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Please reply to:
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Email: chair@guildfordsociety.org.uk

12th October 2026

Dear John Busher

26/P/01163|Application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Condition 2 (approved drawings) to increase the height of Building A in relation to planning permission 21/P/02232 dated 29/04/2023 (Demolition of existing building and erection of two buildings comprising residential accommodation (Use Class C3), flexible retail floorspace (Use Class E) and cinema (Sui Generis), together with car and cycle parking, plant and all highways, landscaping and other associated works.).|Former Debenhams, Millbrook, Guildford, GU1 3UU

The Society Objects to this application.

A) Introduction

It is worth revisiting the history of the application for this site. During the development of the proposals and ultimate consent of the scheme in 21/P/02232 on the 29/04/2023. The original scheme had a height which was one storey higher on both blocks. Historic England argued for this to be reduced and further argued that Block A the northern block should have a further one storey reduction to avoid impact on the High Street and create a stepped height to the blocks in response to its proximity to the High Street and river crossing. The height of the blocks was reduced by one storey to reduce harm to views in Guildford and the heritage buildings that are near the site.

The scheme is a major insertion into the townscape of Guildford and is of a mass and scale that must be very carefully considered vs. the preservation of the historic core of Guildford and its links to the countryside.

Illustration of view down High Street of Proposed Scheme. (Eight and Seven Storey Blocks)



B) Height and Mass.

The Guildford Tall Buildings SPD has come into force 6 November 2025 since the scheme was consented. This SPD is intended to:

- gives guidance on what we consider to be a tall building in Guildford town centre
- provides design guidelines to help manage the visual and environmental impact of tall buildings on nearby streetscapes, heritage sites and public spaces
- promotes good architecture and opportunities for innovative design
- clarifies what we expect to see submitted as part of a planning application for a tall building, including evidence of its potential impact

The Proposed Building Height – 32.28m to plant enclosure (29.48m to 8th floor residential) is more than 6 storeys (i.e.- 21 to 24m high) and therefore falls into the category of a Tall Building.

Obviously, the consented St Mary's Scheme pre-dates the adoption of the Tall Building SPD which might have guided the developer to produce a very different development.

The council have confirmed that the application will be considered against the Tall Buildings SPD. The Society contends that that the proposals fail to meet many of the recommendations made in the SPD and due to the increased height materially worsens the impact of the development in the following aspects.

- The adverse impact on the surrounding listed buildings

- The harmful impact on the environment of the River Wey corridor and town bridge
- The unfavourable impact on the character of the town with its relationship with the surrounding green hills
- The adverse Impact on the massing and townscape of the High Street

Our view is that the Tall Buildings SPD applies to the revised scheme which thus should limit extra storeys being added to consented schemes. The SPD states:

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.

The proposed enlarged 9 storey building (8 storeys and the plant floor) will dominate its surroundings because of its height, bulk and mass and its roofscape. It is completely out of scale with its surroundings which are predominantly 2 and 3 storey buildings many either listed or in the Conservation Area. The building's mass and bulk is significantly out of context because most of the buildings in the surrounding area are small and generally integrated into the various streets, with varied widths and heights fitting cohesively into the town and streetscapes. By contrast the proposed North Block A will appear from many of the surrounding town areas, especially when combined with Block B at the same height, as one standalone building of significant height, mass and bulk compared with its surrounding neighbours.

If a height change is allowed, it sets a very worrying precedent for other developments as to whether we have any effective control over the Guildford Skyline and the sensitive integration of tall buildings in the town centre.

C) Views

The increase in height of the buildings has the following impact on critical Verified Views which related to Views identified in the Guildford town centre views SPD adopted the SPD on 24 September 2019.

The Proposed Scheme worsens the impact of views related to the already poor situation created by the consented scheme, which remember was reduced in Height from original plans. Note we have concentrated on five views Historic England as noted below at Para D) identified 7 views of concern. Illustrations of the Views are attached at the Appendix A.

Note Verified Views have limitations and for example the cumulative effect of a building has to be considered as one moves through a landscape and or Townscape.

Verified View 10 from the Castle:

Consented Scheme:

- 6th floor parapet matches the castellation of the St Mary's Tower.
- Only the 7th floor sits above St Mary's Tower

Proposed Scheme:

- 7th floor parapet now sits above the castellation of the St Mary's Tower

- Main bulk of the block and 8th floor sit above St Mary's Tower and dominate the setting of the listed building.

Verified View 13 from the Bottom of the Mount:

Consented Scheme:

- 6th floor parapet sits well below the gable and bulk of the listed church building and its tower.
- The 7th floor sits well below the tower of the listed building

Proposed Scheme:

- 7th floor parapet is now above the gable and bulk of the listed church building
- The 8th floor of the proposed building is higher up the tower of the listed church building
- The bulk of the new proposal challenges the massing the church building and the vertical form of the tower.

Verified View 23 from Onslow Street Bridge:

Consented Scheme:

- Parapet of the 6th floor relates to the adjacent Millbrook building and the adjacent ridge line of St Nicolas church main roof
- The massing of the proposed residential block is comfortable with the setting of the Old Town Bridge and river

Proposed Scheme:

- The parapet of the 7th floor sits well above the adjacent Millbrook building.
- The parapet of the 7th floor sits well above ridge line of the St Nicolas church main roof
- The proposed building massing dominates the setting of the Old Town Bridge and river environment.

Verified View 40 a from the High Street (at Boots)

Existing View:

- This view captures one of the key characteristics of the town which is how the surrounding green hills can be seen at the end of the streets.

Proposed Scheme:

- Block A completely block the view to the green hills at the end of the street and takes away this key characteristic.
- The end of the street view shows a continuous line of buildings with Block A joining together with the two residential tower blocks beyond.

Verified View 41 from the High Street (outside White Lion Walk)

Consented Scheme:

- Block A sits discreetly behind the controlling height lines of the High Street buildings.

Proposed Scheme:

- Block A now breaks the controlling height line of the High Street buildings and no longer has a discreet relationship with the High Street as the new building becomes very apparent.

D) Impact on Heritage.

The Society has always maintained that the development will cause harm to the historic landscape of the town, and significant listed heritage buildings especially the Castle, and St Mary's church both Grade 1 Listed which are thus in highest category of Buildings in the country at approximately 0.03% of buildings. St Nicolas Churches is also significant to consider as it is Grade II* listed. Many other significant smaller scale buildings are also in the vicinity.

Historic England's wrote two letters of objection to the consented scheme highlighting the impact on these buildings and also focusing on the views discussed above notably views 12,13,18,23,26,35, 40.

We also note that Historic England have restated their objection to the scheme in a letter dated 7th October 2026.

The NPPF 2026 requires special regard to be given to heritage assets at chapter 20.

In particular it strengthens setting at HE7) to include:

- Visual
- Spatial
- Functional
- Experiential relationships

This increases the weight given to townscape, views, and context. Our underlining

Aligns Conservation Areas (CA) with listed building protection HE3 treats CA harm more like listed building harm.

Heritage assets are listed in Annex B as protected areas/assets. This means:

- Heritage value can switch off the presumption in favour of sustainable development
- Heritage constraints override tilted balance in housing-supply cases

The NPPF cannot dilute exiting heritage legislation and Chapter 20 clarifies how it is operated at HE1–HE10.

The golden rule remains: Heritage harm must be given considerable importance and weight.

Viability

The Society notes from the updated Viability Statement 17/9/2026 that the scheme has become less profitable - 8.9% on GDV on the consented scheme moving to - 8.2% if the changes are approved. In the current climate the developers must have taken a commercial decision to handle the risks of a the economic climate and the housing market. The differences in the profit on GDV are very similar and shouldn't drive a decision on development, which damages the towns heritage and fundamental townscape character..

Tilted Balance

The council as it is failing to achieve the new housing targets for the borough that were adjusted in 2025 to adopt the Standard Method of assessing housing needs to consider the NPPF rulings. Although within a settlement the tilted balance is pro-development unless there is strong reason, the society contends that the small number of addition units (8) in the context of overall requirement for an annual local housing need of 1,151 dwellings per annum (Source Local Plan Consultation) contributes in a very minor way to meeting Guildford's housing need. The harm to the Townscape, and Heritage needs to be considered against this tiny contribution to housing numbers.

The latest NPPF 2026 has as noted above at Chapter 20 has strengthened protection for Heritage Assts. Although not explicitly mentioned in the NPPF the Economic Value of the Townscape and Heritage to Guildford makes for a liveable town, attracts retail trade and supports tourism. We would permanently lose this unique characteristic at our peril.

Summary

We believe the harm caused by the proposed development is significant to the Town Centre and the minor (tiny) impact 8 extra units that will have on the supply of new dwellings is totally outweighed by the Harm caused.

It is essential that Guildford's Town Centre is preserved along with its relationship with its surroundings and context. Consenting this application will create a major precedent driving a 'Coach and Horse' through Town Centre Heights and Town Centre Views Policies.

Yours Sincerely

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

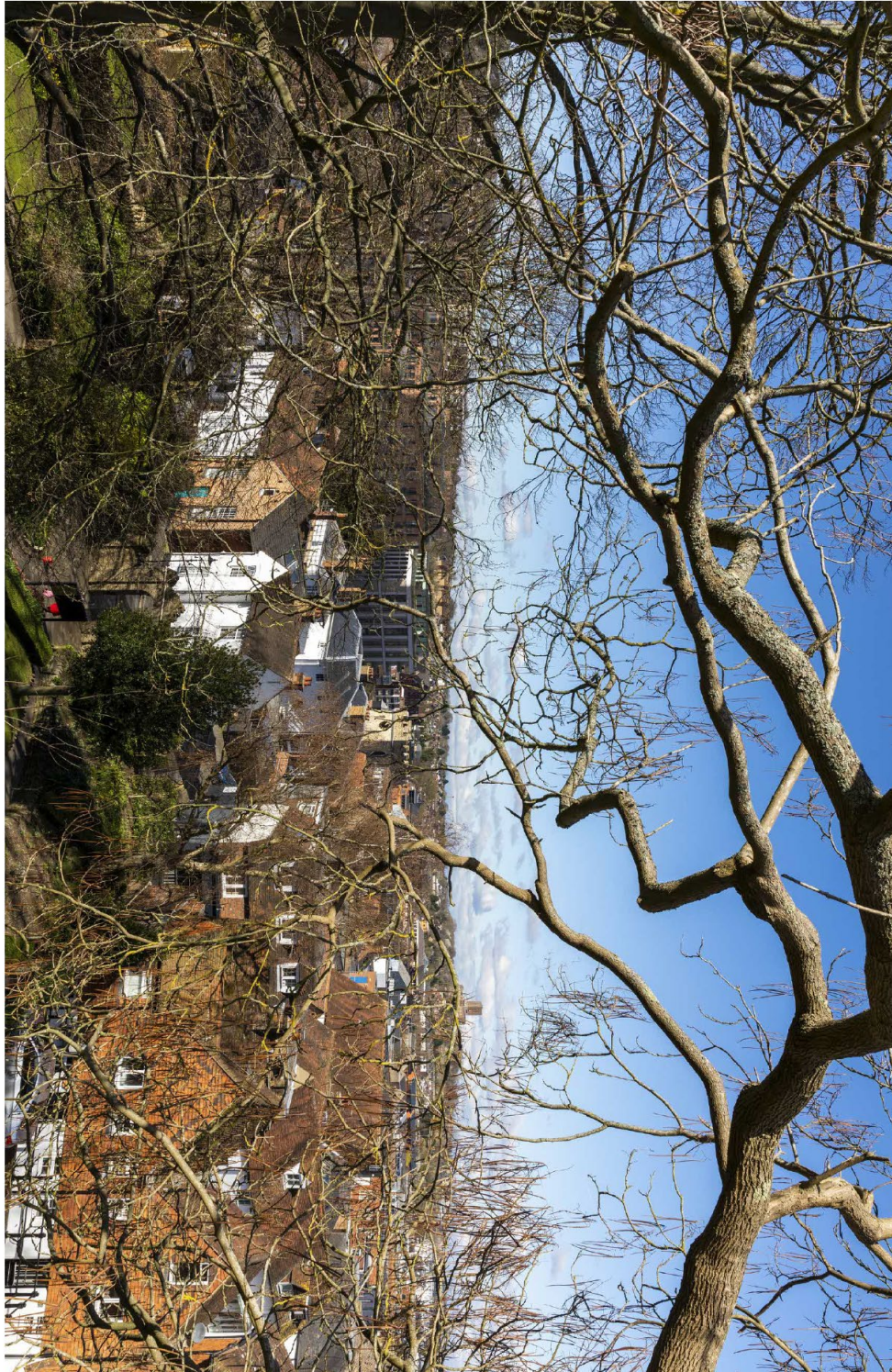
Alistair Smith

Chair The Guildford Society

Appendix - Verified Views discussed in Para C) Above

Verified View 10 From the Castle Consented

Squire & Partners



Verified View 10 (View from the Castle)
Consented (ref 21/P/02232)

PG-17 | St Mary's Wharf

Verified View 10 From the Castle Proposed

Squire & Partners



PG-18 | St Mary's Wharf

Verified View 10 (View from the Castle)
Proposed

Verified View View 13 from the Bottom of the Mount Consented



Verified View 13 (Bottom of the Mount)
Consented (ref:21/P/02232)

Squire & Partners

PG-19 | St Mary's Wharf

Verified View View 13 from the Bottom of the Mount Proposed



Squire & Partners

| PG-20 | St Mary's Wharf

Verified View 13 (Bottom of the Mount)
Proposed

Verified View 23 from Onslow Street Bridge Consented

Squire & Partners



Verified View 23 (Onslow Street Bridge)
Consented (ref:21/P/02232)

PG-21 | St Mary's Wharf

Verified View 23 from Onslow Street Bridge Proposed

Squire & Partners

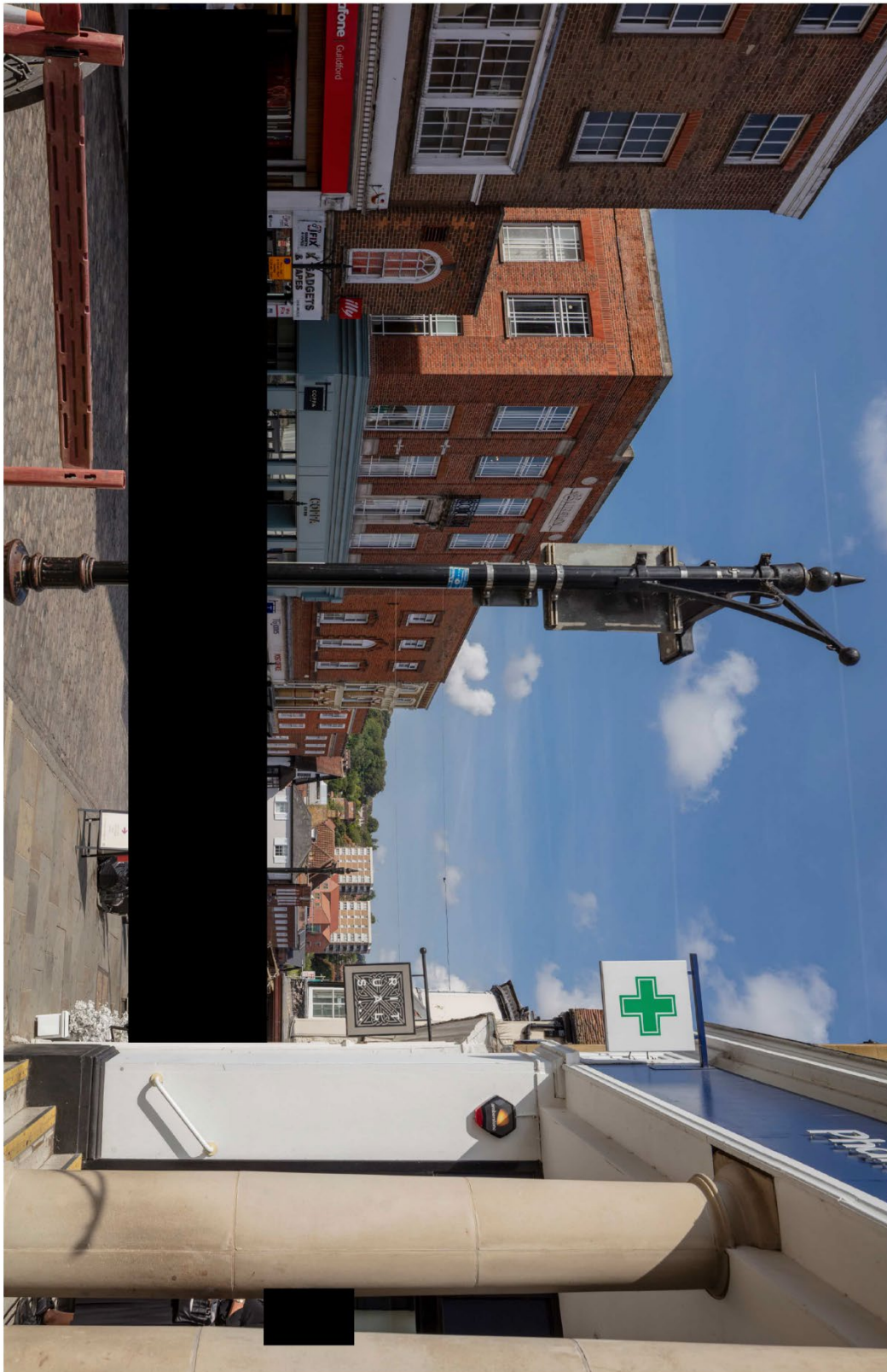


Verified View 23 (Onslow Street Bridge)
Proposed

PG-22 | St Mary's Wharf

Verified View 40a Consented

Squire & Partners

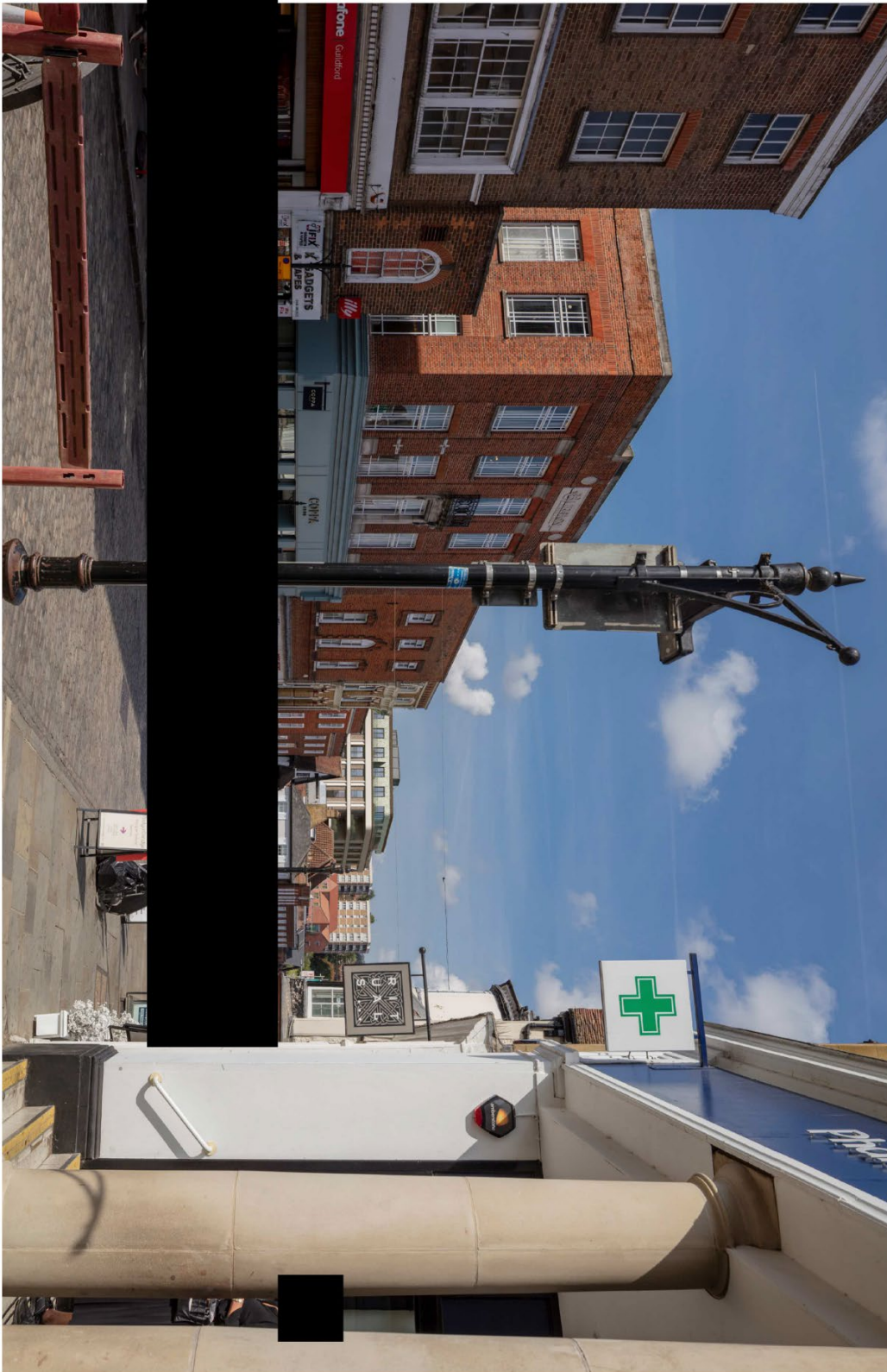


Verified View 40a (High Street)
Existing

PG-25 | St Mary's Wharf

Verified View 40a Proposed

Squire & Partners



Verified View 40a (High Street)
Proposed

PG-26 | St Mary's Wharf

Verified View Consented Outside White Lion Walk



Squire & Partners

PG-31 | St Mary's Wharf

Verified View 41 (High Street)
Consented (ref:21/P/02232)

Verified View 41 Outside White Lion Walk Proposed.

Squire & Partners



Verified View 41 (High Street)
Proposed

PG-32 | St Mary's Wharf