



Attn Holly Dutton

**The Planning Inspectorate Ref - APP/Y3615/W/3325573
Guildford Borough Council Ref 22/p/01336**

Planning (Listed Buildings and Conservation Areas) Act 1990, Town and Country Planning Act 1990 Appeals by St Edward Homes Site Addresses: Land bounded by the Friary Centre Bus Station, North Street and Leapale Road, Guildford, Surrey, GU1 4PU and 17 North Street, Guildford,

The Guildford Society has already commented on the proposed scheme via the planning process, and these are part of the material available on the Guildford Borough council (GBC) Portal for review by the inspector. We would like to add extra comments with reference to the matters identified in the Refusal Letter issued by Guildford Borough Council (GBC) after the Planning committee's decision on 23-1-2023.

Introduction

The North Street is a vital site in the centre of Guildford and has been derelict/dormant for far too long. The Society supports high quality development on the site that respects and enhances the Guildford townscape, we also support the site being used for housing. In summary we have objected to the site as we believe it is overdevelopment in a sensitive location.

GBC have recently adopted, post the refusal of the planning permission, the Development Management Policies (DMP) 2023 to support the Local Plan: strategy and sites 2015-2034 (LPSS) adopted in 2019.

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

This states in the introduction to the policy:

“5.1 The National Planning Policy Framework makes clear that creating high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It goes on to say that planning policies should ensure that developments will function well over its lifetime, are visually attractive, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site and create places that are safe, inclusive and accessible.

5.2 Importantly NPPF paragraph 134 also states that: ‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.

Conversely, significant weight should be given to:

a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or

b) outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.’

5.3 The NPPF places great emphasis on delivering beauty through the use of design codes and guidance. These can be prepared at an area-wide, neighbourhood or site-specific scale. The Council will continue to prepare design guidance where it is considered that this will add value, and work with neighbourhood groups and developers to support them in developing any neighbourhood plan policies or site-specific design codes.

5.4 There is expected to be an increased level of development over the next 10-15 years as a result of the growth identified in the LPSS 2019. It is crucial that the anticipated development is of the highest quality, responds to its local context and maximises the opportunity to improve the quality of the area”

The Society believes the application fundamentally fails to achieve the principles laid out in the DMP policy, being an overdevelopment of the site with a somewhat generic design. If we are creating a new quarter in Guildford that may be in place for over a century – the Town Deserves Better

Our comments on how the scheme, with revisions as lodged on the GBC planning portal in July addresses the reasons for refusal. Below find further comments related to the headings used in the GBC refusal letter for clarity.

Comments

1. The proposed development would lead to an increase in bus journey times, particularly those arriving from the south and the west, specifically all bus services travelling into Guildford along the A281, A3100, A31 and from the University of Surrey / Royal Surrey County Hospital,

The Society believes the revised bus station proposals remove the reasons to be concerned about bus timings accessing the Bus Station for services that use the gyratory system.

The Society remains concerned about aspects of the road network:

- Leapale Road from North Street to Onslow Street has not been adequately modelled. An example is that there is already queuing into Leapale Road from the Leapale Rd Car Park which is containable as the road is currently one-way.
- The impact on the gyratory of allowing Taxis and delivery trucks to reenter the system at the west of North Street seems inadequately worked through. Are extra traffic lights to be installed, and/or phasing changed on the gyratory.
- We agree with allowing commercial vehicles to use North Street in restricted hours. We are not clear that articulated vehicles could comfortably turn left into Leapale road if they run west to east up the road – this may particularly affect traffic to the House of Fraser site.

More detail on the impact on the road network in the town centre is required.

2. The proposed development would result in a reduction in the number of bus stands and layover spaces, and it has not been satisfactorily demonstrated that this reduction can accommodate the planned future growth,

The Society believes the reduction of bus stands is acceptable particularly as new bus stands are to be provided at Solum Station, North Street and longer term potentially on a redeveloped West side of the station.

A concern is that the current facilities might not cope with an extension of Demand Responsive Transport that is being trialed by Surrey County Council in Mole Valley (The CONNECT Service).

Sadly, the Bus Station is being redeveloped without a clear strategy for revising bus services particularly to cope with efforts to promote Modal Shift and Active Travel.

3. It has not been demonstrated that the proposed bus station is accessible for all users. The failure of which would be prejudicial to vulnerable users and would lead to reduced customer satisfaction levels.

The revision proposed to the bus station to improve accessibility appears adequate. We are concerned that access to bus stop No 17 (the single stop to the south of the main area) on the plan has limited pavement width at the doors to the north and behind the bus shelter. Access may be restricted.

4. The proposal would result in less than substantial harm (low to mid end of this scale) to surrounding designated heritage assets as detailed in the Committee Report.

The inspector needs to be aware that there is a particular risk to the setting of St Saviours church due to the consent for a height extension to No 1 Onslow Street just to the west of the proposed site planning application 21/P/00539, this is compounded by the submission of a PDR application for the building adjacent to St Saviours Church (Historic England - Grade II Listed).

The verified view Representative View 10: Woodbridge Road doesn't show the impact of the consented development of No1 Onslow Street, which currently acts as a modern 'marker building' as you approach Guildford down Woodbridge Road.
(See Para 5d Below)

5. Due to its height, scale, massing and cramped layout, the proposed development would represent an overdevelopment of the application site. As a result.....

The Society contends that the site is being overdeveloped which is resulting in an unacceptable Mass and Scale.

a. Policy a5 LPSS 2019

The original site allocation in LPSS2019 Policy A5 covered a wider area.



The Society understands the existing Friary Shopping Centre and No1 Onslow Street (21/P/00539 referred too above) are excluded from the proposed development, the applicant has also failed to obtain ownership of Norwich House and North Street Frontage between commercial road and Woodbridge (which contains Barclays Bank now subject to a planning application 23/P/00984). The planning application thus refers to a restricted site as represented by the blue area.



Policy A5 supported a radically different, retail-led, development. As the plans for the site have developed there has never been a revision to the policy and/or a planning brief to guide development.

The Society considers the failure to issue planning briefs for major sites with the exception of the Strategic Sites covered by Strategic Development Framework - Supplementary Planning Document (July 2020) has caused major issues with planning in the Town Centre. Although the SPD doesn't cover Town Centre sites the SPD does state *'Nevertheless, the general design principles contained within this SPD and the National Design Guide are able to be applied to other developments within the Borough.'*

Retailing has seen major change and continues to change with another major store (House of Fraser) closing in the High Street. The applicant has produced a Retail Impact Assessment it has never been clear whether GBC accept this assessment as part of their overall Guildford Retail and Leisure studies at Policy A5 Allocation (1).

The NPPF states that to *provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;

The Society notes that although the potential NHS Surgery is welcome but not fully agreed and that the Policy A5 requirement for a gym facility has disappeared. Although there is public space most of this is hard surfaced with little true green space.

b. Density

The Society accepts that Dwellings per Hectare (DpHA) is a rough measure of density for a development, but it does provide a reasonable way to conduct comparison across sites and areas.

It is noted that the Dwelling per HA (DpHA) for the proposed development is circa 376 compared with a DpHa of circa 235 for the scheme as first outlined in the Policy A5. This assumes a developed area of circa 1.25 HA for the proposed scheme and 1.7 for a scheme on policy A5 (Current Scheme Area plus Bus Station).

A 400DpHA value is high for a town centre in a country location – Guildford is not a densely occupied city. Student/Studio housing in Guildford naturally has high DpHA with the Plaza site being 700 plus DpHA but in a building height of only 6 stories, flats and housing should exhibit lower densities.

The North Street proposal (of circa 376 homes per hectare) is similar to several of the schemes being developed in a city of the scale of London. It is not appropriate that Guildford, a gap town set in the valley between the Surrey Hills should have such a high density proposal dropped in to its town centre. The proposed North Street development results in blocks which vary in scale from four to fourteen storeys high. The taller blocks above eight storeys and rising to fourteen have a detrimental impact on several of the key views (the views are those referred to in ‘ Guildford Town Centre Views’ Supplementary Planning Document’) into the town centre. For example the scale of the proposals and relentless high massing will form more ‘detractor ‘ buildings in the town and will adversely effect the setting and character of the town . Several of the key views will have the tree line or green horizon lines broken by the proposals and the proposals will adversely effect the setting of key buildings like the Cathedral and St Saviours Church .

It is also noted that the National Model Design guide considers at Page 14 that the typical dense city typology will have over 120 DpHA and a strong mix of uses. North Street is 370 DpHa with a limited number of uses.

We submit that the effect of excessively high-density results in buildings across the development, that are too high and out of character with their surroundings both immediate and more widely when viewed from across the Town and surrounding country.

c. Design

It is surprising that a housing development of this scale is being designed by a single practice. Historic towns are made up from a collage of sites developed over time resulting in a variety of architecture. The St Edwards housing proposals have been prepared by a single architect and do not achieve natural variety. Projects of this scale would normally be designed by a collaborative team of architects led by a masterplanner and lead architect in order to achieve architectural variety. As an example the gridded nature of the elevation proposed for Leapale Road shows little architectural variety and is reminiscent of Russian/ Eastern European housing.

Design South East (DSE) in their second review of the scheme in August 2022 still have concerns relating to the architectural design. The DSE concerns arise from the scale and density of the proposed development which result from the proposals being too big and tall for the site.

It is not clear that comments raised by DSE have been addressed these include in Key Recommendations that the applicant team should:

5 Finesse the long views to avoid breaking the treeline or the coalescence of blocks into a bulky silhouette.

7 Test a looser, less orthogonal elevational approach on the larger buildings to help them feel less gridded and more informal '

The overall recommendations are then expanded under ' 2 Masterplan 2.2 , however two views should be adjusted to avoid breaking the treeline: the Dapdune Wharf view (view1) and the St Catherine's Hill North View (view 3). Furthermore, from the Castle Motte view (view 7) the silhouette of the buildings together creates coalescence and distracts from the prominence of the view to the cathedral. To improve this view and avoid negative impact, different options should be explored for breaking down the scale of the flank elevations on the silhouette buildings.'

The DMP 2023 at policy 2023 para 3 also states:

Development proposals are required to incorporate high quality design which should contribute to local distinctiveness by demonstrating a clear understanding of the place. Development proposals should respond positively to:

- a) the history of a place;*
- b) significant views (to and from);*
- c) surrounding context;*
- d) built and natural features of interest;*
- e) prevailing character;*
- f) landscape; and*
- g) topography*

We contend the Design as presented fails to respond to many of these points.

d. Heights and Massing

The massing of the site does create permeability on several routes which is to be commended. However, some of the routes are effectively canyons with the ratio to Width to Height exceeding 2. Although this is acceptable for many of the proposed pedestrian areas a concern is Leapale Rd is provided which will have tall buildings on both sides (Shadowing in the afternoon will be an issue), a revised traffic flow going two ways plus more on street parking for deliveries etc. No views have been provided to show how Leapale Road will look in the future.

The massing of the site is unfortunate in many aspects. The Town Centre has weak policies embodied in the LPSS and associated DMP. GBC manage heights in the town using Town Centre Views - SPD and also by what appears to be a 'de-facto policy' to limit heights to circa 70M ODA. This is leading to high buildings which cover large parts of their sites and fill in the gap in which Guildford sits. Little regard is being taken of how streetscapes are evolving; with modern computer facilities it is possible to explore new developments in their settings.

The issues are illustrated by the representative views.

Mentioned above (Para 4) is Representative View 10 in Woodbridge Road. This is one of the major entrances to Guildford and should be examined as a series of views as one moves down Woodbridge Road to understand the impact of the scheme, and the other developments mentioned in Para 4.

The Society believes the concept of defined marker buildings will be lost in a confused incoherent streetscape as one approaches down Woodbridge Rd and that St Saviours will cease to be identifiable.



Representative view 10 Amended Proposed Development plus cumulative scheme

A similar exercise should be conducted for Farnham Road View 5 and View 11 providing a clear vision of how the view evolves as one drives or walks down the Farnham Road. This is quite feasible using modelling tools such as Vu.City



Representative view 5 Proposed Development plus cumulative scheme



Representative view 11 Proposed Development plus cumulative scheme

The view from the Hogs Back (Representative View 5) where the proposed mass will form the foreground to the town centre and dramatically effect the townscape of the town. Guildford is increasingly becoming a overbuilt mass of buildings which are very difficult to interpret from a

distance. As an example the high street is increasingly difficult to see apart from very particular directions, or its presence is noticeable by recognising some unfortunate previous developments.



The view down Angel Gate shows how the North Street Scheme creates a wall at the end of one of the historic alleys in the Town. It also swamps No17 the preserved Grade II building.



Representative view 14 Amended Proposed Development

The final example shows the impact of Building E in Representative View 12 The Bars



Representative view 12 Amended Proposed Development plus cumulative scheme

In summary we are concerned about the dominance of the proposed development. This is due to the scheme's excessive heights and massing, caused by the extent of the scheme and its repetitive blocks. These are typically 4 to 7 storeys higher than their surroundings. The proposed buildings will therefore dominate the town centre.

The DMP 2023 at policy 2023 para 6 states

- 6) Development proposals are required to reflect appropriate residential densities that are demonstrated to result from a design-led approach taking into account factors including:*
- a) the site size, characteristics and location;*
 - b) the urban grain of the area and appropriate building forms, heights and sizes for the site; and*
 - c) the context and local character of the area*

The Society believes the proposed development fails to match these points in the policy.

Concerns by Historic England and Design South East.

It should be noted that Historic England in their letter 11-11-2022 commented that:

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF, in particular paragraph 195.

6. The applicant has failed to satisfactorily demonstrate that providing a greater quantum of affordable housing

The debate on viability assessments defies logic.

The developer states they are not going to make any profits (with losses of 15% to 20% of GDV) but is still willing to proceed. The developer is also willing to also budget several £100,000's on an appeal. It is difficult to understand the basis of the figures and assessment being derived from them; as the scheme seems a extraordinary risk in the current economic climate..

A key issue is that there has been no modelling of alternatives, as an example a less ambitious scheme might require less groundwork and be delivered faster with less risk.

A major concern is if the development is consented; one or more of the following will occur:

- a) 'Value engineering' will reduce the quality of the scheme.
- b) Will the scheme be delayed with minimal development taking place in the hope that the economic climate improves. Note - Berkley Homes one of the joint shareholders in St Edwards the developer, has one of the largest land banks of any the large developers
- c) Will elements of the scheme be sold on, as has happened at the Solum development at the Station.

7. The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). In the absence

This objection relates to a failure to provide a completed planning obligation. The Society would hope that any obligation related to SANG and SAMM contributions are clearly identified and are allocated to improvements in the locality. There has been a tendency that SANG's to be developed as green space for dog walking rather than increasing natural diversity. It is hoped that this can be avoided.

8. In the absence of a completed planning obligation the development fails to mitigate its impact on infrastructure provision.

The Society has the following comments on two of the proposed obligations.

- provision of a unit within the scheme which may be used by the NHS as a health or medical care facility or in lieu of this a primary healthcare contribution;
 - COMMENT – With a potential revision to primary Health Care facilities in Guildford town is the NHS fully committed to examining and making a decision on this option. With a growing population in the Town centre better health care facilities will be needed.
- contribution towards the off-site provision of children's playspace;
 - COMMENT: Has space for this been identified within easy access of the site?