

Tall Buildings Supplementary Planning Document

Consultation Statement

November 2025

Prepared in accordance with Regulation 12 of the
Town and Country Planning (Local Development) (England) Regulations 2012

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1. Introduction

- 1.1 We have prepared this consultation statement in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.
- 1.2 Regulation 12(a) requires that before we adopt a Supplementary Planning Document (SPD), we must prepare a statement setting out:
 - the persons whom the authority consulted when preparing the SPD;
 - a summary of the main issues raised by those persons; and
 - how those issues have been addressed in the SPD.
- 1.3 The purpose of the 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);
 - supplement adopted Local Plan 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.

2. Stage 1: Issues scoping and early internal consultation

- 2.1 To inform the preparation of the draft SPD, an issues scoping exercise was undertaken. This included an initial identification of issues raised by stakeholders regarding building heights in Guildford borough. This occurred alongside a desktop exercise regarding how other Councils have managed pressure for tall buildings¹. This was presented to the Local Plan panel (Planning Policy Board at the time).
- 2.2 Following this, in December 2024, early internal consultation took place regarding the scope and potential content that an SPD could incorporate. This included with the Council's Development Management team and a Local Plan panel discussion (on 11 December 2024). This process helped clarify the role of an SPD in the short-term (vs the longer-term opportunities as part of the Local Plan update and policy development), enable further discussion regarding some of the issues and opportunities related to tall buildings, and develop an early view on the potential scope of the proposed SPD, including a thematic outline of areas of guidance.
- 2.3 The key considerations arising from the internal consultation, which informed the preparation of the draft SPD together with actions undertaken are included in Table 1.

¹ In addition to the Council's exercise, the Guildford Society prepared and published an informative document reflecting a review of Height and Tall Building Policies (dated February 2024) which the Council has also reflected upon to assist in initial consideration of the potential role and scope of an SPD in the local context ahead of formal consultation.

3. Stage 2: Internal consultation toward a draft SPD

- 3.1 Between January and May 2025, consultation took place with the Council's Development Management team as part of an iterative process toward developing the draft SPD content. This included a series of interactive officer workshops as part of the co-development process.
- 3.2 Following this the Local Plan panel were engaged on the draft SPD on 6 May 2025.
- 3.3 The considerations arising from this stage of internal consultation together with actions undertaken are included in Table 1.

Table 1. Considerations and actions taken during the internal consultation process

Consultation activity	Considerations raised and actions taken
Development Management (DM) team – interactive workshops [December 2024 – April 2025]	Clarification of geographic scope, definition of threshold to be considered a Tall Building in Guildford Town Centre. <i>Actions: Clarified the geographic scope and tall building threshold to be used in the draft SPD.</i>
	Technical comments on provision of amenity space, protection of amenity and climate change considerations. Technical comments on important and significant views, and landscape and topography design considerations. Technical comments on public realm and mixed uses, and the efficient use of land. Technical comments on surrounding context and prevailing character and history of place / heritage assets. <i>Actions: comments informed drafting of design guidance and submission requirements.</i>
Local Plan panel meeting [11 December 2024]	General support for outline approach to future drafting of SPD/ broad themes. Noted potentially acute impacts of tall buildings including overshadowing. <i>Actions: Officers progress with technical drafting process.</i>
Local Plan panel meeting [6 May 2025]	Regarding topography, it would be helpful to improve legibility in planning application submissions about the proposed floor levels - make it easier for people to understand what is being proposed if proposed floor levels were included and relationship to ground level. <i>Actions: Edit to draft para 7.48.3 to add the following guidance to the DAS requirement: 'This should include elevations clearly showing which parts of the building are above and below ground level.'</i>
	Regarding amenity, the opportunity was raised for communal spaces to address urban heating, and benefit of trees/green walls (inc. biodiversity). Benefit of multi-functional open spaces. (Reference was made to Miyawaki gardens).

	<i>Actions: Edit to draft para 7.65 to add: ‘Planting schemes within amenity spaces should be designed to maximise biodiversity net gain as well as opportunities to reduce the urban heat island effect.’</i> <i>New draft para 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.’</i> <i>New draft design guidance at 7.109.4: ‘Maximise opportunities for new planting in shared amenity spaces and public realm.’</i>
	Query regarding whether the SPD prevents residential being provided on ground floor levels? <i>Actions: Edit made to para 7.87: Furthermore the incorporation of active uses particularly in high footfall areas is important to improving the vitality of the Guildford Town Centre.</i>
	Importance of personal safety and well-being important to emphasise as can be a concern related to space around tall buildings. <i>Actions: Edit made to para 7.93.1: Create a <u>safe and comfortable</u> environment for enjoyment and generally relate new public realm to the primary frontage of the building.</i>
	<i>General support for the draft SPD content and progression toward consultation via the relevant process.</i>

4. Formal consultation on the draft SPD

- 4.1 A six-week period of consultation was held between 27 June 2025 (midday) and 8 August 2025 (midday) following the Council’s Executive endorsing the draft Tall Buildings Supplementary Planning Document and agreeing it proceeding to public consultation². We directly notified those stakeholders (comprising organisations, members of the public, businesses and amenity groups) whose email addresses and postal addresses we hold on our consultation database of this consultation.
- 4.2 The consultation document (the draft SPD) was available on our website throughout the consultation period and paper copies were also available in the borough’s four libraries and in the main Council offices at Millmead. These arrangements are in accordance with our Statement of Community Involvement³.
- 4.3 The SPD has undergone a Habitat Regulations Assessment (HRA) screening to determine whether it would have significant adverse effects upon the integrity of internationally designated sites of nature conservation importance, or Natura 2000 sites. The SPD has also undergone a Strategic

² Consideration occurred at the Executive meeting held on 19 June 2025.

³ Published May 2020 and available to download from <https://www.guildford.gov.uk/sci>

Environmental Assessment (SEA) screening to determine the impact on the environment and to integrate considerations of the environment into the preparation and adoption of the SPD.

- 4.4 The Council is required to consult with Historic England, the Environment Agency and Natural England on all SEA screening opinions, and with Natural England on all HRA screening opinions, before formally determining whether a strategic environmental assessment and/or HRA appropriate assessment is needed. The conclusions outlined in the HRA/SEA screening document were sent to the Environment Agency, Natural England, and Historic England for consideration on 2 June 2025 and these bodies were given a period of six weeks to respond.
- 4.5 All the comments received during public consultation on the SPD have been summarised and responded to in Table 2. The responses column of the table indicates where amendments have been made to the final SPD in light of the comments submitted. .

Table 2. Representations made during public consultation on the SPD (27 July 2025 – 8 August 2025) with GBC responses (note where the response refers to changes made to specific paragraphs; this reflects the numbering in the draft SPD which may have subsequently changed in the final version)

Section / Para no.	Comment	GBC response
1. Prescribed bodies		
Environment Agency		
7c	We note that the SPD does not currently reference rivers or riparian zones within its guidance. Given the River Wey's importance as a Surrey Biodiversity Opportunity Area and a key feature of Guildford Town Centre, we would expect tall building proposals to include an assessment of potential impacts on the river corridor. These may include: • Overshadowing of the river and associated riparian habitats, which could impact biodiversity, landscape character, and public amenity. • Impacts on microclimate and daylight reaching the river, which could be addressed through a daylight/sunlight assessment specific to riverside settings. While the SPD rightly focuses on urban design and townscape considerations, we recommend that the design guidance and submission requirements are updated to specifically reference rivers and riparian zones as sensitive receptors. In particular, where tall buildings are proposed near watercourses, applicants should be required to submit a daylight/sunlight assessment which evaluates potential overshadowing impacts on the river corridor. We therefore suggest that the Council revisit the SEA screening conclusion in light of these omissions. Alternatively, the SPD could be amended to explicitly incorporate rivers as a key consideration in assessing environmental and visual impacts of tall buildings.	It is considered appropriate to include reference to rivers and riparian zones as sensitive receptors to supplement existing Local Plan Policy D13(1)(a). The point is noted regarding incorporating this reference as an alternate to revisiting the SEA screening conclusion. Several amendments to section 7c made as follows: Title: 'c. Landscape, and topography <u>and ecology</u>' New para: '<u>7.40 Furthermore, the River Wey which runs through Guildford Town Centre is identified as a Biodiversity Opportunity Area and is a highly valued asset of boroughwide significance and it is important that tall buildings adequately assess their impacts on the river and its ecological function.</u>' Title: '. Landscape, and topography <u>and ecology</u>' New para: '<u>7.44 7.46 Due to their biodiversity importance, rivers and riparian zones are sensitive ecological receptors. Tall buildings proposed near or adjacent to the River Wey could have an impact on its ecological and biodiversity value due to increased levels of overshadowing and changes to its microclimate. LPDMP Policy D13(1)(a) requires development</u>

Section / Para no.	Comment	GBC response
		<u>proposals which impact the River Wey and its environs to conserve and enhance its ecological value.'</u> New para: '<u>7.47.5 Consider the impact of the proposal on sensitive ecological receptors within the Corridor of the River Wey.'</u> New para: '<u>7.50.6 Biodiversity and Ecological Assessment: demonstrating consideration of any potential impact on sensitive ecological receptors for proposals within the corridor of the River Wey'</u>
Historic England		
7d	Historic England welcomes the Tall Buildings SPD and agrees that it will positively support the application of Local Plan policies in relation to often contentious tall buildings proposals in the town centre. We are concerned that the suggested definition of a tall building as one being 18m high could ultimately lead to a uniform skyline that detracts from the attractive and varied existing historic townscape. In our experience, setting a benchmark height in policy and guidance results in proposals coming forward that just meet that height level and, unintentionally perhaps, cause erosion of varied character over time. This has resulted in some local planning authorities revising guidance to avoid the impact of increasing uniformity of the skyline over time, for instance in Oxford. We are unsure about the use of the term "history of place" throughout the document. There appears to be no definition of common usage of the term in planning law or guidance. A better and more precise term to use would be historic environment which would reflect the usual terminology in such circumstances and the wording in the NPPF.	Whilst this threshold is identified as a means of formally engaging the SPD, it is not aimed at being either a limit or target for the height of new buildings and as a result is it considered that the risk of uniform heights being proposed as a result is limited. Further, height is only one building form and diversity and the articulation of roofscapes is a means of avoiding uniformity of the skyline, even if buildings of similar heights might be proposed in an area. The SPD and Local Plan reflects upon attention to the design of roofscapes which is considered to avoid a tendency toward homogeneity. 'History of place' replaced by '<u>Historic environment</u>' throughout document.

Section / Para no.	Comment	GBC response
National Highways		
General	Reviewed and have no comments	Noted
Natural England		
	Natural England does not have any specific comments on the Tall Buildings Supplementary Planning Document for Guildford Borough Council.	Noted
Surrey County Council		
	We note that on page 19 under Tall building design guidance: history of place / heritage assets Local Plan Policy D13 is referenced. This policy is specifically related to the River Wey and Godalming Navigations. It may be beneficial to reference Local Plan Policies D18-24 in this section as they are specifically relevant to the historic environment. We would suggest that if specialist consideration of the River Wey is considered necessary it would benefit from being demarcated more clearly. We note that there is a typo in footnote 18 on page 20, it should read “Archaeological Potential” instead of “Archaeologic”. We are pleased to note that the Historic England Guidelines (HEAN 4) have been referenced here. We note that there is some repetition across the document. For example, paragraphs 7.16.4 and 7.34.3 could be conflated and Sections E and F cover similar ground. It may be beneficial to combine these sections to make the overall document more concise. We welcome the reference to the Surrey Hills National Landscape within the immediate setting of Guildford Town Centre, and the need to sensitively respond to this context within development proposals.	The ‘policy context’ section of this chapter has been supplemented through addition of the following text at paragraph 7.52: <u>‘In particular all development proposals affecting either designated or non-designated heritage assets must respond to the requirements set by LPDMP Policies D18 - D24.’</u> Footnote corrected to read ‘...Archaeological <u>Potential</u>’ The document has been drafted so that the design guidance for each theme is comprehensive and capable of being read in isolation. This will help ensure that is fully considered when proposals are being developed or assessed. Whilst there may be some overlap across the document where the guidance may be similarly worded however the outcome being sought is likely to differ e.g. the need to screen rooftop building services to ensure the rooftop contributes positively to the skyline vs does not detract from important views. All submission requirement references have been amended as follows: <u>‘Townscape/Landscape and Visual Impact Assessment (TVIA/LVIA)’</u>

Section / Para no.	Comment	GBC response
	We note that Guildford Borough Council has a statutory duty under the Levelling Up and Regeneration Act 2023 (Section 245) to seek to further the statutory purposes of Protected Landscapes. Government guidance can be found here: Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes - GOV.UK. Paragraphs 7.37 and 7.58.2 suggest consideration is given to adding Townscape and Visual Impact Assessment (TVIA) or specifically, Heritage Townscape and Visual Impact Assessment (HTVIA) in addition to/in place of LVIA (where appropriate), as these assessments are likely to be more focussed on the impact on townscape and heritage assets. We would suggest that the most appropriate form of VIA should be scoped and discussed at pre-application stage. We welcome the requirement for Accurate Visual Representations (AVRs) to accompany applications and the requirement that all tall building proposals be subject to assessment by the Design Review Panel. We welcome the references to the provision of soft landscaping and incorporation of green infrastructure at paragraph 7.108 as part of development proposals. However, note that there do not appear to be references to opportunities for façade greening (living walls and/or more substantial planting within structural planters) or living roofs/roof gardens. These elements could provide multi-functional benefits, including climate change adaptation and mitigation and contribute to statutory Biodiversity Net Gain requirements. We therefore recommend that references to potential support for these elements are included.	The reference to green infrastructure is considered broad enough to cover all types of urban greening. This could include living walls and roofs where this can be demonstrated to be appropriate and effective. The design guidance related to the ‘provision of amenity space’ already includes reference to garden roofs.
2. Other organisations		
Artington Parish Council		
	Recognise how this SPD identifies the real risk of harm tall buildings pose to the prevailing characteristics (para 7.7) and surrounding context (para	The SPD guidance will not be engaged for any development proposals outside the town centre for buildings that exceed

Section / Para no.	Comment	GBC response
	7.11) of the setting of Guildford and its proximity to the Surrey Hills National Landscape. As much as tall buildings in the Town Centre itself will necessarily impact views into the Town Centre (eg from the Mount), it must also be recognised how any proposed development of tall buildings in the surrounding countryside, in particular at the former College of Law/Braboeuf Manor site, can impact views and landscape adversely when looking back out from the Town Centre when it comes to “an appreciation of the town’s character” and we therefore see the usefulness of this SPD when considering planning applications for tall buildings outside the boundaries of the Town Centre itself, such as within Artington Parish (para 7.16). Artington Parish Council would therefore welcome this SPD in its recognition of the risk of significant harm tall buildings pose not only to the Town Centre itself but also the potential for significant harm caused by inappropriate development with tall buildings (even those not necessarily beyond 18m in height depending on the setting) to the wider landscape, topography and to heritage assets located in the vicinity of the Town Centre which in turn would adversely impact the Town Centre and those who live there and visit it.	18m in height. However, it is acknowledged that they could have the potential to harm important views from within the town centre of the surrounding landscape. Relevant policies in the adopted Local Plans would still apply in these instances as a basis for ensuring that inappropriate schemes to be refused.
7.37	Requirements for AVR should specify that mere dotted line outlines of buildings set in a visual photograph of the landscape are rejected; rather, block images should be used to illustrate the actual impact a tall building will have both in the immediate setting and the wider viewpoints of that landscape.	Where AVRs are included as submission requirements the following text has been added: <u>‘This should reflect the actual form and design of the building where this is known.’</u>
DP9 on behalf of Clan (Guildford) LLP / Native Land		

Section / Para no.	Comment	GBC response
5	Further explanation and evidence of the analysis that has been undertaken to reach the 18m should therefore be provided and referenced in the SPD.	The town centre generally comprises of 2-3 storey buildings particularly in the historic core with some taller buildings in other parts. A threshold of 18m, which generally equates to approximately 5-6 storeys, is considered to be a reasonable and proportionate definition of a what would normally be considered to be tall building within the context of Guildford town centre and where special attention needs to be given as to its potential impact on the area.
6	Query whether the full scale of opportunities that a ‘tall building’ or a ‘taller building’ (own term), could deliver has been considered fully. Key opportunities include the following: <u>Brownfield Land</u> Most, if not all of Guildford Town Centre, comprises brownfield land. The redevelopment or intensification of sites in such a location should therefore be prioritised, responding to and according with the NPPF’s ‘presumption in favour of sustainable development.’ In prioritising and developing, highly accessible and sustainable brownfield land, this reduces the demand for, and keeps development away from, the Green Belt. <u>Housing Needs</u> For residential schemes, ‘tall buildings’ or ‘taller buildings’ have the opportunity to provide additional residential accommodation and, more importantly, additional affordable housing. In the context of the recently increased housing targets for Guildford, plus a desire to keep development away from the Green Belt, opportunities for additional height and ‘tall’ (or ‘taller’) buildings should be supported within the highly sustainable location that is the Town Centre.	The potential opportunities that tall buildings present are set out in paragraph 6.3. This has been expanded as follows: ‘can make the most efficient use of sustainable brownfield sites <u>and provide much needed homes</u>’

Section / Para no.	Comment	GBC response
	We note that reference is only made to the requirement for a Landscape and Visual Impact Assessment ('LVIA') to be submitted alongside a planning application for a 'tall building'. However, an LVIA usually equates harm with visibility and is something that might be more typically expected for a proposal which introduces development on an otherwise unspoilt landscape. A Townscape and Visual Impact Assessment ('TVIA'), however, is a better measure for impacts where the visibility of a new tall development could be assessed as a good thing and an enhancement to local context if designed well. Therefore, we would recommend that the SPD is updated to make reference to the requirement for a TVIA to be submitted. This can be considered on a case by case basis.	All submission requirement references have been amended as follows: 'Townscape/Landscape and Visual Impact Assessment (TVIA/LVIA)'
Gatwick Airport Ltd		
	Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which London Gatwick is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes. It is vital that their safe operation is not impacted upon by buildings, structures or works which infringe the protected Obstacle Limitation Surfaces (OLS), impact on navigational aids utilised by the airport, distracting or confusing lighting or by development which has the potential to increase the number of birds or the bird hazard risk. Please note this list is not exhaustive. With regard to the above-mentioned consultation, we have no objections or comments other than we would need to be consulted on any buildings/structure that exceed the consultation trigger heights as shown on the 'Aerodrome Safeguarding Colour Squares Map' that was sent to	Noted.

Section / Para no.	Comment	GBC response
	yourselves in November 2024. This will give us the opportunity to assess developments to ensure that there are no impacts to air safety at London Gatwick.	
Guildford Borough Council – Regulatory Services		
7e / 7.64	Regarding balconies, common issues are the noise outbreak due to proximity of neighbouring residential units this can be solved by enforcement action but that is very costly, but where practical staggering the balconies rather than being in a vertical line may help. By far the most common issue is that balconies become pigeon coops, retrospective fitting of netting has been used, but any design to deter pigeons is recommended.	See the response below regarding noise. The design guidance in relation to balconies is aimed at increasing the usage of balconies as a practical and pleasant amenity space. Increased activity should reduce the prevalence of pigeon nesting.
7f	Mixed uses are expected in many locations reference 7.881. Positioning of plant and equipment and waste/delivery areas in tall buildings should be as near to the commercial units as practical. It is common place to utilise the roofs of buildings for plant and whilst this is certainly the easiest location a noise source at height can affect a wider area than one for example in an enclosure at ground level. Other noise Noise separation/insulation of commercial units and lifts from residential units is an important consideration. External entertainment and dining areas under a block of flats are very difficult to control in terms of patron and music noise.	Paragraph 7.61 has been amended to include ‘noise’ from Policy D5. Additional design guidance has been added to the ‘protection of amenity’ section: <u>‘7.65.4 Carefully consider the design and location of residential units, including in relation to building servicing features and noise generating non-residential uses, to avoid any unacceptable amenity issues related to noise.’</u>
Other	We have some examples where waste systems in flats still have a chute feeding a waste area, rodent infestations have been reported and the chutes have been closed. I would not recommend chutes, but waste	LPDMP Policy D5 covers the provision of practical and well-designed bin storage. It also suggests that applicants should undertake consultation with the Council’s Waste and Recycling Team to determine their requirements

Section / Para no.	Comment	GBC response
	storage/collection are important considerations as a large block of flats can generate a lot of waste.	
7.95.3	A relatively new issue has been wind generated noise from a multi storey car park. I am assuming this document covers car parks so as a word of caution the design should cover any potential for wind noise.	The SPD would be engaged for any building that exceeded 18m in height, this would include car parks. The SPD already indicates at para 7.91 that: ‘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.’ Furthermore, the SPD includes the following submission requirement linked to the Section f (public realm and mixed uses): ‘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’.
Guildford Residents Association		
General	Need for clarity that this SPD is to guide <i>whether</i> a tall building is appropriate on a particular site, as well as the design (including height, bulk and footprint) of a tall building.	Application of the SPD should guide both whether a tall building is appropriate on a particular site as well as, if suitable, aspects of its design. Para 1.1. amended to clarify this position (as expressed later in the SPD) as follows: ‘However, with sufficient consideration given to their suitability and design which avoids or minimises any harm in relation to sensitivities, taller buildings can <u>in some locations</u> contribute

Section / Para no.	Comment	GBC response
		positively to the Guildford's townscape, the vitality of the town, and to making efficient use of land.'
General / 1.3	Scope beyond town.	The SPD is drafted to apply to tall buildings (as defined in relation to the 18m threshold) and their impacts, most particularly within the context of the Guildford Town Centre, with its specific range of design considerations. The SPD indicates at para 1.3 and 1.4 that 'the geographic scope of the SPD is due to the Town Centre being the focus within the borough for tall building proposals' and that 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.' In this context, it is not considered necessary to widen the spatial scope of the SPD at this stage, and that it should remain focussed on areas where further detailed guidance is most pressing and appropriate. However, the policies that the guidance supplements will continue to be relevant to areas beyond the Town Centre and para 5.6 is amended as follows. <u>'...Further, for sites outside the town centre, the Local Plan policies that the SPD provides design guidance for would still be relevant as a basis for ensuring that inappropriate and harmful development can be resisted.'</u>
General	Steer on heights that can influence price paid for sites.	Whilst this SPD is not site specific, it is considered that this point is best addressed under section 8. In this regard, para 8.1 is amended as follows:

Section / Para no.	Comment	GBC response
		This will ensure that any planning application that is submitted is supported by the necessary submission requirements set by this SPD. <u>'It is also considered to be helpful to avoid unrealistic expectations in terms of potential height and bulk to be achieved to help inform developer considerations regarding viability and the potential price to be paid for land.'</u>
General	Ensuring issues referred to in the "context" text are picked up effectively in the "design guidelines".	This has been considered. Amendments proposed as below in response to detailed comments.
General	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.	This has been considered. Amendments proposed as below in response to detailed comments
General	More clarity is need on legibility and permeability, and on avoiding walls of tall development and blocky designs	See response to comment against para 7.1 below. It is acknowledged that in addition to height, building's bulk, massing, proportions and profile can have negative impacts. This is reflected in relation to character (see para 7.7), views (see para 7.25). In terms of design guidance, Para 7.34.2 references bulk and massing in relation to avoidance of detracting from significant views, and Para 7.88.3 acknowledges the need to consider incorporating breaks in the building to create visual relief. For further clarity para 7.34.2 is amended as follows: Implement design measures, such as stepping down or appropriate siting of building height, choice of materials and

Section / Para no.	Comment	GBC response
		lighting, and a sensitive approach to bulk and massing, to avoid detracting from significant or important views
General	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.	Whilst the definition of a tall building does not seek to use context height as a threshold to engage the SPD's design guidance, for buildings that do engage the SPD, height relative to its surrounding context is considered (see sections 7.11 – 7.15). Detailed consideration regarding juxtaposition in height between a tall building proposal and adjacent buildings, and any associated level of harm, will need to be considered in more detail at the site-specific level in the context of the design guidance provided by the SPD.
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 is 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."	Agreed. Para 1.1. amended to clarify this position (as expressed later in the SPD) as follows: '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	Suggest the purposes include that the design guidelines convey considerations of importance in a local context.	Agreed. Para 1.2, bullet 2 amended as follows: '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

Section / Para no.	Comment	GBC response
		good design <u>focussing on considerations of importance in the local context;</u>
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.	The SPD is drafted to apply to tall buildings (as defined in relation to the 18m threshold) and their impacts, most particularly within the context of the Guildford Town Centre, with its specific range of design considerations. The SPD indicates at para 1.3 and 1.4 that ‘the geographic scope of the SPD is due to the Town Centre being the focus within the borough for tall building proposals’ and that 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.’ In this context, it is not considered necessary to widen the spatial scope of the SPD at this stage, and that it should remain focussed on areas where further detailed guidance is most pressing and appropriate. However, the policies that the guidance supplements will continue to be relevant to areas beyond the Town Centre and para 5.6 is amended as follows. <u>‘...Further, for sites outside the town centre, the Local Plan policies that the SPD provides design guidance for would still be relevant as a basis for ensuring that inappropriate and harmful development can be resisted.’</u>
5.3	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.	Whilst it is accepted that a ‘context height’ definition (e.g. using a ratio reflecting the height of a proposed building to the average heights of buildings in its local surrounding area) is a

Section / Para no.	Comment	GBC response
		further means of defining a tall building and allows for relative height to be considered, this option has been reflected upon and is not taken forward at this stage. This approach would have either required context height mapping and judgement regarding what (the) particular area context height/s should be as part of the SPD, or an approach set in the SPD for an applicant to determine the context height ratio of a proposal. It was considered that this would add unnecessary complexity, especially when the SPD is focussed on the Guildford Town Centre (rather than the entire borough) despite a degree of height variation within the Centre itself. In this context, the 18m threshold (as defined, including measurement from the lowest external point around the building to the height of the highest part of the roof) is considered appropriate for this SPD, within the Town Centre, and would likely be applicable to most building proposals that would be considered tall.
6.4	Welcomed 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.	Agreed. Para 6.4 amended as follows: '...In addition, 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	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	Agreed that sensitivities referenced in the SPD are not only those contained within the Guildford Town Centre and that considerable sensitivity is required for tall building proposals.

Section / Para no.	Comment	GBC response
	exceptional rather than the norm. It should not focus exclusively on the town centre.	Para 6.5 amended as follows: ‘The SPD should be focussed on the Guildford Town Centre – this is the area of greatest pressure/opportunity for tall buildings - <u>alongside acknowledging contextual sensitivities, including those within and beyond the town centre</u>. It should also reference features which are specific to Guildford’s unique local character (<u>e.g. its distinctive townscape, heritage assets, important views, downland landscape and topography</u>), <u>recognising that any proposals for tall buildings require considerable sensitivity to these features</u>.
7.1	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.	A new para has been added: <u>‘7.88 Given their scale, tall building proposals are likely to have larger built footprints. This can reduce permeability through the site, particularly for pedestrians and cyclists, with consequential negative impacts on the legibility of the area. A less permeable layout reduces the choice of routes, making it harder to orient oneself. It is important that the massing of tall building(s) is considered through the design process and opportunities to improve connectivity and permeability with the wider area are maximised in line with LPSS Policy D1(6).’</u> A new design guideline has also been added: <u>‘7.89.10 Maximise opportunities to improve the permeability of the site and aid in the legibility of the wider area.’</u>
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.	Noted. Whilst additional reference has been added to para 1.1 as above, it is considered that suitability (or lack thereof) is highlighted sufficiently at various other points throughout the document (e.g. paras 7.11, 7.29, 7.42).

Section / Para no.	Comment	GBC response
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.	The figure is attempting to illustrate the three vertical elements that a tall building is comprised of, in particular the middle element, and is why all the buildings shown are of ‘tall’ buildings.
7a / 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.	It is considered that this point is best addressed under section 8. In this regard, para 8.1 is amended as follows: This will ensure that any planning application that is submitted is supported by the necessary submission requirements set by this SPD. <u>‘It is also considered to be helpful to avoid unrealistic expectations in terms of potential height and bulk to be achieved to help inform developer considerations regarding viability and the potential price to be paid for land.’</u>
7a/ 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 title of this section is changed to “Interfaces with surrounding buildings and 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.	Agreed. It is acknowledged that the reference to ‘the surrounding context’ is wider than the surrounding buildings and that this should be reflected in the SPD. In this regard several amendments are proposed as follows: Para 7.12: ‘Considerations can include the nature of the interface between the development proposal and <u>surrounding adjacent</u> buildings <u>and/or features (such as the public realm, open spaces, and the River Wey).</u>’ Para 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 <u>with surrounding buildings</u> in such a way that it may contribute to meeting the expectation of a positive response sought by Policy D4(3).’

Section / Para no.	Comment	GBC response
	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, <u>roads/pavements, green space or the Wey.</u>” “integrate tall building(s) within the urban block or with the tallest point away from (an) adjoining smaller scale building/s, <u>roads/pavements, green space or the Wey</u>” “use buffers such as landscaping between the proposed tall building and (an) adjoining smaller scale building/s, <u>roads/pavements, green space or the Wey</u>” 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.	Title: ‘Interfaces with <u>surrounding adjacent</u> buildings <u>and features</u>. ‘Design sensitive interfaces with <u>surrounding-adjacent</u> buildings <u>and features</u> by considering the appropriateness and potential to:’ Para 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.’ Para 7.14.2: ‘integrate tall building(s) within the urban block or with the tallest point away from (an) adjoining smaller scale building/s <u>sensitive edges</u>. Para 7.14.3: ‘use buffers such as landscaping between the proposed tall building and (an) adjoining smaller scale building/s <u>sensitive edges</u>.’ Para 7.15: With regard to this guidance, it is important to stress that some level of juxtaposition in height with <u>surrounding adjacent</u> buildings will not be unacceptable in all instances.
7a / 7.14	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.	The figures are meant to be illustrative of a particular design principle within that particular section. A graphic is often more effective at explaining a design principle than descriptive text. They are not intended to reflect appropriate architectural forms or scales of buildings and have deliberately been kept simplistic for that reason.

Section / Para no.	Comment	GBC response
		A new para has been added to Section 2: <u>'2.4 The SPD also includes several diagrams to help illustrate some of the design guidelines. It should be noted that these are deliberately simplistic and intended to simply illustrate a particular design principle. It is not intended to illustrate what an acceptable proposal looks like when considering all the design guidelines.'</u> Further, the amendments to the text in this section is considered to clarify the matter further, including the treatment of sensitive interfaces other than adjacent buildings.
7a / 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.	It is considered that para 7.16.5 sufficiently addresses the need to avoid excessive lighting relating to the top element of buildings. However, to ensure this point receives greater prominence the para 7.16 is amended as follows: '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 – <u>this extends to features such as lighting which can harm night-time views.</u>'
7b / 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.	This point is addressed in para 7.31, however, for clarity a further reference as a footnote to para 7.24 has been added in the context section as follows: <u>'It should be noted that this does not preclude other views being valued and being a material consideration in terms of specific planning applications (see para 7.31)</u>

Section / Para no.	Comment	GBC response
7b / 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.	Important views would be identified based on the particular circumstances, including any site-specific considerations.
7c / 7.38 and 7.39	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.	Agreed. Whilst this is referenced in para 7.43, there could be further clarity in the context section and Para 7.39 is amended as follows: 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. <u>This complexity is added to by the more subtle variations in topography within the town, including the rise of the land from the river and noticeable incline of the High Street, North Street, the Mount, and Farnham Road.</u>
7c / 7.41	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.	See response below (regarding para 7.45.2) which is considered to address this point.
7c / 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”.	Amendment to para 7.45.2 as follows: ‘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

Section / Para no.	Comment	GBC response
		locations <u>whilst enabling an appreciation of the rise and fall of the land.'</u>
7d / 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.	Further clarity added in the context section with amendment to para 7.49 as follows: 'This can occur by the building having an overbearing effect and detracting from the appreciation or setting of the heritage asset, <u>which is especially relevant in the local context, where the majority of heritage assets are of modest scale and height.'</u> Regarding supplementing para 7.55.1, it is considered that the nature of harm is best considered in relation to specific heritage assets rather than highlighting 'overwhelming' as a specific harm. Factors such as those identified, and other potential heritage harms, would be identified in the submission requirements and assessment of the proposal.
7e / 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.	Whilst the SPD includes considerable design guidance in relation to balconies, this is reflective of the design opportunities and challenges that they need to address, and the need for further clarity on the way in which they are incorporated into tall building schemes. The provision of balconies is not a requirement of all flatted developments (see SPD para 7.65) but they can provide positive private amenity space if well designed. However, it is acknowledged that the SPD could helpfully include further detail or emphasis on the provision of other forms of amenity space. In this regard, several amendments are incorporated as follows. Included additional reference at para 7.65:

Section / Para no.	Comment	GBC response
		‘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, <u>including encouraging physical activity, promoting improved mental health, and fostering a greater sense of social inclusion. In more urban settings such as the Guildford Town Centre, the opportunity to access amenity space is particularly important²⁷.</u>’ Included a new FN to para 7.65: <u>‘²⁷This extends to considering the need to access play space, especially in relation to larger tall building schemes of 50 or more dwellings – see Local Plan Development Management Policy ID6’</u> Updated para 7.71.1 as follows: ‘Explore innovative ways of providing multi-functional shared amenity space <u>and conveniently located play space</u> including through the provision of roof gardens and terraces <u>and/or creative use of areas where development is set back.</u>’
7f / 7.86	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.	Agreed. In order to expand on this and why it is important more detail is provided by an amendment to para 7.84 as follows: ‘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’. <u>Building line setbacks, including to allow space for landscaping, address changes in levels, and avoid air</u>

Section / Para no.	Comment	GBC response
	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.	<u>quality/noise impacts at street level, may be appropriate to ensure sensitive interfaces with surround features (see also paragraph 7.14.3). The balance between creating a sense of enclosure and allowing sufficient setback will be important to consider in relation to the specifics of the site and to the height of buildings proposed, the setting and levels of amenity.</u> Further, 'the building's frontage should also not be excessively long. Instead, the façade should have appropriate breaks.'
7f / 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.	Noted. The comment references adopted policy.
7g / 7.100.2	It should be clear that this is subject to compatibility with managing flood risk, ground water capacity and infrastructure resilience.	The aspects, whilst important, are considered to be addressed sufficiently by national policy, guidance and adopted Local Policies, which would apply to relevant planning applications.
General	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	It is acknowledged that in addition to height, a building's bulk, massing, proportions and profile can have negative impacts.

Section / Para no.	Comment	GBC response
	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.	This is reflected in relation to character (see para 7.7) and views (see para 7.25). In terms of design guidance, Para 7.34.2 references bulk and massing in relation to avoidance of detracting from significant views, and Para 7.88.3 acknowledges the need to consider incorporating breaks in the building to create visual relief. For further clarity para 7.34.2 is amended as follows: Implement design measures, such as stepping down or appropriate siting of building height, choice of materials and lighting, <u>and a sensitive approach to</u> bulk and massing, to avoid detracting from significant or important views
General	Included in the comment are extracts from GRA position on why building height is important in Guildford. Includes that an 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. • Building height and bulk will be consistent with attractive views including to and from the Surrey Hills National Landscape and town centre. • 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 • The distribution of heights within a scheme will be consistent with promoting soft green edges to development. Lower heights around	Noted. Many of these points have fed into the specific comments on the draft Tall Buildings SPD as addressed above.

Section / Para no.	Comment	GBC response
	the edge, with any higher elements set within a scheme, will often be more appropriate in a Guildford context. - Height along linear features requires particular attention including that: - Lower heights and set back will often be appropriate along road frontages; - heights along the river frontage should normally be lower to avoid an overbearing impact on the river setting; - 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.	
Guildford Society		
General	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. 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.	The SPD requires development proposals to reflect a thorough understanding of their context. It is not intended to describe what is special to Guildford as this will vary from scheme to scheme depending upon its location and characteristics. The SPD does not seek to replace other Council evidence-based documents which do provide descriptions or appraisals of Guildford's townscape character such as the Townscape Character Assessment or Conservation Area Appraisals (although these are referenced in the SPD).
5	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.	Whilst it is accepted that a 'context height' definition (e.g. using a ratio reflecting the height of a proposed building to the average heights of buildings in its local surrounding area) is a further means of defining a tall building and allows for relative height to be considered, this option has been reflected upon and is not taken forward at this stage. This area. It was considered that this would add unnecessary complexity, especially when the SPD is focussed on the

Section / Para no.	Comment	GBC response
	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. The draft SPD does discuss buildings lower than the 18m threshold in paragraph 5.6 but it has questionable wording which in our opinion can be ignored by developers.	Guildford Town Centre (rather than the entire borough) despite a degree of height variation within the Centre itself. In this context, the 18m threshold (as defined, including measurement from the lowest external point around the building to the height of the highest part of the roof) is considered appropriate for this SPD, within the Town Centre, and would likely be applicable to most building proposals that would be considered tall.
	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. It would be helpful if Guildford's Tall Buildings SPD is written to cover 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.	The SPD is drafted to apply to tall buildings (as defined in relation to the 18m threshold) and their impacts, most particularly within the context of the Guildford Town Centre, with its specific range of design considerations. The SPD indicates at para 1.3 and 1.4 that 'the geographic scope of the SPD is due to the Town Centre being the focus within the borough for tall building proposals' and that 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.' In this context, it is not considered necessary to widen the spatial scope of the SPD at this stage, and that it should remain focussed on areas where further detailed guidance is most pressing and appropriate. However, the policies that the guidance supplements will continue to be relevant to areas beyond the Town Centre and para 5.6 is amended as follows.

Section / Para no.	Comment	GBC response
		<u>'...Further, for sites outside the town centre, the Local Plan policies that the SPD provides design guidance for would still be relevant as a basis for ensuring that inappropriate and harmful development can be resisted.'</u> See above for response regarding context height.
5	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.	The eight SPD sections (under 7) are considered relevant as key design considerations relevant to Tall Buildings. The Local Plan policies are included for clarity, and as a reference to indicate which policies are being supplemented, rather than to structure the SPD.
6	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. 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.	The purpose of the vision statement includes to acknowledge that there can be advantages to tall buildings. Making efficient use of land is a policy requirement in both the LPSS (Policy S3(3)), LPDMP (Policy D4(6-7)) and the NPPF (Chapter 11). If a site is capable of accommodating a tall building, and this is demonstrated through a robust design led approach and supported by the necessary evidence, then it should do so. The suggested text is not clear regarding what sort of compelling evidence would be required.
General / 7	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?	It is considered that the suggested use of the term 'design considerations' would be more appropriate. Amendments, replacing 'themes' with 'design considerations' have been made throughout the SPD, alongside consequential changes.

Section / Para no.	Comment	GBC response
General / 7	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.	The requirement for proposals to be subject to assessment by the Design Review Panel is already included in Section 8 of the SPD: ‘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.’
General / 7	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.	The definition does not limit itself to simply residential or residential led buildings – it applies to any building that is greater than 18m tall. Whilst some of the design guidelines may be more applicable to residential led schemes e.g. provision of amenity space, many will be just as relevant to a non-residential scheme e.g. impact on important views.
7.6	Query reference to ‘associated sensitivities’. To what does this refer?	Para 7.6 amended as follows: ‘However, the surrounding context and prevailing character of each application for a tall

Section / Para no.	Comment	GBC response
		building is unique and therefore requires careful and detailed consideration including of associated sensitivities <u>relevant constraints and opportunities.</u>
7.7	Should not this include overshadowing, impact on streets and public realm and skylines, etc.?	These potential negative impacts are picked up in other more relevant sections e.g. overshadowing in Section 7e, impact on public realm in Section 7f, impact on skyline in Section 7b, etc.
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.	Measures to ensure design quality and that these are not downgraded are included in Section 8.
7.19 and 7.20	We would expect that developers should be required to provide views of the proposed tall building using VuCity.	LPDMP policy D4 (para 5.9) requires that the software package used for Accurate Visual Representations is agreed with the Council. It is not appropriate to mandate the use of a particular software.
7.21 - 24	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.	The Council already requires that the verified views are agreed with the Council. LPDMP policy D4 (para 5.9) states: 'Applicants are advised to engage with the Council at pre-application stage to agree both the views / models and how they are presented (i.e. full renders or wirelines) and, if required, the software package to be used.' Para 7.31 of the draft SPD states: 'The Council may request consideration of views other than those identified by these sources as part of the planning application process.'
7.26 - 29	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.	The town centre has and may continue to be an area of significant change. There are some buildings/parts of the town centre which have buildings that are unsympathetic to the historic character of the area and where potential future

Section / Para no.	Comment	GBC response
		redevelopment opportunities have the potential to improve this.
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.	All planning decisions must be determined on the basis of planning judgement. The decision maker will need to assess the relative harms and benefits of a proposed scheme in arriving at this decision. This includes consideration of representations received to the application.
7c	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.	Opportunities to provide new public realm is included in Section 7f.
7d	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.	The following sentence has been added to paragraph 8.1: <u>'Applicants are encouraged to seek early input from other relevant statutory consultees, for example Historic England, the Local Highway Authority and Surrey Police.'</u> Historic England would also be consulted for any relevant planning application. The Council's Conservation Officer would also be involved in assessing the impact and appropriateness of any scheme, including at pre-app stage.
7e	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	Para 7.66 of the draft SPD states in relation to balconies: '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.' Para 7.71.3 amended as follows: 'Balcony type, design and location should take account of orientation to manage solar gain in the flat (i.e. maximise daylight whilst limiting

Section / Para no.	Comment	GBC response
		overheating) <u>and respond to prevailing wind conditions to ensure usability and comfort.</u> New submission requirement added: <u>‘Wind microclimate assessments: Applicants should carry out an initial assessment of the likely wind conditions at balcony level.’</u>
7f	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.	Whilst the shading effects of tall buildings was already referenced in this section at para 7.91 and 7.93.1, the design guideline at para 7.63.4 (which was in Section 7e) that states: ‘Seek to minimise excessive overshadowing on surrounding open spaces, especially parks, squares and other outdoor amenities.’ is considered to relate better to the contents of Section 7f and so has been moved here. A new submission requirement required only previously in Section 7e has been added to Section 7f: <u>‘Physical impact assessment / Daylight and sunlight assessment: to identify impacts on overshadowing of new or existing public realm including sun path study / glare study.’</u>
7g	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.	The SPD is intended to ensure that any tall building proposals are rigorously assessed to ensure that they are appropriate. The starting point for any development within the town centre is that they make efficient use of land however this need not necessarily always equate to a tall building. There is an expectation that applicants consider alternative forms of development that would still make efficient use of land in this highly sustainable location. Design guideline at para 7.100.1 states ‘Consider alternative development forms to achieve efficient use of land, including compact mid-rise development

Section / Para no.	Comment	GBC response
		rather than increased height where this can reduce or avoid harm.'
7h	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?	Flatted developments have lower embodied carbon emissions, and lower operational emissions meaning the whole lifecycle carbon emissions of a flat would be lower than that of a typical house, included terraced housing. The embodied carbon is lower due to most of the features being shared between occupants (i.e. walls, ceilings/floors) and the savings in embodied carbon emissions is greater than the additional embodied carbon emissions associated with foundations/structural support. The operational emissions are also significantly lower as the compact built form is more efficient, which reduces heat loss. Over the lifecycle of a building these reductions are significant. Requiring Passivhaus can only be done through policy not guidance in an SPD. However, LPDMP Policy D14(4) states: 'Development proposals that will improve the energy efficiency and carbon emission rate of existing buildings to a level significantly better than the Council's adopted standards or national standards for new buildings, whichever is most challenging, are encouraged.'
7h	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.	LPDMP Policy D14(3) states: 'Proposals for major development are required to demonstrate how they have considered the lifecycle of buildings and public spaces and the materials used to construct them to reduce lifetime carbon emissions.' This would apply to any tall building proposal. It is acknowledged that the requirements for an additional staircase may have a negative impact on viability which may have a consequential impact on the type of proposals put forward.

Section / Para no.	Comment	GBC response
Merrow Residents Association		
	Fully support the response submitted by the GRA. Trust that GBC will introduce the appropriate amendments into the draft.	Noted. See GBC responses to comments submitted by the Guildford Residents Association.
National Trust		
Other	The National Trust welcomes the publication of the Draft Tall Buildings SPD and considers that, once adopted, it will provide useful advice to developers, landowners, stakeholders and the local community.	Noted.
7d	Because the National Trust is the custodian of heritage assets in Guildford town centre, including the River Wey and the Wey Navigation, it is particularly interested in the tall buildings guidance in section 7 (d) relating to the history of a place and heritage assets. The Trust finds the guidance to be soundly based and is satisfied that it is drafted appropriately to seek the safeguarding of heritage assets in the town centre, not least the character and appearance of the Wey and Godalming Navigations Conservation Area. The Trust is pleased to note that reference is made in the SPD to the Trust's planning guidance for development next to the River Wey and the Godalming Navigations.	Noted.
Surrey Fire and Rescue Service		
Section 5/5.3.	Consideration should be given to definitions in the documentation that these buildings are designed to. The height of a building is deemed to be the finished floor height of the highest occupied floor from the main access at ground level. Not aligning to this definition may lead to confusion around the building height and application to the BSR and height required for fire-fighting facilities etc. Using 18 metres for two different definitions of height threshold should be avoided, reducing questions and delaying the application process or adding additional design costs.	Using the same definition as the Building Safety Regulator would have the effect of increasing the height at which a building would be considered a tall building as it is measured to the finished floor height of the highest occupied floor rather than the top of the roof. This increase above 18m could be significant depending on the ceiling height of the top floor and the roof height. Given the relative height within Guildford town centre, it is considered that a lower threshold is more appropriate to ensure that it captures all buildings where

Section / Para no.	Comment	GBC response
		special attention needs to be given as to its potential impact on the area.
5/5.5	Buildings of 18 metres generally fit into the 7 stories bracket, not 5-6. Commonly used definitions are 1-3 stories are low rise, 4-6 is midrise and 7+ is high rise/tall buildings. By not using commonly recognised height definitions, there is an additional risk of confusion, slowing down the process and making compliance with the guidance more confusing and leading to delays, particularly if the Building Safety Regulator (BSR) is involved at all stages in the design of the building, including planning.	This SPD has been prepared to respond to Guildford's specific context and what is considered to be 'tall' rather than a generic definition that might apply more generally.
7.38	The first sentence appears to have an incorrect spelling. Should it read 'where the River Wey runs through'? As opposed to 'runs though'.	Correction made 'where the River Wey runs th <u>rough</u> '
Surrey Police		
	SPD lacks explicit guidance on crime prevention through environmental design. Tall buildings, often accommodating large numbers of people, require careful planning to ensure public safety, secure access, and robust surveillance. These considerations must not be treated as secondary but as integral to the planning process. The National Design Guide and National Model Design Code reinforce the NPPF's emphasis on secure, resilient places: • The National Design Guide outlines 10 characteristics of well-designed places, including <i>Public Spaces – safe, social and inclusive</i> and <i>Homes and Buildings – functional, healthy and sustainable</i>. • Paragraph 105 states that “<i>careful planning and design create the right conditions for people to feel safe and secure, without the</i>	The SPD does already include a design guidance in relation to ensuring a safe and attractive public realm. Section 3 has been expanded as follows: <u>Applicants should also refer to and consider guidance contained in the National Design Guide and National Model Design Code when planning for and designing a tall building proposal.</u>

Section / Para no.	Comment	GBC response
	<i>need for additional security measures”, citing passive surveillance, active frontages, and early risk assessments.</i> - Paragraph 124 emphasises that safety, security, and comfort are essential components of quality of life and good design. The National Model Design Code goes further: - Paragraph 63 (Part 1) affirms that <i>“All schemes should aim to create a safe and secure environment and provide a sense of security for all users.”</i> - Paragraphs 143–144 (Part 2) explicitly reference Secured by Design, recommending that local design codes support the inclusion of SBD standards for homes, commercial premises, and public spaces. - Paragraph 146 highlights the importance of integrating counter-terrorism considerations into the design of buildings and public realm, advising early consultation with Designing Out Crime Officers (DOCOs) and Counter Terrorism Security Advisors (CTSAs). The SPD should reference the NPPF, National Design Guide, and National Model Design Code in relation to crime prevention and secure environments.	
	The SPD should explicitly reference Secured by Design as the security benchmark for tall buildings. Permissions should include a condition requiring Secured by Design certification. This formal assessment provides an independent check or review to confirm that developers effectively create attractive, safe and accessible places, or that they adequately consider potential impacts on crime and disorder.	Requiring this would go beyond the scope of the SPD. Secured by Design is referenced in LPSS Policy D1. Secured by Design has been referenced in the SPD under ‘Further references and resources’.

Section / Para no.	Comment	GBC response
	The SPD should require DOCO engagement at the pre-application stage for all tall building proposals. For the public realm areas, the guidance of a Surrey Police Counter Terrorism Security Advisor is available and should be sought.	The following sentence has been added to paragraph 8.1: <u>'Applicants are encouraged to seek early input from other relevant statutory consultees, for example Historic England, the Local Highway Authority and Surrey Police.'</u>
3. Individuals		
1/1.3	The policy should not be restricted to the town centre. The adjacent areas also need to be considered, so as to avoid a ring of high-rise applications just outside the designated Town Centre. The suburbs and villages need similar guidelines. The town centre has a pressing need for this guidance, but suburbs and villages have different pressing needs for it. For example, a lot of home-building is planned for the suburbs and villages, so having guidelines in place would place clear expectations for developers when purchasing and planning their sites and help avoid future arguments at planning application stage.	The SPD is drafted to apply to tall buildings (as defined in relation to the 18m threshold) and their impacts, most particularly within the context of the Guildford Town Centre, with its specific range of design considerations. The SPD indicates at para 1.3 and 1.4 that 'the geographic scope of the SPD is due to the Town Centre being the focus within the borough for tall building proposals' and that 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.' In this context, it is not considered necessary to widen the spatial scope of the SPD at this stage, and that it should remain focussed on areas where further detailed guidance is most pressing and appropriate. However, the policies that the guidance supplements will continue to be relevant to areas beyond the Town Centre and para 5.6 is amended as follows. <u>'...Further, for sites outside the town centre, the Local Plan policies that the SPD provides design guidance for would still be</u>

Section / Para no.	Comment	GBC response
		<u>relevant as a basis for ensuring that inappropriate and harmful development can be resisted.'</u>
5	A variety of comments proposing that the 18m threshold in the draft SPD, or another height, should be a firm cap on building height in the Guildford Town Centre including that: • An 18m restriction (or unequivocal cap) on the height of tall buildings in the Town Centre of Guildford should be imposed. • Approval of proposals that exceed the tall building threshold should not be allowed – the SPD should more explicitly rule out further tall buildings in Guildford. • the centre of Guildford needs to remain low-rise with very few exceptions. A different (12m) threshold should be set for a tall building, indicating that rather than 18m, as 18m is already a very tall building for the centre of Guildford.	It is not considered appropriate or possible to establish an unequivocal cap on the height of buildings through an SPD. The 18m threshold is considered reasonable and appropriate in the context of the Guildford Town Centre. The design principles are more relevant to buildings of this scale.
	Definition is overly simplistic. Most people could not tell the difference between a 17 meter and 19 meter building, but they could tell the difference between a four and five storey one. Storey heights, however, vary by use and so a definition combining both along the lines of a tall building is anything over four storeys or 18 m for example.	It is considered that the threshold as defined is more precise than using storeys (even though 18m is often described as akin to a 6-storey building). As noted, storey heights can vary by use and roof profile/height can also impact on the actual overall height of a tall building.
5.6	Relativity is highly important and so the surrounding buildings, street widths and topography will affect how a tall building is perceived. The definition should include reference to the height to existing nearby buildings. While the draft SPD rightly focuses on contextual design, it lacks sufficient clarity. Height thresholds should be tied to character zones, not just a flat 18m limit. For some areas, 4 storeys may already be too high.	Whilst it is accepted that a 'context height' definition (e.g. using a ratio reflecting the height of a proposed building to the average heights of buildings in its local surrounding area) is a further means of defining a tall building and allows for relative height to be considered, this option has been reflected upon and is not taken forward at this stage.

Section / Para no.	Comment	GBC response
		This approach would have either required context height mapping and judgement regarding what (the) particular area context height/s should be as part of the SPD, or an approach set in the SPD for an applicant to determine the context height ratio of a proposal. It was considered that this would add unnecessary complexity, especially when the SPD is focussed on the Guildford Town Centre (rather than the entire borough) despite a degree of height variation within the Centre itself. In this context, the 18m threshold (as defined, including measurement from the lowest external point around the building to the height of the highest part of the roof) is considered appropriate for this SPD, within the Town Centre, and would likely be applicable to most building proposals that would be considered tall.
6	It should be clearly stated that the purpose of the height policy is to conserve and enhance the character of the town, in particular its history as evidenced by street pattern, scale and character of existing buildings, and that of a gap town in the Surrey Hills with views in from, and views out to, the landscape that provides a rare and valued feature of Guildford. Explaining why the policy exists, and the harms its intended to prevent will help developers avoid wasting their time, your time and make it harder for barristers to argue that black is white on appeal. The draft vision statement at 6.4 achieves none of this. Indeed, it lists grounds at 6.3 for developers to seek exception from the policy.	This section is considered useful to set out the range of outcomes that are sought from the SPD as a point of departure. The detailed design guidance which seeks to assist in achieving these outcomes (and the vision statement at para 6.4) are included in section 7. This section (6) has, however, been amended to emphasise that considerable sensitivity is required for tall building proposals as follows: ‘The SPD should be focussed on the Guildford Town Centre – this is the area of greatest pressure/opportunity for tall buildings - <u>alongside acknowledging contextual sensitivities, including those within and beyond the town centre</u>. It should also reference features which are specific to Guildford’s unique local character <u>(e.g. its distinctive townscape, heritage assets, important views, downland landscape and topography)</u>.’

Section / Para no.	Comment	GBC response
		<u>recognising that any proposals for tall buildings require considerable sensitivity to these features.</u> Further, to avoid any impression that second part/sentence of the vision statement is exclusive of the need to address the first part/ sentence, para 6.4 has been amended as follows@ ‘...<u>In addition, T</u>all 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’
7	Figures are too simplistic and have no grounding in the issues that are likely to be faced in Guildford, which is not flat and has a preponderance of buildings with pitched roofs for example.	The figures are meant to be illustrative of a particular design principle within that particular section. A graphic is often more effective at explaining a design principle than descriptive text. They are not intended to reflect appropriate architectural forms or scales of buildings and have deliberately been kept simplistic for that reason. A new para has been added to Section 2: ‘<u>2.4 The SPD also includes several diagrams to help illustrate some of the design guidelines. It should be noted that these are deliberately simplistic and intended to simply illustrate a particular design principle. It is not intended to illustrate what an acceptable proposal looks like when considering all the design guidelines.</u>’
7a	Support for the general guidance with an emphasis on the need for sensitive design including in relation to height considering the area within which buildings are proposed.	Noted. The SPD aims to assist in achieving sensitive design which responds positively to the surrounding context and prevailing character.
7a	Concern that tall buildings will dwarf attractive older buildings.	SPD guidance aims to achieve sensitive interfaces with adjacent buildings (e.g. para 7.14).

Section / Para no.	Comment	GBC response
7a	Buildings should be constructed to last using traditional materials where possible and being in keeping with Guildford's more historical buildings and not those of the 60's, 70's and 80's.	Choice of materials is considered important and is highlighted for instance in relation to avoiding detracting from significant or important views (see 7.34.2) and is required to be reflected as part of the DAS to enable evaluation of potential impacts (see for example section 7.20.1). However, it is likely that tall buildings 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
7a	An 18 meter height threshold does not seem excessive but that would depend on how many buildings of that height and overall scale are going to be placed in proximity to each other.	It is accepted that consideration of context including any clustering of taller buildings could be relevant to any impacts. In this regard para 7.16.1 seeks to ensure a coordinated approach, including with other consented / built development in the surrounding area to ensure that buildings relate well to each other, and this does not result in a disjointed skyline.
7a	Should not leave it to developers to define what constitutes local character when communities or even the council can do this for themselves?	The Council does provide a level of character assessment through published documents as indicated under the 'further references' as part of section 7a. However, further assessment would be necessary at an individual site level and it is appropriate that planning applications provide further detail, which the Council will in turn consider.
7b	Variety of comments indicating the importance of specific views, and the need for more explicit, view specific guidance including regarding: - avoiding blocking the best views in Guildford, e.g. between the town clock and the Hog's Back or between Pewley Down or Castle Hill and the cathedral and its grounds on Stag Hill. - having more explicit views guidance, particularly for the High Street, the cathedral, the Downs, and riverside sightlines.	The Tall Buildings SPD development guidance is in addition to that of the Guildford Town Centre Views SPD (GTCV SPD). The latter sets out the more detailed and explicit view management guidance for each of 15 viewpoints identified, and includes clear measures to seek to avoid detracting from these individual views.

Section / Para no.	Comment	GBC response
	maintaining river views, views of the high Street, of the three churches and the Hills that surround Guildford. Proposed that there should be clearer spatial prescriptions or protected view corridors with enforceable safeguards.	The Tall Buildings SPD does not include review and detail of individual views and it is beyond its scope to set further individually detailed views guidance.
7b	The views policy has a static viewpoint that observes a wide cone of view. No development will obliterate the view, but it might appear as a prominent feature in the view, but its prominence depends on proximity. Had the policy been designed to use the viewing experience to inform decision-makers as to how a development might look close up, and to use zoomed images in an attempt to mimic the way the brain focuses on the significant elements observed in a way that a photograph cannot, it could have had some use. CGI views can be helpful in illustrating a proposal, but they are generally produced by the marketing department and are more in the nature of propaganda being highly selective in where they are taken from. The points from which the views are taken should be agreed with the planning department at the outset to ensure they are objective and not left to the marketing propagandists. Distant verified views when used to judge the impact of a scheme within its setting, have some merit, but two major real world flaws. Firstly, branches and similar objects in the foreground become unduly prominent in a photograph, and may make achieving a proper viewpoint difficult. More crucially the photograph simply does not reflect the way the brain interprets what the eye sees and is therefore fundamentally misleading. Depictions of the proposal from various viewpoints will always be informative, but the existing policy is far too prescriptive. Views using drones and zoomed images should therefore be encouraged and the objective of the policy should be re-framed so that it is simply to illustrate	The methodology that is used to prepare the Townscape and Visual Impact Assessment is expected to reflect standard industry guidance: Guidelines for Landscape and Visual Assessment (GLVIA) Third Edition (Landscape Institute/IEMA 2013, Routledge) and Technical Guidance Note 06/19 Visual Representation of Development Proposals (Landscape Institute 2019). At 1.1.8 the Guidance Note states 'Zoom lenses should not be used for the principal photograph from any location, but can sometimes be helpful for distant views to clarify detail, where that is not readily apparent in a 50mm lens image. If presented for such purposes, they should be shown alongside a 50mm FL photograph with clear explanation that a zoom lens has been used, and with a statement as to the reasons for its use.'

Section / Para no.	Comment	GBC response
	how the scheme would sit in its landscape to aid its evaluation and leave some flexibility in the way that that is achieved.	
7c	Concern that a preponderance of tall buildings will be a significant blot on the Surrey landscape.	The SPD includes guidance that seeks to avoid or mitigate harm to significant views including (to and from) features such as the Surrey Hills. (see para 7.34). It is accepted that consideration of context including any clustering ('preponderance') of taller buildings could be relevant to any impacts. In this regard para 7.16.1 seeks to ensure a coordinated approach, including with other consented / built development in the surrounding area to ensure that buildings relate well to each other, and this does not result in a disjointed skyline
7d	Comments focussing on the need to protect / preserve and appreciate the historic market town's heritage assets and that height should be limited due to its impact on: • its rich architectural legacy, including its iconic High Street, • heritage views toward the North Downs, • long-established roofscape character. These elements are essential to the town's identity, civic pride, and tourism economy. Preserving this setting should not be treated as a secondary consideration to housing delivery or urban intensification. Other comments indicating that development is not incompatible with heritage, and it can bring new homes, sustainable density, and a vibrant economy, but that new development must be sensitively managed including: • respect for heritage and townscape.	The SPD does include guidance associated with dealing with building height, including limiting it to maintain important views (e.g. para 7.45.1) or avoiding visual obstruction of significant views of/from heritage assets (e.g para 7.55.2), and adopting a highly sensitive approach to building height to avoid or minimise harm to heritage assets (see for example para 7.55.1) The SPD does not seek to treat protection of key elements of the local context as a secondary consideration, but rather supplement adopted policies with detailed design guidance to help achieve high quality design. It is considered that new development (potentially including tall buildings) is not necessarily incompatible with protecting heritage assets but that it should be sensitively managed. The SPD aims to help achieve this.

Section / Para no.	Comment	GBC response
	- careful location and design of taller buildings, avoiding overly dominant forms or diminish the existing fabric of the town. - Careful choice of materials, including brickwork that blends in with the historic side of Guildford, avoiding more concrete.	
7e	Emphasis on the need for good communal spaces, good planting.	The SPD seeks a well-designed communal spaces and includes guidance on innovative ways of providing multi-functional shared amenity space (e.g. para 7.77.1) – this is also addressed through Local Plan Policy D5(2). In addition, the need for landscaping (including planting) is addressed relating to the public realm (e.g. para 7.93.3), to help adapt to climate change (e.g. para 7.109.2) and to contribute sensitive design of interfaces (e.g. para 7.14.3).
7f / 7.91 & 7.95.3	In relation to the design and positioning of tall buildings consideration of wind is important - both in terms of any wind tunnelling effect and also in terms of the noise impact. (example provided of a wind whistling noise from the new multi storey car park at the station).	The SPD already indicates at para 7.91 that: ‘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.’ Furthermore, the SPD includes the following submission requirement linked to the Section f (public realm and mixed uses): ‘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’.
8/8.1	Support for mention about the invitation to and need for Pre-Application meetings. However, concern that this would be removed in the final adopted draft and that there might be withdrawal of this communication route.	Noted. [This reference has not been removed]. However, the availability of the pre-application service is beyond the scope of this SPD.

Section / Para no.	Comment	GBC response
8	Inevitably developers renege on mitigation once permission is given (in the same way that many have side stepped affordability criteria). Any proposal that is at the current threshold should be very rigorously tied down with penalties for non-compliance.	Para 8.5 seeks to emphasise the need to not materially diminish the quality of the approved development between permission and completion, focussing on design aspects. Any specific conditions set and compliance with such conditions are beyond the scope of this SPD.
Appendix 3b and 3c	Appendices 3b and 3c - the best location logistically with travel times and distances for future developments fuelling a demand for high-density housing - would be close to the town centre and major transport intersection. In other words, the Railway Station and the current Bedford Road cinema. However, this area appears to be washed over with protected zones of retained views from certain viewpoints. If development is not in these areas - where will it go in order to minimise travel distances?	The key views reflected in the Appendices are areas where detailed views management guidance is set in the adopted Guildford Town Centre Views SPD. This guidance does not prevent appropriate development coming forward in these areas.
Other	Tall buildings could exacerbate an already overburdened issue in relation to existing infrastructure, roads, water supply and waste removal, schools and hospitals. The number of people living in central Guildford should be limited due to impacts on the road system.	The provision of infrastructure is beyond the scope of this SPD, which focusses on design matters and supplements design related Local Plan policies.
Other	Good design can be objectively assessed but few planners have sufficient training therefore need quantitative rules. It also needs to reflect local and Surrey context. The council needs to budget for and appoint some design expertise either directly or via consultants in order to evaluate their proposals. Need to ensure impressive features aren't value-engineered out along the way. The Heights policy should require more detail about the design than might be required for lower buildings (which have less impact) if the policy effect is to make approval conditional on a particular design. The consent needs to ensure that that is delivered. The detail needs to be	Para 8.5 of the SPD states: '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

Section / Para no.	Comment	GBC response
	nailed down much earlier in the negotiations around the consent, and the policy should be drafted to ensure officers can do this.	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: ' <i>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)</i> '. 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.'
Other	Tall Buildings should be avoided. These are generally to boost the ego of the developer or his architect or to promote a larger scheme. They may be appropriate in metropolitan developments signalling wholesale regeneration but do not apply in Surrey, where the challenge is to accommodate modern high density residential into areas of low rise brick buildings with pitched roofs. Something understated is likely to work best.	The SPD does not seek to promote tall buildings (as defined), but rather, whilst supporting efficient use of land, aims to protect local views, character, and heritage. The SPD seeks to contribute to avoiding / managing any negative impacts and enhancing positive qualities and contributions associated with tall building proposals.
Other	Consider it's better to build tall buildings to accommodate more residents (as per our housing need) in the Town than to take more of our countryside to build more dwellings. The flats appear to be purchased by people commuting to and from London, with very little benefit to Guildford other than additional income for developers.	This matter (spatial strategy related) is beyond the scope of the SPD. The SPD cannot determine who buys property.
Other	Accommodation should include affordable homes for key workers.	This matter is beyond the scope of the SPD. Affordable Housing is addressed through relevant Local Plan policies.
Other	Query whether the pre-application route be will be available for medium to small schemes of less than say 10 units if the circumstances require it.	The availability of the pre-application service is beyond the scope of this SPD.

Section / Para no.	Comment	GBC response
Other	There is a risk of height creep as the general level of a buildings is raised. What measures can be put in place to prevent disruptive incremental demands to raise the number of floors using floor-at-a-time applications	Para 5.2 indicates that the SPD is applicable to 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. The SPD will apply where planning permission is required for additional storeys above or breaching the threshold.
Other	As a minimum the council could say that very rigorous reasons have to exist for raising above the existing height and identify these.	The SPD seeks to ensure that planning applications include detailed and robust submissions to fully justify proposals (see sections on ‘submission requirements’). These should include addressing design aspects as set out in the SPD, avoiding or minimising harm. It is not considered what would amount to a ‘presumption against’ height exceeding that of (an) adjacent building/s would be justified, nor would it directly address potential harm / impact of such a height proposal.
Other	A variety of comments were submitted reflecting concerns with permissions already granted including that: • planning consent has been given for buildings at over twice the proposed threshold height. • they will obscure important views (e.g. from the Hogs Back) and tarnish the landscape / townscape, skyline • they result in loss of buildings / history,	The SPD is not applicable to past planning permissions.

Section / Para no.	Comment	GBC response
	they adversely affect character – are discordant and intrusive, with a scale and massing breaking with existing patterns and creating an overly urbanised feel. Concern that it's too late to stop recent permissions and a proposal to amend permissions restrict them to a maximum of 18m height.	
Other	A proposal to restrict the number of tall buildings approved given the vast number of recent additions approved. Make it clear that poor precedence set by these will not be binding on future schemes.	Whilst the SPD cannot restrict the number of proposals for tall buildings in this manner / based on these reasons, the SPD does seek to ensure that proposals for tall building(s) take a coordinated including consideration of other consented / built development in the surrounding area to ensure they relate well with each other / does not result in a disjointed skyline (see para 7.16.1). Further, visual impact assessment should include a reflection of existing buildings and those consented but not yet built (see para 7.20.1). Individual proposals will need to be assessed on their own merits taking into account all relevant considerations. Whilst the height of adjacent buildings is capable of being a material consideration for a planning application, this would not automatically justify (be 'binding' on) the height of any new building.
Other	At present as we cannot rescue people from high buildings we shouldn't build them.	The Local Plan, which this SPD supplements, does not reflect policy relating to fire safety matters. It is considered that other mechanisms (e.g. Building Regulations and national policies/guidance) outside of this SPD are more appropriate to address fire safety requirements.
Other	Concern regarding a preponderance of tall buildings in Guildford. Various comments seeking to avoid the scale and number of tall buildings that has	The SPD does not seek to promote tall buildings (as defined), but rather, whilst supporting efficient use of land, aims to protect local views, character, and heritage. The SPD seeks to

Section / Para no.	Comment	GBC response
	occurred in other towns / places, with the indication that Guildford should retain its character.	contribute to avoiding / managing any negative impacts and enhancing positive qualities and contributions associated with tall building proposals.