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*Please reply to: Dr John Baylis
Secretary of the Guildford Society Planning
Applications Team
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24th September 2024

Dear Katie Williams

23/P/01850 Hybrid planning application comprising: A full planning application for the demolition and retention of existing buildings and erection of new buildings to provide extra care housing (Use Class C2) and associated ancillary accommodation and amenity space, public realm works, at-grade car parking, plus restoration and upgrade works to Braboeuf Manor (ancillary accommodation and amenity space) and the refurbishment of Pound Cottage (Use Class C3); and An outline planning application for a residential led scheme (Use Class C3) and car park, with all matters reserved except access | The University Of Law Braboeuf Manor, Portsmouth Road, Guildford, GU3 1HA

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1 Introduction

The Society **Strongly Objects** to this this application that is within the Surrey Hills National Landscape (SHNL) (Previously the Surrey Hills Area of Outstanding National Beauty (AONB) and is in the St Catherine's conservation area.

2 Background

We have commented on the application in its original form, (See our letter 15th December 2023), and have had extensive discussions with the developers Elysian. We have no objection in principle to the site being used for senior living accommodation and are supportive of elements of the proposed development notably the provision of public aspect to the green space at the front of Braboeuf Manor. Although we welcome the separation to remove unfortunate modern linked buildings to the manor house, we note below that the Manor House will be overshadowed and Crowded by the new development.

However, the National Policy Framework (NPPF) states

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way;

and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The society has yet to see any cogent argument that shows that the benefits of this scheme outweigh the large disbenefits related to the impact on the environment, SHNL , conservation area and locale in an important part of the southeast. It also appears not to be compliant with the NPPF.

The Society notes the site is covered/abuts by the Greenbelt, Surrey Hills National Landscape (SHNL) ((Previously AONB) and AGLV. The site is also outside the Guildford Urban Area.

We don't consider the current scheme shows proper consideration for its exceptionally sensitive position.

3 Revised Scheme

The revised scheme has been reduced in height, the architectural design has been modified, and the proposals to build on the current car park have been removed. The plan for the site now includes major development surrounding the Braboeuf Manor and buildings that we be revamped or rebuilt supporting Law College occupation.



4 Scale and Mass of Development

This society contends that, even in modified form, the buildings proposed for the site are totally out of scale in height, unbroken lengths, bulk and mass, with the surrounding buildings in the conservation area. The surrounding area – with the exception of the Police HQ consists of a variety of fairly modest buildings.

Block D which is 3 Storey's high compared to the current 2 Storeys has a floor plate that extends far nearer Braboeuf Manor (See diagram Below). This crowds the view of the Manor from major viewpoints as one comes up the drive.



Blocks G, H, J replace two modest blocks which have heights of two stories. The three replacement blocks all feature deep floor plates, more acceptable in an office buildings, which result in approximately 50% of the buildings having single aspects. We do note the blocks have had height reduction, but they are substantially taller than the blocks they replace. This results in the setting of Braboeuf Manor being compromised by highly visible buildings behind.

The original application Design and Access Statement documented that the Current Buildings on the Site provide educational facilities which total 7800 square metres of gross external area (GEA) and the site also provides 388 car parking spaces. These buildings cover the areas known as zones 1, 2 in the applicants plans.

The scheme as presented is defined in the Design and Access statement as providing 21,575 square metres of GEA for zones 1-2 of the area (Zone 3 is the Car Park area that has now been withdrawn). This is a large increase of almost triple the area on a sensitive site.

5 Design of the Development



The proposed design language of the buildings has been considerably modified, with flat roofs adopted and a commercial style adopted for the facades. The horizontal emphasis of the revised elevational treatment combined with the length and height of the buildings and extent of fenestration is inappropriate to a conservation area and we believe this design doesn't fit well with Braboeuf Manor.

The scale of the buildings envisaged for the site is adopting a scale that is to be expected for a town centre location rather than a significant edge of town location bordered by areas of outstanding natural beauty and overlooking the Surrey Hills.

A characteristic of the Saint Catherines area which has been recognised in the local development plans is that most of the buildings of modest scale two or three storeys max and sit within their sites with considerable green space around the buildings.

LPSS Policy D1 para 1 states *“All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space.”*

We don't believe the proposed design meets the criteria documented in this policy.

6 Braboeuf Manor

We note the comments from Historic England (Letter 22-August-2024) emphasises the importance of Brabouf Manor but welcomes that the new scheme reduces harm to an extent. Historic England still have concerns that: *“The new buildings (blocks B, D, G, H and J) would all remain fundamentally visible to the side and behind the manor. This interruption to the clarity and silhouette of the manor house's important façade and roof profile against the treeline behind would sustain the harm to setting identified in the original submission.*

Historic England also in their recommendation mention *Given that harm is still identified and taking into consideration the Inspector's conclusions in the recent Guildford Cathedral Appeal Decision, the question remains as to whether the public benefits of this scheme could be achieved in a less harmful manner.*

The Cathedral is a highly visible Grade II listed building. The proposed development as well as an interaction with Braboeuf Manor also impact a Grade I property St Catherine's Chapel - see below.

7 Height and Visibility of the Development

The Society is concerned that, even in modified form, the height and scale of the buildings proposed for the site are still visible from key viewpoints around the town.

Guildford has a very unfortunate example of a recent development that is all too visible from a distance with impact on heritage buildings. This building is the new RSCH staff Multistorey Car Park next to the University that as built is highly visible from Bright Hill because of its mass, height and materials, as white development to the left of Holy Trinity Church. The building is especially visible in the morning when sun illuminates the building.



Whilst the Law College proposals will be buildings with a very different colouration they will be mainly glass faced which could reflect sunlight, especially as the frontages are not overhung.

The Views provided don't in several cases show the full impact of the Buildings.



An example is the view from the Boathouse where the St Catherines Chapel Grade 1 is hidden by a tree at the left of the picture, red arrow and the proposed development is glimpsed above the tree line (under horizontal red line). The more realistic view is to consider the view as seen on the footpath to Shalford just to the south of the boathouse See below. NOTE St Catherines' Chapel is visible along the Cycle/Footpath and as one traverses the water meadows, as one traverses the route. Visibility obviously changes with seasons and angle of sun.



St Catherine's is a Grade 1 listed asset and it needs to be protected from Harm. It is widely visible from a variety of views and attracts the eye particularly during the morning when it is well lit by the sun.

The picture below shows St Catherine's chapel further down the path.



Historic England in their letter on this planning application dated the 11th December 2023 note that *“The number of six storey tall residential blocks across the site would diminish the Victorian residential character and village feel of the Conservation Area by making it more urban in plan, layout and height.”* We are not convinced the redesign has addressed these issues. It should also be noted that the local St Catherine’s Village conservation area was extended in the early 1909’s to include the Law College site.

Using computer modelling tools should enable developments in sensitive developments in landscapes to be explored from a multiplicity of viewpoints.

8 The Car Park

The Developers are silent on aspirations for the car park area. The applicant has now withdrawn the proposals to develop the car park and it will remain, for the time being as a 388 space surface car park.

We remain concerned that the car park will have consent applied for it in the future. As we have argued in our previous comments, we believe the Car Park site was a massive overdevelopment.

The area currently occupied by the car park which is subject to a local plan policy A34 which allowed for 112 Student Units. This policy was originally defined to provide units which would have supported the ongoing operation of the Law College. If this policy is followed it gives a Gross Internal Area of between 2,200 to 3700 square metres. The variation is caused by the uncertainty of Student Unit sizing with recent Walnut Tree Developments being 25 SQ/M and some other recent designs allowing on 15 SQ/M for each unit.

Note: in our calculation we have added 20% to cover Corridors/Access and Stairs. Student Units have also an added 10% added for shared common areas.

The equivalent calculation for the proposed development 104 Dwellings with a unit area of on average 60SqM, assuming a mix of 1 and 2 bed units, gives 7488 GIA.

The previous application proposed 2-3 times the size of GIA compared with that proposed and consulted upon in the Local Plan. The reasons for this large change, apart from commercial gain, needs to be fully explained.

Although this part of the site has now been withdrawn it must be expected that it will be subject to a development request in the future.

GBC needs to make it clear what is acceptable on this sensitive part of the site.

LPSS Policy D1 para 4 states *“All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD’s, neighbourhood plans and SPDs.”*

In addition, the National Policy Framework (NPPF) states

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development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

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and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

The society has yet to see any cogent argument that shows that the benefits of this scheme outweigh the large disbenefits related to the impact on the environment, SHNL, conservation area and locale in an important part of the southeast. It also appears not to be compliant with the NPPF.

9 Views of the Site.

The applicant provides verified views of many aspects of the site as seen from both without and within the site. This society has examined these in detail and would have comments on all of them in various aspects. For the sake of brevity, we are concentrating on five views which we believe need to be considered in considerable detail by the council and relevant authorities e.g. the SHNL to consider whether the development really respects the countryside which is one of the glories of Guildford.

We are also surprised that the applicant has seen fit to only submit Wire Line illustrations on the impact of the developments. For a full application in a sensitive location, we would consider at the very least there should have been a properly developed shaded diagram of the site in various views. In addition, we are disappointed that the council have not seen fit to require that the developer presents their proposal within the VU.City model of the town. This would allow the full scale modelling of this site in the VU.City model that the council is operating in order to give proper 3D modelling of the application. This requirement is recommended in the recently approved Development Management Policies. This modelling would have allowed a proper investigation of the impact of aspects such as shading lighting and how the site will look at various states of the year when trees shed their leaves etc. We do not understand why this facility on such a major important site in the town is not used and the results of its use made public in some manner for public engagement and understanding.

Historic England in their letter on this planning application dated the 11th December 2023 note that *"The number of six storey tall residential blocks across the site would diminish the Victorian residential character and village feel of the Conservation Area by making it more urban in plan, layout and height."*

We are surprised that the Planning Statement paragraph 7.37 concludes *"The LVIA concludes that there would be a Negligible overall effect on the Surrey Hills AONB, which is non-significant."* As we set out below, we believe this is an erroneous interpretation of the information presented.

As noted above the Wireframe illustrations can be difficult to interpret. As an exercise to provide clarity we have as accurately as possible coloured in the Wireframes to provide a better indication of the area of the proposed buildings that will be seen with the current tree cover.

The society also notes that the development relies on tree cover to hide its considerable mass. Tree cover cannot be taken as a constant, as areas of vegetation over the life of the building, may be felled and replanted.

10 Transport and Access

There are several concerns:

It is assumed that staff will be on site 24 hrs a day and thus traffic will occur 24 hrs a day. Site access will need to carefully be monitored outside normal working hours when speeding can occur on the Portsmouth Rd.

It should be noted that access to the bus stops is difficult from the site as the pavements on the Portsmouth Rd are exceptionally narrow.

Cycling on the Portsmouth Rd towards Guildford is possible but unpleasant. The cycle path down the Wey should not be considered a realistic alternative as it is a leisure cycling path, it is blocked at Tumbling Bay in the Town Centre and also has a very steep access to the tow path from Ferry Lane.

It should be noted the cutting on the Portsmouth Rd to the south of the site entrance has a pavement only on the west side. All pedestrian traffic going South North is likely to cross over, using the proposed crossing, and then across the access route to the development to gain the proposed crossing. Does this need to be allowed for in the entrance design.

As regards traffic on site, are deliveries going to be to a central facility with onward distribution by small electric vehicles? The turning spaces and parking for deliveries looks very tight.

11 Change of Use to Extra Care Housing

The Developers claim that there is a considerable need for extra care housing. We can understand this need, but also note the proposed development will be a very high specification upmarket facility probably out of the reach of most people in the Guildford area. It is not clear that it will provide benefits such as allowing the downsizing from large family houses to a large degree and that the population of the site may come from a large area in the southwest quadrant around London.

The developers document that 519 extra care places will be needed in Guildford by 2040. Due to the expected charges for the proposed development, we suspect the proposed development will make little impact on the places needed for local residents.

The justification for the site needs to be considered carefully versus the undoubted harm it does to the setting of the National Landscape which brings its own economic advantages to Guildford.

We would hope that GBC Planning team ask for a draft Section 106 Statement before the application is determined.

12 Conclusion

The applicant is proposing a scheme that is high density development that is out of character with its surroundings, and is in an elevated position, and if consented will extend the urban area of the town. It will set a precedent for Mass and Scale that could be used to argue for other developments on equivalent sites, and especially the open car park at the site.

The proposed development of the site is detrimental to the character of the St Catherine's Conservation, the setting of St Catherine's Chapel, the setting of Braboeuf Manor and the setting of the SHNL and sets disturbing precedents if approved. Guildford needs to be serious about encouraging good and appropriate designed developments that respect and enhance the area, not overdevelopment of the site based on a poorly considered proposal.

As noted above we have doubts that the proposed scheme is compliant with policies as laid out in the NPPF and the LPSS.

Yours Sincerely

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

Alistair Smith

Chair - Guildford Society