

The Guildford Society Response to Draft Tall Buildings SPD August 2025

Introduction

The Guildford Society welcomes this Tall Buildings SPD. The Society has consistently, for several years, proposed that Guildford requires a policy to control the heights of buildings in Guildford Borough.

To support the debate on a heights policy and help the case for the Council to produce a Tall Building Policy we produced our report 'Review of Height and Tall Building Policies' in February 2024. [Link to Document](#) This demonstrated that the Local Planning Authorities (LPA's) of most similar towns and cities had developed and were using Tall Building policies. The report includes good examples of these policies.

Although this policy is welcome it comes too late to influence many key Town Centre (Defined as the area documented in the Guildford Local Plan (LPSS) 2019) sites which have already achieved planning for, in our opinion, excessively high and sized developments e.g. Solum at Guildford Station, St Mary's Wharf, North Street. If this SPD had been in place whilst these projects were going through their planning stages, it is likely that they would have had to reconsider their heights and massing.

We are concerned today about heights of possible developments on town centre sites such as Guildford Park Road; Bedford Wharf & Millmead identified in Shaping Guildford's Future, and Riverside Business Park. The Local Plan update, which is being developed at present, may also consider further Town Centre sites such as the Telephone Exchange dropped from the LPSS2019.

We also note significant sites on the border of the Town Centre are not covered by the SPD as drafted notably Shaping Guildford's Future - Woodbridge Meadows. There are also other areas of the borough that would benefit from coverage by a Tall Buildings SPD, particularly as new large sites are likely to be identified as part of the Local Plan Update.

Agreeing and implementing a Tall Buildings SPD is thus important and urgent.

We have a range of comments on this Draft Tall Buildings SPD. We have split these into overall comments points 1/ to 5/ below and 6/ specific comments on the draft.

1/ Robustness of the SPD.

The draft SPD is not as precise or robust compared to policies we have studied from other boroughs.

If the SPD is not precise and robust, developers will be able to circumvent its purpose.

Compared with similar SPDs for other LPA's it appears unconvincing about the control of tall buildings in Guildford, as an example Canterbury sets out its views firmly and explicitly:

The general policy is that new buildings should be based on the heights of existing buildings, particularly in historic areas. This relates to both the height of the building and also to the street enclosure ratio. Accommodating growth will require a relatively high density of development. Tall buildings (over five storeys) are not considered necessary to achieve this and most parts of the District are not considered suitable for tall buildings. High density development does not have to involve building high or disrupting the urban grain. With skill and care it is possible to incorporate large modern uses within the grain of historic places. Tall buildings (over five storeys) need to be designed with an appreciation of the context in which they are to be built. If proposals have a detrimental impact in terms of overshadowing,

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loss of sunlight, or would be overbearing on their surroundings they will be refused permission.

Other SPD's have better structure and clarity. An excellent example is Windsor and Maidenhead's Building Heights and Tall Buildings SPD, which is well worth reviewing as in our opinion, it demonstrates an exemplary clarity of language and structure supplemented by appropriate illustrations. [Link to the Document](#).

As the Draft SPD only covers the town centre, we are disappointed that it does not focus in more detail on some of the very specific urban design and wider design issues related to tall buildings specific to Guildford with its topography, gap town location, townscape, heritage and history, street patterns, skylines and roofscapes.

2/ Definition of Tall Buildings

We question the SPD's definition of Tall Buildings:

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. 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.

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.

We believe that the selection of 18m or taller as the definition of a tall building in Guildford town centre excludes from this SPD buildings of lower height for example 4-5 storeys which could in an area predominantly two storey buildings, be considered as tall buildings with significant impact. In areas of the town centre with its large number of heritage assets, existing scale and skylines, new buildings of 18m and taller are relatively unlikely whereas new buildings lower than this, that could have a significant impact, are excluded although acknowledged.

The 18m or higher definition should we strongly believe, be replaced by a more intelligent and appropriate definition for Guildford based upon the 'context height'. So new buildings have to be related to the heights of buildings in their immediate context or surrounding area.

An excellent example from another borough's tall buildings SPD:-

A tall building is an exceptional development that is significantly higher than the buildings in its surrounding context and that notably breaks the skyline. As such, 'tall building' is a relative term. A building is considered tall in relation to the height of its surroundings, which is called the 'context height'. The context height is the height that an observer would read as the typical or defining height of a particular area.

The relationship of height between a tall building and its context can be expressed as a factor of the prevailing context height. This is the context height ratio (CHR), which expresses the degree of height of a building in relation to its context. This provides a measure of the extent to which a building is 'outstanding' on the skyline considering the prevailing height and scale of the existing place.

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Tall buildings with a height of 1.5 to 2.5 times the context height will be prominent and outstanding features in an area. Thus any building exceeding 1.5 times the context height of the surrounding area (or a minimum of 4 storeys in a 2 storey area) will be defined as a tall building

Using context height ratio in Guildford would be appropriate because much of the town has a cohesive scale of 2-3 storey buildings with a few buildings rising to 4 and 5 storeys. A key factor when designing new buildings is considering their context and how they relate to that context both immediate and wider. It therefore makes sense when considering a new building's height to relate this to its surrounding context.

The draft SPD does discuss buildings lower than the 18m threshold in the paragraph below but it has questionable wording which in our opinion can be ignored by developers:

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.

3/ Limited Coverage of only the Town Centre

It is likely that there will be pressure for taller buildings in other locations within the Borough outside the Town Centre. Already we have seen a tall building development being approved outside the town centre at the Law College. Simplistically it may appear more likely that taller buildings will be within Guildford's urban area but only if the narrow definition of tall buildings in the draft SPD is retained. As stated above we seriously question this definition.

If a context height ratio was adopted, then new developments anywhere in the Borough of 1.5 times the context height could be considered under this SPD as a tall building. An example is the Magnet site in Woodbridge Road where the proposal is for a five storey new building in an area of predominantly two storey buildings—the context height. In this case the proposed building is 2.5 times the context height and should be considered a tall building. We have also seen proposals submitted under 'permitted development rights' for a two storey upwards extension of a two storey house within a large estate of similar 1950's two storey houses. This would be 2 times the context height.

It is important to note that the majority of other boroughs we have studied who have well considered tall building SPDs or tall building policies in their local plans, have policies that cover their complete borough. Examples include, Brighton and Hove, Windsor and Maidenhead and

Canterbury whose policy specifically covers Herne Bay and Whitstable both with predominantly 2 and 3 storey buildings. Canterbury's policy states:

Canterbury is perhaps the most critical place in terms of its character and the impact of new development on views and vistas. Building heights should be determined by the immediate context of a development. However, it is not expected that new buildings will exceed four residential storeys over an active ground floor (i.e. five storeys maximum height).

Herne Bay is a Victorian seaside town of mainly two to three storey houses with a slightly higher central area (two to three storeys over an active frontage). Building heights should be determined by the immediate context of a development.

Whitstable is a town of two storey houses with a central area of two or three storeys. The predominant building height is an active ground floor with a residential floor over. Building heights should be determined by the immediate context of a development.

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It would be helpful if Guildford's Tall Buildings SPD is written to covers the complete Borough that it includes specific references to areas such as Ash and Tongham and the villages. The use of a context height approach as detailed above, in our view, would make this easy to achieve.

4/ Structure of SPD

We understand the importance of this SPD having its basis in Local Plan policies but are concerned that its structure is made complicated and less understandable by being segmented into sections adhering to Local Plan policies. Is this really necessary? As stated above other boroughs such as Windsor and Maidenhead's Tall Buildings SPD seem far better structured documents that are easy to understand and follow.

We are concerned about the use of the term 'themes' for design consideration. This seems an inappropriate term. Why are these purely not 'design considerations' or 'tall building principles' as used in the Windsor and Maidenhead Tall Buildings SPD?

5/ Design Quality

It is accepted widely and in the draft SPD that tall buildings need to be of a highest design quality. Tall buildings are highly visible and, depending on their stature, are a key part of the skyline and image of a place. Therefore, they must be of exceptional architectural design and integrity.

In Section 3 para 3.1 the NPPF is quoted. Within this it states 'the NPPF places a great amount of emphasis on good design'.

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.'

Within the draft SPD terms such as 'design quality', 'high quality urban design', 'well designed tall buildings' 'design led approach' 'design-led thinking' are used.

Our concern is how this highest or exceptional design quality can be achieved. At an early stage in the design of tall building developments who judges whether the highest design quality is being proposed? Sadly, the experience in Guildford is that the taller building developments that have received permission are of a mediocre design quality. Guildford, considering the design quality of its heritage buildings, has a track record in recent years of accepting second best with design and architecture of new buildings. To make this 'design quality' a reality it is important that the Council considers how this can be achieved. Other councils are successfully working with developers to deliver the highest design quality. We believe that the Council should consider how it works with developers of tall buildings to obtain the high design quality required. Developers should be encouraged to have architectural competitions. A combination of Design South East and a local design panel should be used to make sure that the design of every taller building project is reviewed a number of times during the design development process. We believe that the Council's design champion, a position we understand is currently not filled, should be a focus for design quality in the borough and especially with tall building projects.

6/ Specific Comments on the sections of the SPD document

We comment below on specific parts of the SPD.

We note that through the SPD there is an assumption that new tall buildings referred to are residential. Although this may be correct the various sections should also take account of new tall buildings, or extended existing buildings, that are offices or other uses such as hotels.

6. Overarching principles and vision statement

We question the purpose of this vision statement. It seems unusual in SPDs such as this. In our opinion this section opens the door to the continuation of inappropriate tall buildings being built in Guildford. Section 6.3 would appear to support developers who want to build tall buildings by arguing for their developments using the points below which appear very similar to those used by the St Mary's Wharf developer.

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*

It appears that the council is sitting on the fence and is still open to developers producing inappropriately tall buildings in Guildford.

If this vision statement is retained, we suggest it should state that where tall buildings are proposed the developers need to provide compelling evidence as to why taller development is necessary.

7. Tall Building Guidance

Below we comment on some sections of this guidance.

Section a. Surrounding context and prevailing character

In para 7.6 we query 'associated sensitivities' (our underlining). To what does this refer?

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 Centre⁴ 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.

In para 7.7 should not this include overshadowing, impact on streets and public realm and skylines, etc.?

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.

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In para 7.8 the part 'if they are complementary to their surroundings and of exceptional quality' is subjective and needs more clarity. Above we discuss design quality and exceptional quality.

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.

In paras 7.19 and 7.20 we would expect that developers should be required to provide views of the proposed tall building using VuCity

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.

Section b. Important and significant views

In this section starting with paras 7.21-23 much emphasis and reliance for assessing tall building proposals, is placed on the Guildford Town Centre Views SPD. We know from recent major planning applications in Guildford, including those for tall buildings, that this views policy has proved inadequate. We believe that it is essential with tall building applications that a far greater number of verified views should be provided including specific closer views at street level and mid distant views. These should be in addition to VuCity views noted above.

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 viewpoints⁸ 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

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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.....

In paras 7.26-31 the potential impact of tall buildings in Guildford is downplayed. We question in relation to a quite a small and compact town that Guildford is whether a tall building can 'offer unique opportunities to improve the quality of a place.....' etc. In a large city this may be appropriate, but it does not seem appropriate for Guildford.

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 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.

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.

In para 7.30 we would dispute whether the level of harm caused by a tall building is solely 'planning judgement'. Surely this would be a judgement by others including the public.

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.

Section c. Landscape and topography

We agree the content of this section but what is absent is any requirements related to public realm related to a new tall building. A benefit provided by a tall building using a site efficiently may be the provision of a public space or other new public realm.

Section d. History of place / heritage assets

As part of the submission requirements under this section we would expect there should be evidence of early consultations with Historic England if important heritage assets/listed buildings are affected by a proposed tall building.

Section e. Protection of amenity and provision of amenity space

Not specifically mentioned in this section but highly important to amenity spaces such as balconies at higher levels, are the microclimate effects of tall buildings. Submission requirements should include analysis of the wind impact as stated in 7.91 and 7.95.3

Section f. Public realm and mixed uses

We do not believe this section on public realm discusses the location of a tall building related to new or existing public space and how the positioning of the tall building should not shadow the public space from sunlight. Ideally the tall building is to the north or east of the public space to allow sunlight from the south or west into the space.

Section g. Efficient use of land

As drafted, we find this a confusing section. Without doubt we must have highly efficient use of land in Guildford, but this is not a reason to have inappropriately tall buildings in Guildford. So we agree with the first sentence of para 7.97. What is lacking from this section is any requirement for the developer proposing a tall building to provide a detailed explanation and factual assessment as to the need for a tall building as opposed to another form of development.

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.

Section h. Sustainable design and construction

This section of the SPD covers most of the issues related to tall buildings and sustainability. There is much discussion about the sustainability of tall buildings. No matter how sustainably tall buildings are designed, they will always have an inherent 'carbon premium' that comes with height. As noted in para 7.103 'their materials and design can also reflect challenges in terms of resource use in the face of climate change'.

As the Council has declared a climate emergency shouldn't this SPD go further in its requirements for taller buildings such as requiring, they meet Passivhaus standards?

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.

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As noted in para 7.115 there is minimal opportunity for renewables/solar panels. Also, tall buildings can be far less adaptable and flexible. The recent requirement for two staircases in residential tall buildings, to provide safer means of escape in case of fire has increased circulation areas making some developments less viable and sustainable.

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



6th August 2025

References

Link to Windsor and Maidenhead SPD

<https://consult.rbwm.gov.uk/file/6268499>

Link to GSoc Paper 'Review of Height and Tall Building Policies'

[2402_-_Heights_Policies_or_Tall_Building_Policies_-_final.pdf](#)