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Dear George

### **Response to St Mary's Wharf Consultation 3**

Thank you, and the Native Land Team, for engaging in discussions with the Society on the proposed redevelopment of St Mary's Wharf. We welcome moves to redevelop the Debenhams site, However, we consider the scheme, as presented during this 3<sup>rd</sup> Consultation, is fundamentally flawed. It will do immense damage to the Town Centre that has already suffered from ill-considered development.

Until we see the full detail of the scheme in the planning application, we can only make general comments at this stage.

#### **1. Mass and Scale**

Being twice the height of the existing Debenham's building the proposed development will dominate and interact with a significant area of Guildford town centre. The majority of the buildings in the surrounding areas are 2-4 floors so buildings of 8 to 9 stories are inappropriate.

The proposed development because of its scale, height, and overdevelopment of its site, will damage the historic Town Centre. The impact of two such large buildings will by no means be compensated for, by a relatively small area of new public realm.

If this inappropriate scale of buildings is permitted here, this will set a precedent for excess height buildings elsewhere in the town centre and on the riverside.

#### **2. Views and Streetscape.**

Due to the excessive scale and height of the buildings, they will have serious detrimental impact on Guildford as it will impact many of the views over the Town Centre. As a gap town we should seek to preserve character of Guildford in its valley setting when viewed from the surrounding hillsides and mitigate blocking the valley when viewed from North or South. Sadly, we do have buildings that block the parts of the gap already, but we should seek to remedy this over time.

We must not forget street level ambience and views as well. These need to be properly evaluated. We are concerned at your attitude to the use of VU.CITY as this will enable proper understanding of visual impact at street level including shadowing and illumination. We hope you can work constructively with GBC to place your finalised scheme into the model so it can be evaluated.

### **3. Heritage Impact**

Guildford in the surrounding area is unique as a Town Centre in the variety and importance of heritage buildings. Despite bad developments in the past, we have managed to preserve a historic core.

The proposed buildings will impact the heritage of the Town Centre and adversely affect the setting of some 35 adjoining listed buildings and the Town Centre Conservation Area. Listed buildings adjacent/closely related to site include:

- St Mary's Church,
- St Nicolas Church,
- Town Mill,
- Yvonne Arnaud Theatre,
- 5 and 6 Millmead,
- 23, 25, 27 and 29 High Street.

St Marys church has been important with planning considerations along Millbrook where English Heritage have placed considerable importance of this historic setting and adjacent buildings. St Mary's is a grade 1 listed building and is the oldest church in Guildford with a rare Saxon tower. St Mary's will be dwarfed and overshadowed by this proposed development.

In addition to St Mary's Church, Quarry Street has 34 other listed buildings. It is one of the oldest and most historic streets in Guildford. A high proportion of the listed buildings in the northern section of Quarry Street will be impacted and those on the West of Quarry Street will have their setting damaged and views across Guildford lost because of the 8/9 storey height of the proposed buildings.

The passage, through the development between blocks A and B, is promoted as creating a new view of St Mary's Church but this will only be visible from a very small area on the river's opposite bank which is mainly road.

The proposed development will also destroy the visual linkage between Heritage Sites e.g. St Mary's and St Nicholas won't be visible together in some of the views across the town.

### **4. Riverside**

The River Wey is an underutilised asset in the Town Centre. The proposed development shows no sensitivity to its riverside surroundings and may need to have even higher wharf walls built to meet flood prevention requirements. The opportunity to provide stepping of the banks or even green borders appear to be lost. The height and mass of the buildings will form a cliff on the riverside and dwarf all the buildings and the much used riverside in Millmead opposite. The visual intrusion on walks on the Wey also needs consideration particularly as one approaches from the south.

### **5. Public Realm**

Much is made of the additional public realm being provided by the project. Firstly, it is worth pointing out that in a sense most of Debenhams was Public Realm being open seven days a week.

Whilst welcoming the opening up of the Riverside Frontage this appears to be identical to the current area, with an extra pocket park provided on the south side.

The passage through the middle of the development is narrow Circa 10M and will be mainly in shadow because of the buildings 8 and 9 storeys. This street will be a quite uncomfortable environment which like much of the development may be subject to wind deflection, wind tunnel or down-draughts caused by the height of the buildings. There appears to be no positive relationship to Millbrook or the urban layout of the area and the passage joins a relatively narrow pavement. This highlights that this is not planned as a public thoroughfare but as a necessary gap between two apartment buildings.

For a development of such importance the release of Public Realm is poor, and any development brief should establish “due to the importance of the location” a more considered release to the benefit of the public.

## 6. Other Matters

We have other concerns on the proposals related to:

- a. Flooding
- b. Pollution
- c. Site Layout and Connectivity
- d. Placemaking and Planning including integration with emerging Town Centre Masterplan
- e. Design
- f. Sustainability

We will await your final proposals before commenting.

## 7. Conclusion

Guildford, at St Mary's Wharf has an outstanding site, probably unique in the Southeast. It could produce a development that the town can be proud of, complementing and enhancing the town.

Policy S3 in the local Plan has a requirement (our underlining) to

(5) New development will have regard to:

- a) the provisions of Policy D1;
- b) the historic environment, street pattern and topography.
- c) important views into and out of the town centre from the surrounding landscape.
- d) views within the town centre of important historic buildings and local landmarks.

In the Reasoned Justification for the policy, it also at states

(4.1.24) This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:

- (a) enhance the vibrancy of Guildford Town Centre
- (b) create and foster high quality design
- (c) protect the town's heritage and character as an historic market town
- (d) respect existing townscape at both the street and roof level
- (e) create an enhanced and more positive public realm
- (f) reduce the concrete environment atmosphere

- (g) realise the Council's 'drive to, not through' concept to reduce the impact of traffic in the town centre, complementing future environmental improvements
- (h) improve walking links from the Town Centre to the train station
- (i) open up the River Wey and improve connections to the river
- U) assist in meeting Guildford's housing need
- (k) ensure schemes are sustainable and do not block future development potential
- (l) promote and create an investment friendly environment

The Societies view is that the proposed development fails to respond to the potential of the site, damages the town, and fails to meet the aspirations of the planning policy.

You asked a series of specifics in your Web Questionnaire our comments are at Appendix A

Yours Faithfully

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

Alistair Smith Chair- Guildford Society

## Appendix A

Do you agree that the planned redevelopment of this important site in Guildford town centre will provide a welcome boost to Guildford's local economy, particularly in light of the COVID-19 Pandemic?

- Difficult to judge. Building Workers likely to be from out of area, Occupants will boost town economy to an extent but may attract commuters from London. The availability of employment either based in Guildford or as Home Working may be critical. Keeping the balance of commercial and dwelling space is critical. Should St Mary's have some office space? The lower commercial space is heavily dependent on good connectivity with the rest of the town.

The design team has ensured that St Mary's Wharf reflects and enhances the local area – complementing uses on the existing High Street, committing to use local building materials (where possible) and providing access to a new riverside park and walkway. Do you agree with this localised approach?

- Guildford has a long history of good architecture Lutyens, Voysey, Shaw and Grimshaw – not sure the proposed design reflects this rich heritage.

The St Mary's Wharf team are keen to bring forward a sustainable development and to promote a healthy and active environment. This will include new walking routes and outdoor play space, a commitment to use recycled and low carbon construction methods and materials where possible and plans to increase the biodiversity on the site. Do you support this approach?

- Agree but will be interested to see the details particularly with new Government Policies due to be published.

St Mary's Wharf will deliver new homes, shops, a riverside park and walkway, as well as new bars and cafes for Guildford. Our proposals will also regenerate a key gateway site for the town, providing high quality architecture that is sympathetic to its surroundings. Given the delivery of these public benefits, do you agree that the proposed number of new homes and the overall design, height and materials proposed is right for Guildford Town Centre?

- Serious issues with Mass and Scale. Site should provide more Public Gain and maybe work in conjunction with another site to allow more limited accommodation numbers.

Following your engagement with this latest and final round of public consultation, are you now looking forward to Native Land submitting a planning application, with a view to delivering these benefits for Guildford Town Centre as soon as possible?

- Will be interested to see the detail in the Planning application.