

Building Heights

# Draft Tall Buildings Supplementary Planning Document

June 2025



GUILDFORD  
B O R O U G H

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## 1. Introduction

- 1.1 Due to their form and scale, including height and visual prominence, tall buildings can result in particularly acute and harmful impacts on various elements of the context within which they are proposed. However, with sufficient consideration given to their suitability and design which avoids or minimises any harm in relation to sensitivities, taller buildings can contribute positively to the Guildford's townscape, the vitality of the town, and to making efficient use of land.
- 1.2 The purpose of this Supplementary Planning Document (SPD) is to:
  - provide guidance on what the Council consider tall buildings to be in the Guildford Town Centre (as defined on the Local Plan Policies map<sup>1</sup>);
  - supplement adopted policy most relevant to assessing proposals for taller buildings, with a set of design guidelines that seek to manage impacts and promote opportunities for good design; and
  - clarify expected submission requirements as part of planning applications for tall building proposals that will assist in demonstrating policy compliance.
- 1.3 This SPD applies to Guildford Town Centre<sup>2</sup> only, even though some of its principles could have wider relevance, purely as good design practice. The geographic scope of the SPD is due to this area being the focus within the borough for tall building proposals. The guidance has been developed with Guildford Town Centre's particular context in mind.
- 1.4 This is not to suggest that building height (amongst a range of other form related considerations) cannot have harmful impacts elsewhere in the borough. However, in these instances, it is considered that there is sufficient policy in place to address concerns and, in many cases, (such as for strategic sites) masterplanning and design coding will provide further controls.
- 1.5 It is critical that the guidance reflected in this SPD is not used in place of an understanding and application of the full suite of Local Plan policies. This SPD does not seek to reflect upon or supplement all policies that may be relevant to the design of a tall building. Rather, it provides design guidance which is considered particularly relevant to managing the impact of tall buildings, as distinct from other development proposals.
- 1.6 The SPD is intended principally for applicants seeking planning permission and their agents, and for planning decision-makers. It has been produced to ensure there is clarity and consistency on how decision-makers apply particular Local Plan policies in relation to planning applications for tall buildings in Guildford Town Centre. This SPD is a material consideration in planning decisions and decision-makers will use it to help determine planning applications.

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<sup>1</sup> See: <https://www.guildford.gov.uk/localplan/policiesmap>

<sup>2</sup> Ibid.

## 2. How the SPD is structured

- 2.1 The design guidance applicable to tall buildings (as defined in chapter 5) is structured around eight themes. Each theme relates to a design consideration that is particularly relevant to tall building proposals and supplements related Local Plan policies. Local Plan policies are shown in blue boxes as illustrated below.

### **Blue boxes**

Contain GBC Local Plan wording

- 2.2 Each thematic chapter provides some relevant context before setting out in more detail the design guidance that supplements adopted Local Plan policy. The design guidelines are shown in grey boxes as illustrated below and are collated for ease of reference at Appendix 1. These take the form of design principles that the Council expects applicants to carefully consider and fully demonstrate as part of the planning application process. Each thematic chapter concludes with the submission requirements that are expected to form part of the planning application and will assist in demonstrating compliance with the policies and guidance. A collation of the submission requirements for each theme is included in Chapter 8. Some of the submission requirements are documents that are already included on the Council's local validation list and will simply require additional detail to be incorporated within them. Others however are new submission requirements that address some of the more technical aspects associated with tall buildings. The submission requirements are also shown in grey boxes as illustrated below.

2.2.1 Design guidance...

2.2.2 Submission requirements...

- 2.3 Finally, each thematic chapter includes a list of further references and resources that may also be relevant and should be considered as appropriate.

### 3. National Planning Policy context

- 3.1 The National Planning Policy Framework places a great amount of emphasis on the importance of good design. The introduction to the chapter on 'achieving well-designed places' states:

*'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.'*<sup>3</sup>

- 3.2 This SPD seeks to provide that clarity on design expectations in relation to tall buildings. Where this design guidance is not considered as part of the design process or inadequate information is submitted to demonstrate this, planning permission may be refused. This accords with the NPPF which states at paragraph 139: *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*.

### 4. Local Planning Policy context

- 4.1 This SPD supplements several Local Plan policies contained in both the Local Plan: Strategy and Sites (2019) and Local Plan: Development Management Policies (2023). These provide important locally specific policies that are relevant to Guildford and the achievement of high quality and distinctive places.

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<sup>3</sup> NPPF (December 2024); paragraph 131

## 5. Guidance on defining a tall building in Guildford Town Centre

- 5.1 This SPD is applicable to proposals for tall buildings proposed within the Guildford Town Centre.
- 5.2 This includes proposals for new buildings, such as those that result from a redevelopment of a brownfield site, as well as for proposals for additional storeys on existing buildings, which either result in a breach of the threshold, or increase the height of buildings that themselves breach the threshold prior to the proposed increase in building height.
- 5.3 To determine whether a proposal is for a tall building (and hence the relevance of this SPD), the following threshold is set as guidance to applicants and decision makers:

**Guildford Town Centre tall building threshold:** 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.

- 5.4 This threshold is based on several considerations including an appreciation of the townscape and the various features that contribute to the distinctive character of areas within the Town Centre.
- 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.

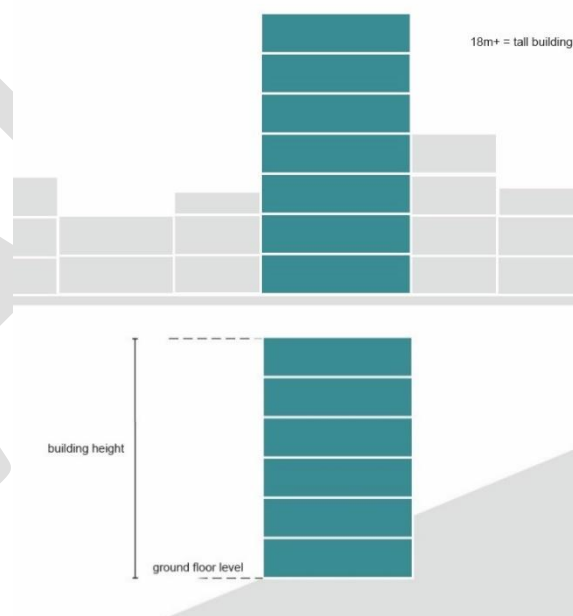


Figure 2: Height of a building is measured from the lowest external point around the building to the height of the highest part of the roof

- 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.

## 6. Overarching principles and vision statement

6.1 A vision statement has been developed which seeks identify what is sought to be achieved as a desired outcome of this SPD, and the policy that it supports.

6.2 This vision statement is informed on the one hand by an understanding of the issues associated with tall buildings, including those that have been highlighted in the Guildford context. These issues include that:

- there is a need to protect views of the surrounding landscape/townscape and legacy landmarks;
- there is a need to protect character from excessively scaled development;
- there is a need to protect heritage and sensitive historic areas;
- the public realm and surrounding development risks being overwhelmed by tall buildings;
- overdevelopment of sites is a threat, with little public space provided;
- street environments generally reflect pedestrian unfriendly spaces with tall buildings exacerbating this – e.g. shadowing;
- the capacity of sites seems ‘pre-determined’ to maximise yields rather than being the outcome of a design-led approach resulting in too high buildings being proposed.

6.3 On the other hand, the vision statement is also informed by the potential that tall buildings may hold including that they:

- can make the most efficient use of sustainable brownfield sites;
- may support regeneration efforts including delivering public benefits such as public realm improvements and supporting an appropriate mix of uses;
- may assist with the viability of the scheme;
- may perform placemaking role / point of orientation.

6.4 In this context and seeking to be forward focussed, the vision statement is as follows.

**Vision statement:** In line with the Local Plan, this SPD will seek to ensure a design-led approach to considering tall buildings, which promotes efficient use of land whilst being consistent with the protection of important and significant views, local character and heritage in Guildford Town Centre. Tall buildings will contribute to achieving a high-quality living environment; an attractive and safe public realm; protect the amenity of surrounding uses; and reflect sustainable, low impact development.

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. It should also reference features which are specific to Guildford's unique local character.

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## 7. Tall building guidance

7.1 This chapter comprises the design principles that are applicable to all tall building proposals. It has been split into eight themes, each of which consists of a particular aspect of design that requires careful consideration when proposing tall building schemes. The themes are:

- a. Surrounding context and prevailing character
- b. Important and significant views
- c. Landscape and topography
- d. History of place / heritage assets
- e. Protection of amenity and provision of amenity space
- f. Public realm and mixed uses
- g. Efficient use of land
- h. Sustainable design and construction

7.2 Consideration of the design guidance across these themes presents both challenges that proposals for tall buildings will need to guard against or avoid but also unique opportunities that proposals should seek to realise. Some guidance may also cut across multiple themes, for instance maintaining views of legacy landmarks is relevant to theme (b) important and significant views and theme (d) history of place / heritage assets.

7.3 The design guidance also cuts across spatial scales in the sense that using it (and undertaking the studies required for submission) will inform decisions regarding the suitability of a site (or parts of a site) for a tall building in its wider context, but also guide the design response at the scale of the tall building itself.

7.4 Regarding the latter, proposals for tall buildings should acknowledge a vertical categorisation, including top; middle; and base elements (see Figure 3), whilst also integrating parts into a single coherent whole. This split allows for recognition of and the potential to address the range of impacts that should be considered as part of the design process. These are addressed variously as part of the thematic guidance that follows.

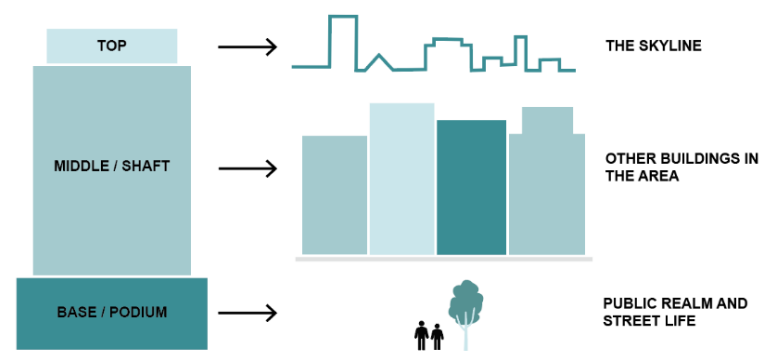


Figure 3: Vertical categorisation of a tall building

7.5 The design expression of these parts and of the overall building form, including height, will vary depending on the location of the proposed development within the Town Centre and careful consideration of all associated contextual informants.

## a. Surrounding context and prevailing character

### Context

- 7.6 Guildford Town Centre is a diverse place with varying townscapes with their own characteristics and distinctiveness. Significant work has already been undertaken to describe the character of parts of the Town Centre<sup>4</sup> albeit some areas have been, and/or continue to be, subject to significant change. However, the surrounding context and prevailing character of each application for a tall building is unique and therefore requires careful and detailed consideration including of associated sensitivities.
- 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.
- 7.8 On the other hand, proposals for tall buildings may also present certain opportunities to complement or enhance existing local character and distinctiveness if they are complementary to their surroundings and are of exceptional quality.
- 7.9 To manage these potential impacts and take advantage of potential opportunities for tall buildings to enhance existing local character and distinctiveness, the following guidance is proposed to supplement relevant Local Plan policies, along with submission requirements / expectations that would enable the decision-maker to assess impacts and ensure compliance with policy.

### Tall building design guidance: surrounding context and character

- 7.10 The Local Plan Policy D4 sets out that:

3) ...Development proposals should respond positively to:

- c) the surrounding context;
- e) prevailing character

- 7.11 In certain instances, there may be little prospect that a tall building could respond positively to its surrounding context or the prevailing character of the area without creating unacceptable levels of harm.
- 7.12 Factors that decision-makers will likely consider regarding such harm are diverse and cut across several themes within this SPD. Considerations can include the nature of the interface between the development proposal and surrounding buildings. It could also include the

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<sup>4</sup> See for instance those listed under 'further references and sources'

degree to which the development proposal is taller<sup>5</sup> than buildings within its immediate surrounds and whether there are resultant harms, how such height difference is perceived within the surrounding context, the sensitivity of the prevailing character of the area, and degree to which it is defined by distinctive or coherent design features and built form (such as uniformity in building heights).

- 7.13 In some instances, the impact of a tall building on its surrounding context and the prevailing character of the area may be mitigated or avoided through carefully addressing interfaces with surrounding buildings in such a way that it may contribute to meeting the expectation of a positive response sought by Policy D4(3).
- 7.14 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

#### **Interfaces with surrounding buildings**

Design sensitive interfaces with surrounding buildings by considering the appropriateness and potential to:

- 7.14.1 step down in height toward the edges of the site/building where this would enable a more sympathetically scaled interface condition with (an) adjoining smaller scale building/s.
- 7.14.2 integrate tall building(s) within the urban block or with the tallest point away from (an) adjoining smaller scale building/s.
- 7.14.3 use buffers such as landscaping between the proposed tall building and (an) adjoining smaller scale building/s.



*Figure 4: Design measures can reduce potential harms along any sensitive interfaces with adjoining smaller scale building/s*

- 7.15 With regard to this guidance, it is important to stress that some level of juxtaposition in height with surrounding buildings will not be unacceptable in all instances. Difference in height can be used to create positive juxtapositions, especially in areas characterised by transition in, or diversity of, building forms or that are subject to existing or planned change. These areas tend to support greater flexibility and be appropriate to increased density. It is also relevant that in some cases, there will be limited opportunity to step down in height toward the edges of the site due its size and/or configuration.
- 7.16 A further feature of tall buildings that is of particular significance in relation to its response to prevailing character and context is how its 'top element,' including roof is addressed in design terms. This is particularly relevant in Guildford with views into the Town Centre from highpoints such as the Castle mound and Mount being particularly significant to the

<sup>5</sup> It is important to appreciate that consideration of the height of a development proposal within its surrounding context is only one aspect of a full consideration of whether a building responds positively to the surrounding context and prevailing character.

appreciation of the town's character. In this regard proposals should consider the following:

### Roofscape and skyline

7.16.1 Proposals for tall building(s) should take a coordinated approach across the site (where relevant) and with other consented / built development in the surrounding area to ensure they relate well with each other / does not result in a disjointed skyline.

Carefully consider the top element of the building to positively contribute to the character of the existing skyline including:

7.16.2 designing fine grained and articulated roofscapes.

7.16.3 employing exemplary architectural design to add to visual interest.

7.16.4 wherever possible integrating rooftop building servicing features (e.g. lift overrun or other building services plant). Where they are necessary on the rooftop employ appropriate screening measures to ensure they are not visually prominent.

7.16.5 avoiding obtrusive glare (from reflective surfaces) and excessive lighting.



Figure 5: Adopting a coordinated approach to building heights in relation to those in the surrounding area can result in a more coherent skyline.



Figure 6: Use of appropriate screening to integrate rooftop building servicing features reduces visual prominence and harm to views.

### Tall building submission requirements

7.17 The Local Plan includes a requirement for development proposals to reflect a clear understanding of the place. This is set out under LPDMP Policy D4 as follows:

3) Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. [Emphasis added].

7.18 Further, the LPDMP Policy D4 indicates that:

5) Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:

...

b) Form and scale of buildings and spaces - height, bulk, massing, proportions, profile and roofscapes...

7.19 In this context, it is important that planning applications reflect sufficient and rigorous analysis of the surrounding context and prevailing character within which a new development is proposed and that this is demonstrated throughout the planning application process.

7.20 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

**7.20.1 Design and Access Statement (DAS):** demonstrating a robust analysis and appreciation of the surrounding context, local townscape and prevailing character, including layout, form and scale of buildings and spaces, and any related sensitivities. The DAS should also demonstrate how the proposal responds to its surrounding context and local character. This should include: (i) appropriate illustration of edge conditions with surrounding buildings (such as perspective drawings, elevations, walk through); (ii) reflection on how the tall building complements the existing overall skyline – this may include reference to the submitted Visual Impact Assessment, which should provide accurate visual representations of overall impacts on the skyline from agreed viewpoints. This should include a reflection of existing buildings and those consented but not yet built; (iii) reflection of key design features including materials, detailing, etc which should include appropriate illustration to enable evaluation of potential impacts. For instance, with regard to roofscapes, this should include cross sections detailing how rooftop servicing will be addressed.

#### Further references and resources

- [Guildford landscape and townscape character assessments](https://www.guildford.gov.uk/article/24720/What-is-a-Landscape-Character-Assessment)<sup>6</sup>
- [Conservation area appraisals](https://guildford.gov.uk/conservation)<sup>7</sup>

<sup>6</sup> Available at: <https://www.guildford.gov.uk/article/24720/What-is-a-Landscape-Character-Assessment> ; see also Appendix 2: Townscape character areas in Guildford Town Centre

<sup>7</sup> Available at: <https://guildford.gov.uk/conservation>

## b. Important and significant views

### Context

- 7.21 Guildford Town Centre reflects a setting which includes the surrounding wooded Surrey Hills National Landscape, along with a wealth of distinctive and prominent legacy landmark buildings.
- 7.22 The ability to continue to appreciate important views of these features from particular viewpoints<sup>8</sup> contributes to the identity of place and is a key asset that the Council seeks to protect and, where possible, enhance.
- 7.23 In this regard, the Council has gone some way to defining such views and providing detailed view management guidance including in support of LPSS Policy S3 (relating to the Guildford Town Centre) which requires that:

- (5) New development will have regard to:
- c) important views into and out of the town centre from the surrounding landscape;
  - d) views within the town centre of important historic buildings and local landmarks.

- 7.24 This detailed view management guidance is set out in the Guildford Town Centre Views SPD (GTCV SPD), which should be considered at the outset of and throughout the design process for relevant development proposals. The 15 viewpoints identified by the GTCV SPD are shown in Appendix 3(a-c). This SPD's development guidance is thus in addition to that of the GTCV SPD and is considered necessary to supplement general design policy regarding views under Policy D4(3) alongside reference to views in other Local Plan policies including in relation to the Corridor of the River Wey<sup>9</sup>.
- 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.
- 7.26 Whilst tall buildings can have a significant negative impact on important views when inappropriately located, they also offer unique opportunities to improve the quality of a

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<sup>8</sup> Accepting that there is in many cases a 'kinetic experience' at viewpoints as opposed to a fixed location entirely reflecting the experience there.

<sup>9</sup> See LPDMP Policy D13

place. This can include the creation of new landmark buildings of unique and special architectural merit. Well-designed tall building in appropriate locations can have a positive impact on the existing skyline, improve an area's sense of place and identity, and enhance local legibility and wayfinding.

- 7.27 To manage these potential impacts whilst taking advantage of any opportunities relating to the improvement or enhancement of significant/important views, the following guidance is proposed to supplement relevant Local Plan policies, along with submission requirements / expectations that would enable the decision-maker to assess impacts and ensure compliance with policy.

#### **Tall building design guidance: important views**

- 7.28 LPDMP Policy D4 sets out that:

(3) Development proposals should respond positively to:

- b) significant views (to and from);
- d) built and natural features of interest;

- 7.29 In certain instances, there may be little prospect that a tall building could respond positively to significant views without creating unacceptable levels of harm. This harm may extend to other related considerations such as local character.
- 7.30 The level of harm to significant views that would result from a development proposal is a matter of planning judgement and requires specific consideration of the proposal in the context of such views.
- 7.31 Factors that decision-makers will likely consider regarding such harm include the significance or importance of the view and the extent to which a development proposal may impinge on or detract from such a view, including due to its height. Regarding the importance of views, the GTCV SPD identifies significant views that are deemed to be important in the context of LPSS Policy S3. This does not preclude other views being valued and being a material consideration in terms of specific planning applications, including for instance important views within, into and from Conservations Areas. Important views may also be identified in other evidence-based documents, such as Conservation Area Appraisals. The Council may request consideration of views other than those identified by these sources as part of the planning application process.
- 7.32 In some instances, the impact of a tall building on significant views, and built and natural features of interest may be mitigated or avoided through its design in such a way that it may contribute to meeting the positive response sought by Policy D4(3).



7.33 These design responses include consideration of the proposed height<sup>10</sup> of the building, the location of building height within the site, and design of the building, including prominent features such as the roofscape, in a manner that avoids or reduces harm to any significant views.

7.34 In this regard, it is expected that tall building development proposals will seek to avoid or mitigate harm to significant views by demonstrating consideration of the following design guidelines:

7.34.1 Limit building height to maintain the prominence of, or important sky gap associated with, legacy landmarks or other built and natural features of interest as part of significant or important views.

7.34.2 Implement design measures, such as stepping down or appropriate siting of building height, choice of materials and lighting, and bulk and massing, to avoid detracting from significant or important views.

7.34.3 Pay particular attention to the roofscape and wherever possible integrate rooftop building servicing features (e.g. lift overrun or other building services plant) within the building. Where they are necessary on the rooftop employ appropriate screening measures to ensure they are not visually prominent.

7.35 Further, the design of tall buildings should not only seek to mitigate or avoid harm. Development proposals can provide an opportunity to enhance or even reveal obscured or hidden views. This opportunity is for instance the basis of the requirement (under LPDMP Policy D13(1)c and d) for development along the Corridor of the River Wey to open up views of the river, and enhance key existing views to, from, across and along the river<sup>11</sup>. Whilst the river is a key heritage and natural feature within the borough, hence these policy requirements, this principle could be also applied in relation to other legacy landmarks or built and natural features of interest. In this regard, proposals should consider the following:

7.35.1 Explore opportunities, particularly as part of redevelopment schemes, to further reveal views of legacy landmarks or built and natural features of interest.

7.35.2 Explore opportunities to enhance the skyline through the introduction of distinctive and visually striking roof profiles that can add to Guildford's rich and diverse character.

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<sup>10</sup> Recognising that other elements of built form can also impact negatively on significant views. In some cases, a taller slimmer building form will have less impact on a significant view than a bulkier scheme that may be less tall.

<sup>11</sup> See also LPDMP paragraph 5.183

## Tall building submission requirements

- 7.36 It is important that planning applications reflect sufficient and rigorous identification and analysis of important or significant views relevant to the development proposal. This should include a reflection of the impact of the proposal on such views.
- 7.37 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings.

- 7.37.1 Landscape and Visual Impact Assessment (LVIA):** reflecting views to be assessed as agreed with the Council. These should be based upon existing identified significant or important views such as those in the GTCV SPD, but may also include other views based on the specifics of the case.
- 7.37.2 Accurate Visual Representations (AVRs):** reflecting likely impact on townscape/landscape and/or nearby heritage assets.
- 7.37.3 Design and Access Statement:** demonstrating a robust analysis and appreciation of the agreed views with reference to the LVIA and AVRs, and setting out how this has informed the design response.

## Further references and resources

- [Guildford Town Centre Views SPD](#)<sup>12</sup>
- [Conservation area appraisals](#)<sup>13</sup>
- [Guildford Landscape and Townscape Character Assessment](#)<sup>14</sup>
- National Trust (2011) Planning Guidance for development next to the River Wey and Godalming Navigations<sup>15</sup>
- Landscape Institute and Institute of Environmental Management & Assessment, Guidelines for Landscape and Visual Impact Assessment

<sup>12</sup> Available at: <https://guildford.gov.uk/article/16937/Supplementary-Planning-Documents-SPDs>

<sup>13</sup> Available at: <https://guildford.gov.uk/conservation>

<sup>14</sup> Available at: <https://www.guildford.gov.uk/article/24720/What-is-a-Landscape-Character-Assessment>

<sup>15</sup> Available at: <https://guildford.inconsult.uk/gf2.ti/af/1107458/243228/PDF/-/10886005%201%20riverweynavigationsplanningguidancepdf.pdf>

## c. Landscape and topography

### Context

- 7.38 The landscape setting of Guildford Town Centre is an important characteristic of the town with Guildford's location in a gap in the North Downs, where the River Wey runs through, a defining feature. This setting comprises wooded, undulating, and picturesque countryside including the Surrey Hills National Landscape.
- 7.39 Guildford's varied topography, open downland, and treed landscape means there are strong visual links between town and countryside. This topographical variation and particular visual links to and from the surrounding landscape result in a complex context to consider for any tall building proposals.

### Tall building design guidance: landscape and topography

- 7.40 The Local Plan Policy D4 sets out that:

(3) Development proposals should respond positively to:  
f) landscape; and  
g) topography

- 7.41 In certain instances, there may be little prospect that a tall building could respond positively to its landscape setting without creating unacceptable levels of harm, primarily based on visual and character impacts. This would depend on the location and height of a building including in relation to key views, particularly to and from the surrounding Surrey Hills.
- 7.42 In some instances, the impact of a tall building in relation to landscape or topography may be mitigated or avoided through its design in such a way that it may contribute to meeting the expectation of a positive response sought by Policy D4(3).
- 7.43 Concurrently, the topography of the town presents a 'variable platform' for buildings and can significantly impact on the manner that buildings of a similar height are perceived and impact upon their surrounds.
- 7.44 The topography of the site may also present construction challenges and opportunities that would need to be carefully considered including how design can work with slope to minimise a tall building's visual prominence and impact on its surrounds. Where proposals build into a slope, consideration should be given as to how to minimise ground disturbance, including avoiding any adverse impacts on slope stability, and generating excessive rock and soil waste,

for instance through cut and fill. Excess material should be reused on site wherever possible. Furthermore, given the depth of foundations necessary for tall buildings, ground conditions of the site will need to be understood in particular whether the proposal would impact on any ground conditions including groundwater protection zones.

7.45 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.45.1 Limit or locate building height appropriately to maintain important views of surrounding landscapes. [see also guidance under previous section 7b.]

7.45.2 Respect the natural valley topography of the town and subtle variations in elevation within the town centre, avoiding harmful building height at topographically elevated or prominent locations

7.45.3 Consider and work with the underlying topography of the site in relation to the construction, design and height of building(s).

7.45.4 Consider the impact of the proposal on slope stability and ground conditions.

#### Tall building submission requirements

7.46 The Local Plan is clear regarding requirements for development proposals to clearly demonstrate at all stages of the planning application process how it has responded to the surrounding landscape. This is set out under LPDMP Policy D4 as follows:

(5) Development proposals are expected to demonstrate high quality design at the earliest stages of the design process, and then through the evolution of the scheme, including in relation to:

...

(d) Landscape - landform and drainage, hard landscape and soft landscape

7.47 In order to demonstrate that sufficient consideration has been given to the landscape and topographical context of the tall building proposal, it is important that planning applications reflect sufficient and rigorous analysis of these features and articulate the design response and that this is demonstrated throughout the planning application process.

7.48 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

7.48.1 **Landscape and Visual Impact Assessment (LVIA):** identifying the effects of the proposal on views and the landscape together with demonstrating how the proposal has evolved to respond to the LVIA findings in order to reduce potential adverse effects.

7.48.2 **Accurate Visual Representations (AVRs):** reflecting likely impact on views that have

been agreed with the Council on the townscape/landscape and/or nearby heritage assets

- 7.48.3 **Design and Access Statement:** demonstrating a robust analysis and appreciation of the landscape and topographical context of the site alongside how this has informed the design response. This should include elevations clearly showing which parts of the building are above and below ground level.
- 7.48.4 **Slope Stability Assessment:** demonstrating an understanding of the factors affecting the site's stability, the impact of the proposal on slope stability and any necessary mitigation.
- 7.48.5 **Ground Conditions Survey:** demonstrating an understanding of the likelihood of any ground, groundwater or gas contamination of the site.

#### Further references and resources

- Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment

## d. History of a place / heritage assets

### Context

- 7.49 A tall building can harm the significance of a heritage asset of which there are many in Guildford including listed buildings, conservation areas, scheduled monuments alongside a range of non-designated assets (see Appendix 4: Heritage Assets in Guildford Town Centre). This can occur by the building having an overbearing effect and detracting from the appreciation or setting of the heritage asset. Most obviously this is likely when a tall building is proposed near a heritage asset.
- 7.50 However, in the context of Guildford, these harms can arise even when tall buildings are proposed at locations which may be more distant from these assets. This can occur by virtue of the tall building intruding into a significant view of a heritage asset and/or harming its setting. Particular attention is required to assessing and mitigating the impact of tall building proposals, especially related to assets whose setting contributes importantly to their significance.

### Tall building design guidance: history of place / heritage assets

- 7.51 The Local Plan Policy D4 sets out that:

(3) Development proposals should respond positively to:  
a) the history of a place;

- 7.52 In some instances, the impact of a tall building on the history of place and heritage assets may be mitigated or avoided through a careful and sensitive design in accordance with Policy D4(3) alongside consideration of other national and local policy on conserving and enhancing heritage assets.

- 7.53 The Local Plan Policy D13 sets out that:

(1) Development proposals which impact The River Wey and Godalming Navigations and its environs are required to:  
a) conserve and enhance the distinct character of the Navigations, including its visual setting, amenity, recreational and ecological value, and architectural and historic interest;  
b) protect and conserve landscape features, buildings, structures and archaeological remains that are associated with the river's unique character, history and heritage;

d) protect, and where possible, enhance key existing views to, from, across and along the river, including those identified in the Guildford Town Centre Views SPD

7.54 The River Wey corridor is a significant heritage asset within the town centre and is a designated Conservation Area. Proposals for tall buildings alongside or nearby to the river have the potential to adversely impact its distinctive character. It is important that any proposals demonstrate how they have responded positively to it, taking into account the varied character that exists along its length.

7.55 In this regard and more generally with regard to heritage assets, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.55.1 Adopt a highly sensitive approach to building height (as well as other design features) to avoid or minimise harm to the heritage asset and its setting (where applicable).

7.55.2 Avoid visual obstruction and/or competition of significant views of/from heritage assets.

7.56 Further, design of tall buildings should not only seek to mitigate or avoid harm. Development proposals can provide an opportunity to complement heritage assets. This opportunity is for instance recognised by the LPDMP in relation to listed buildings and their settings<sup>16</sup>, Conservation Areas<sup>17</sup>, and non-designated Heritage Assets<sup>18</sup>. In this regard proposals should consider the following:

7.56.1 Explore opportunities to better reveal the significance of heritage assets (and their settings, where relevant) by appropriate location of building height and other design features.

7.56.2 Where archaeological remains of significance are found to exist and are preserved in-situ, seek opportunities to better reveal the significance of the find as part of the building design, with public access allowed where possible.

### **Tall building submission requirements**

7.57 It is important that planning applications reflect sufficient and rigorous analysis of the historic context within which a new development is proposed and that this is demonstrated

<sup>16</sup> See LPDMP Policy D19(1) which indicates that development proposals could 'better reveal the significance of listed buildings and their settings.

<sup>17</sup> See LPDMP Policy D20(2)(c) where development proposal are required to have regard to the '...enhancement of key views and vistas to, from and through a Conservation Area' and LPDMP Policy D13(1)c regarding the River Wey and Godalming Navigations which includes requirements around establishing a positive relationship with the Navigation's setting and waterfront character and its historic interest, and the potential to open up views of the waterway.

<sup>18</sup> See LPDMP Policy D23 including para 6. Due to their deeper foundations and potential location within the Guildford Historic Core Area of High Archaeologic (AHAP) excavations may be more likely to encounter archaeological remains.

throughout the planning application process.

7.58 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

- 7.58.1 **Heritage Impact Assessment**<sup>19</sup> (designated heritage asset) or **statement of significance**<sup>20</sup> (non-designated heritage asset): prepared in accordance with relevant policy requirements, demonstrating how height has been considered in relation to avoiding, minimising or mitigating any resultant harm on the heritage asset and its setting (where applicable).
- 7.58.2 **Landscape and Visual Impact Assessment**: to assist in illustrating the impact on heritage assets and their setting.
- 7.58.3 **Archaeological report**: including a desk-based assessment prior to the submission of a planning application and fieldwork in line with LPDMP paragraphs 5.408 – 5.410.
- 7.58.4 **Design and Access Statement**: demonstrating a robust analysis and appreciation of the heritage context of the site alongside how this has informed the design response.

#### Further references and resources

- Historic England, Tall Buildings Historic England Advice Note 4 (or updates)
- [Guildford Town Centre Views SPD](#)<sup>21</sup>
- [Conservation area appraisals](#)<sup>22</sup>
- [Guildford Landscape and Townscape Character Assessment](#)<sup>23</sup>
- National Trust (2011) Planning Guidance for development next to the River Wey and Godalming Navigations<sup>24</sup>

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<sup>19</sup> See LPDMP Policy D18(1)

<sup>20</sup> See LPDMP Policy D23(1)

<sup>21</sup> Available at: <https://www.guildford.gov.uk/boroughwideplanningguidance>

<sup>22</sup> Available at: <https://guildford.gov.uk/conservation>

<sup>23</sup> Available at: <https://www.guildford.gov.uk/article/24720/What-is-a-Landscape-Character-Assessment>

<sup>24</sup> Available at: <https://guildford.inconsult.uk/gf2.ti/af/1107458/243228/PDF/-/10886005%201%20riverweynavigationsplanningguidancepdf.pdf>



## e. Protection of amenity and provision of amenity space

### Context

- 7.59 This chapter covers two distinct matters - the first being the protection of amenity. The LPDMP defines amenity as the 'positive element(s) that contribute to the overall character or enjoyment of an area'. In other words, it is what makes a place attractive and pleasant to live in. Given their scale, tall buildings have the potential to have a disproportionate and harmful impact on the amenity of neighbouring properties, particularly where these are of a smaller scale. This can include for instance unacceptable levels of overlooking or obstructing access to sunlight/daylight. Building design can also impact on the level of amenity that residents of a new tall building enjoy.
- 7.60 The second matter covered by this chapter is the provision of amenity space. The LPDMP defines amenity space as 'the outside space associated with a home or homes. It may be private or shared'. Given the density of a tall building and the likely constrained site areas within the town centre, there will be more limited opportunities to provide significant levels of amenity space in relation to the overall number of residents. As a result, it is important that any amenity space that is provided is well designed and well located to maximise usage.

### Tall building design guidance: protection of amenity

- 7.61 The Local Plan Policy D5 sets out that:

#### **Protection of amenity**

- 1) Development proposals are required to avoid having an unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, in terms of:
    - a) Privacy and overlooking
    - b) Visual dominance and overbearing effects of a development
    - c) Access to sunlight and daylight
    - d) Artificial lighting
- ...

- 7.62 Through careful design, a tall building may mitigate or avoid unacceptable impacts on the living environment of existing residential properties or on new residential properties in such a way that it may contribute to meeting the requirements set out under Policy D5(1).

7.63 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.63.1 Employ careful building/room layout, orientation, effective screening and positioning/glazing of windows to maintain privacy and avoid harmful overlooking.

7.63.2 Step down in height toward the edges of the site/building where this would avoid unacceptable visual dominance and overbearing effects.

7.63.3 Carefully consider the layout/orientation of units/rooms (maximising provision of dual aspect units and generally avoiding single aspect north facing units), location and size of windows, the design of balconies, and impact of/on surrounding buildings to provide sufficient access to sunlight and daylight.

7.63.4 Seek to minimise excessive overshadowing on surrounding open spaces, especially parks, squares and other outdoor amenities.

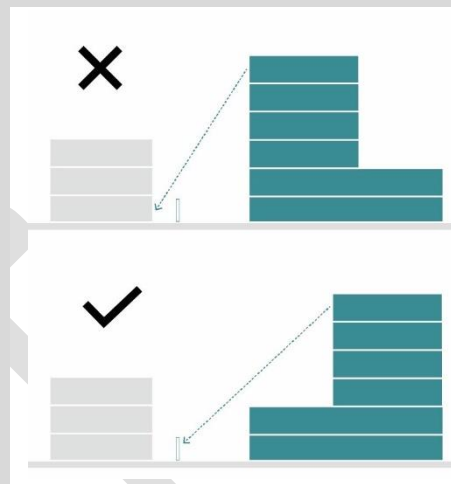


Figure 7: Harmful overlooking into surrounding private amenity space can be reduced through building layout and the location of height

#### Tall building design guidance: provision of amenity space

7.64 The Local Plan Policy D5 sets out that:

##### Provision of amenity space

2) All new build residential development proposals, including flatted development, are expected to have direct access to an area of private outdoor amenity space.

In providing appropriate outdoor amenity space, both private and shared, development proposals are required to:

- a) take into account the orientation of the amenity space in relation to the sun at different times of the year;
- b) address issues of overlooking and enclosure, which may otherwise impact unacceptably on the proposed property and any neighbouring properties; and
- c) design the amenity space to be of a shape, size and location to allow effective and practical use of the space by residents.

7.65 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. Planting schemes within amenity spaces should be designed to maximise biodiversity net gain as well as opportunities to reduce the urban heat island effect. This is particularly the case where the amenity space is private and directly associated with the property. In tall buildings private amenity space is likely to take the form of terraces or balconies. Whilst provision of private amenity space in tall building proposals should be maximised, the policy does acknowledge that it may not always be possible or desirable to provide private amenity space for each residential unit. It is therefore a policy expectation rather than a requirement. However, it is important that the planning application demonstrates how the provision of amenity space, both private and shared, has been considered throughout the design process.

- 7.66 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.
- 7.67 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.
- 7.68 The usability of a balcony will be influenced by whether occupants can enjoy sufficient levels of privacy. This is particularly relevant for projecting balconies which, if poorly designed, can be left feeling quite exposed. Furthermore, features that enable privacy for the occupants or

users of the space can also help reduce unacceptable levels of overlooking of adjacent properties. The design of balustrading should balance openness which enables users to enjoy outward views with enclosure which helps to manage views in and out. Thin metal bars which provide limited screening should be avoided.

- 7.69 Low levels of privacy can result in reduced usage of balconies as an outdoor amenity space and instead lead to increased usage of balconies as storage areas for bulky items such as bicycles, pushchairs, etc. This can lead to unattractive visual clutter. Well-designed balustrading with sufficient levels of screening helps avoid occupiers retrofitting their own screening measures and can also offer the opportunity to conceal any bulky items that may be stored on the balcony.
- 7.70 As part of the planning application, there will need to be clarity regarding the way in which communal and shared spaces will be managed. Appropriate management arrangements will be secured through the S106 legal agreement. It is expected that, whatever arrangement is secured, it has representation from the residents themselves to ensure that they have a say in how these spaces are managed. This will help ensure that the spaces are maintained to the standard required and that access is not unduly restricted to any particular groups, for instance limiting spaces that can be used by young children.
- 7.71 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.71.1 Explore innovative ways of providing multi-functional shared amenity space including through the provision of roof gardens and terraces.

7.71.2 Consider the appropriate split between private balconies and shared amenity space depending on the location and characteristics of the building(s).

7.71.3 Balcony type, design and location should take account of orientation to manage solar gain in the flat (i.e. maximise daylight whilst limiting overheating).

7.71.4 Ensure the design of the balcony balustrading enhances the appearance of the building and provides privacy for both occupants and neighbours, and helps to minimise visual clutter.

7.71.5 Consider the design, fixtures, and ongoing management and maintenance of shared amenity spaces (e.g. shading, planting, seating).

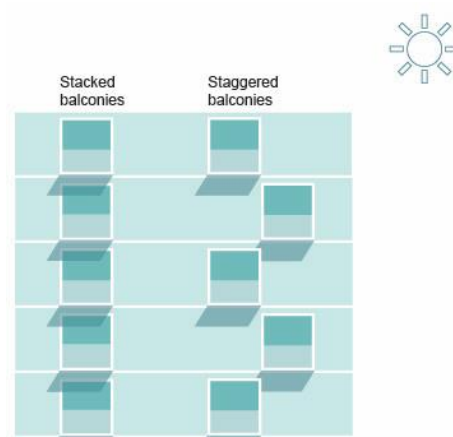


Figure 8: Differing approaches to balcony design and location are likely to be appropriate depending on building orientation to manage solar gain and access to daylight / sunlight

7.72 The Local Plan Policy D5 sets out that:

**Provision of amenity space**

3) All balconies or terraces provided on new flatted development proposals are required to be:

- a) designed as an integrated part of the overall design; and
- b) a minimum of 4sqm.

7.73 The policy requires that balconies are designed as an integrated part of the overall design. This does not mean that balconies need to be inset or partially inset into the structure of the building, nor does it mean that projecting balconies are inappropriate. Instead, the policy is seeking to ensure that the design of the balconies add to the building's design narrative and local distinctiveness rather than detracting from it. For this reason, it is important to carefully consider the design of the support structure used to affix the balconies onto the building. Self-supporting/bolt on structural frames which result in excessive external clutter that detracts from the appearance of the building should be avoided.

7.74 A minimum size has been defined for balconies or terraces in flatted developments to ensure they are of a sufficient size to enable accommodation of a table and chairs. The size should be proportionate to the size of the flat and the likely number of occupants. If they are too small, and in particular if they are very narrow, then they are less likely to be used, as the space becomes impractical to use.

7.75 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.75.1 Avoid balconies that are attached via self-supporting structural frames.

7.75.2 Ensure the materials used and appearance of the balcony structure, soffit, and balustrading complements and enhances the design of the building(s).

7.75.3 Ensure the balcony or terrace is deep enough to accommodate a table and sufficient chairs for all occupants to sit outside comfortably.

**Tall building submission requirements – protection of amenity**

7.76 In order to demonstrate that there is no unacceptable impact on the living environment of existing residential properties or resulting in unacceptable living conditions for new residential properties, it is important that planning applications reflect sufficient and rigorous analysis of the impacts and that this is demonstrated throughout the planning application

process.

7.77 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

7.77.1 **Physical impact assessment:** to identify impacts on privacy and overlooking, and overshadowing including sun path study / glare study (unless incorporated into Daylight and sunlight assessment).

7.77.2 **Daylight and sunlight assessment:** prepared in line with the methods described in the BRE: site layout planning for daylight and sunlight: A guide to good practice. The information should reflect: (i) the receptor (i.e. each building); (ii) the number of rooms in the receptor tested; (iii) the number of rooms which meet the BRE criteria; (iv) the number of rooms which do not meet the BRE criteria, split by minor, moderate and major significance; (v) the number of dwellings affected; (vi) commentary on minor, moderate and major sunlight and daylight losses.

#### **Tall building submission requirements – provision of amenity space**

7.78 In order to demonstrate that sufficient levels of shared and private amenity space have been provided and that these have been designed in such a way that maximises their usability, it is important that planning applications reflect sufficient detail and provide the necessary narrative to justify the specific design proposals.

7.79 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

7.79.1 **Design and Access Statement:** setting out in detail how the guidance has been applied in the design of both private and shared amenity space

7.79.2 **Daylight and sunlight assessment:** prepared in line with the methods described in the BRE: site layout planning for daylight and sunlight: A guide to good practice.

#### **Further references and resources**

- Building Research Establishment, Site layout planning for daylight and sunlight: A guide to good practice.

## f. Public realm and mixed uses

### Context

- 7.80 Due to their scale and form, tall buildings can impact disproportionately on the quality of existing public realm in either positive (e.g. activation, surveillance, enclosure) or negative (e.g. lack of safety, overbearing) ways. Ensuring a high quality and vibrant public realm is especially important as it can contribute to the ongoing and improved vitality of the Guildford Town Centre.
- 7.81 This chapter addresses two broad areas of guidance. The first relates to how the design of tall buildings including both form and uses at lower /ground floor level/s can contribute to improving the existing public realm. The second relates to instances where tall buildings provide new public realm as part of the scheme and includes further guidance regarding the design of such spaces as part of proposals.

### Tall building design guidance: public realm and mixed uses

- 7.82 The Local Plan Policy S3 sets out that:

(6) Schemes must demonstrate high quality urban design and contribute wherever possible to achieving:

- b) defined public and private spaces which are well-enclosed;
- c) an attractive and safe public realm

- 7.83 Enclosure is the relationship between the height of the buildings across a space, and the dimension of the space itself<sup>25</sup>. Due to their relative height, tall buildings can contribute to creating a sense of enclosure. The level of enclosure can increase when the height is located at the edge of a space on the building line.
- 7.84 However, whilst well-enclosed public spaces such as streets, squares or walkways are important to providing a sense of comfort, there are some cases where excessive height can create an overbearing effect on adjacent public realm and detract from its overall quality. It is therefore important that the lower parts of the building are designed to be of a 'human scale'. The building's frontage should also not be excessively long. Instead, the façade should have appropriate breaks.
- 7.85 There are several ways in which tall buildings can help achieve defined public (and private) spaces which are well enclosed, alongside an attractive and safe public realm, whilst avoiding an overbearing effect.
- 7.86 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

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<sup>25</sup> See National Design Guide (2021): 6. Paragraph 27.

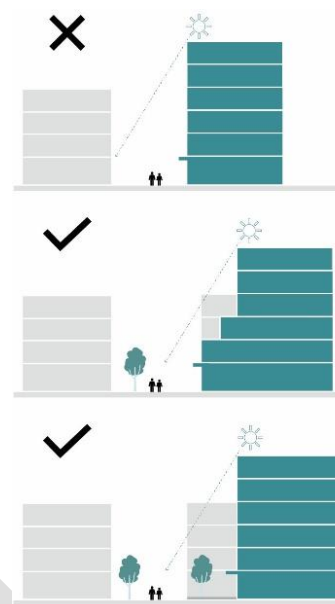
### Building form including massing / building lines

Lower floors should respond to a human scale and consider:

- 7.86.1 stepping back building line or built form to reduce the immediate mass of the building on the public realm.
- 7.86.2 appropriate alignment of building lines and enclosure.
- 7.86.3 incorporating breaks in the building to create visual relief.
- 7.86.4 including features such as roof structures for base/podium buildings, colonnades or porticos at street level for shelter from the elements.

### Building frontages

- 7.86.5 Active building frontages should be maximised/encouraged to create a positive interface with publicly accessible areas and create visual interest and activity.
- 7.86.6 Primary frontages should incorporate well-articulated main entrances that respond to areas with most activity.
- 7.86.7 Secondary frontages should also positively respond to the street scene, maximising opportunities for activity and natural surveillance.
- 7.86.8 Excessive blank frontages should be avoided.
- 7.86.9 Servicing and storage should be discretely designed and be avoided in visually prominent locations including the primary / secondary frontages.



*Figure 9: Stepping back height of a tall building can reduce overbearing impacts whilst retaining a sense of enclosure at ground level. Incorporation of landscaping and breaks in building lines can create a sense of visual relief*

- 7.87 The form of tall buildings including their massing and building lines, alongside the design treatment of building frontages can all contribute to a high quality public realm. Furthermore the incorporation of active uses particularly in high footfall areas is important to improving the vitality of the Guildford Town Centre. This is reflected in Local Plan Policy which indicates that schemes should contribute wherever possible to achieving mixed use developments with active ground floor uses<sup>26</sup>.
- 7.88 In this regard it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

<sup>26</sup> See LPDMP Policy S3(6)a)



### Mixed uses to enhance vitality

- 7.88.1 Provide a mix of uses in the base of a building, particularly at ground floor level.
- 7.88.2 Maximise opportunities for these uses to positively interact and potentially extend into the public realm and create activity and visual interest at street level.

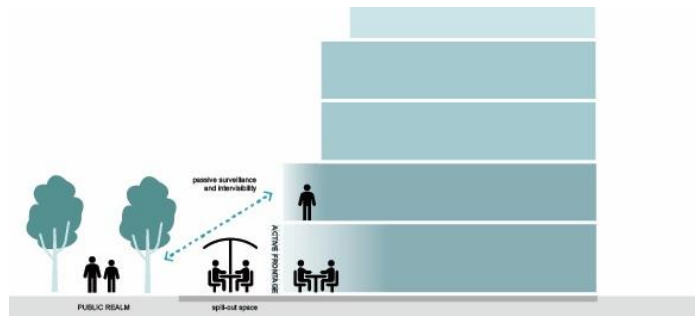


Figure 10: A mix of uses and active building interface can support a safe and vibrant public realm

- 7.89 Tall buildings may also provide the opportunity to create new public realm as part of the scheme. In this regard, the Local Plan Policy D7 sets out that:

(2) High quality new or improved public realm proposals are required to demonstrate that:

- e) it maximises opportunities for activity and enjoyment, and encourages social interaction and community cohesion;
- f) it maximises opportunities to incorporate soft landscaping including trees, hedges and other planting, appropriate to both the scale of buildings and the space available;
- i) it takes a coordinated approach with adjacent sites/phases in terms of the palette of materials, and the design and siting of street furniture, boundary treatments, lighting and signage.

- 7.90 Whilst individual tall buildings may provide limited opportunities for significant levels of new public realm, larger more comprehensive schemes may create new streets, squares, and open space. In these instances, it is important that these features are designed to encourage year-round use and are clearly read as part of the wider public realm, in other words it is clear that they are publicly accessible rather than private space.
- 7.91 Tall buildings should be designed to minimise potential negative microclimatic effects. Given their scale and massing they can, if not designed carefully, lead to excessive levels of shading or wind tunnelling effects. This can be exacerbated by the location of the proposal in relation to surrounding buildings (e.g. creating a wind-funnelling effect) alongside the design of the building itself (e.g. tall and wide facades facing the prevailing wind can cause accelerated wind speeds at windward corners at ground level). This can reduce the usability of the space and the extent to which people enjoy and dwell in the space. The design process should involve wind testing to ensure there are no unacceptable levels of wind or wind noise affecting the quality, amenity and safety of spaces around the building.

- 7.92 In some instances, the public realm may be provided inside or on top of the building to increase the social/community benefits of a scheme (e.g. a viewing platform/roof top public open space). Where this is proposed, consideration will need to be given as to how to enable public access without compromising security.
- 7.93 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

#### New Public Realm

- 7.93.1 Create a safe and comfortable environment for enjoyment and generally relate new public realm to the primary frontage of the building.
- 7.93.2 Private and semi-private spaces should be well-defined from the public realm.
- 7.93.3 Ensure that hard and soft landscaping measures help create attractive spaces and do not create barriers that restrict levels of natural surveillance.
- 7.93.4 Any publicly accessible open spaces should be designed to read as part of the wider public realm (using consistent materials, lighting etc) and promote social inclusion, avoiding unnecessary closure or physical barriers.

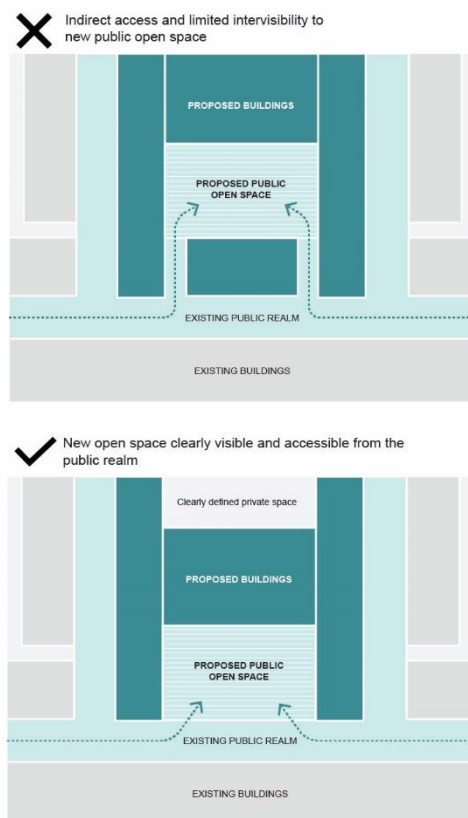


Figure 11: Design of new public realm should integrate with the wider public realm and promote social inclusion

#### Tall building submission requirements

- 7.94 In order to demonstrate that tall building development proposals contribute positively to the existing public realm, create lively streets and promote vitality of the town centre, and carefully consider the design and management of any new public realm, it is important that planning applications reflect sufficient detail and provide the narrative to justify the specific design proposals.
- 7.95 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

- 7.95.1 **Design and Access Statement:** reflecting (i) Built form including illustration of interface / edge conditions – this should include elevations; (ii) Building frontages including identification of primary / secondary frontages, and drawings and description relating to access and servicing arrangements; (iii) Plans and elevations

including relevant uses; (iv) Drawings and a description of the design of any new public space including basis for its location, scale, intended uses, materials, management, and how it relates to the wider townscape.

7.95.2 **Public Realm Strategy:** reflecting the performance, design including materials, and management and maintenance arrangements regarding any new public realm. These arrangements should not assume that the Council would take on a management role.

7.95.3 **Wind microclimate assessments:** Applicants should carry out an initial assessment of a tall building's potential impact on the wind conditions at ground level and where found to be necessary undertake more detailed modelling, ensuring the resulting proposal provides suitable conditions for the intended uses.

#### Further references and resources

- Building Research Establishment, Wind microclimate around buildings

## g. Efficient use of land

### Context

- 7.96 Making the most efficient use of land in Guildford Town Centre can contribute to a more compact form of development, with a range of benefits such as increasing residents' ability to access services, greater footfall to support businesses and supporting sustainable forms of travel such as walking, cycling and using public transport.
- 7.97 Tall buildings can help to achieve this, however in Guildford there is a need to balance increased density with having regard to a range of contextual sensitivities already highlighted in preceding chapters. In many cases, this will favour mid-rise forms of development that can still achieve higher density development. Where tall buildings are proposed, it is important that they make most efficient use of land through careful design.

### Tall building design guidance: efficient use of land

- 7.98 In line with the NPPF, the Local Plan supports efficient use of land including that:

S3(3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses.

- 7.99 The Plan acknowledges that increased densities may be appropriate if the proposals would not have a determinantal impact on an area's prevailing character and setting<sup>27</sup>. Importantly, the Plan reflects that design-led thinking should inform density outcomes (rather than a pre-determined approach based on the expected yield of a site). The Local Plan Policy D4 sets out that:

6) Development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:

...b) the urban grain of the area and appropriate building forms, heights and sizes for the site; and

c) the context and local character of the area.

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<sup>27</sup> See LPDMP Policy D4(7).

7.100 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.100.1 Consider alternative development forms to achieve efficient use of land, including compact mid-rise development rather than increased height where this can reduce or avoid harm.

7.100.2 Consider innovative and modern design solutions that reduce the amount of space needed to accommodate building services and locate these underground where feasible to maximise above ground developable land.

### **Tall building submission requirements**

7.101 The Local Plan emphasises a design-led approach to density, considering a range of contextual factors. To demonstrate that this has been undertaken for tall building proposals, it is important that planning applications reflect sufficient and rigorous analysis of the context within which a new development is proposed, building form options considered, and that this is demonstrated throughout the planning application process.

7.102 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

7.102.1 **Design and Access Statement:** demonstrating how a design-led approach has resulted in the form of building/s proposed. A narrative should be included which outlines the thought process from inception to the final proposal including modifications that have been made, alongside alternatives (including those which do not exceed prevailing heights) considered. The statement should include a reflection of how design-led thinking: (i) supports and provides a clear rationale for this location as suitable for a tall building - this should reflect analysis across spatial scales; (ii) has accounted for sensitivities of the site and its context and has avoided or mitigated any harm resulting from the tall building proposal.

## h. Sustainable design and construction

### Context

- 7.103 Tall buildings can provide both a challenge and opportunity to address climate change objectives. On the one hand, they reflect an opportunity to promote a compact form of development that supports the use of sustainable modes of travel which can contribute to reducing carbon emissions associated with transport. However, their materials and design can also reflect challenges in terms of resource use in the face of climate change. This chapter focusses on aspects of climate change adaptation and mitigation that can be particularly pertinent to the design of tall buildings.
- 7.104 This is necessarily not comprehensive and does not reflect detailed guidance on matters such as minimising embodied carbon (a particular issue with tall buildings). Further, most climate change policies and principles are similarly applicable to all building types and scales of development and are not repeated in this SPD. Reference should be made to the Local Plan and the Council's Climate Change, Sustainable Design, Construction and Energy SPD for full detail.

### Tall building design guidance: climate change adaptation

- 7.105 The Local Plan Policy D15 sets out that:

#### Climate change adaptation

- (1) Development proposals are required to demonstrate how new buildings will:
- a) be designed and constructed to provide for the comfort, health, and wellbeing of current and future occupiers over the lifetime of the development, covering the full range of expected climate impacts and with particular regard to overheating
  - b) incorporate passive heat control measures, and the exclusion of conventional air conditioning, in line with the cooling hierarchy

- 7.106 With regard to climate change adaptation, there are some challenges that are particularly pertinent to tall buildings. Depending on their design, orientation, and use of materials (including a tendency for extensive, glazed facades), alongside their location in Guildford town centre (with an urban heat island effect) the challenge of managing overheating is a particular concern for tall buildings in a warming climate.
- 7.107 On the other hand, passive solar gain can reduce the need for mechanical heating, which in turn reduces energy use and carbon emissions. Well-positioned buildings will create spaces that capture solar gain whilst avoiding overheating. It is important that the cooling hierarchy

is applied to limit the need for mechanical cooling which should be used as the last resort. Given the nature of tall buildings it is however acknowledged that it may not be possible to achieve sufficient cooling through passive means only.

7.108 New planting can have significant benefits including reducing the urban heat island effect and improving air quality. It also helps to support biodiversity and prevent localised flooding by absorbing and slowing down surface water during severe rainfall events. Given the built-up nature of the town centre it is important that opportunities are taken to incorporate new green infrastructure into tall building proposals.

7.109 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.109.1 Consider orientation of buildings and rooms to make the best use of solar gain i.e. its effect on energy usage and comfort levels.

7.109.2 Implement effective measures to manage solar gain including through fenestration (e.g. size, depth, location, glazing properties) and shading (e.g. shuttering, brise soleil, balconies, soft landscaping).

7.109.3 Apply the cooling hierarchy to manage overheating. Where mechanical ventilation and/or active cooling is necessary to mitigate excessive heat, ensure that its ongoing maintenance and energy efficiency has been considered at the outset.

7.109.4 Maximise opportunities for new planting in shared amenity spaces and the public realm.

### **Tall building design guidance: climate change mitigation**

7.110 The Local Plan Policy D2 sets out that:

#### **Sustainable design and construction**

2) When meeting these requirements, the energy and waste hierarchies should be followed except where it can be demonstrated that greater sustainability can be achieved by utilising measures further down the hierarchy.

7.111 With regard to climate change mitigation, it is acknowledged that tall buildings can present a challenge in that they tend to reflect comparatively high levels of embodied carbon due to generally extensive use of materials such as concrete and steel. Applying the waste hierarchy can assist by prioritising strategies that minimise resource use and waste, which in turn lowers the carbon footprint associated with materials and processes. This is important to consider alongside other Local Plan policies aimed at minimising embodied carbon<sup>28</sup>.

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<sup>28</sup> See LPDMP Policy D14(2).

7.112 Regarding operational carbon, if not well considered, tall buildings can be inefficient in terms of their energy needs. The use of the energy hierarchy<sup>29</sup> to inform design in line with Local Plan policy is important. There are other considerations specific to efforts to reduce operational carbon relating to tall building proposals in the Guildford Town Centre.

7.113 The Local Plan Policy D16 sets out that:

**Carbon Emissions from Buildings**

(3) Proposals for development within Heat Priority Areas as shown on the Policies Map and all sufficiently large or intensive developments must demonstrate that low carbon heat networks have been given adequate consideration as the primary source of heat.

7.114 In this regard, it is expected that tall building development proposals will demonstrate consideration of the following design guidelines:

7.114.1 Minimise emissions through efficient building services and use of low carbon energy.

7.114.2 Assess the potential for heat networks to provide the primary source of energy for the development.

7.115 Another means of reducing operational carbon (whilst following a ‘fabric first’ approach in line with the energy hierarchy) can be the subsequent consideration of the use of solar panels on buildings. However, given the form of tall buildings and the relatively small roof area in comparison to their height, solar panels may be unlikely to provide effective capacity and it would be preferable to maximise efficiencies further up the energy hierarchy. Furthermore, it may be more beneficial to utilise the limited rooftop space as a roof garden. However, if solar panels are installed on the building, particular attention should be given to any resultant glint or glare (e.g. from the Hogs Back) due to their likely prominent position on the building.

**Tall building submission requirements**

7.116 In order to demonstrate that proposals are sustainably designed and help deliver climate change objectives, it is important that planning applications reflect sufficient and rigorous analysis and implementation of climate change adaptation and mitigation measures and that this is demonstrated throughout the planning application process.

7.117 To demonstrate that such analysis has been undertaken and sufficiently informed proposals, the following should be submitted as part of planning applications for tall buildings:

7.117.1 **Energy statement:** see Climate Change, Sustainable Design, Construction and Energy SPD

<sup>29</sup> See LPDMP Policy D14(1), paragraph 5.190 and diagram on page 108 of the LPSS.



7.117.2 **Sustainability statement:** see Climate Change, Sustainable Design, Construction and Energy SPD

7.117.3 **CIBSE TM59 overheating assessment:** demonstrating no unacceptable risk of overheating.

#### Further references and resources

- [Guildford borough Climate Change, Sustainable Design, Construction and Energy Supplementary Planning Document](#)
- Chartered Institution of Building Services Engineers, TM59 Design methodology for the assessment of overheating risk in homes

## 8. Summary of tall building planning application requirements and checklist

- 8.1 Given the complexities of designing a tall building and the many competing objectives that will need to be carefully balanced, it is essential that applicants considering proposals that may meet or exceed the tall building definition threshold (see Chapter 5) engage with the Council at an early stage through its pre-application service. This will enable early discussions regarding the principle of the height of the building(s) being proposed and therefore clarity regarding whether this SPD is engaged. This will ensure that any planning application that is submitted is supported by the necessary submission requirements set by this SPD.
- 8.2 When considering the suitability of a site for tall building it is essential that there is a thorough understanding of the constraints and opportunities presented by the site. A constraints and opportunities plan should be prepared early in the process to understand the site-specific context and facilitate discussions with the Council regarding the appropriateness of the proposal. It is also important that the design evolution of the scheme is documented in order to understand how feedback has been addressed. This should form part of the Design and Access Statement of any planning application that is subsequently submitted.
- 8.3 Given the level of design detail that is necessary to be able to conclude that a tall building proposal is acceptable in principle, it is considered essential that any planning applications are submitted as full applications rather than outline applications.
- 8.4 Given the likely impacts of a tall building proposal as well as the importance that the final scheme is of the highest possible design quality standard, all schemes will need to be subject to assessment by the Design Review Panel. This will enable independent expert advice from a range of specialisms and help deliver an exemplar scheme. Careful consideration will need to be given to the architectural approach of the proposal. Given their scale it is likely that they will need to reflect modern influences and architecture and, whilst they can take cues from historic building forms, it is important that they are not pastiche in their design.
- 8.5 There is a risk that the design that is permitted at planning application stage is eroded later through a series of s73 amendments. This is often as a result of not fully considering the feasibility or practicality of the permitted proposal earlier in the process, for instance not fully understanding the structural requirements of a building that may have consequential impacts on its final form. It is important that this is avoided and any s73 applications that are considered to erode the design quality will be resisted particularly when the design quality of the scheme was a primary reason for finding the proposal acceptable. This accords with the NPPF which states at paragraph 140: *'Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used)'*. This can be avoided by ensuring that the construction process is understood from an early stage and the original architectural team is maintained for the duration of the project.

8.6 The checklist below provides a summary reference of submission requirements for development proposals for tall buildings based on this SPD. This is not a comprehensive list of submission requirements – in this regard, reference should be made to the Council’s [Local Validation List](#)<sup>30</sup>.

|   | a. Surrounding context and character | b. Important and significant views | c. Landscape and topography | d. History of a place / heritage assets | e. Protection of amenity and provision of amenity space | f. Public realm and mixed uses | g. Efficient use of land | h. Sustainable and low impact development |
|---|--------------------------------------|------------------------------------|-----------------------------|---|---|--------------------------------|--------------------------|---|
| 1. Design and Access Statement            | X                                    | X                                  | X                           | X                                       | X   | X                              | X                        | X   |
| 2. Landscape and Visual Impact Assessment |                                      | X                                  | X                           | X                                       |   |                                |                          |   |
| 3. Accurate Visual Representations        |                                      | X                                  | X                           |   |   |                                |                          |   |
| 4. Slope Stability Assessment             |                                      |                                    | X                           |   |   |                                |                          |   |
| 5. Ground Conditions Survey               |                                      |                                    | X                           |   |   |                                |                          |   |
| 6. Heritage Impact Assessment             |                                      |                                    |                             | X                                       |   |                                |                          |   |
| 7. Archaeological report                  |                                      |                                    |                             | X                                       |   |                                |                          |   |
| 8. Physical impact assessment             |                                      |                                    |                             |   | X   |                                |                          |   |
| 9. Daylight and sunlight assessment       |                                      |                                    |                             |   | X   |                                |                          |   |
| 10. Public Realm Strategy                 |                                      |                                    |                             |   |   | X                              |                          |   |
| 11. Wind microclimate assessments         |                                      |                                    |                             |   |   | X                              |                          |   |
| 12. Energy statement                      |                                      |                                    |                             |   |   |                                |                          | X   |
| 13. Sustainability statement              |                                      |                                    |                             |   |   |                                |                          | X   |
| 14. CIBSE TM59 overheating assessment     |                                      |                                    |                             |   |   |                                |                          | X   |

<sup>30</sup> See <https://guildford.gov.uk/validationlist>

## Appendix 1: Collation of tall building design guidelines

### a. Surrounding context and prevailing character

#### *Interfaces with surrounding buildings*

Design sensitive interfaces with surrounding buildings by considering the appropriateness and potential to:

- ✓ step down in height toward the edges of the site/building where this would enable a more sympathetically scaled interface condition with (an) adjoining smaller scale building/s.
- ✓ integrate tall building(s) within the urban block or with the tallest point away from (an) adjoining smaller scale building/s.
- ✓ use buffers such as landscaping between the proposed tall building and (an) adjoining smaller scale building/s.

#### *Roofscape and skyline*

- ✓ Proposals for tall building(s) should take a coordinated approach across the site (where relevant) and with other consented / built development in the surrounding area to ensure they relate well with each other/ does not result in a disjointed skyline.

Carefully consider the top element of the building to positively contribute to the character of the existing skyline including:

- ✓ designing fine grained and articulated roofscapes.
- ✓ employing exemplary architectural design to add to visual interest.
- ✓ wherever possible integrating rooftop building servicing features (e.g. lift overrun or other building services plant). Where they are necessary on the rooftop employ appropriate screening measures to ensure they are not visually prominent.
- ✓ avoiding obtrusive glare (from reflective surfaces) and excessive lighting.

### b. Important and significant views

- ✓ Limit building height to maintain the prominence of, or important sky gap associated with, legacy landmarks or other built and natural features of interest as part of significant or important views.
- ✓ Implement design measures, such as stepping down or appropriate siting of building height, choice of materials and lighting, and bulk and massing, to avoid detracting from significant or important views.
- ✓ Pay particular attention to the roofscape and wherever possible integrate rooftop building servicing features (e.g. lift overrun or other building services plant) within the building. Where they are necessary on the rooftop employ appropriate screening measures to ensure they are not visually prominent.
- ✓ Explore opportunities, particularly as part of redevelopment schemes, to further reveal views of legacy landmarks or built and natural features of interest.
- ✓ Explore opportunities to enhance the skyline through the introduction of distinctive and visually striking roof profiles that can add to Guildford's rich and diverse character.

**c. Landscape and topography**

- ✓ Limit or locate building height appropriately to maintain important views of surrounding landscapes. [see also guidance under previous section 7a.]
- ✓ Respect the natural valley topography of the town and subtle variations in elevation within the town centre, avoiding harmful building height at topographically elevated or prominent locations.
- ✓ Consider and work with the underlying topography of the site in relation to the construction, design and height of building(s).
- ✓ Consider the impact of the proposal on slope stability and ground conditions.

**d. History of place / heritage assets**

- ✓ Adopt a highly sensitive approach to building height (as well as other design features) to avoid or minimise harm to the heritage asset and its setting (where applicable).
- ✓ Avoid visual obstruction and/or competition of significant views of/from heritage assets.
- ✓ Explore opportunities to better reveal the significance of heritage assets (and their settings, where relevant) by appropriate location of building height and other design features.
- ✓ Where archaeological remains of significance are found to exist and are preserved in-situ, seek opportunities to better reveal the significance of the find as part of the building design, with public access allowed where possible.

**e. Protection of amenity and provision of amenity space**

*Protection of amenity*

- ✓ Employ careful building/room layout, orientation, effective screening and positioning/glazing of windows to maintain privacy and avoid harmful overlooking.
- ✓ Step down in height toward the edges of the site/building where this would avoid unacceptable visual dominance and overbearing effects.
- ✓ Carefully consider the layout/orientation of units/rooms (maximising provision of dual aspect units and generally avoiding single aspect north facing units), location and size of windows, the design of balconies, and impact of/on surrounding buildings to provide sufficient access to sunlight and daylight.
- ✓ Seek to minimise excessive overshadowing on surrounding open spaces, especially parks, squares and other outdoor amenities.

*Provision of amenity space*

- ✓ Explore innovative ways of providing multi-functional shared amenity space including through the provision of roof gardens and terraces.
- ✓ Consider the appropriate split between private balconies and shared amenity space depending on the location and characteristics of the building(s).
- ✓ Balcony type, design and location should take account of orientation to manage solar gain in the flat (i.e. maximise daylight whilst limiting overheating).
- ✓ Ensure the design of the balcony balustrading enhances the appearance of the building and provides privacy for both occupants and neighbours, and helps to minimise visual clutter.
- ✓ Consider the design, fixtures, and ongoing management and maintenance of

- shared amenity spaces (e.g. shading, planting, seating).
- ✓ Avoid balconies that are attached via self-supporting structural frames.
- ✓ Ensure the materials used and appearance of the balcony structure, soffit, and balustrading complements and enhances the design of the building(s).
- ✓ Ensure the balcony or terrace is deep enough to accommodate a table and sufficient chairs for all occupants to sit outside comfortably.

#### **f. Public realm and mixed uses**

##### *Building form including massing / building lines*

Lower floors should respond to a human scale and consider:

- ✓ stepping back building line or built form to reduce the immediate mass of the building on the public realm.
- ✓ appropriate alignment of building lines and enclosure.
- ✓ incorporating breaks in the building to create visual relief.
- ✓ including features such as roof areas for base/podium buildings, colonnades or porticos at street level for shelter from the elements.

##### *Building frontages*

- ✓ Active building frontages should be maximised/encouraged to create a positive interface with publicly accessible areas and create visual interest and activity.
- ✓ Primary frontages should incorporate well-articulated main entrances that respond to areas with most activity.
- ✓ Secondary frontages should also positively respond to the street scene, maximising opportunities for activity and natural surveillance.
- ✓ Excessive blank frontages should be avoided.
- ✓ Servicing and storage should be discretely designed and be avoided in visually prominent locations including the primary / secondary frontages.

##### *Mixed uses to enhance vitality*

- ✓ Provide a mix of uses in the base of a building, particularly at ground floor level.
- ✓ Maximise opportunities for these uses to positively interact and potentially extend into the public realm and create activity and visual interest at street level.

##### *New Public Realm*

- ✓ Create a comfortable environment for enjoyment and generally relate new public realm to the primary frontage of the building.
- ✓ Private and semi-private spaces should be well-defined from the public realm.
- ✓ Ensure that hard and soft landscaping measures help create attractive spaces and do not create barriers that restrict levels of natural surveillance.
- ✓ Any publicly accessible open spaces should be designed to read as part of the wider public realm (using materials, lighting etc) and promote social inclusion, avoiding unnecessary closure or physical barriers.

#### **g. Efficient use of land**

- ✓ Consider alternative development forms to achieve efficient use of land, including compact mid-rise development rather than increased height where this can reduce or avoid harm.
- ✓ Consider innovative and modern design solutions that reduce the amount of space needed to accommodate building services and locate these underground where feasible to maximise above ground developable land.

#### **h. Sustainable design and construction**

##### *Climate change adaptation*

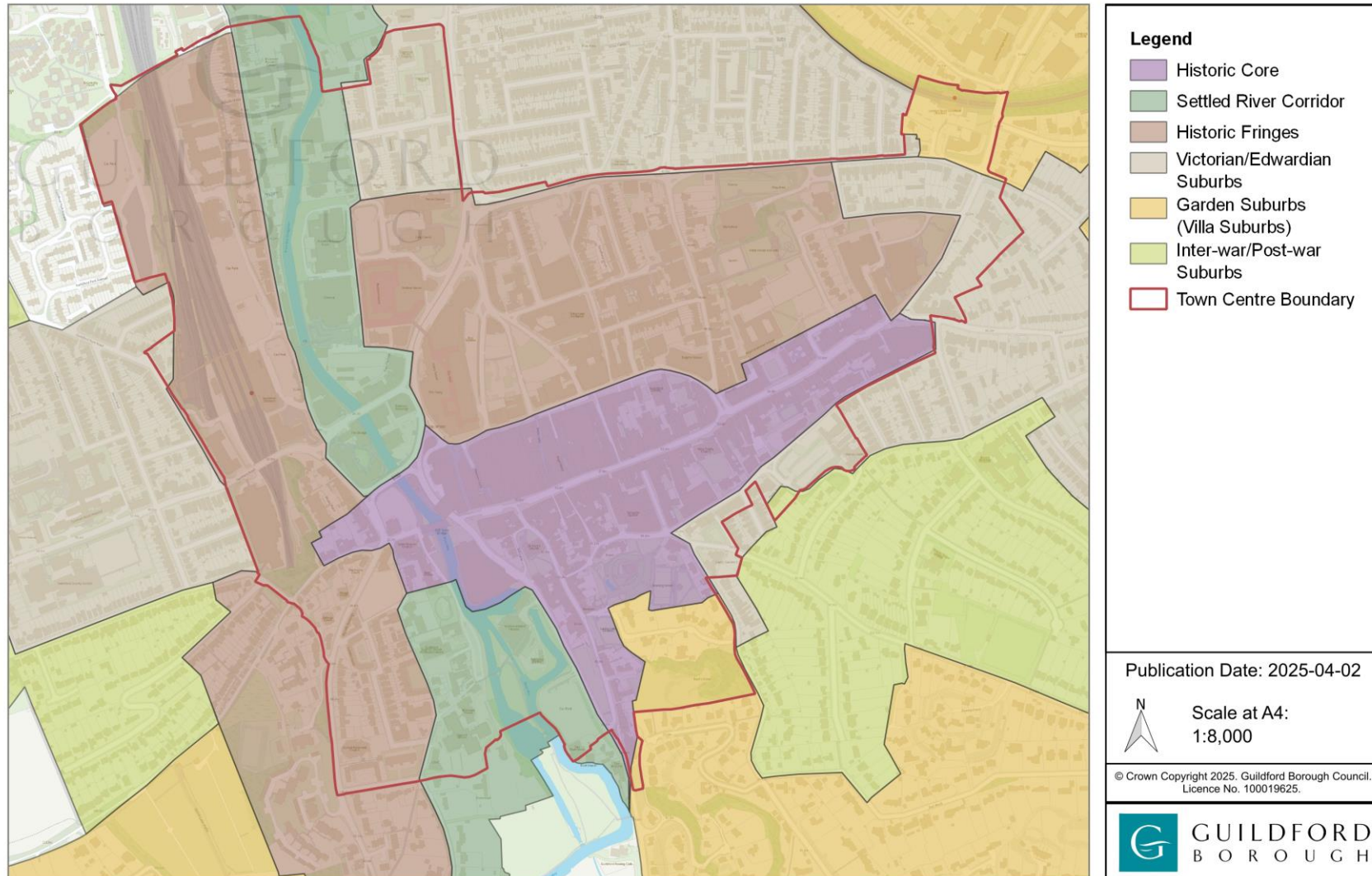
- ✓ Consider orientation of buildings and rooms to make the best use of solar gain i.e. its effect on energy usage and comfort levels.
- ✓ Implement effective measures to manage solar gain including through fenestration (e.g. size, depth, location, glazing properties) and shading (e.g. shuttering, brise soleil, balconies, soft landscaping).
- ✓ Apply the cooling hierarchy to manage overheating. Where mechanical ventilation and/or active cooling is necessary to mitigate excessive heat, ensure that its ongoing maintenance and energy efficiency has been considered at the outset.
- ✓ Maximise opportunities for new planting in shared amenity spaces and the public realm.

##### *Climate change mitigation*

- ✓ Minimise emissions through efficient building services and use of low carbon energy.
- ✓ Assess the potential for heat networks to provide the primary source of energy for the development.

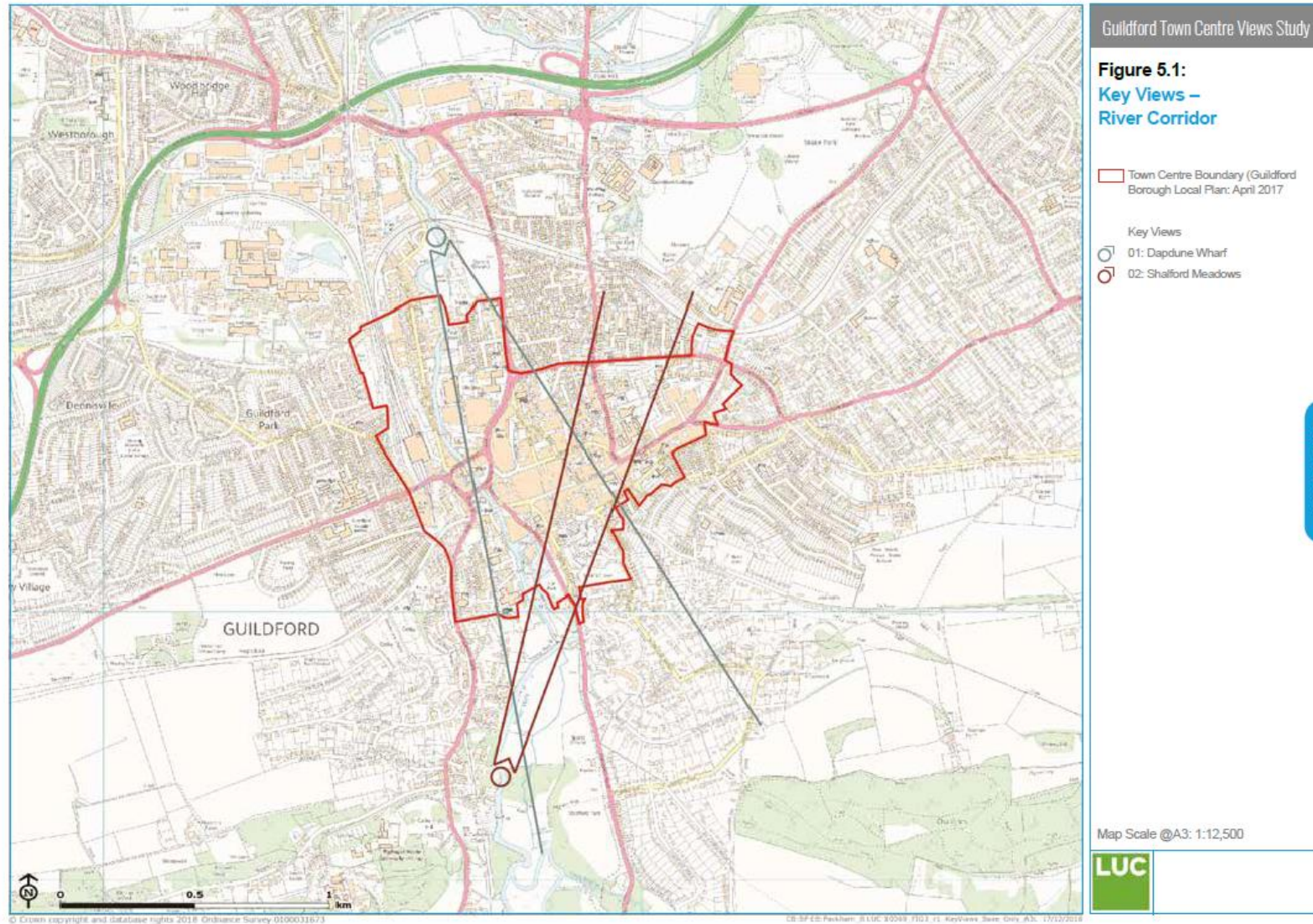
## Appendix 2: Townscape character areas in Guildford Town Centre

Townscape Character Areas - Guildford Town Centre



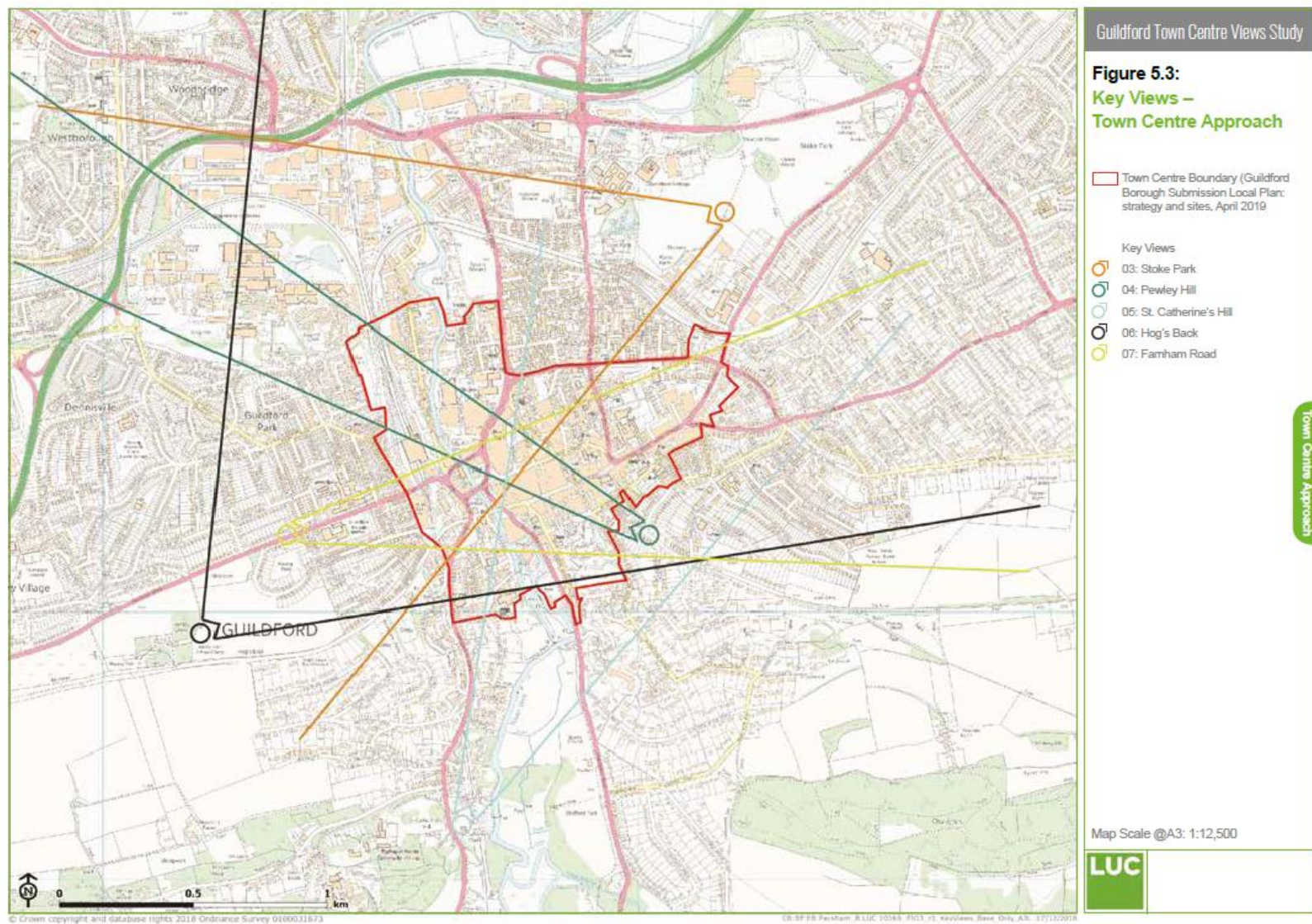


## Appendix 3a: Important River Corridor views identified in the Guildford Town Centre Views SPD



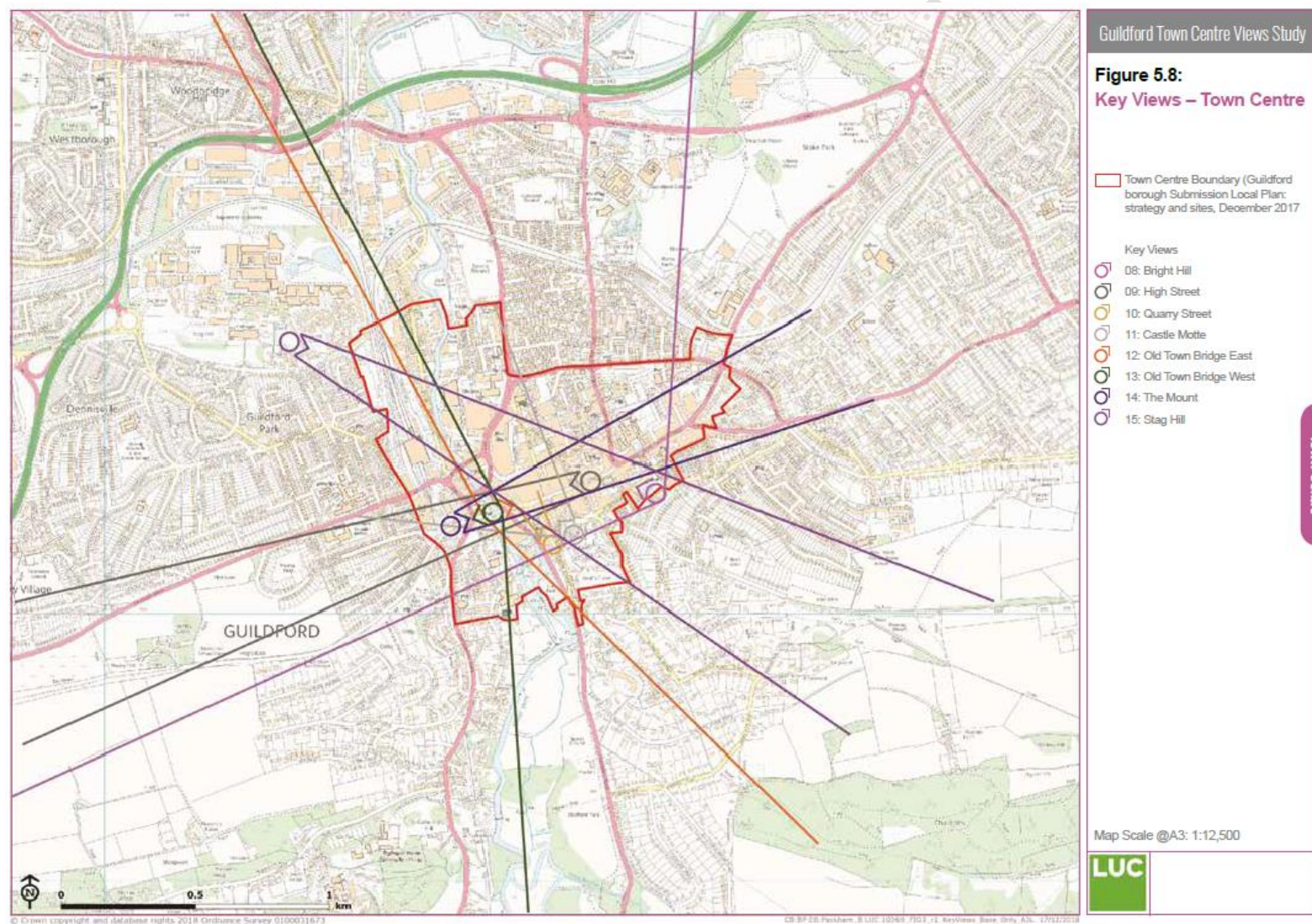


## Appendix 3b: Important Town Centre Approach views identified in the Guildford Town Centre Views SPD





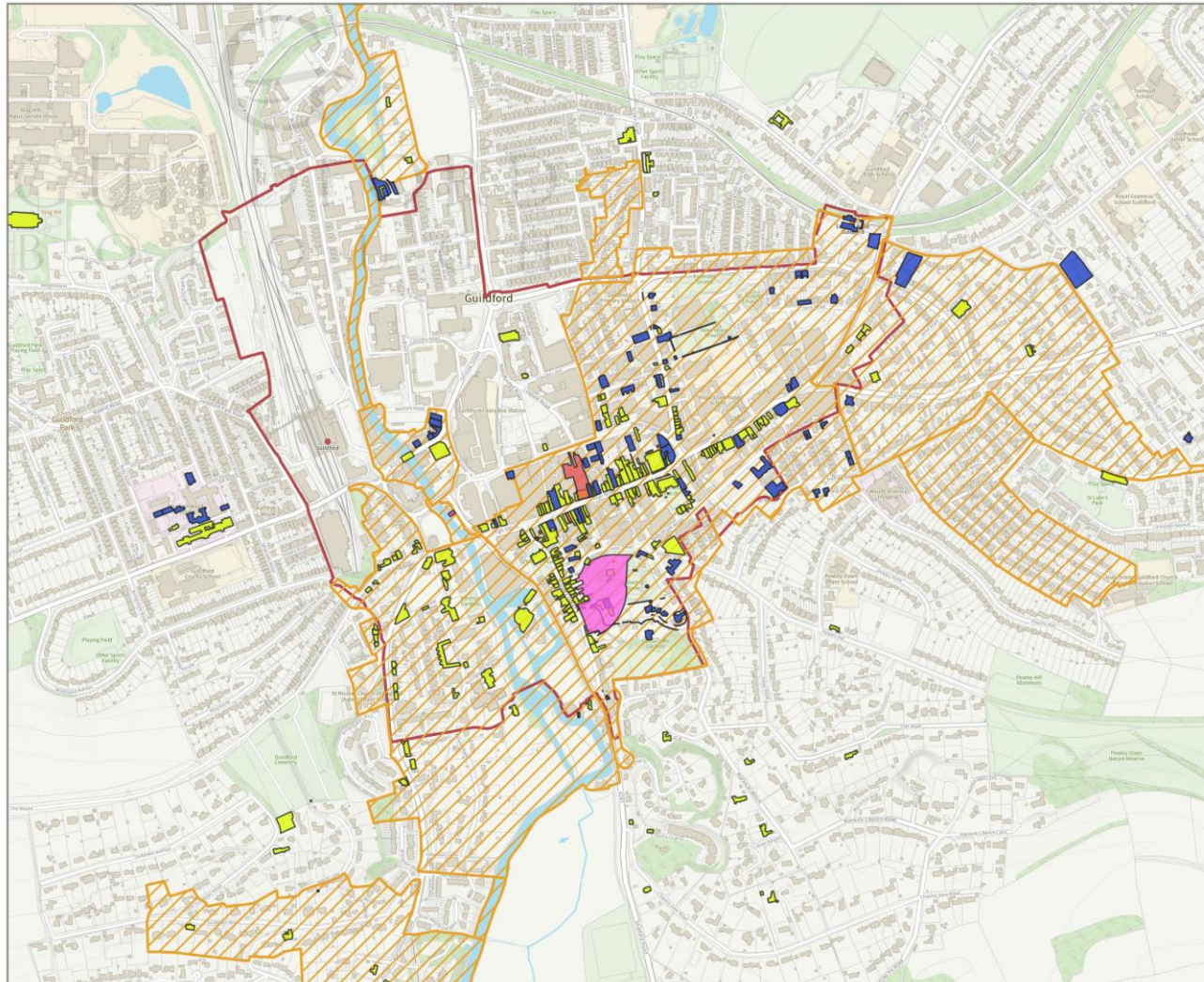
## Appendix 3c: Important Town Centre views identified in the Guildford Town Centre Views SPD





## Appendix 4: Heritage Assets in Guildford Town Centre

### Heritage Assets in Guildford Town Centre



#### Legend

-  Conservation Area
-  Listed Buildings
-  Locally Listed Buildings
-  Town Centre Boundary
-  Registered Parks and Gardens
-  Scheduled Monuments

Publication Date: 2025-04-02



Scale at A4:  
1:12,000

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