

Dear Councillor

The Guildford Society believes that this is a planning application that needs to be considered very carefully as it could have a massive impact on the character of the Town Centre.

Progress has been made

The Society is supportive of an appropriate, well designed, and sustainable redevelopment of the site, which has been empty for decades. Changing the use of part of the site identified in Policy A5 to be for mixed-use, including a quantum of housing is broadly agreed. The Society believes the scheme is a serious proposal by a respected developer that with modification could be the basis for a development. The proposal should not be consented without the following issues being addressed.

Mass and Scale

The development has a density circa 350 DPH this, in our view, causes over development. The proposal's density is comparable with proposals which are being made in major city centres. Furthermore, the proposed scale of development will fill the valley and permanently adversely affect the character and setting of Guildford as a county town set in the Surrey Hills.

The scheme is a series of large blocks, with the exception of a lower height on the North Street frontage, which results in an overbearing development that impacts the town and its setting. An example is that Leapale Road which will be turned into a canyon.

In particular the height and scale of Building E is inappropriate. The officers report notes that "*Block E (marker building), if approved, would become one of the tallest buildings in the town centre.*"

Design Southeast noted that "*the marker block building, which is sufficiently different in height to the blocks that surround it to be distinctive and create an accent in height at this strategic location*" and the Council's Urban Design Officer describes Block E as an '*elegant marker building*'. The Society beg to differ; if a marker building is being proposed it should be of an exceptional design quality to more than compensate for the adverse impact it has on the setting of Guildford. The proposal is underwhelming and of mediocre design quality. We consider Block E to be poorly designed and too high.

Historic England continue to have concerns on the impact of the scheme, recently joined by the Surrey Hills AONB who have written: "*the development would have an unfortunate dominating impact on the town centre that together with the insensitive Station development, would spoil its character and perception from outside views, including from at least one part of the AONB. Its height needs to be significantly reduced which may require the architecture of the building to be amended as that has been influenced by its height. I question whether it is necessary to have a "marker" building. The height and bulk of the Station development should not be a precedent for this scheme. Two wrongs do not make a right.*"

Although it is noted in the Officers Report that all sites are considered on their individual merits, developers naturally reference previous developments and hope for an increment. We have continuing pressure to build to densities and height which will ultimately change the character, in an unplanned manner, of Guildford. With major development proposed across the Town Centre, notably, in the forthcoming Shaping Guildford exercise, which we support, and developments elsewhere, including potentially the rest of the Policy A5 allocation attention needs to be paid to evolving the town in an agreed and planned manner including infrastructure provision.

The absence of clear and effective planning policies for the Town Centre makes it complex to manage design, mass and scale on developments to maintain, evolve, and complement the character of Guildford. Guildford is a unique town in setting, heritage and opportunity, we are in danger of the town centre becoming a series of similarly styled developments with inappropriate mass and scale which could be found anywhere. This would harm the town both in character and economically.

Dwellings

We welcome the use of the site for housing. Guildford town centre has a housing planned or being provided comfortably in excess of the numbers proposed in the Local Plan. The current application for 473 Dwellings is a considerable uplift on the approximately 400 dwellings proposed in policy A5 over a larger area. The Society considers reducing the number of dwellings on the site is not an issue and would have beneficial effects.

St Edwards have offered a small number of Affordable Units 10 single bed dwellings despite concern on viability issues. On a site of this size in Guildford this seems to ignore the Local Plan aspirations for a percentage of affordable housing. There is no evidence that a sensitivity analysis on various options for the scheme has been performed that might show that in some cases affordable housing to be viable. That the Developers and GBC having a difference of circa £40M on viability assessment is concerning. Can **any** assessment be relied upon?

The Council Officers are using saved policy R2 that mandates 2.5 people per dwelling for calculation of requirements such as health provision. The potential of circa 1000 plus residents will have an impact on the Town Centre with a need for employment opportunities, infrastructure etc. We support the proposal to house a Surgery but believe GBC also need to consider other impacts, particularly attracting employment if we are to be a 15-minute town

Policy A5

The original scope of Local Plan Policy A5 refers to a site substantially different to the proposed development. We understand that the Policy A5 does need revision but note:

- A. **Retail Demand** - A review conducted by the developer of the Retail Market is used to support the major reduction in retail/commercial space. It is not clear if this revised retail market assessment is a now considered adopted GBC policy for this and other applications.
- B. **North Street** - The plan area now covers a substantial portion of North Street. The society are not against revising North Street but believe it should be planned. A SPD should have been developed to provide a strategic view for the street with details on mass and scale of buildings, use of buildings etc.

Street views.

The Society notes that at Page 95 of the Officers Report comments

“Officers consider the TVIA as important in assessing the wider impact of the development as now proposed on Guildford. However, it is stressed that any such view is, literally, a ‘snapshot’, and that buildings are experienced in their settings in a dynamic manner, as the observer moves around. Thus, whilst a key view could be adversely impacted by a proposal, it is important to appreciate that a slight repositioning of the viewpoint could have a very different result. Accordingly, it would be inappropriate to judge the townscape impact of a proposed development solely via the TVIA process.”

We agree with this statement, and it is why considerable importance should be attached to the impact of the development at local street level i.e. the experience of a pedestrian.

We consider that the views at Leapale Rd, & Bars View demonstrate considerable impact on the town and illustrate the need to produce additional detailed views for surrounding roads notably down Leapale Road. With the focus on placemaking, impacting existing areas with overly massive and intrusive buildings doesn't seem sensible. It should be noted that VU.City modelling system available to the Planning department allows these views to be explored dynamically at street level.

It is also noted that No 1 Onslow Street, which is subject to a development application, is discussed in the Officers Report. The Woodbridge Rd view should be revised to include this building and view of the dynamic street view taken to determine how St Saviours, Block E, No 1 Onslow Street relate to each other.

(Below at the foot of the e-mail are the views referred too)

Bus Station

The Society notes that Surrey County Council, Stagecoach and Safeguard have objected to the proposed bus station revamp on operational, resilience, future flexibility, and management grounds. Although the officers report addresses these concerns in some detail it is not clear if the computer modelling allows for large slow-moving vehicles at key junctions. Having seen a coach 'U' turning at York Road roundabout recently with considerable traffic impact, there should be physical trails to validate modelling predictions.

The Society, although it notes the option to divert through services to other stops (but where?), is concerned that the bus station lacks resilience.

Traffic

The Society would like to highlight a number of concerns with the proposed traffic around the development.

- A. Taxis** The use of a two-way connection from the west end of North Street to the gyratory looks a potential issue which is not commented upon.
- B. Traffic – Parking** There is a loss of town centre car parking space (157 spaces + 6 blue badge) which would accord with the aim of modal shift – all the more reason to get the bus station fit for purpose. It is not clear if these 6 blue badge spaces are to be re-instated anywhere else in the vicinity?
- C. Traffic - Leapale Road** Does it really work? The site has limited delivery space for Moving in/out and deliveries, compounded by access to Leapale Rd Car Park and the Car Park in the North Street Development. The provision of a larger Layby is welcome but on a scheme of this size there should be allowance for one move every working day (473 dwellings occupied for 5yrs average, gives circa 200 moves (Out/In) per year.
On top of this a two-way flow of traffic including buses is to be allowed. Design Southeast also propose a cycle track.

Sustainability - As the proposed development is going to be in situ for a considerable time (it is unclear what consideration has been given to longer-term refurbishment and improvement, potentially involving retrofitting and rearrangement of dwellings. The viability

study envisages individual units being sold on 999 year leases so the design and common areas need to allow for these maintenance and refurbishment aspects.

The frame of the proposed building is going to be a concrete frame. The use of concrete needs to be considered as it is a very heavy source of Carbon.

Permeability - The proposed plans have poor links east and west. The route through the Friary Centre which is a natural route to the station is only available during shop opening hours. There is also a route for pedestrians between Leapale Rd Car Park and the Telephone Exchange that could give good access to the east.

Alistair Smith

Chair – The Guildford Society



Key Views in the Town Centre

Leapale Road View 18



The Bars View 12



Woodbridge Road View 10

