



Patrick Daly
Planning Management
Guildford Borough Council
Millmead House
Guildford, GU2 4BB

Please reply to:
Guildford Society Planning Applications Team
Flat 4 Catherine's Place
Chestnut Ave
Guildford GU2 4AE

Email: chair@guildfordsociety.org.uk

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Dear Patrick Daly

25/P/01522 Full planning application for the erection of residential apartment blocks and townhouses (248 Use Class C3 units), with associated site preparation works, cycle and vehicle parking, highway and access improvements, children's play space, public realm enhancements, tree works and landscaping.

The Society Objects to this application.

A summary of our discussions with the developer is provided at Page 91 of the Design and Access Statement. We believe the summary doesn't reflect accurately the breadth of subjects covered in a wide-ranging consultation. The Society were pleased to be consulted on this project's design prior to the application being finalised, meeting with Wates, their architect HLM and GBC. We discussed the design proposals and input a number of ideas for enhancing the design. These, we were informed were welcomed by the Wates/GBC team. Subsequently the majority of these positive ideas for improving the design have been ignored. This is just the latest example of consultation covering a variety of schemes appearing of being of limited practical value. Making consultation meetings and events effective, not just a planning box ticking exercise, is critical to ensure the local community feels it is engaged.

1. PRINCIPLE OF DEVELOPMENT

We recognise the need to redevelop this highly sustainable and strategically important site, and accept that Guildford must accommodate increased housing delivery, the current proposal represents a missed opportunity. In its design quality, treatment of scale and massing, provision of amenity space, and approach to movement, placemaking and townscape, the scheme falls materially short of the standards set out in adopted policy and recent Supplementary Planning Guidance. Given the site's prominence and precedent-setting nature, the development should exemplify the highest standards of design-led, context-sensitive planning.

Summary of principal objections

- The proposal fails to demonstrate a genuinely design-led approach appropriate to a highly sensitive, precedent-setting site.
- The scale, massing and inter-block spacing result in an overly dense, wall-like form that harms townscape character and important views.
- Architectural quality is poor, with bland, panelised façades that are out of keeping with Guildford's character and aspirations.
- Public and communal amenity provision is inadequate for a development of this size and does not meet the intent of the Tall Buildings SPD.

- The scheme offers limited placemaking value, with no meaningful public spaces and an over-engineered internal layout.
- The “Living Street” proposal is overstated.
- Pedestrian and cycle connectivity, particularly to the station, is poorly resolved and in places conflicts with current guidance.
- The cumulative impact on townscape, heritage setting and pedestrian experience has not been adequately addressed.

2. POLICY CONTEXT

National Design Guides.

The National Design Guide, and National Model Design Code and Guidance Notes are vital guidance for new developments including this.

The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. This National Design Guide, and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government’s collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

The design proposed, we believe, does not meet the guidance standards of the National Design Guide and National Model Design Code. The former states:-

A well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels, including:

- *the layout (or masterplan);*
- *the form and scale of buildings;*
- *their appearance;*
- *and landscape;*
- *materials; and*
- *their detailing.*

The identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is not just about the buildings or how a place looks, but how it engages with all of the senses. Local character makes places distinctive and memorable and helps people to find their way around. Well-designed, sustainable places with a strong identity give their users, occupiers and owners a sense of pride, helping to create and sustain communities and neighbourhoods.

Well-designed places, buildings and spaces:

- *have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing towards health and well-being, inclusion and cohesion.*
- *have a character that suits the context, its history, how we live today and how we are likely to live in the future; and*
- *are visually attractive, to delight their occupants and other users.*

Tall Buildings SPD

This application should adhere to the requirements of the newly adopted GBC Tall Buildings SPD November 2025. The buildings proposed are located on high ground in Guildford Town Centre and therefore the net effect of this continuous wall of five and six storey buildings is effectively of buildings of 8 or 9 storeys high because of their relationship to the lower areas of the Town Centre from whence they will be viewed. The higher blocks are 20.824m in height which definitely categorises them as tall buildings under the SPD's definition of a tall building being 18m or above.

The Tall Buildings SPD states:-

A tall building in Guildford Town Centre is any building of 18m in height as measured from the lowest external point around the building to the height of the highest part of the roof.

5.5 The Council's view is that buildings of 18m or taller (which tends to align with buildings of 5-6 storeys) have a greater likelihood of harm to aspects of the local context (e.g. significant views, heritage assets) and it is sensible to detail further guidance specific for these buildings to avoid or mitigate harm, whilst enhancing positive design features. The approach also seeks to promote definitional clarity to support clear and efficient decision-making.

5.6 It is acknowledged that buildings of a height lower than 18m may also have impacts on a range of considerations identified by this SPD, especially if they are taller than immediately surrounding buildings. Whilst the guidance in this SPD is not formally engaged by these proposals, the principles incorporated reflect good planning and design practice and should be given consideration by applicants when formulating their proposals. Further, for sites outside the town centre, the Local Plan policies that the SPD provides design guidance for would still be relevant as a basis for ensuring that inappropriate and harmful development can be resisted.

6.5 The development of the vision seeks to bring together a set of vision elements. These are as follows:

- Role of SPD: There is recognition that the SPD should have its basis in Local Plan policies;*
- Focus on design process ahead of outcome: Outcomes should reflect a 'Design-led' approach – the form and height of development proposals should be informed by site in its context (not a 'predetermined' figure);*
- Seek balance in the design approach by avoiding or mitigating harm and enhancing benefits: There should be efficient use of land whilst also protecting views, character, heritage. The SPD should contribute to avoiding / managing negative impacts and enhancing positive qualities and contributions*
- Be location specific and reference the Guildford context: The SPD should be focussed on the Guildford Town Centre – this is the area of greatest pressure/opportunity for tall buildings - alongside acknowledging contextual sensitivities, including those within and beyond the town centre. It should also reference features which are specific to Guildford's unique local character (e.g. its distinctive townscape, heritage assets, important views, downland landscape and topography), recognising that any proposals for tall buildings require considerable sensitivity to these features.*

Surrounding context and prevailing character

7.7 A tall building can have a negative impact on the character of an area if it breaks or detracts from prevailing characteristics especially in terms of the form and scale of buildings including their height, bulk, massing, proportions, profile and roofscapes.

Important and significant views

7.25 The form and scale of new buildings are key in determining their visual impact. Building height is a key feature of a building's form and scale and can thus impact substantially on important views. This can occur by a building blocking or obstructing important views of key landmarks or natural features or detracting from views of legacy landmarks or heritage assets that may form part of the skyline. It is however important not to consider building height in isolation. Other elements of built form may also contribute to its impact on views. This includes its bulk, massing, proportions, profile, roofscapes and materials.

Tall building design guidance: provision of amenity space

7.67 Having access to amenity space is an important factor in providing a good quality living environment. It is capable of being multi-functional and can have significant well-being benefits, including encouraging physical activity, promoting improved mental health, and fostering a greater sense of social inclusion. In more urban settings such as the Guildford Town Centre, the opportunity to access amenity space is particularly important²⁷

7.69 The Local Plan policy's primary objective is to ensure that any amenity space that is provided has been designed at the outset rather than being an afterthought. The aim is to ensure that the amenity space is well designed and located in order to maximise how and when it can be used. For instance, shared amenity space should be large enough for the number of likely users of that space as well as being a pleasant and comfortable area to relax. Built in furniture including places to sit should be provided to encourage dwell time and be a sociable space which encourages interaction between residents. They should also be designed so as to maximise year-round use by taking into account likely sunlight/wind levels. This could include provision of shading features for hotter months and use of planting/built features to provide some shelter from the prevailing wind during cooler months. On tall building proposals, opportunities to provide communal roof gardens should be maximised. Furthermore, planting schemes within amenity spaces should be designed to maximise biodiversity net gain as well as opportunities to reduce the urban heat island effect.

7.70 For balconies, consideration should be given to their design and location depending on the building's orientation. For instance, it is likely to be more appropriate to provide inset balconies on southern and westerly facades where the reduced daylight to internal rooms would be offset by more direct sunshine. Projecting balconies on the other hand would be more appropriate on northern and eastern facades as they would result in less shading of the internal rooms. Projecting balconies are however more exposed to the elements and at higher levels may be susceptible to greater wind speeds. This should also be taken into account in the design process. Orientation of the building should also be a factor in how the balconies are located/distributed across the facade. Stacked balconies (i.e. one on top of another) are likely to be more appropriate on southern facades as this would provide some shading for the lower units during the hotter summer months thereby minimising overheating. Special consideration should be given to top floor balconies/terraces in these locations and whether some sort of shelter/enclosure may be appropriate to also assist with this. On northern facades it may be more appropriate to stagger the balconies (so they are not on top of each other) to minimise the loss of daylight in the units below.

3. DESIGN SCALE AND MASSING

The latest housing numbers calculated using the 'Standard Method' for the borough present a major challenge in that the borough must deliver approximately double the housing numbers agreed in the LPSS 2019-2024. It is important that the borough doesn't just chase the numbers, development still needs to balance Dwelling Numbers, Infrastructure Provision, Environment, and Commercial requirements. National policy places significant emphasis on housing numbers, sometimes at the expense of balanced place-making.

Accepting we must deliver more housing, and Guildford has severe constraints on land availability, which means that we will require developments of increased density and height **BUT** they must be well designed and capable of contributing to the housing stock for many generations.

Our concerns and objection are that the current proposals fail because of:-

1. The overall design does not accord with parts of the Government guidance very fully set out in the National Design Guide and the National Model Design Codes. We believe a high-profile public project of this scale must follow this guidance to create a housing development with 248 homes of the highest 21st century standards.
2. The proposed development, which includes tall buildings in excess of 18m does not comply with the requirements of the Council's own Tall Buildings SPD.
3. The design is poor with the wall of repetitive tall flat blocks whose scale, height and massing will seriously impact the already limited views of the Cathedral from the Town Centre and areas to the east.
4. For such an important and impactful project, the Council should be using this as an exemplar for other developments. The overall design and layout as proposed is mediocre and will not provide housing of the highest standard for the future residents.
5. The layout of the proposed development is poor because of it being bisected by a 6.2m road which serves as access to the development, and provides limited access to the university for a selection of controlled vehicles. This results in there being very limited public amenity space for the use and enjoyment of the 700+ future residents.
6. Conflicting with 1. above is the Council's policy on Sustainable Movement Corridors (SMC). The route through this site is designated as part of the Guildford SMC network and yet the design does not incorporate this.

Facades & Balconies.

The proposed design of the flats in the development suffers from being a series of monolithic and repetitive built forms which appears to prioritise construction efficiency over architectural quality. Modern Methods of Construction (MMC) systems, judging by other developments in Guildford, do not need to be a straight-jacket or an excuse for poor design.

The facades in many cases are very bland using large concrete panels with obvious jointing between the panels. The development claims that

The Secondary Façade

The architectural intent for the secondary façade is to celebrate and optimize the Modern Method of Construction (MMC) proposed for the scheme, offering a contemporary interpretation of Guildford's character.

As a complementary counterpart to the more traditional primary façade, the secondary elevation explores innovative design techniques and materials,

including the use of textured and tinted panels. This modern approach not only reflects the construction method but also tells the story of the site and its context through integrated detailing, etched artworks, and graphic elements embedded with the façade. The result is a layered contemporary expression that reinforces the narrative of place while clearly distinguishing itself as a secondary element within the overall composition.



Clarity is required on how secondary facades will weather, and no examples are given for the artwork proposed which may also suffer from weathering. How it offers a 'interpretation of Guildford's character' is a mystery. The flat, panelised façades with little articulation or material richness are totally out of character with the rest of Guildford.

The spacing between the four flat blocks is limited. The development will therefore appear, especially from the east/the Town Centre, as a wall of buildings running along the whole of the site.

The balconies are very simplistic and as they are projecting don't form an attractive extension to a living space. Inset balconies provide far more useful areas for flat dwellers. Some of the larger flats have balconies extending around the corners, although welcome, we believe proper inset dual aspect balconies would be better. See 7.70 in the Tall buildings SPD noted above.

4. AMENITY PROVISION AND PLACEMAKING

For the 233 flats there is limited public amenity space. The scheme relies heavily on the Living Street to provide its public realm. Flat dwellers only public amenity is the living street-poor environment with it's 6.2m wide road or bits of landscaped area left over by the siting of the flat blocks. There are no proper public spaces which might be desirable places for flat dwellers to use and enjoy. Most flats do have a balcony for private amenity space although again these do not satisfy the requirements of the Heights SPD. There is a play area but located at the north end of the development requires children, with or without parents/escorts, from all parts of the development to cross the main road.

The design is cramped and overcomplicated with its multiplicity of paths and areas, having more open grass areas could be preferable to allow residents to organise how they use the site themselves?

The absence of roof gardens represents a missed opportunity which Roof gardens could be part of a green roof sustainability plan, would be better visually and would provide excellent

shared amenity spaces encouraging a sense of community. Note the PV Cells lost on a roof might be replaced by incorporating PV cells as part of the facades as has been done very successfully in many modern buildings.

The Amenity space is very limited for the 700+ future residents.

We fail to see that the current proposals adhere to these and other requirements of the Tall Buildings SPD. If the Council fails to follow its own policies, it will not be possible for the Council to insist that developers of other projects adhere.

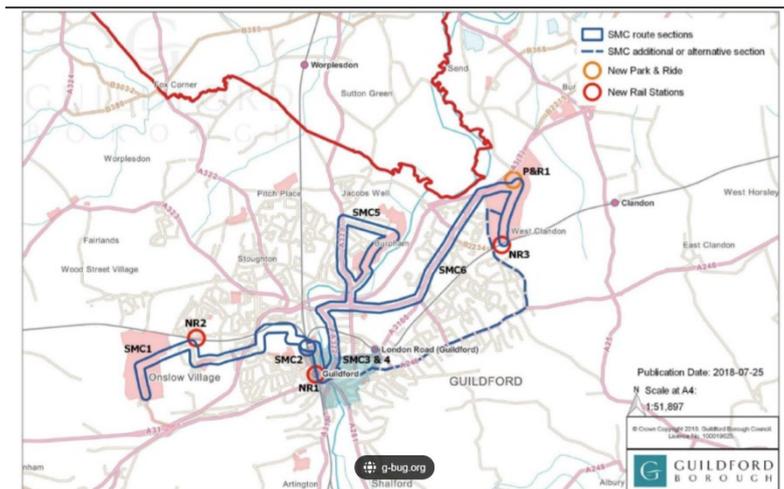
5. MOVEMENT, STREETS AND ACCESS

Living Street.

We would contend that this aspect of the scheme is being oversold. In reality, it looks like a two-way road with some speed humps. As noted above the Living Street is also a public amenity area but in reality is of limited use as genuine public realm.

Impact of the Sustainable Movement Corridor

How the sustainable movement corridor (SMC) relates to the site. Is the Living Street planned to become a Sustainable Movement Corridor or is the original plan to use a rebuilt Yorkies Bridge to provide a route for Buses, Cyclists and Pedestrians due to be implemented. Note it is not clear how a bus can access Yorkies Bridge from Walnut Tree close due to the tight road layout..



The current highway design proposed for the site doesn't comply with SMC corridor cross sections which could set a precedent.

The land at the southern end is also preserved for access to a potential development on the western side of the railway land. The society would welcome a strategic plan for the Station to accommodate growth provide better connectivity to the university and provide a better bus interchange.

Road and Traffic Volumes.



There is no proper confirmation of the traffic expected through the site. We have assumed that the route will continue to have at the university boundary its width restrictor, this allows for the controlled passage of buses, and other traffic via a rising bollard system, for vehicles with the correct accreditation. The main through traffic will 4 buses each way per hour.

It should be questioned if the proposed 6.2m road which serves as access to the development and provides limited access to the university for a selection of controlled vehicles is necessary. Although a two-way road is useful for road traffic, a narrow road enforcing one-way operation would be more effective in calming traffic and potentially allow provide benefits to the wider public realm.

Confirmation is required on other traffic e.g. are delivery vans allowed through or will they have 'U' Turn?

Parking

Only 39 car spaces are to be provided. The road will be defined as a double yellow roadway which means there are no visitor or tradesman parking. How is this to be provided, the rear courtyards are cramped and have access requirements for bike stores etc. It is not clear whether there is short term parking in the entrance areas of the blocks – but this looks barely adequate for a tradesman visiting one of the flats.

It should be noted that the limited parking will be a disincentive to certain types of occupations to live in the development e.g. Tradespeople who have a van.

Pedestrian Access

The pedestrian path through the site appears to have kept on the western side because it is legacy from the previously consented team. Logically the pavement should be on the eastern side as this links directly to the proposed site of the Sustainable Movement Corridor (SMC), to the flats, avoids crossing car parking spaces at the houses and links to Yorkie's Bridge to access Walnut Tree Close. The pedestrian path will also be more attractive rather than be jammed up against a high wall 5-6 metres high for much of its length. It would also open up the space in front of blocks A-D.



As far as access is concerned it the route to the town centre and station via Guildford Park Rd and Farnham Road bridge is narrower than current guidance

The footway on Guildford Park Road (ATZ Route 6 on p42) is narrower than current guidance e.g. only 1.4m across Farnham Road Bridge. Large vehicles also cannot turn easily from Guildford Park Road onto the bridge with dangerous incursions across the pavement. Parked, some of them illegally, cars often cause pedestrians to have to take the roadway to get past. Cars often wait illegally on double yellow lines near the station.

Bike Travel

It should be noted that one of the attractors for Bike Travel will be the Station. The bike racks are at the main entrance which from the Travel Transport Assessment will require a cycle down potentially congested Guildford Park Road across a congested Farnham Road Bridge – this is a unattractive and hazardous route, Cyclists should be encouraged to use the Yorkies Bridge to Walnut Tree Route which although has its own hazards can be a made a very viable route to the station.

6. HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

Although having a view of the town from various views we consistently fail to have views as experienced by pedestrians. An example is the view of the new Solum Car Park taken from the adjacent road which we would contend is an aggressive and unfortunate building impacting the pedestrian environment.



Another view across the tracks to the Cathedral show the proposed site. Guildford should provide a welcoming and interesting view for travelers at the station, and on trains. It is a concern that the views of the cathedral from trains and platforms will almost disappear with the proposed development with its limited inter block gaps, and ground level height that increases the apparent height of the buildings above rail level.



Although the visual link between Guildford Castle and Guildford Cathedral remains protected and considered sensitively, see the Visual Impact and Heritage Impact Assessment, the glimpses of the Cathedral from street level are severely compromised.

7. CONCLUSION

This proposal represents a significant missed opportunity on one of Guildford's most important gateway sites. It fails to deliver meaningful placemaking, falls short of the principles set out in the Tall Buildings SPD, and does not provide the exemplar, design-led development that this location demands. The Society therefore considers the application to be an inadequate response to the site and urges the Council to seek a substantially improved scheme that genuinely reflects Guildford's aspirations for quality, sustainability and place.

Yours Faithfully

Alistair Smith

07711 01576

Chair@Guildfordsociety.org.uk