



GRA Comments on GBC's Draft Tall Buildings SPD

GRA warmly welcomes the proposal for an SPD on Tall Buildings. This is much needed given the characteristics of Guildford and something we have proposed for some time to shape development for the better. This is a thoughtful draft and we have made detailed suggestions seeking to make it more effective in a Guildford context. There are a number of issues that we are concerned need to be addressed in order that the document can have a positive impact in practice. These include:

- Need for clarity that this SPD is to guide **whether** a tall building is appropriate on a particular site, as well as the design (including height, bulk and footprint) of a tall building.
- Scope beyond town centre.
- Steer on heights that can influence price paid for sites.
- Ensuring issues referred to in the “context” text are picked up effectively in the “design guidelines”.
- Capturing distinctive features of Guildford with its downland topography, views, narrow converging streets and soft green edges to development to assist developers in ensuring designs are appropriate for Guildford and ensure design approaches better suited to a flat landscape are not used here.
- More clarity is need on legibility and permeability, and on avoiding walls of tall development and blocky designs.
- Being more precise about height relative to adjoining lower buildings, as various other authorities do, may make it easier to avoid stark juxtaposition of tall and low buildings in practice.

Our detailed comments on specific paragraphs of the draft are set out below.

Introduction

1.1

This is drafted in a way that gives the impression that, with good design, a tall building will be acceptable on any site. Great care will be needed to ensure tall buildings are in appropriate locations as well as designed with sensitivity to context. The document recognises this in some later sections but this should be clearer from the outset.

“However, with sufficient consideration given to their suitability and design which avoids or minimises any harm in relation to sensitivities, taller buildings can ***in some locations*** contribute positively to the Guildford’s townscape, the vitality of the town, and to making efficient use of land.”

1.2

We suggest the purposes include that the design guidelines convey considerations of importance in a local context.

1.3

The geographical scope should extend beyond the town centre, especially given the university, college of law, Guildford college, along Ladymead and various business area redevelopments. We agree strategic sites already have an SPD although heights are not addressed adequately in this.

5.3

Welcome the definition of height

The reference to the lowest point is particularly important in the context of Guildford’s downland landscape (eg the North Street redevelopment) and the raising of ground floor levels to lift development up in the flood plain (eg Debenhams, Casino proposal or near the Wey).

We suggest that the section on height includes a reference to height relative to lower surrounding buildings. Five storeys may be a tall building next to two storey buildings.

6.4 Vision Statement

This is welcome but the two parts need to be integrated. As drafted, the first part relates to the SPD, the second part relates to tall buildings. It needs to be clear that the tall building vision should be consistent with and achieve the SPD vision. To achieve this, we suggest either you insert “***In addition***” before “tall buildings will...” or redraft the second sentence to capture compatibility with views etc in the objectives for tall buildings. Otherwise, developers will focus on the second sentence and gloss over the need for tall buildings to be consistent with the SPD aims in the first sentence.

6.5

Vision elements:

We suggest this section should give an indication that tall buildings above 6 storeys would require considerable sensitivity in the context of Guildford’s downland landscape and buildings of this height and above are likely to be exceptional rather than the norm. It should not focus exclusively on the town centre.

7.1

We welcome the 8 themes identified.

Legibility and permeability should be a theme or more clearly expressed within the theme considering building lines and frontages. The form and scale of tall buildings should make it possible for a pedestrian or road user to be able to interpret the townscape to understand the way ahead. There are examples along Walnut Tree Close where, as a pedestrian, cyclist or driver, you are faced with a wall of development, feel hemmed in and are uncertain of the way ahead. At the University, there are places where you simply cannot get through the mass of buildings and have to keep turning back to find a way.

7.3

The paragraph includes the following very important point that should be highlighted: “...will inform decisions regarding the suitability of a site (or parts of a site) for a tall building in its wider context”. This needs to be made more explicit throughout the document. Otherwise, the document risks being seen as just a few guidelines on the design of a tall building.

7.4

Figure 3

Although schematic, we propose that the diagram of “other buildings in the area” is amended to capture a range of building heights not just a block of buildings that are quite tall relative to width.



a. Surrounding context and prevailing character

7.9

We suggest that the context acknowledges the importance of helping to inform site acquisition assumptions. A harmful driver for inappropriate height has been the high price paid for some sites affecting viability of less tall and dense designs.

7.11

The honesty and simplicity of this paragraph is welcome.

7.14

The guidelines in this paragraph should not be confined to “interfaces with surrounding buildings”. They propose an approach that applies equally to other aspects of “context” and not just to “smaller scale buildings”.

We suggest the guidelines should specify:

- “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, ***roads/pavements, green space or the Wey.***”
- “integrate tall building(s) within the urban block or with the tallest point away from (an) adjoining smaller scale building/s, ***roads/pavements, green space or the Wey.***”
- “use buffers such as landscaping between the proposed tall building and (an) adjoining smaller scale building/s, ***roads/pavements, green space or the Wey.***”

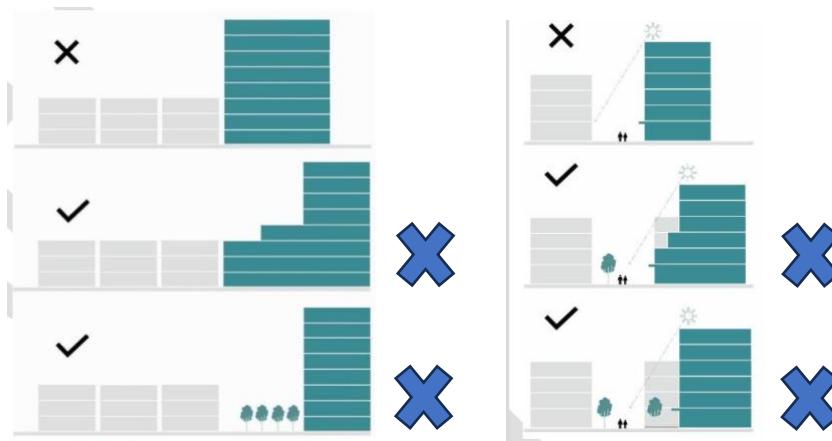
This will ensure an integrated approach and avoid the need for duplication under other themes which focus on other design aspects. It will also avoid giving the unintended message that putting tall elements alongside roads, the river and green space is fine as long as tall parts are not alongside another building. There are a number of reasons why height at the edge of a site may be less desirable in a Guildford context.

This merits expansion in the SPD. Avoid bulk at the edge and put it in the middle is often a more Guildford appropriate response. The design approach of putting bigger (landmark) buildings around the edge of plots can work in areas of flat topography and wider streets. In Guildford, this approach can create inappropriately blocky forms that do not sit well in the undulating downland landscape and can result in oppressively tall frontages along narrow roads. It can also be important to set back the building line and step height due to air quality, especially nitrous oxides given exceedances and particulates.

We suggest the title of this section is changed to “Interfaces with surrounding buildings and context”.

We welcome and note the cross reference in the later ‘landscape and topography’ section.

Figure 4 is overly simplistic, could mislead and should be amended. A gap or stepping where the tall building abuts other development might be ok but moving the building line to the boundary with no set back or stepping on the other side, which may be a road, river or narrow street, may not merit a “tick” in a Guildford context. Hence the diagram is inappropriate. Figure 9 has a similar issue.



7.16.5

Please give more prominence to lighting, e.g. no glazed light boxes on higher storeys because of the importance of views, as in the case of the glass night club on top of the Casino proposal.

b. Important and significant views

7.21

It is important to capture in the 'context' section that views not included in the Views SPD are also relevant and may also be a material consideration.

Specify that views into, out of and across the town matter.

7.25

We welcome the final sentence.

7.31

We welcome the recognition that not only views in the SPD will be material considerations. We suggest replacing "this does not preclude" with "**other views will also be**" a material consideration in terms of specific planning applications, including ...". As drafted, the wording suggests considering other views will be the exception rather than the norm.

c. Landscape and topography

7.38 and 7.39

We welcome these paragraphs. It is also important to capture topography within the urban fabric of the town here. E.g. the rise of the land from the river and significant attractive incline of the High Street, North Street, the Mount, and Farnham Road. This is picked up later in this section but not at the start where the reason for this being an element is described.

7.41

We welcome the clarity here.

One of the paragraphs in section 7 should include a clear reference to the importance of buildings not obscuring appreciation of the rise and fall of the land and the importance of avoiding creating roof height plateaux. It recognises impact might be too great due to, for example, some higher sites being more prominent, but it should also describe how a tall building can obscure landform. Lots of tall buildings at the bottom of a hill, medium buildings in the middle reaches and lower buildings at the top can block out any sense of topography.

7.45.2

After “avoiding harmful building height at topographically elevated or prominent locations” we propose inserting “or that obscures appreciation of the rise of the land”.

d. History of a place / heritage assets

7.55

We suggest that this section needs to reflect the fact that the vast majority of Guildford’s heritage assets are of modest scale and height. 7.55.1 should be explicit that harm includes avoiding overwhelming a heritage asset and the contribution of its scale to character and landscape appreciation.

e. Protection of amenity and provision of amenity space

7.65

This section jumps too readily to the expectation that amenity space will take the form of balconies. While balconies will be important, it is vital that this document gives a steer on space created by set back and the opportunity for this to enhance the amenity of residents as well as other positives such as avoiding overbearing buildings that rise abruptly from the edge of a plot, especially along the street. There should be an expectation that taller buildings may be set in landscaped grounds. The potential linkage between public realm and amenity should be explicit.

f. Public realm and mixed uses

7.86 Building Line

Re 7.86.2 “appropriate alignment of building lines and enclosure”, we fully agree this is important and are concerned that this guideline is very open. The SPD should reinforce the importance of this by providing more information as to why this is significant in a Guildford context and what the approach seeks to achieve, albeit recognising the need for site by site consideration.

This should include set back of the building line for landscaping. This is particularly significant in Guildford given the layout of narrow streets converging to cross the Downs, levels of congestion and rapid surface water run off combined with flood risk making rain gardens desirable. Replacing low rise buildings along a narrow street pattern with high rise building to the same building line would be overbearing. There should be a clear expectation of set back, as was often achieved with earlier taller buildings in Guildford.

Set back can be significant given the undulating terrain of Guildford's downland setting. Many sites involve significant changes in level making set back valuable in creating opportunity to accommodate changes in gradient and to achieve a more level building base.

Set back can also be an important consideration for air quality along streets, especially in areas where there is frequent queuing traffic or where there are high traffic levels. Set back of the building line and avoiding canopies can avoid deterioration in air quality.

It will be important to avoid the argument pursued by the developers of North Street in relation to building lines. In this tall scheme, narrow road widths, and hence narrow spaces between tall buildings, were proposed as mimicking the narrow lanes of Guildford even though these characterful alleys are lined by very low buildings. This logic was flawed and the need for set back should be relative to the height of buildings proposed, the setting and amenity.

7.89 2f

The reference to landscaping here is welcome, but this does not make the connection with setting back building lines or with the importance of soft green frontages in a Guildford setting.

g. Efficient use of land

7.97

We welcome this paragraph.

7.100.2

It should be clear that this is subject to compatibility with managing flood risk, ground water capacity and infrastructure resilience.

ISSUE FOR GREATER EMPHASIS:

A theme that does not emerge sufficiently clearly is the importance of avoiding walls of taller development. Just adding some even taller elements to "break up" the façades (eg a 12 storey tower part way along a run of 6-8 storey buildings) does not break up the impact of a wall of development. This has been an issue in a number of locations in Guildford. Along the railways, views are blocked and a tunnel effect is created that cuts across the downland landscape. On Gosden Hill, a wall of development is proposed along the A3 to block sound which would run counter to the ambition of a well-designed roofscape rising up

the hillside softened by trees and screening. Care will be needed to ensure development does not form a wall along the Wey or that development along the gyratory does not become even more of a pollution trap. Tall buildings along both sides of the railway would create a tunnel effect and obscure views of the cathedral.

Extracts from GRA position on why building height is an important matter in Guildford:

Why height matters in Guildford

Guildford is set in a gap in the Surrey Hills National Landscape. Views *into*, *out of* and *across* the town and the downs are a defining feature. The interplay of hills makes roofscapes, streetscapes and landscapes striking and valued. The historic High Street follows the rise of the downland. The Cathedral sits on a green hill. Villages nestle in valleys. Green edges soften the impact of development. Green features such as woodland, commons, wetland or an old tree characterise, and give identity to, various parts of the borough. Routes that converge to cross the downs are often narrow.

These distinctive characteristics make the bulkiness and height of buildings particularly sensitive issues in Guildford. Inappropriate tall or blocky buildings can:

- obscure views, including of the Surrey Hills National Landscape and heritage assets,
- destroy appreciation of the rise and fall of the downland and undermine its intimate scale,
- be intrusive from many angles, and
- be overbearing by blocking light and trapping pollution along narrow streets and passages.

Guildford's distinctive downland character, with attractive views onto and from the Surrey Hills National Landscape, contributes to its appeal as a place to live, visit and do business. In an era of internet shopping, when people visit a town centre in person, they want a place it feels good to be in with some personality. The proliferation of tall and blocky buildings will harm the growth and resilience of Guildford's economy undermining the reasons people want to come here.

We want Guildford to be a vibrant distinctive place where imaginative and sustainable future development is in tune with the valued features of our borough.

The approach to heights and bulk should ensure that:

Buildings will often be of 3 to 4 storeys in the centre, and may be up to 6 storeys in a few selected places. If developers know Guildford has height limits, they will stop paying inflated prices for sites and more sensitive buildings will be viable. Focus can shift from a height race to delivery of well-designed homes.

Building height and bulk will be consistent with attractive views including to and from the Surrey Hills National Landscape and town centre. Assessment will not be confined to a few cones

identified in the Town Centre Views SPD. Assessment will take account of how the eye perceives views and of impact at street level.

The height and bulkiness of buildings will be sensitive to the setting and avoid diminishing appreciation of historical buildings, Conservation Areas, the National Landscape, green spaces and waterways

The height and bulkiness of buildings should be sympathetic to the *scale* of the downs and avoid masking the *form* of the landscape. Taller buildings are inappropriate on, or breaching, ridges. Blocky buildings of uniform height should be avoided on downland slopes. Any taller buildings on lower land should avoid creating a rooftop plateau that blocks out and obscures appreciation of the river valley. Imaginative use of stepped heights will enable the rise and fall of the distinctive downland setting to be reflected in the form of built development.

The distribution of heights within a scheme will be consistent with promoting soft green edges to development. Lower heights around the edge, with any higher elements set within a scheme, will often be more appropriate in a Guildford context. The model of taller boundary and landmark buildings with lower infill is not well-suited to the character of Guildford. It creates a blocky form with greater impact on the downland landscape. Low-rise edges with “green features”, such as a prominent tree, are more appropriate given the significance of soft green edges as a feature around settlements, along roads and around properties in Guildford.

Height along linear features requires particular attention.

- Many Guildford roads are narrow and the green character of approaches is a valued feature to be respected and enhanced. **Lower heights and set back will often be appropriate along road frontages.** Roadside heights are also significant for air quality. Nitrous oxides and particulates can be trapped at street level where narrow roads, especially with queuing traffic, are lined by tall buildings.
- Rivers provide attractive green, accessible and visible corridors through our borough and the Wey is a Conservation Area. In addition to development being set back for nature conservation, landscape, access and flood risk management reasons, **heights along the river frontage should normally be lower to avoid an overbearing impact on the river setting.** Where relevant, any taller elements within a scheme should be away from the river and include gaps through which the river can be seen.
- The railways is an important sustainable approach to Guildford. In view of the effect of the Solum scheme on views to the east of the railway, it will be particularly important to ensure views, including of the Cathedral, to the west remain open. **Further development in proximity to the railway should be of a height and design that avoids a canyon effect and enables attractive and welcoming views of Guildford.**