9 stories. These present proposals are somewhat higher. We object in particular to the progressive increase in the monolithic nature of the proposals. The 2012 consultation proposed 9 separate blocks. In the present revision blocks A1, A2 the station, B, C and D are one huge block, leaving just block E as a separate block. In this respect the current proposal is worse than that of a year ago. Such a huge single structure is out of context in Guildford, and gives an



unpleasant slab of high development when viewed from the west. It will overshadow opposite residential properties

8. General remarks

The Station

The railway station should not be viewed simply as a development opportunity. This is a once in a generation opportunity to provide major improvements to the transport experience and the place-making that so often comes with major railway stations. For the rail traveller, these proposals provide little improvements to the station itself. The minor increase in the size of the concourse is insufficient to cope with the masterplan's desire to see a 30% modal shift to public transport in addition to coping with the predicted increase in Guildford's population. Indeed, the present station concourse would serve much of the future need for expansion if the M&S shop was reclaimed for railway use. It was originally a Travel Centre serving, inter alia, much of the face-to-face assistance now handled entirely by the Booking Office desks. In other words, there is no 'Railway' need to do anything significant to the present building. It is only being redeveloped to free up 'brown land'.

Scale

The Guildford Town Centre and Hinterland Masterplan Report prepared for the Council by Allies and Morrison contains numerous drawings to illustrate the Masterplan's concept of the town centre built environment. Residential buildings are never more than 5 ½ storeys high, except for a hint of a seven story building at the station. Commercial buildings are generally three storeys plus one residential above. The capacities given in the tables of Chapter 5 of the Masterplan are in full accord with these heights. As already noted, the Solum proposals are wholly alien to the Masterplan concepts of what the town centre should be like in terms of height, bulk and massing.

As noted above the Council has recently consulted on its proposed development of Guildford Park Car Park site, just across the tracks from the Solum site. The proposed housing is 5 ½ storeys high, and the blocks of flats are 6 storey. This scale is presumably what the Council consider suitable and in character with this part of town. It is considerably less than the up to ten storeys proposed by Solum.

The Society has published a number of agreed Position Papers on its web site. They express our views on many aspects of planning and design. For example, the paper on 'Good Design' includes our desire to "restrict the height of buildings so that they blend into the existing urban fabric. Given the height of existing buildings in The Town, building heights of more than four or five storeys will generally be unlikely to meet this principle".

Model

The proposed development will so fundamentally alter Guildford that it should be a bare minimum to demonstrate its impact through 3D modelling of the wider area, and probably also by UDIM (Urban Development Information Management) to illustrate the impacts of the scheme itself on Guildford and of possible alternative proposals. We have asked Solum several



times for a model. Over recent years several lesser applications have been enhanced by the provision of models and it seems extraordinary that Solum have not provided one.

Design Review

We have asked GBC for copies of the Design Review Panel reports but have not yet received either of them. Our interpretation of the Design Review Memorandum of Understanding is that reports written after submission of the application should be non-confidential.

Sign Off

This letter of objection has been prepared by the Planning Group, the Transport Group and the Design and Heritage Group of the Society, and has been endorsed by the Society's Executive Committee. Further analysis work will be undertaken by the Groups and the Society reserves the right to make further submissions in respect to this application, particularly in respect of Design Review and the outcome of a meeting with Solum due to take place early in the New Year.

Yours sincerely

John Baylis

Secretary to the Planning Group of The Guildford Society

cc: by email

Tim Dawes, Development Control Manager

Paul Sherman, Development Management Team Leader (Majors)