

## Guildford Society

### Comments on the Proposed Development North Street Guildford by St Edward Policy A5 Local Plan

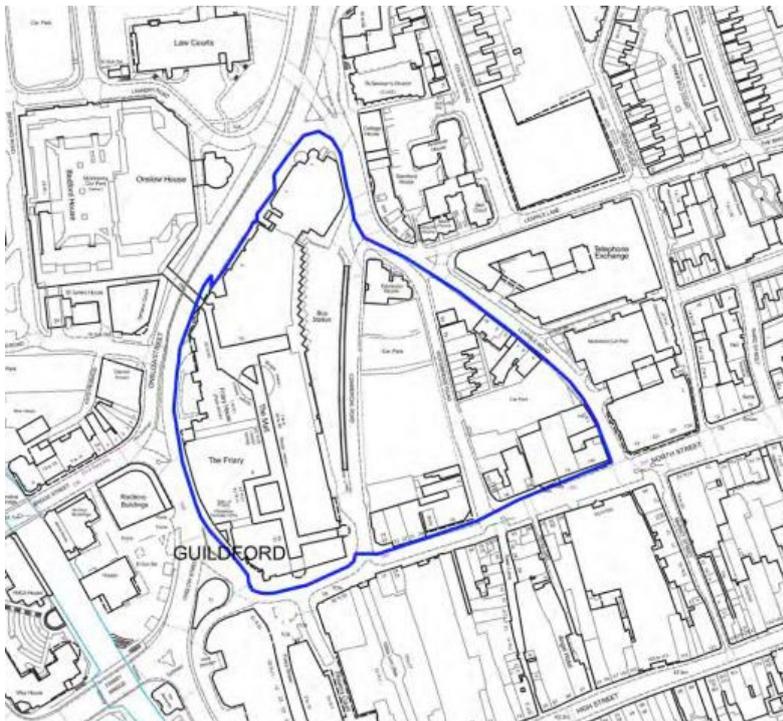
Having reviewed the plans, the Society has a series of comments/queries on the proposed development.

The Society appreciates the site is complex with limitations due to having to accommodate a listed building, sites in the plot, that ideally would be revamped or redeveloped as part of the scheme, and an awkward triangular form of the site. These difficulties have in part been reflected in the decades long wait for a deliverable and acceptable plan to be developed.

#### a) Compliance with Local Plan

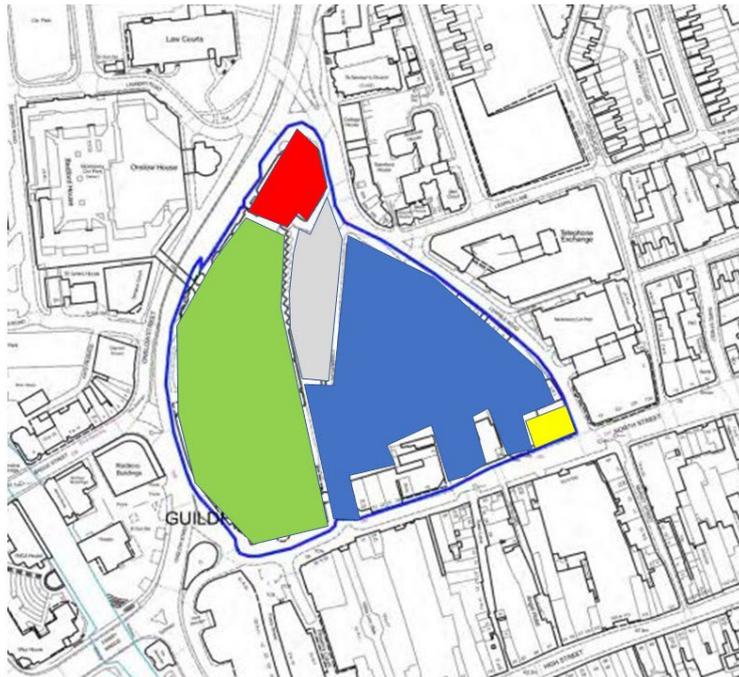
The original scope of Local Plan Policy A5 (attached as an Appendix) that refers to the site

covered a wide area including a major frontage on North Street.



The St Edward North Street Plan is only covering a part of the area in the policy

Our understanding is that the plans are being developed, by the current owners, for No1 Onslow Street and Norwich House, other sites for commercial reasons have not been included in the Site. The Bus Station is utilising the space over the underground No1 Onslow Street parking area, which is difficult to build upon, together with a revision to the Bus Station Parking Bays and access.



- Red - No1 Onslow House Planning Applied for
- Green – Friary Centre
- Grey- Bus Station with No 1 Onslow House parking underneath
- Blue – St Edward North Street
- Yellow – Norwich House Planning Applied For

Policy A5 in the Local Plan covers the site. The Policy has apparently been totally revised but Guildford Borough Council (GBC) has not offered any explanation as to how the policy should now be read to support the proposed development.

In particular, the changing Retail environment has caused a considerable reduction in demand and the Society supports the removal of the 41,000SQM gross of retail. Policy A5 at Key considerations (7) states “If the forecast requirements for retail and leisure uses in the latest Retail and Leisure Study are updated in future either by the Council or by a study agreed by the Council then the balance of allocated uses for this site will be adjusted accordingly.”

Although The Society accepts that the demand for Retail is declining it would be useful for Guildford Borough Council (GBC) to publish updated information on the thinking related to retail as information for this site and others in the Town Centre.

The A5 allocation also states Approximately 400 homes. The presented plan at 500 approx homes is a 25% uplift over the policy proposals. GBC should be publishing their definition of approximately – 25% appears to be a large change. The Society notes this raising of home numbers has happened on other sites meaning the Local Policies are of limited value.

The Policy also states that

Design, vitality and connectivity

(2) Development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes

(3) If demonstrated through the Design and Access Statement that providing the proposed scale of development on site is not consistent with good design then the proposed residential quantum should be reduced so that retail needs are met .

As the quantum of retail has now reduced it is probable that, at the very least, the initial number of 400 Dwellings is accepted provided good design principles proposed in 2) are met.

Policy A5 at Requirements (1) states “A minimum of 5,500 sq m of existing office (B1a) floorspace will be retained”. GBC need to clarify what this means as the Policy covers a wide area including properties that are not in the St Edward North Street Scheme e.g. Norwich House on North Street. The Society would like it clarified what this requirement refers to.

b) Overall plan

The plan as presented is better than previous proposals in that it respects the existing road layout in the pedestrian layout.

The proposed layout with the retained routes through the site North to South and two new routes East West is a good urban plan structure and retains historic Woodbridge Road and Commercial Road alignments.

The East-West routes/lanes have issues in that at the edges of the site, they do not connect or continue beyond the site.

Astor Lane, the longer of these to the South of the development, terminates at Leapale Road with no onward connection through to the Martyr Road/Haydon Place area. To promote permeability GBC should examine opening a footpath from Leapale Road up the side of the BT property to Haydon Place & Martyr Road. At the West end this ‘arrives’ at the new public green space but the Friary Shopping Centre obstructs this connecting through to Onslow Street and beyond.

The shorter of these East West routes is through the Northern Gateway. It can connect across Leapale Road to Leapale Lane but at its West end it terminates abruptly at the vehicular area of the bus station. This route could give access to the Friary Shopping Centre which actually has one of its entrances on the right alignment, but this requires crossing the bus manoeuvring area.

The Massing and Form on the West Side of the site in East West alignment follows closely that of the High Street.

The Easterly part of the site has attempted to align to Leapale Rd which being relatively recent road in the Town Centre has an awkward NW/SW axis. Our understanding is that up till the first quarter of the 19th C the grain of Guildford was orthogonal with the streets laid out on a north-south and east west basis (As shown in the 1822 map). The curve of Leapale Road appears in the mid 19th century. (Present on the 1868 map).

To revert to the Guildford street plan is not feasible, but the design of the Eastern Blocks might not major on a grain of blocks facing on to Leapale Rd but consider a design that relates to the older street of Woodbridge Road, with just the ground level of the blocks picking up the curve of Leapale Road.

This solution matches the buildings across Leapale Road and would also avoid having a long façade on the road which is in danger of being turned into a canyon.

### c) Height of Buildings

The Society is concerned at the heights of buildings where we believe the Town Scape is in danger of being terminally damaged by a series of undistinguished tall buildings. The Northern Tall Block proposed for the site looks very problematic with its relationship to St Saviours, No 1 Onslow Street (itself subject to planning proposals), and the BT buildings. As noted above the increase in dwellings from 400 to 500 is part of the cause of the need for more height.

The Town Centre Views SPD is a key determinant on mass and heights. The Society notes that Para 4.8. states (our underlining):

“A number of modern additions have occurred within the town that are large and bulky. Some of these detract from heritage assets and their settings or detract on wider views within and across the town, and from its landscape. The SPD has shown shaded detractor buildings in the view management guidance. Consideration will need to be given to how new development might better reveal heritage buildings and to reduce mass and bulk on views and on skylines. Where new development is proposed to amend or replace negative detractor buildings, improvement and enhancement will be sought. Reductions in bulk and mass of negative buildings may be achieved through changed massing, varied roofscapes, detailing and materials.”

We are concerned that the proposed scheme does little to reduce mass and bulk in particular related to St Saviour Church, and views from the surrounding downs will be impacted..

The Society is pleased to see recognition that the North Street frontage should respect existing building heights but see our comments on place maker buildings below.

### d) Design

It is obvious that the detailed design is still evolving for individual buildings.

The Policy A5 states as requirements under Design, vitality and connectivity that:

Para (2) Development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes

Para (5) Provide a varied roofscape, minimising the impact on the skyline to protect views in and out of the site

The society is not convinced the proposed development, at present, meets the requirements in the Policy. The Design needs to work further on its Palette of Materials and as noted above in B) consider its massing.

### e) Place Maker Buildings (PMB).

The proposals to provide place maker buildings on the North Street, on the central Plaza and at the northern end of the site at Leapale Rd all need further work. This is recognised by JTP who are working on revised/refined proposals.

The Society would like to see consideration given too:

North Street (PMB) – Should it be taller, in part, to provide a real marker as to the entrance to the development. Looking at the picture of the old North Street with its spires and various roof heights shows that some modest variation to rooflines might be appropriate to mark the entrance to the site.



Central Plaza (PMB) – Should it have a real feature façade e.g. Vertical Garden.

Northern Block Leapale Rd (PMB) – We have covered our concerns on height above. The plans as presented show a building that is different in form and scale to the No 1 Onslow Street building for which plans have been submitted recently. The Society believes real care is needed to create an area of Guildford at the north end of the Bus Station where a proper relationships between buildings is established and the St Saviour’s Church (which is a Grade 2 Listed Building) is not lost in the resulting streetscape.

#### f) Ground Floor Use

The Society is pleased that Ground floors are being constructed on the basis that flexibility is critical as the use may vary over the design life of the development. Although not within the remit of St Edward we believe there needs to be a concerted effort to attract tenants into the development that will ensure that there is good footfall within the development. The Society believes GBC should be engaged actively in this process to ensure that at least some of the ground floor is used for public facilities e.g. Health Centre, Arts Centre, Museum etc.

#### g) Homes

This is still a work in progress our understanding is that the 500 proposed homes will be split roughly equally between 1,2,3 bedroom flats. The percentage of affordable housing is not yet determined.

The Society has two comments of the allocation of homes.

Firstly, Guildford , including the proposed development, has circa 1000 1 and 2 bedroom flats being planned in the Town Centre. GBC needs to have a clear spatial policy to ensure there is a mixture of housing types and we are not just building a commuter land dormitory for London.

Secondly, over the design life of the buildings needs for housing may change considerably. It is to be hoped that the design of the accommodation make allowance for change of use and retrofitting within the fabric.

#### h) Bus Station

The Bus Station, as a building looks to be a design that offers few benefits over the existing facility and has a very poorly designed façade.

The Society believes that no submission for North Street is made until a proper traffic modelling exercise is completed for Leapale Rd, Onslow Street, York Road, North Street upper section, and Chertsey Street/Stoke Road.

Traffic Flows - Analysis of the Bus Traffic at current timetable levels and considering possible growth due to extra Park and Ride Sites, Modal Shift, use of On-Call Minibuses give cause for concern. The Society considers that the Bus Station as proposed will have severe operational problems at the Commercial Road/Leapale Road Junction and at Leapale Road/Onslow Street and if traffic needs to be re-routed Chertsey Street/Stoke Road.

There is also a major impact on Onslow Street where there may be a need to revise Bus Lanes.

The Bus Station is also constrained in that articulated buses will not be useable in the space limited Nose-in Nose-Out parking bays.

Policy A5 at Requirements (11) states “Mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses”

We are concerned the planned Bus Station is a poor short-term solution to that doesn't address this requirement. Guildford will always have issues with its Bus station balancing a desire to have Town Centre facilities with the need to provide transport integration at the Station. This is an issue that the Town Centre Master Plan needs to address.

#### i) Taxi Rank

The understanding is that the Taxi rank remains at the foot of North Street with Taxi's not using North Street but re-joining the one-way system. How this will work is unclear as it will force Taxi's to cross up to three lanes of traffic to go north to Woodbridge Road. At some times of the day Taxi's will also need to face oncoming delivery Traffic into North Street. As a solution it looks in need of further thought and detail.

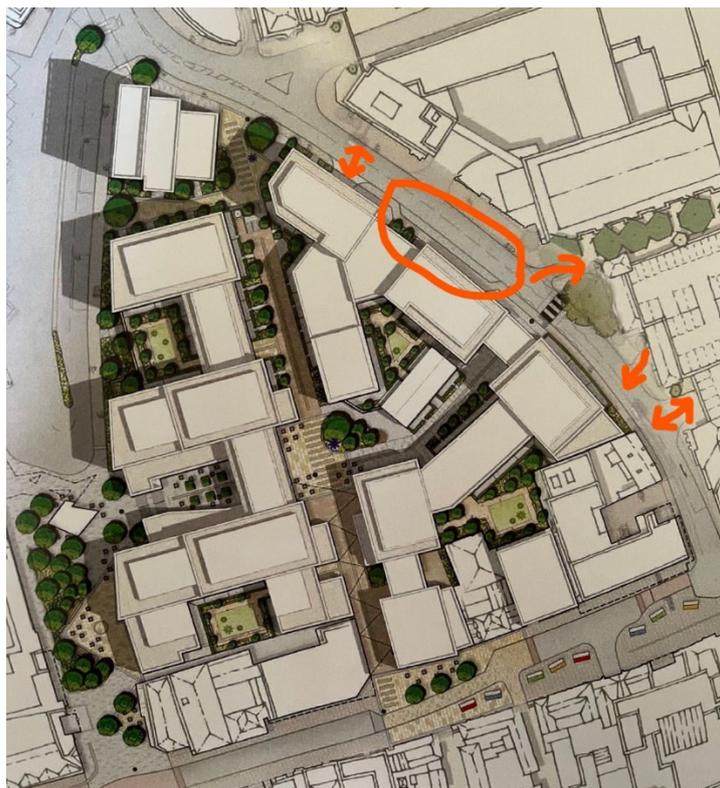
#### j) Leapale Road

We have remarked on the overall alignment of the development to Leapale Road above. The access arrangements for vehicles to the site appear very limited and focused on Leapale Road

The provision of a single Layby is inadequate – on a scheme of this size there should be allowance for one move every working day (500 dwellings occupied for 5yrs average, gives circa 200 moves (Out/In) per year.

The Society believes, like the St Mary Wharf development, there should an enclosed ground level delivery area (Porte Cochere) for Trucks, Deliveries and Moving Vans

The illustration below highlights the proposed layby, entrance to parking in the development and entrance to the existing Leapale Road Car Park.



Depending on Traffic Surveys we believe the scheme should consider that Leapale Road is closed for two-way through traffic except for buses. Deliveries and access to the site and Leapale road car park should be from North Street only. The traffic pressure on other roads if Leapale Road is closed to two-way traffic is likely to be significant. York Road and its roundabout junction with Onslow Street/Woodbridge Road could have worse congestion than now.

#### k) North Street

The society welcomes the strategy to turn part of North Street into a pedestrian area for a large part of the day. Whilst the Strategy is laudable it needs to be turned into an implementable plan.

The proposals for revising the road surface look uninspired and a missed opportunity. A multiplicity of surfaces, unlike the High Street, looks unattractive.

North Street has a collection of mismatched buildings of various qualities. To make North Street attractive the Council needs to provide leadership to show North Street can be revived and rejuvenated. With other major developments due in North Street e.g. House of Fraser should a short SPD be produced to manage future development across multiple sites?

There also needs to be a robust commitment from GBC/SCC to maintain the new Pedestrian Area.

#### l) The Existing Friary Centre

It is apparent that M&G who continue to own the existing Friary Centre have not been totally co-operative with the proposed development.

There doesn't appear to have been positive engagement with enabling linkages across the centre to allow access to the west side of the town, especially the Station. As well as limiting permeability, it also impacts the bus station as North Street residents will be using the bus station concourse to access the Friary. With a revision to one of the retail units a proper entrance to the Friary could be achieved at the North end of the proposed square on the south end of Commercial Road. Enabling this entrance would have benefits both for North Street and the Friary. The Society does appreciate that the Friary Centre does have concerns at 24 access and we would expect any links would be time limited.

It would be interesting to understand the M&G strategy for the Friary Centre as there are obvious plans for No 1 Onslow Street at the north end of the site and there may be other proposals being evolved for the retail centre.

#### m) Retail Impact

There is no discussion on the impact on Retailers in North Street and the Market. Retailers should benefit from pedestrianisation but deliveries and in some cases collections from retailers will be compromised. These should be solvable issues, but have they been discussed and agreed with the retail community?

The Market will benefit from wider pavements, many market traders use vans for storage during the day or as a retail outlet. The access and parking of vans needs to be considered particularly as the levels in North Street are a challenge.

Guildford Society May 2022

## APPENDIX - POLICY A5: North Street redevelopment, Guildford

Allocation	<p>The site is allocated for a comprehensive mixed use redevelopment with an additional:</p> <ul style="list-style-type: none"> <li>(1) Approximately 41,000 sq m (gross) comparison retail floorspace or a figure that is consistent with subsequent updates to the Guildford Retail and Leisure studies</li> <li>(2) Approximately 6,000 sq m food and drink (A3) and drinking establishments (A4)</li> <li>(3) Approximately 400 homes (C3)</li> <li>(4) Provision of 1 gym (D2)</li> </ul>
Requirements	<p><u>Office provision</u></p> <ul style="list-style-type: none"> <li>(1) A minimum of 5,500 sq m of existing office (B1a) floorspace will be retained</li> </ul> <p><u>Design, vitality and connectivity</u></p> <ul style="list-style-type: none"> <li>(2) Development must respond to the context set by the surrounding street pattern and historic environment, including the adjacent Conservation Area, through the need for high quality design and materials, with particular care of massing, heights and roofscapes</li> <li>(3) If demonstrated through the Design and Access Statement that providing the proposed scale of development on site is not consistent with good design then the proposed residential quantum should be reduced so that retail needs are met</li> <li>(4) Design to enhance and respond to the existing historic shopping core and; <ul style="list-style-type: none"> <li>(a) Improve connectivity with High Street and lanes, and</li> <li>(b) Improve underused areas, and</li> <li>(c) Improve the public realm</li> </ul> </li> <li>(5) Provide a varied roofscape, minimising the impact on the skyline to protect views in and out of the site</li> <li>(6) Mix day and night time uses to add to vitality of area</li> <li>(7) 24 hour access to public streets and squares</li> </ul> <p><u>Bus interchange</u></p> <ul style="list-style-type: none"> <li>(8) Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site</li> <li>(9) If alternative arrangement involves on-street provision of bus stops and waiting facilities within the town centre, consideration is required of interactions with other uses such as North Street market, vehicular access and parking, movement and crossings for pedestrians, and the quality, character and setting of the town centre environment</li> </ul> <p><u>Transport</u></p> <ul style="list-style-type: none"> <li>(10) Stopping up and/or Traffic Regulation Orders to restrict certain vehicle types on Commercial Road and Woodbridge Road (between North Street and Leapale Road)</li> <li>(11) Mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses</li> </ul> <p><u>Flood risk</u></p> <ul style="list-style-type: none"> <li>(12) Achieve flood risk betterment, appropriate mitigation and flood risk management, and have regard to the recommendations of the Level 2 SFRA</li> <li>(13) Avoid development of more or highly vulnerable uses in flood zone 2 (medium risk) and flood zone 3 (high risk)</li> </ul> <p><u>Assessments</u></p> <ul style="list-style-type: none"> <li>(14) Including; (a) Retail impact assessment (b) Environmental Impact Assessment</li> </ul>
Opportunities	<ul style="list-style-type: none"> <li>(1) This site offers a major opportunity to reinforce Guildford's comparison retail offer, provide town centre housing, to create new squares and streets, and to improve the appearance of North Street</li> <li>(2) Help to reduce flood risk in the local area</li> </ul>