

1 Introduction

1.1 This note relates to Application 21/P/02232 for full planning permission for the redevelopment of the former Debenhams Department Store.

1.2 The note is set out as follows:

1. Introduction
2. Summary of Design Policy and Guidance
3. Understanding of the site
4. Understanding of the application
5. Urban Design Comments

2 Summary of Design Policy and Guidance

National Planning Policy Framework (NPPF)

2.1 The NPPF Framework Chapter 12 sets out the requirements of well-designed places.

2.2 Paragraph 130 states that decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green space and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*

2.3 Paragraph 134 states that, *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.'*

The National Design Guide (NDG)

2.4 The NDG (MHCLG, 2021) describes the ten characteristics of good design.

- *'Context – enhances the surrounding;*
- *Identity – attractive and distinctive;*
- *Built Form – a coherent pattern of development;*
- *Movement – accessible and easy to move around;*

- *Nature – enhanced and optimised;*
- *Public spaces – safe, social and inclusive;*
- *Uses – mixed and integrated;*
- *Homes and buildings – functional, healthy and sustainable;*
- *Resources – efficient and resilient;*
- *Lifespan – made to last.’ (NDG para. 37)*

Guildford Borough Council Local Plan

2.5 Local design policy relevant to the application is summarised.

2.6 **Policy S3 Delivery of development and regeneration within Guildford Town Centre**, which amongst other things requires development to have regard to:

- The historic environment, street pattern and topography;
- Important views into and out of the town centre from the surrounding landscape; and
- Views within the town centre to important historic buildings and local landmarks.'

The policy goes on to say that,

‘Schemes must demonstrate high quality design and contribute wherever possible to achieving: a) mixed uses with active ground floor uses; b) defined public and private spaces that are well enclosed; c) an attractive and safe public realm; d) legible routes that are easy to understand and move through; e) give priority to pedestrians and cyclists over motor vehicles; e) improved access and views to the River Wey.’

2.7 **Policy D1 Place shaping**, which requires all new development to:

‘achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set.’

The policy then describes the essential elements of place making:

‘...creating economically and socially successful places with a clear identity that promote healthy living; they should be easy to navigate; provide natural security through layout design with attractive, well enclosed and overlooked streets, roads and spaces with clear thought given to the interrelationship of internal and external land use.’

The policy expects all new development to:

‘...have regard to and perform positively against the recommendations set out in the latest Building for Life guidance and conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG) [Emphasis added]’.

2.8 **Saved Policies G5 (2-9)**, which covers scale proportion and form, space around buildings, street level design, materials and architectural detailing, traffic, parking and design and landscape design.

2.9 **Saved Policy G11 The Corridor of the River Wey and the Guildford and Godalming Navigations**, which requires development to protect or improve the special character of the River Wey and the Guildford and Godalming Navigations in particular:

‘...their visual setting, amenities, ecological value, architectural and historical interest...’

2.10 **Saved Policy H4 Housing in Urban Areas**, which supports the provision of residential development in urban areas provided that: the development:

‘1. Is in scale and character with the area; 2. Has no unacceptable effect upon the amenities enjoyed by the occupants of the buildings in terms of privacy and access, daylight and

sunlight; 3 Has no unacceptable effect on the existing context and character of the adjacent buildings and immediate surroundings.'

- 2.11 **Saved Policy HE4 New Development which affects the setting of a Listed Building**, which states that: *'Planning permission will not be granted for development that adversely affects the setting of a listed building by virtue of design, proximity or impact on significant views.'*
- 2.12 **Saved Policy HE7 New Development in Conservation Areas**, requires development to preserve or enhance the character or appearance of the Conservation Area. Amongst other things applicants must demonstrate they have considered: *'The impact of development upon the townscape and roofscape of the area.'*
- 2.13 **Saved Policy HE10 Development which affects the setting of a Conservation Area**, which states that: *'The Borough Council will not grant permission for development which would harm the setting of a conservation area, or views into or out of that area.'*
- 2.14 **Saved Policy R2 Recreational Open Space Provision in relation to large new residential developments**, which sets out the open space requirements for developments of 25 dwellings or more.

Local Design Guidance and SPD's

- 2.15 Relevant Local Design Guidance and SPDs are listed below:
- Landscape and Townscape Character Appraisal (GBC, 2007)
 - Residential Design Guide (GBC, 2004)
 - Bridge Street Conservation Area Appraisal (GBC, 2003)
 - Town Centre Conservation Area Character Appraisal (GBC, 2006)
 - Climate Change, Sustainable Design, Construction and Energy SPD (GBC, 2020)
 - Planning Guidance for developments next to the River Wey and Godalming Navigations (National Trust, 2011)

GBC Landscape and Townscape Character Appraisal

- 2.16 The townscape appraisal divides Guildford into 12 Townscape Types, which are further subdivided into Character Areas. The Site lies within Character Area 1A: Guildford Historic Town Core. Management guidance and opportunities for enhancement that are relevant to the application include:
- *'Encourage new development within existing alignment and topography.*
 - *Encourage highway improvements, which retain the human scale of the streets.*
 - *Maintain and reinforce a visual connection between the High Street and Town Bridge/the Mount.*
 - *Conserve the narrow plot width and 2-3 storey building heights that are typical of the Historic Core on the street frontage.*
 - *Use modern materials with care. Where possible combine with local materials such as sandstone, clunch flint and brick with stucco or tile hung exteriors, which reflect the local vernacular.*
 - *Use traditional materials such as cobbles, stone kerbs, and black painted cast iron street furniture to maintain the unity of the Historic Core.*
 - *Conserve riverside vegetation that indicates the presence of the river and provides a green backdrop to views down the High Street. Plan for any future loss with a programme of replacement and encourage native or suitable waterside species to*

enhance habitats and wildlife value along the river.

- *Conserve views along the streets, particularly those to the chalk ridges in the background.*
- *Conserve panoramic views from high points e.g. from the Castle Mound.*
- *Ensure all developments consider the visual impact on key views or viewpoints and roofscapes.*
- *Conserve the historic landmarks and views to these landmarks.'*

3 Understanding of the site

3.1 The application site is at a prominent location where the rurality of the River Wey meets the historic High Street, and traditional town centre land uses transition to residential neighbourhoods. It sits within a Conservation Area and close to the boundary of two further Conservation Areas. Heritage assets include The Yvonne Arnaud Theatre, Town Mill, St Marys Church, St Nicholas Church and Guildford Castle. The site is bound by the A281 Millbrook, the River Wey and the Mill Pond.

3.2 The site comprises the former Debenhams department store, an area of public realm to the north and a gated access/maintenance walkway alongside the river frontage.

3.3 The building stands at 15-20 meters in height (above existing ground levels). The main part of the building comprises three retail floors with a fourth retail floor and offices over the southern part of the building. The fourth floor is stepped back from the River and Millbrook. Basement parking/servicing is accessed from Millbrook and the retail entrance is from the public realm area.

3.4 Historic mapping highlight the contextual influences that have shaped how the site has developed. Maps dating back to the mid-19th Century show that the northern end of the site formed part of the High Street until it was annexed by Millbrook in the 1960's. The main site area was historically wooded, and later became the site of a sawmill and timber yard. Following the introduction of the A281 Millbrook the Debenhams store was constructed, with a curved façade frontage onto the road. The present arrangement of a glazed entrance and public space to the north followed the demolition of the annexed High Street buildings in the early 1990's. The store closed in May 2021, following the collapse of Debenhams plc, which was in-part a result of changing town centre and retail trends.

3.5 An advisory panel of Architects commented on the Debenhams scheme in 1959. This historic information provides an insight into the original design approach:

"The overall size of the building was considered and we recognise that it is necessarily a large building and that practically all the length of its outside walls constitutes important frontages. Also the planning of a large retail store requires large internal spaces with no change of function and therefore no change of external expression.

The architects have, in our opinion rightly, designed these elevations as long horizontally treated units, which they consider would give the impression of being less bulky than if they were in more units and the horizontality was lost

They should be requested to make every effort in detailed design and choice of materials and colours, to moderate the sense of architectural weight. This could

also be done by using greater areas of glass, where appropriate, and by breaking down plain surfaces of brickwork by introducing some windows or decorative features.

We understand that the architects are already trying to remove the austerity of the elevation over-looking the Mill Pond. In this case where it has internally smaller administrative units rather than open trading space, some opportunity could be taken of breaking the straight façade, varying the fenestration, setting back the top storey, and so on. This is an important frontage and needs to be treated accordingly...”

4 Understanding of the application

- 4.1 The proposal is for the demolition of the vacant building and replacement with a residential led mixed-use development. It would comprise two buildings of up to 9 and 8 stories in height that are described by the applicant as Building A (Town Centre) and Building B (Riverside). The two buildings would sit either side of an outdoor lobby space described as a ‘Residential Street’. The ground floor deck would be raised by approximately 1 meter to allow for flood risk. The existing basement would be retained and re-purposed to service the site.
- 4.2 The existing public space at the northern end of the site would be renovated with the introduction of a pavilion, new paving, planting, seating, and steps/ramps to accommodate the new level change. This space is described by the applicant as a ‘Civic Square’. The scheme would also include a ‘Riverside Promenade’ adjacent to the Wey and a ‘Pocket Park’ adjacent to the Mill Pond. The Design and Access Statement (DAS) shows that access to the Civic Square would be open 24/7 and access to the Residential Street, River Promenade and Pocket Square would be available to visitors during the opening hours of commercial units.
- 4.3 Building A would create the main frontage to the site, overlooking the Civic Square. The building would stand at 34 meters above existing ground levels. Building B would form an angular v shape, containing a first-floor private Podium Terrace with an open southerly aspect overlooking the Pocket Square and Mill Pond. This building would be slightly lower than Building A at 32 meters above existing levels.
- 4.4 Internally the basement would consist of service uses, retail would be located at ground floor level and the residential apartments would be located over the upper floors. The basement space would comprise vehicle parking, cycle storage, bin storage and plant. Access for cars, bikes and service vehicles would be from the existing Millbrook access via a new Port-Cochere. The ground floor level would comprise residential lobbies and flexible retail space. The lobbies to Building’s A and B would be accessed from the Residential Street and entrances to the retail units would be from the Civic Square, River Promenade, Residential Street and Pocket Square. The upper floors would consist of studio, 1, 2 and 3 bed apartments with access from internal stair wells, lifts and corridors.

5 Urban Design Comments

- 5.1 There is no ‘in principle’ objection to redevelopment of the site and the opportunities that would flow from this. These include enhanced pedestrian access between the High Street and the River Wey, new and improved areas of public open space and public realm; and improvements to the pedestrian environment on Millbrook. Amongst other things the design challenges include the setting to historic buildings, the setting to the River Wey, respecting the existing topography and roofscape, retaining views to the chalk ridges in the background

and noise and air quality associated with Millbrook. There are key concerns regarding how the scheme responds to its context, which are set out in the following comments.

Block Structure

5.2 The block structure seeks to maximise the development footprint whilst providing public and private outdoor amenity space. The uniform floorplan depths with central corridors and stair wells result in predominantly single aspect apartments. The residential street and open southerly aspect, forms a broken or fragmented perimeter block structure.

5.3 Concerns regarding the block structure arrangement are summarised below.

- Around 20% of the apartments have a single north-east aspect onto Millbrook with associated sunlight, noise and air quality concerns.
- There is ambiguity between 'public' and 'private' space for example the residential street would only be open to the public during commercial opening hours and the pocket square would be overlooked by the private podium terrace.
- The residents of Building A would have no direct access to the common outdoor space, which should be a shared focus of residents and a point for community building.
- The open sided nature of Building B will result in the common outdoor space and facing apartment having less protection from external noise, air pollution, wind and sun than a contained perimeter block.

Massing and Appearance

5.4 The uniform stacked approach of the upper stories seeks to efficiently maximise the amount of residential floor space. This approach has resulted in a monolithic structure, which poorly relates to important characteristics of the area, which include:

- The existing alignment and topography;
- Views along streets, particularly those to the chalk ridges in the background;
- Panoramic views from high points such as the Castle Mound;
- The visual impact on key views and viewpoints and roofscapes;
- Historic landmarks and views to these landmarks; and
- The Character of the River Wey

5.5 Table 5.1 on the following pages appraises a selection of the views presented in the Townscape and Visual Impact Assessment (TVIA)

Table 5.1 Appraisal of Selected TVIA views

| TVIA View Location | Existing View | Proposed View |
|---|---|--|
| 09 Quarry Street, outside No 57 | The Grade I Listed St. Mary's Church is the focus of this view. The existing department store building sits below the main roofline of the church. In this view most of the former Debenhams building is obscured by the church building and evergreen vegetation in the churchyard. A relatively small part of the building is seen between the church and the vegetation. The light materials of the former department store are subservient to the church. | The proposed building would be seen above the roofline of the church. The scale of the building, dominant materials, Juliet balconies and uniform and regular geometric form would detract from the existing character of the view and setting to the church. In this view the proposals do not reflect the GBC townscape character guidance; amongst other things this includes working with alignment and topography and considering the impact upon roofscapes. |
| 10: Castle Motte, looking north-west | This elevated view overlooks the varied, generally pitched rooftops of Guildford's historic core, which naturally fall with the topography to the valley floor. St. Mary's Church Tower and the Cathedral are two key landmarks in the view, beyond which lies a wooded skyline. The rooftop of the former Debenhams sits below the roofline and appears subservient to the historic roofscape. | The proposed building would be seen above parts of the historic roofline and break the treed skyline. It would be at odds with the existing roofscape, which follows the topography visually connecting the town and the river. In this view that visual connection and reading of the landform would be lost. The scale and form and detailing of the proposed building is at odds with the existing human scale of the buildings, varied generally pitched roof line and varied forms. |
| 11: The Town Bridge, looking South-east | The view extends from the historic bridge up the high street with modern buildings seen to the left and right of the bridge, which include the former Debenhams store. The extent to which the building is visible is softened by existing riverside trees on both banks – A Willow on the eastern bank and several trees (Category B and C) within the site, which would be removed as part of the proposals. | The proposal would be double the height of the existing building. The scale of the building, regular geometric forms, dark window frames and flat roof would appear bulky and 'block-like' in contrast to the finer grain forms of the historic high street. Removal of the existing mature trees would result in loss of riparian character. |

Table 5.1 Appraisal of Selected TVIA views

| TVIA View Location | Existing View | Proposed View |
|-----------------------------|--|---|
| 12: High Street/Millbrook | This view extends to the tower of the Grade II St. Nicholas Church. To the right of the view the former Debenhams store is visible. The former store’s curved Millbrook Frontage and northern elevation are prominent features of the view. The roofline of the former store is on the same plane as the church tower. | In this view the proposed building would be around double the height of the former store. The significant height, geometric form and heavy detailing would be in stark contrast to the High Street. It would visually detract from the historic landmark of St. Nicholas Church. The prominent corner balconies, which are shown in the visuals with green vegetation are likely to be used for storage, outdoor seating, tables, and other paraphernalia. The inward-looking pavilion would effectively turn its back on the town bridge, which would also detract from the setting to the Church. |
| 13: The Mount, looking east | In this view the existing building is concealed by intervening buildings, which include the listed St. Nicholas Church and GV II House and a modern three storey block of offices. Distant views extend to the high street and roof tops on the skyline. | The proposal would be seen over the roofline of the listed buildings and modern office block. They would break the skyline of rooftops that lie beyond. Overall, the proposal would diminish views of the church and skyline beyond. |
| 19 Millmead embankment | In this view the rounded glazed corner of the former Debenhams building creates a prominent landmark at the junction of the River Wey and the Mill Pond. The curve of the building reflects the curved form of the Yvonne Arnold Building on the opposite side of the Mill Pond. | <p>The proposal would see the existing sheet piles and Riverside Wall raised by around 1 meter and the addition of a further 0.6meter for steel planters. This will result in a more austere view from the opposite bank and minimise any connection between the development site and the river below.</p> <p>The building would be almost double the height of the existing building. The buildings form, uniform appearance, prominent materials, dark window surrounds, and Juliet balconies would further accentuate the overall mass and scale.</p> |

| Table 5.1 Appraisal of Selected TVIA views | | |
|--|---|---|
| TVIA View Location | Existing View | Proposed View |
| | | The blank red brick wall at the junction of the Wey and Mill Pond would have the effect of deadening this important corner. It would be incongruous with the existing curved form of the riverside wall. |
| 21 Millbrook at Rosemary Alley | In this view the modernist appearance of the Debenhams building is in stark contrast the 18th Century Town Mill Building. Although contrasting in architectural appearance the roofline of the Debenhams building does not extend above the Mill Building. Between the two buildings, the canopy of a silver birch tree extends above the existing roof lines. The sweeping curve of the Debenhams Millbrook frontage is also a characteristic feature of the view. | The proposal would be seen above the Town Mill Building and the existing mature tree. The sweeping Millbrook Road frontage would be replaced by the angular appearance of the two buildings awkwardly juxtaposed together. |
| 22 North Street, looking up Friary Street | In this view the Debenhams building sits in the same plane as the buildings on Friary Street. The sky-blue glazed panels and stonework of the contemporary buildings on Friary Street reflect the horizontal colour bands of the former department store. The characteristic curve of the Debenhams building has the effect of extending the view beyond the street. | The height and massing of the two buildings would extend over the roofline of existing properties on Friary Street and terminate the view. |
| 23 Friary Bridge | In this panoramic view the Debenhams building appears subservient to the river, riparian vegetation, and the tower of St. Nicholas Church, which is an important landmark at the junction of the river and the High Street. The adjacent White House pub is also a characteristic feature of the view. The large-scale modernist structures of Friary Court | In this mid-distant view, the proposed building scale, massing, geometric fenestration, and bands of appear similar in style to Friary Court and Mount Court. The building would draw the attention from St. Nicholas Church. |

| Table 5.1 Appraisal of Selected TVIA views | | |
|--|---|---|
| TVIA View Location | Existing View | Proposed View |
| | to the left and Mount Court to the right and the surface car park in the foreground detract from the view. | |
| 24 Millmead entrance | In this view the curved glazed corner of the former department store is a recognisable landmark. The southern façade of the existing building is softened by London plane trees on Millmead. | The proposed building would be seen over the existing trees. The heavy materials and geometric appearance would accentuate the overall scale of the building. |
| 25 Portsmouth Road at Bury Street | Views towards the tower of Holy Trinity Church (Grade I) and the top of the Abbot's Hospital (Grade I) are framed by Wycliffe Buildings (Grade II) to the left and Condor Court to the right. | The proposal would obscure views to the tower of Holy Trinity Church, which is an important landmark on the skyline; and the top of the Abbot's Hospital. |
| 30 Castle Street at Tunsgate | In the existing view, the built form falls away to the river. Beyond Castle Street, the tower of Grade I Listed St. Mary's Church is glimpsed. This composition has a backdrop of wooded hills on the opposite valley side. | The proposed building would sit between St. Mary's Church tower and the wooded hillside beyond. The scale and massing would be inconsistent with the roofscape that falls to the river. The proposal would also interrupt the wooded setting including the setting to the church tower. |
| 31 Millbrook at bus stop (Stop J) | In this view the existing building is almost entirely obscured by the Yvonne Arnaud Theatre, Town Mill and the mature trees in the foreground. | The proposed building would be seen over the roofline of the Town Mill, which would have an adverse effect upon the setting of the building and overall composition of the view. |
| 35 Park Street/Onslow Street | Beyond the road junction, St Nicholas Church is the prominent feature of this view. To the left of the church the top of the former department store sits below a treed skyline. Guildford Castle is glimpsed between the former store's rooftop and skyline. | The proposed building would sit behind and to the left of St Nicholas Church tower. The building would break the skyline and obscure views towards the castle |

Table 5.1 Appraisal of Selected TVIA views

| TVIA View Location | Existing View | Proposed View |
|------------------------------|--|--|
| 40 High Street/Chapel Street | In this view the former Debenhams building is obscured by existing buildings of the High Street. Beyond the High Street a wooded skyline is seen beyond the Mount Pleasant tower blocks. | In views from this location, the existing Mount Pleasant towers, in combination with the proposed building, would entirely obscure views of the wooded skyline beyond. The height of the proposal would also be inconsistent with the High Street buildings, which fall with the topography to the valley floor. |
| 41 High Street/Chapel Street | In this view the former Debenhams building is obscured by the High Street buildings. The roofline of the High Street descends with the landform to the town bridge and St Nicholas Church. | The proposal would see the top three stories of Building A appear over the characteristic High Street roofline. The introduction of this building would be inconsistent with the historic roof pattern and would detract from the existing view. |

Pedestrian and Cycle Access

- 5.6 Pedestrian access would be centralised with internal lobbies, stair wells and corridors. This arrangement would lead to a poor interrelationship between internal and external space. Concerns regarding this approach are summarised below:
- The corridor, stair well and elevator arrangements would result in indirect routes between the apartments, public space and the shared communal space.
 - The central corridors and stair wells would have no natural light or ventilation except at the entrance to the first-floor podium.
 - The proposals generally promote elevators over stairs as the primary means of accessing the upper floors, which would not support healthy living.
 - Overall, the access arrangement would not encourage a sense of ownership or neighbourliness.
- 5.7 Access for cyclists would be shared with the vehicle and service route off Millbrook. Cyclists would need to use the service lift or vehicle ramp to access the bike storage facility through doorways and a narrow corridor. Elevators or an internal stair well would provide access to the upper floors. This arrangement would be unattractive and inconvenient to cyclists. It wouldn't encourage or support cycle use as a sustainable mode of transport for residents or visitors.

Public Realm

- 5.8 The Public Realm proposals would include new spaces and improved access to the banks of the River Wey. However, the proposed uses and circulation would be constrained by limited space. Concerns are summarised below:
- The built form results in an uncomfortable pinch point at the site's south-western corner where the upper stories of Building B would over sail the riverside walk and outdoor seating area.
 - The scheme does not offer enhancement to the public realm alongside Millbrook, which is a key frontage and pedestrian walkway.
 - The scheme does not allow space for meaningful tree planting alongside the River and Millbrook frontages.
 - The limited space has the potential to result in conflict between 'public' and 'private' activities such as public seating and private restaurant seating.
 - The application doesn't include details of how various proposed activities within the Civic Square would be serviced.
 - The proposed Civic Square pavilion is at an important corner where the site meets the bridge. It would create a pinch point for access and restrict the available space for tree growth.

Townscape and Visual Impact Assessment (TVIA)

- 5.8 Concerns regarding the TVIA are summarised below:
- The verified views methodology uses the London Views Management Framework Supplementary Planning Guidance (SPG). National Guidance is set out in, 'Visual Representation of Development Proposals' (Landscape Institute, 2019)
 - The well-established approach to assessing Landscape/Townscape Character, which involves reviewing published character assessments to help inform site-specific assessment has not been followed. The assessor has taken the GBC Townscape Area boundaries and made their own assessment, which extends well beyond the immediate environs of the site.

- The criteria used to arrive at sensitivity and significance judgements is not clearly set out in the methodology.
- The photographs of existing views are presented at a smaller scale than the proposed views, which makes it difficult to compare the two scenarios.
- The assessment describes all of the townscape and visual effects as either positive or neutral. Given the concerns regarding how the scheme responds to context and character these judgements are not considered credible.

Conclusion

5.9 In summary the approach taken to the design seeks to efficiently maximise residential and commercial floorspace across the site. Consequently, this would result in a weak relationship with the site's context and character. Insufficient consideration has been given to how the place would function and relate to its setting. It would not comply with the requirements of the NPPF para 130, National Design Guidance, Local Design Policy and Local Design Guidance.