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*Secretary of the Guildford Society Planning
Applications Team*
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18th December 2023

Dear Ms Williams

23/P/01850 Hybrid planning application comprising: A full planning application for the demolition and retention of existing buildings and erection of new buildings to provide extra care housing (Use Class C2) and associated ancillary accommodation and amenity space, public realm works, at-grade car parking, plus restoration and upgrade works to Braboeuf Manor (ancillary accommodation and amenity space) and the refurbishment of Pound Cottage (Use Class C3); and An outline planning application for a residential led scheme (Use Class C3) and car park, with all matters reserved except access | The University Of Law Braboeuf Manor, Portsmouth Road, Guildford, GU3 1HA

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Introduction

The Society **Strongly Objects** to this this application that borders the Surrey Hills National Landscape (Previously the Surrey Hills Area of Outstanding National Beauty (AONB) and is in the St Catherine’s conservation area.

It believes this planning application represents a new low in over developing major sites within the town. Although it has some elements of public benefit, overall, it will cause considerable harm to the South West edge of the Guildford area and turn it into just another “high-rise” area of the town. The application is a real failure of planning and should have been stopped or revised at a far earlier stage.

The Society notes the site is covered by the Greenbelt (Part Only), Surrey Hills National Landscape (SHNL) (Previously AONB) and AGLV (Part Only). The site is also outside the Guildford Urban Area but covered by the St Catherine’s Conservation area.. We don’t consider the current scheme shows proper consideration for its exceptionally sensitive position.

Consultation

Although Public Consultation has occurred the submitted scheme is the first time full details of the height of the buildings has been apparent as the June consultation (See diagram to side) used a very different scheme with underground car parks. The 5-6 Storey Buildings have only appeared in the submitted application.



The Society notes that according to the Design and access Statement that the council has worked with the developers over a series (6-7) pre-application meetings. There has also been one meeting with the Guildford Design Panel to review the plans at the midway stage. The applicant has evolved the scheme over several iterations in consultation with council officers to produce the plan that has been submitted as 23/P/01850.

Change of Use to Extra Care Housing and Market Housing

Extra Care Housing

The Developers claim that there is a considerable need for extra care housing. We can understand this need, but also note the proposed development will be a very high specification upmarket facility probably out of the reach of most people in the Guildford area. It is not clear that it will provide benefits such as allowing the downsizing from large family houses to a large degree and that the population of the site may come from a large area in the southwest quadrant around London.

We are not convinced that the development will make a major impact on the circa 500 extra care places that are required in the Guildford area.

Housing

The proposed provision of circa 100 Market Flats on the site is part of a trend to provide these units with in Guildford . We question if this is the best use for the site as we have numerous new developments in progress to provide flats notably the Plaza site (300) being built, Solum – Guildford Station (445) being built, Saint Mary’s Wharf (185) which is due to start building shortly, and finally North St (470). These developments are focussed on providing Studios, 1- and 2-bedroom flats in the town centre totally circa 1,400 units. There is an argument that the dwelling space at the Law College would be better suited for family houses.

The society observes that the application is silent on the issue of affordable housing for the Zone3 part of the development.

Size of Development

The current law college according to the design and access statement provides educational facilities which total 7800 square metres of gross external area (GEA) and the site also provides 388 car parking spaces. These buildings cover the areas known as zones 1-2 , & 3 (Car Park) in the applicants plans.

The scheme as presented is defined in the Design and Access statement as providing 21,575 square metres of GEA for zones 1-2 of the area. This is large increase of almost 3 times the area on a sensitive site.

The area currently occupied by the car park which is subject to a local plan policy A34 which allowed for 112 Student Units. This policy was originally defined to provide units which would have supported the ongoing operation of the Law College. If this policy is followed it gives a Gross Internal Area of between 2,200 to 3700 square metres. The variation is caused by the uncertainty of Student Unit sizing with recent Walnut Tree Developments being 25 SQ/M and some other recent designs allowing on 15 SQ/M for each unit.

The equivalent calculation for the proposed development 104 Dwellings with a unit area of on average 60SqM, assuming a mix of 1 and 2 bed units, gives 7488 GIA. Thus, the proposed plan is 2- 3 times the size of an agreed and consulted upon policy in the local plan. The reasons for this large change, apart from commercial gain, needs to be fully explained.

Note: in our calculation we have added 20% to cover Corridors/Access and Stairs. Student Units have also an added 10% added for shared common areas.

The applicant is thus asking for a series of buildings which are going to be far larger than the existing buildings on the site in area and will be exceeding the area determined for the part in the Local Plan as Policy A34 in the local plan.

The proposed floor space is significantly larger that the current buildings on site. This impacts the Height and Mass of the development.

Height and Mass of Development

This society contends that the height and scale of the buildings proposed for the site are totally out of scale with the surrounding buildings in the conservation area. As a measure of scale the blocks O & N which are joined have a total length of approx.76M, which is longer in unbroken length to modern town centre developments e.g the St Marys Wharf (Debenhams) Site south block is only 60M in length. The recently completed North Block of the Solum Guildford Station Development, The Mint, is approximately 55M in width, see recent photograph from west below (this building is approx. 2-3 storeys higher).



This demonstrates that the scale of the buildings envisaged for the site is adopting a scale that is to be expected for a town centre location rather than a significant edge of town location bordered by areas of outstanding natural beauty and overlooking the Surrey Hills.

The massing of the buildings is of a concern in that the blocks come very near to the edge of the site in several cases and will create a cliff edge of buildings along certain of the boundaries. A characteristic of the Saint Catherines area which has been recognised in the local development plans is that most of the buildings of modest scale two or three storeys max and sit within their sites with considerable green space around the buildings.

The proposal for five and six storey blocks is an over development of the site and completely out of character with the adjacent conservation area.

The resulting massing of the five and six storey blocks, which have large footplates result in buildings which break the tree lines and the horizon of the hill adversely affecting the setting of the SHNL and the setting of St Catherine's church.

LPSS Policy D1 para 4 states *"All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD's, neighbourhood plans and SPDs."*

In addition, the National Policy Framework (NPPF) states

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

The society has yet to see any cogent argument that shows that the benefits of this scheme outweigh the large disbenefits related to the impact on the environment, SHNL , conservation area and locale in an important part of the southeast. It is also appears not to be compliant with the NPPF.

Design

The Society will not comment in detail on the design but makes the following observations.

It is disappointing to see, yet again, a site being developed which is using one architectural style across the entire site, providing little architectural variety. This is especially important in St Catherines which has a variety of styles, building colourations, variety of roofscapes and mixture of materials. This is part of the areas character and charm that and has evolved over the years.

Having a design monoculture which the Law College development represents is a retrograde step in our view and creates a very forbidding and uninteresting environment. It is notable that lots of other towns take a far more dynamic approach to their design issues and ask for a multiplicity of architects, to work within a masterplan with a lead architect, to be used on large sites to provide that variation, intrigue and interest id created.

LPSS Policy D1 para 1 states *“All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space.”*

We don't believe the proposed design meets the criteria documented in this policy.

Relationship to Mount Brown

The applicants have shown no details about how the proposed development will relate to Mount Brown (LPSS Policy A33) (the Police Headquarters) which in itself is subject to a redevelopment application which will be coming forward shortly. The other sites are not linked by footpaths or roads etc. but the buildings do have a relationship with each other particularly on the southern boundary of the Law College site where, depending on what plans are submitted by the police authority, it is probable that the flats on that area will overlook a Multi Storey car park. It is surprising that the applicants have not seen fit to at least detail how these two sites would integrate in terms of views overshadowing etc.

Views of the Site.

The applicant provides verified views of many aspects of the site as seen from both without and within the site. This society has examined these in detail and would have comments on all of them in various aspects. For the sake of brevity, we are concentrating on five views which we believe need to be considered in considerable detail by the council and relevant authorities e.g. the SHNL to consider whether the development really respects the countryside which is one of the glories of Guildford.

We are also surprised that the applicant has seen fit to only submit Wire Line illustrations on the impact of the developments. For a full application in a sensitive location, we would consider at the very least there should have been a properly developed shaded diagram of the site in various views. In addition, we are disappointed that the council have not seen fit to require that the developer presents their proposal within the VU.City model of the town. This would allow the full

scale modelling of this site in the VU.City model that the council is operating in order to give proper 3D modelling of the application. This requirement is recommended in the recently approved Development Management Policies. This modelling would have allowed a proper investigation of the impact of aspects such as shading lighting and how the site will look at various states of the year when tree trees shed their leaves etc. We do not understand why this facility on such a major important site in the town is not used and the results of it use made public in some manner for public engagement and understanding.

Historic England in their letter on this planning application dated the 11th December 2023 note that *“The number of six storey tall residential blocks across the site would diminish the Victorian residential character and village feel of the Conservation Area by making it more urban in plan, layout and height.”*

We are surprised that the Planning Statement paragraph 7.37 concludes *“The LVIA concludes that there would be a Negligible overall effect on the Surrey Hills AONB, which is non-significant.”* As we set out below, we believe this is an erroneous interpretation of the information presented.

As noted above the Wireframe illustrations can be difficult to interpret. As a exercise to provide clarity we have as accurately as possible to coloured in the Wireframes to provide a better indication of the area of the proposed buildings that will be seen with the current tree cove.

The Society also notes that the development relies on tree cover to hide its considerable mass. Tree cover cannot be taken as a constant, as areas of vegetation over the life of the building, may be felled and replanted.

Pewley Down (LVIA - 01aM)

This view is focused on the St Catherine's Chapel the proposed buildings mass and projection of the buildings above the tree line are very obvious to the right of the Chapel in the illustration and will draw the eye away from the hillside with its ancient Chapel. The effect on the view is detrimental to the setting of the ancient monument and the character of the SHNL.

The diagram is also incomplete in that the buildings should be properly displayed with for example the grey line behind the red lines being only faintly visible in the photographs but actually have material impact on the view, with the building breaking the skyline.

It should also be realised that this view is seen as one traverses the Pewley Down countryside and that the buildings will be visible from a considerable area. Pewley Down is one the favourite walks in the area. The society believes the impact on this view is a major harm to the local vicinity.

Historic England also comment that *“Due to the topography of the Conservation Area, these six-storey tall buildings would also be visible amongst the mature deciduous trees in long views across the Surrey Hills AONB towards the Conservation Area, as illustrated by the Views Study in, e.g., ‘Pewley Down southeast above [and] below footpath FP35’.* “

We've provided an update of the verified view with coloured in buildings just to demonstrate the harm that will be caused.



Hogs Back (LVIA 35bR)

This is a popular walking area for many in Guildford and the surrounding area. When we look at the illustrations provided. It is obvious once the various blocks are solid coloured in to show their full impact that there is a major impact on the view of this part of the countryside and SHNL (See modified illustration below). This view shows the folly and detrimental impact to the character of the area which will be caused by inserting large and tall buildings, of very generic design, into an area which is characterised by smaller buildings.



Guildown Road (LVIA 36a)

This illustration shows the impact of the development which can be easily seen through various gaps in the built environment as one goes up this particular road. It is notable that the building on the left in the illustration is a heritage building, part of the St Catherines conservation area, and the scale of the proposed buildings don't fit well with the character of the area even though they are at a distance within this view.

It is also noted that by moving the camera across the road to the other side of the road it is likely that the buildings proposed for the Law College would be far more visible. This again shows the requirement to have a proper modelling tool such as the VU.City to fully show what the impact is. It is also noted that the wireline illustration with the purple building on the right-hand side shows this building breaking the skyline which we believe is against the idea of protected views for the sensitive area.

Proposed view



Footpath towards Shalford (LVIA 25M)

This view shows the impact when looking across the well-used setting at Shalford and the buildings being seen on the horizon. It is noticeable that submitted wire line in the view does not show the black outline of the proposed building very clearly, and this again breaks the skyline which is a negative impact on the character of the area.



Park Land at Law College (LVIA 47)

This view shows that Braboeuf Manor with the outlines of the new development. The Manor will be overshadowed and dwarfed by the mass and scale of the proposed new buildings. The developer claims that the Manor is to be rescued from its current unfortunate situation with buildings attached to it and will be renovated. The Society contends the mass and scale of the surrounding modern buildings make the vision of Braboeuf Manor impacted compared with the current situation.

Historic England are particularly concerned about the impact of the high blocks proposed as shown in the illustration below on the conservation of the Manor house. To quote from their *letter* “*This would harm the significance of the manor’s setting as a landmark building within the conservation area, but particularly because of the topography of the site which would make the new residential blocks appear dominant in views of the Manor.*”

Proposed view



Heritage Impact

The Design and Access Statement describes potential interaction with the heritage in the surrounding area as: *The site sits within the St Catherine's Conservation Area which was designated in 1969. It was subsequently reviewed in 1991, and revised to include, amongst other areas, Braboeuf Manor and the site.*

The area contains an interesting range of important buildings including the 14th Century St Catherine's Chapel, 16th Century timber frame buildings and a range of 19th and 20th Century buildings by notable architects Norman Shaw and Sir Edwin Lutyens.

The southerly expansion of Guildford in the 19th Century turned the adjacent area into a Victorian residential suburb. The topography and buildings provide the area with a varied but distinct character.

There are 33 listed buildings including Braboeuf Manor and one scheduled monument in the St Catherine's Conservation Area.

The Listed structures and the Conservation Area are 'designated heritage assets' as defined by the National Planning Policy Framework (NPPF).

The St Catherine's Conservation Area Study and Character Appraisal also notes that South of North Downs Way

Summary: Streets and buildings, including garden walls

- *Historic road pattern.*
- *Small groups of significant buildings set in a rural well-treed landscape.*
- *Buildings of high architectural quality with good individual detailing.*
- *Generally unspoilt by inappropriate changes.*
- *Some visually important walls*

The Heritage assessment in the planning application states that *"The setting of Braboeuf Manor, nearby listed buildings and the character and appearance of St Catherine's Conservation Area will be preserved and enhanced by the Proposed Development"*. Whilst in some respects Braboeuf Manor has some improvements we cannot agree its setting is improved and how the character of the St Catherine's Conservation is enhanced must be questioned.

Historic England as we have previously mentioned comment *"The number of six-storey tall residential blocks across the site would diminish the Victorian residential character and 'village' feel of the Conservation Area by making it more urban in plan, layout and height.*

Historic England also add: *"Due to the height of proposed residential blocks in Zone 2 (and Zone 3) proposals would harm the significance of both the Conservation Area and the listed manor."*

The proposed scheme will cause could be considered to cause 'less than substantial harm' to the Conservation area and Relevant Assets. Its reliance on screening by trees must be questioned as trees are not permanent features of the landscape.

Transport and Access

There are several concerns:

It is assumed that staff will be on site 24 hrs a day and thus traffic will occur 24 hrs a day. Site access will need to carefully be monitored outside normal working hours when speeding can occur on the Portsmouth Rd.

Are 13 Visitor and Staff parking spaces sufficient for the site, we are concerned that parking could overspill to Sandy Lane particularly once the Market Flats are occupied..

It should be noted that access to the bus stops is difficult from the site as the pavements on the Portsmouth Rd are exceptionally narrow.

Cycling on the Portsmouth Rd towards Guildford is possible but unpleasant. The cycle path down the Wey should not be considered a realistic alternative as it is leisure cycling path, it is blocked at Tumbling Bay in the Town Centre and also has a very steep access to the tow path from Ferry Lane.

It should be noted the cutting on the Portsmouth Rd to the south of the site entrance has a pavement only the west side. All pedestrian traffic going South North is likely to cross over, using the proposed crossing, and then across the access route to the development to gain the proposed crossing. Does this need to be allowed for in the entrance design.

As regards traffic on site, are deliveries going to be to a central facility with onward distribution by small electric vehicles? The Turning spaces and parking for deliveries looks very tight.

Conclusion

The applicant is proposing a scheme that is high density development that is out of character with its surroundings, and is in an elevated position, and if consented will extend the urban area of the town. It will set a precedent for Mass and Scale that could be used to argue for other developments on equivalent sites.

The proposed development of the site is detrimental to the character of the St Catherine's Conservation, the setting of St Catherine's Chapel, the setting of Braboeuf Manor and the setting of the SHNL and sets disturbing precedents if approved. Guildford needs to be serious about encouraging good and appropriate designed developments that respect and enhance the area, not overdevelopment of the site based on a poorly considered proposal.

As noted above we have doubts that the proposed scheme is compliant with policies as laid out in the NPPF and the LPSS.

Yours Sincerely

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

Alistair Smith

Chair - Guildford Society