



Ian Doyle

Director of Service Delivery  
Guildford Borough Council  
Millmead House  
Guildford,  
GU2 4BB

*Please reply to*  
1, Beech Lane  
Guildford  
GU2 4ES

10 December 2021

Dear Mr Doyle

**21/P/02232 | Demolition of existing building and erection of two buildings comprising residential accommodation (Use Class C3), retail floorspace (Use Class E) and cinema (Sui Generis), erection of a retail pavilion (Use Class E), together with car and cycle parking, plant and all highways, landscaping and other associated works. | Debenhams, Millbrook, Guildford, GU1 3UU**

Guildford Residents Association wishes to object to this proposal on behalf of members, on the following grounds:-

1. Inadequate set back from the River Wey, in particular the SE corner, producing an overbearing impact on the Wey Corridor, contrary to the saved policies in 2003 Local Plan.
  - 1.1. The greatest opportunity afforded by redevelopment is the creation of an attractive public riverside walk. There was strong support for this during the consultation. This needs to be open to the public 24 hours a day, seven days per week but the application does not promise this.
  - 1.2. The current proposal is more of a narrow afterthought, particularly at the south-east corner which appears to be even closer to the river than the current building. This needs to be an attractive space within which to linger, not a cramped parsimonious thoroughfare.
  - 1.3. A pedestrian bridge link to the Yvonne Arnaud theatre would be a further major positive.
  - 1.4. Raising the ground level adjoining the river demands a greater setback to avoid urban structures dominating the Wey Corridor in an overbearing way.
2. Excessive height.
  - 2.1. This scheme would produce some of the tallest buildings in the town, but situated where medium rise is the maximum acceptable to avoid damaging views that define the town, and to avoid being overbearing given that the full height effectively extends to the site perimeter on three sides. The token high level setback in no way alleviates this.
  - 2.2. The additional height is particularly damaging at the south-east corner because the proposed building is closer to the river at this point: both proximity and height need reducing
  - 2.3. The buildings need to be several storeys lower *and* the facades need additional architectural refinement such as setbacks to reduce the impact.



- 2.4. It is important to appreciate that Solum does not set a precedent for the StMary's scheme on a sensitive riverside site, that also bookends the historic High Street and impacts the Grade 1 listed building from which the scheme takes its name. Solum was approved having applied a completely different NPPF policy that only applied previously because there was no approved housing allocation and supply at the time. We now have adequate designated sites to provide sufficient housing supply. Solum will stand as a monument to poor local planning, and is often cited as an example of such. This must not be another.
  - 2.5. The site is to be raised materially on the riverside frontage for flood prevention purposes. We believe the architectural treatment of this structure needs proper consideration to reduce the impact of the additional massing on the river corridor. The proposal to disguise it with some hanging vegetation is unlikely to be effective in practice.
3. Monolithic Design
    - 3.1. The gap between buildings A and B is there to accommodate the variation in ground levels across the site, to enable emergency vehicular access and enable the introduction of fenestration.
    - 3.2. It will be a long, narrow canyon and likely wind tunnel
    - 3.3. Being narrow it would have only a very limited effect in breaking up the huge overall mass, particularly along Millmead, and in distant views
    - 3.4. It would be too narrow to provide attractive or effective views of St Mary's. In practice its tall, narrow, parsimonious nature might perversely serve to emphasise the overbearing nature of the new buildings
    - 3.5. Similarly it is not capable of providing an attractive pedestrian thoroughfare
    - 3.6. Natural light reaching flats at lower levels on these elevations may be limited due to the proportions and tone of the brickwork
  4. Impact on views
    - 4.1. Our members are familiar with the town and the complex interactions that impact on views into the town, out of the town and within the town. They can therefore comprehend the montage views that are taken from specific static points and gain a proper appreciation of the impacts of the combined proposed scale, mass and height. It is these interactions combined with the topography and existing layout that give rise to the justified high level of objection.
    - 4.2. Decision-makers, perhaps less familiar with the town, even if experienced at interpolating plans and montages, are urged to walk along Quarry Street, Millmead and the High Street and then visualise the proposal to properly appreciate the damage it would do.
    - 4.3. Viewed from outside Wagamama at the bottom of the High Street for instance anything above the top of the existing flagpole would appear overbearing.
    - 4.4. From outside Boots, the proposal would obscure views out to the Surrey Hills AONB
    - 4.5. From Quarry Street, St Mary's church is now viewed against the skyline but this would disappear with the proposal which would overwhelm and destroy the setting of the church
    - 4.6. The proposed building would also be overly dominant in views into the town from, for example, the Downs to the west off the Mount where it would overwhelm the line of the historic High Street or St Mary's church for example. Again we believe decision-makers should visit the locations from which approved views have been taken in order to properly appreciate the context of the viewpoint.
    - 4.7. There are numerous other viewpoints - both public and private - throughout the town that would be adversely impacted because the topography provides many views into the town or across the valley, and the size, bulk and height of the proposed building is alien to the town and would stick



out like a sore thumb. The many small individual negatives should be aggregated with the itemised larger impacts set out in formal visual assessments

5. Overbearing on street scene, Conservation Area, notable historic buildings and riverside.
  - 5.1. The scale and massing is alien to Guildford and would materially damage the town's character given the prominence and visibility of the site. The height combined with the unrelenting facade off the back of the Millmead pavement and very close to the river, has an exponential effect on the perceived visual impact.
  - 5.2. In our opinion the height proposed on the Millmead elevation should not exceed the top of the plant rooms or similar that are the highest point on the existing structure. This would permit a meaningful increase in the volume of accommodation provided whilst avoiding damaging the cherished and valuable character of the town.
  - 5.3. The proposed building would also be overbearing and physically intimidating to pedestrians in the lower High Street or Quarry Street for example, over and above impacting views from there. VuCity may help with views but to gauge the damaging sense of overbearing-ness that would be caused, and crucially to properly appreciate the existing character that is at risk, we very strongly urge any decision-makers to walk the ground and then construct the proposal in their mind's eye.
  - 5.4. The proposal would be incredibly domineering viewed from the riverside and it's detrimental impact e.g. shading on buildings such as the Britannia pub would be considerable. Three factors compound here: raising the plinth in mass concrete, bringing the building closer to the south-east corner and more than doubling the building's height.
6. Flawed consultation
  - 6.1. We are particularly critical of the so-called public consultation which was in reality a slick professional PR exercise
  - 6.2. The meagre public benefits were overhyped and lavishly illustrated with ample artistic license in an effort to gain support for the scheme
  - 6.3. Crucially the height of the building, which is far and away the most critical aspect, aesthetically and financially, was not revealed until the very late stage
  - 6.4. We believe this timing was a deliberate attempt to manage public opinion and in particular avoid negative comment. We believe that any comments submitted before the proposal was revealed in full should therefore be disregarded. To do otherwise could invite future legal problems.
7. The Pavilion and "Civic Square"
  - 7.1. The proposed triangular building near the bridge would further obscure views of the river contrary to the stated objective of opening up the river. We are not persuaded that this pavilion caters for a worthwhile function and suggest it is omitted to maximise the visual opportunities which is a key point of the master plan.
  - 7.2. In any event, we consider the design and materials inappropriate. We do not believe the historical references work satisfactorily.
  - 7.3. Much is made of this piece of public realm, but the so-called square is no bigger than the existing triangle. It adjoins a busy road that divorces the site from the town centre and is often characterised by standing, polluting traffic.
8. Social Housing & viability
  - 8.1. Social housing, particularly social rented, is desperately needed in the borough
  - 8.2. Exceptionally in the case of this scheme, we believe it could legitimately be provided off site



- 8.3. We have read the viability study forming part of the application and posted on the council website
- 8.4. The viability study will determine how much, if any, social housing is provided
- 8.5. Also, in this instance, viability issues are being publicly discussed as being the principal determinant of the extent of the development. Accordingly the viability study is of crucial importance here
- 8.6. Viability studies are, however, open to manipulation since the outcome is dependent upon estimates of future costs, proceeds, sales rates etc., and each of these has a wide range of possible outcomes, which crucially the methodology compounds, giving a huge range of potential viability outcomes
- 8.7. To illustrate this, total revenue is shown at £132.7 million and cost at £125 million giving a difference of £7.7m. However,
  - 8.7.1. Increasing sales revenue by 10% gives a difference of £21m
  - 8.7.2. Reducing costs by 10% as well gives £33.5m an increase in the bottom line of of 435%
- 8.8. Cost information submitted is based on October and sales commentary is derived from April data, ie costs are much more recent than prices
- 8.9. By far the longest document in the appendix is the cost summary. It would be natural for anybody making this type of calculation to ensure that costs were fully reflected whilst also taking a cautious view of proceeds.
- 8.10. The use of crude average sales prices from comparables is often misleading. Best to exclude atypical units and consider median prices. Also some high-quality local schemes appear to have been omitted from the comparable evidence submitted. Sales evidence needs to be derived from comprehensive knowledge of objectively selected current relevant transactions in the local market, use of national trend data is likely to be misleading
- 8.11. A word search of the applicant's document for 'sensitivity analysis' finds an RICS statement that one is mandatory, in order to convey to readers the variance around the output (which might well be greater than the example in 8.7.2, above), but we could not find one amongst the submitted documents. Could this be uploaded please once available.

## 9. Sustainability

- 9.1. Does the council have, or is it preparing, a carbon budget for development during the plan period?
- 9.2. How might this proposal impact such a budget?
- 9.3. Has adequate consideration been given to repurposing the existing structure and what saving in carbon might result?

## 10. Conclusion

We trust the decision maker will reflect on our concerns and conclude that the proposal is unacceptable and refuse consent accordingly.

For your information, Guildford Residents Association's membership consists of 25+ residents' associations, interest groups and some parish councils from across the borough. It is politically non-aligned.

Yours Sincerely,  
for and on behalf of GRA

John Harrison