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29th September 2023

Dear Mr Busher

23/P/01211 | A mixed use redevelopment on a site bounded by North Street, Leapale Road and including Commercial Road and part of Woodbridge Road, Guildford comprising: ? Demolition of existing buildings; A new bus interchange with new access junction arrangement, new canopy, waiting facilities, a hard and soft landscaped pedestrian public area and hardstanding; Erection of buildings ranging from 4 to 11 storeys

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1/SUMMARY

The Society **objects** to the proposed scheme

The Guildford Society is the Civic Society for Guildford Town and the surrounding area and has been operational for over 100 years. As such it has been involved in commenting on and encouraging appropriate development in the town as well as protecting Guildford's unique heritage and countryside.

The Guildford Society objected to the original scheme (22/P/01336) which was rejected by the Guildford Borough Council (GBC) planning committee in January 2023. The Society has also submitted a letter to the Planning inspector who may examine the appeal on the original scheme in early 2024.

In our examination of the revised scheme 23/P/01211 the subject of this letter, as well as examining the scheme as proposed, we have also taken into account how the revised scheme addresses some of the reasons for refusal detailed in the GBC Decision Note 23/1/2023. (Where appropriate we have replicated the Decision Notice paragraph in shortened form).

Our **Objection** relates to:-

- The Overdevelopment of the Site
- Poor Quality of the Design and it's resulting impact on the town and it's heritage.
- Transport changes, particularly Leapale Road.
- We also comment on some more minor matters.

2/ THE SITE NEEDS DEVELOPMENT

The site, which covers part of the site outlined in Local Plan Strategic Sites (LPSS2019) - Policy A5 in the current local plan, is a complex triangular site which has remained dormant for many years, being used mainly for carparking for over two decades, with the exception of Dominion House at the Northern end.

The Society considers that St Edward has now been brought forward as serious proposal for consideration, and also commends the developers on the engagement we have had on the development of the proposals. This consultation has included public events, briefings, and the production for the original scheme of a fully developed model of the site. The Society notes that this far more than other major schemes have conducted in Guildford. Various Society members have visited several St Edwards sites, and in general have been impressed by the quality and arrangement of the developments.

The proposed development has many attractive aspects including:

- A retention of basic road layout/ urban form in the form of pedestrianised areas.
- Flexible Multi-use space on the ground floor to allow for development of active frontages.
- New public areas
- Proposals to make North Street more attractive through pedestrianisation.
- Sustainable Heating and Ventilation
- Upgraded Bus Station

The North Street Development is a vital site in the centre of Guildford and has been derelict/dormant for too long. It requires a high-quality development on the site that respects and enhances the Guildford townscape. The Society also supports the site being used for housing.

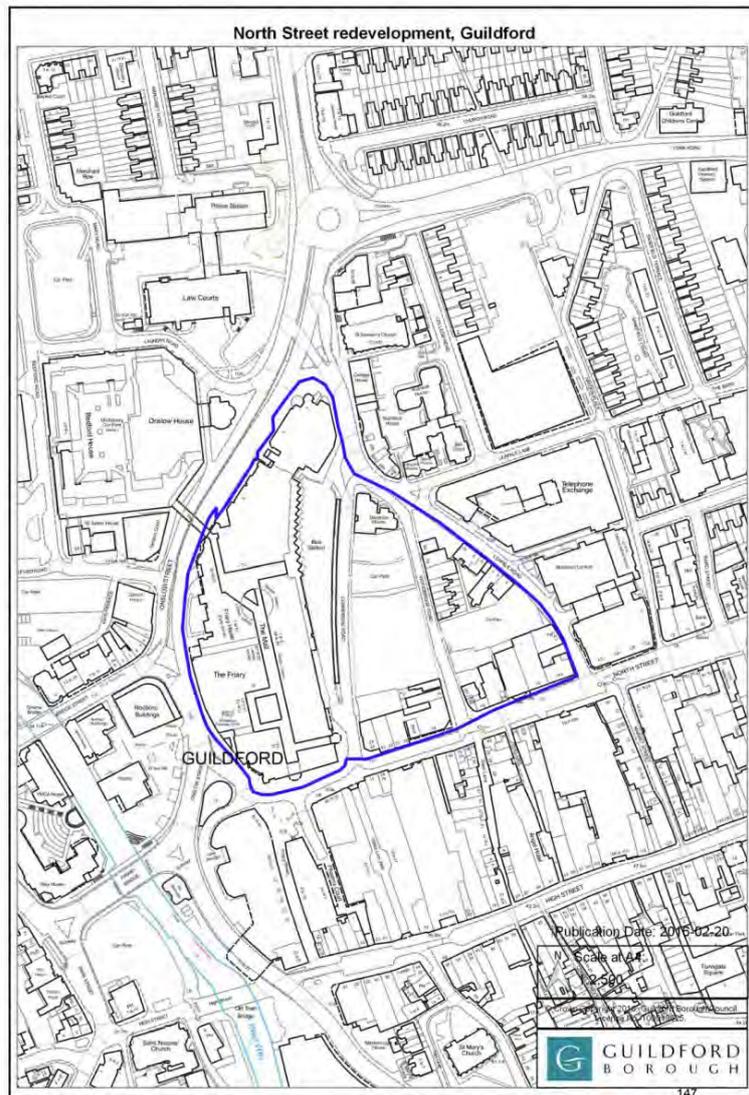
The site has an impact across the town in terms of place making, visibility, social make-up, and transport links and traffic flows. It needs to be a very carefully considered development which has the potential to enhance the town for years to come.

Despite efforts by the developers, we feel the revised scheme still fails to meet the challenges of the site and fully address the issues raised with the original scheme. We recognize progress has been made with the revised scheme with welcome changes including an attempt to resolve the concerns on the Bus Station Layout and the provision of a green space in the centre of the scheme.

3/ POLICIES GUIDING THE DEVELOPMENT

a. Policy A5

The original scope of Local Plan Policy A5 that refers to the site that covered a large site with frontages along North Street, Onslow Street and Leapale Road.



The St Edward North Street Plan is only covering a part of the allocated land in the policy, and other developments have been approved for various parts of the site.

The Society understands the applicant was interested in extending the site to cover a larger area but has failed to agree commercial terms for several parts of the site.

The Status of the various elements of the whole site are:

North Street Development (Blue) - 23/P/01211 Application
 Bus Station (Grey) - 23/P/01211 Application
 No17 North Street (Black) (Historic Building) – 23/P/01212 (Not being Redeveloped)

Friary Centre (Green) – No current planning application
 No1 Onslow Street (Red) 21/P/00539 – Approved
 Norwich House (Yellow) 22/P/01699 – Approved
 Barclays Bank (Brown) 23/P/00984 – Approved
 North Street Buildings no development proposals (Purple)

Notes :

- a) The Bus Station is in part placed over the underground No1 Onslow Street parking area, which is difficult to build upon.
- b) North Street to south of Site (Black Arrow) is, as part of 23/P/01211, proposed to be changed into a mainly pedestrian area with an upgrading of the Street area.



Comments on Policy 5:

Retail and Leisure

The Policy 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”*

Lambert Smith Hampton (LSH) on behalf of the council have re-examined the retail provision in the revised scheme, having previously supported the removal in the original scheme of the very large retail footprint envisaged in Policy 5, which assumed little retail impact from on-line retailing and was created before the Covid pandemic. The revised scheme provides 2000Sq/M of the comparison retail and F&B.

Has this statement been adopted by the council as a correct view of the retail environment? It also needs to be integrated with other retail developments in the town e.g. St Mary’s Wharf will be contributing new/replacement floorspace.

No of Dwellings

Policy A5 also proposed an additional 400 dwellings across the whole site. This now appears to have been allocated exclusively to the eastern sector of the site, with an uplift of 71 units partially in compensation for the Retail/Commercial area having been substantially reduced.

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 370 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 1.7HA for a scheme on policy A5 – assuming 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 Studio site being 700 plus DpHa but in a building height of only 6 stories. Flats and housing should exhibit substantially lower densities.

Extension to Policy A5 area.

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. There seems to have been little recent strategic view taken on the future of North Street, taking into account what use should be encouraged, and how should the built environment be developed on both North and South sides, with details on mass and scale of buildings. As an example, rumours exist that one substantial property might be converted to a hotel – how is this to be accommodated on North Street when pedestrianised?

Policy A5 should have been subject to a change process with an examination of the options for the Area. The public have never seen a planning brief for the site that should have been available to guide the development of this key site.

b. Development Management Policies (DMP)

GBC have recently adopted, post the refusal of the planning permission for the original scheme, the Development Management Policies (DMP) 2023 to support the Local Plan Strategy and Sites 2015-2034 (LPSS) adopted in 2019.

DMP Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

This states in the introduction

“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 that 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

4/ HEIGHT SCALE AND MASSING

(Decision Notice - 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 revised scheme 23/P/01226 still represents an overdevelopment of the site resulting in an unacceptable Mass and Scale for its location.

Policy A5, as noted above, 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, it is not agreed (See Letter Surrey Heartlands 1-9-2023 on the GBC Planning Portal 23/P/01211), and that the Policy A5 requirement for a gym facility has disappeared. Although there is public space most of this is hard surfaced with limited green space.

Density

The North Street proposal (of circa 370 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 eleven storeys high. The taller blocks, eight storeys and rising to eleven have a detrimental impact on several of the key views (the views are those referred to in ' Guildford Town Centre Views' Supplementary Planning Document') in the town centre.

The scale of the proposals and relentless high massing, notably along Leapale Road, will form more 'detractor ' buildings in the town and will adversely affect 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 affect 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 the immediate streetscape and more widely when viewed from across the Town and surrounding country.

The Developer details that the revised scheme will provide 471 units which is to be welcomed. However, Guildford Town Centre is planned to deliver approx. 1400 Dwelling Units in the LPSS 2019. There are now if the North Street Plan is consented due to be 2200 dwelling units built or in development. The majority of these units are Single Bed units. The Town Centre is in danger of losing its mix of dwellings to meet the requirements of Singles, New Families, and potentially Down Sizers. The North Street Development is built in a very inflexible manner and doesn't appear designed to allow for adaptable accommodation over the decades ahead. Are we placemaking for a mono-culture of central Guildford dwellers?

5/ 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. The Guildford Town Centre Views SPD also sets out that buildings should allow for views through sites – although this is apparent in some parts of the proposed development many of the blocks are very large with long frontages preventing views through the site.

Block E that has been redesigned as lower but wider block is in a prominent position at the north end of the site. As we will illustrate below (7 Heritage) Block E has a considerable impact on the streetscape when combined with other developments. We feel Block E doesn't improve except for height on the original proposals.

The tallest building in the proposed development Block E should be considered with reference to the National Model Design Code which states:

Tall Buildings Design Principles:

Tall buildings are, by their nature, one-offs and need to be designed to the highest architectural quality because of their prominence. They can be designed in a variety of architectural styles, but the following principles apply to all tall buildings:

Top: The top of the building and its impact on the skyline needs to be carefully considered. Services needs to be concealed and both the street views and the long views need to be considered.

Form: The form and silhouette of the building needs to be considered. The long and short elevations need to be well-proportioned in terms of their slenderness. Materials: The use of materials need to be consistent and simple.

Base: The tall building needs to follow the building line at street level. To do this it may rise from a base or plinth that is scaled to the surrounding buildings.

Public realm: Public spaces around the base of tall buildings need to be generous, well designed and contribute positively to the local context.

DMP Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness places great emphasis on design quality we would take just one para 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”

We consider north Street to be a poor response to this policy with very generic, bland architecture (See illustration of one of the units on Leapale Rd) and a cramped layout.



3D View

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 in the DSE letter 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 **Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness** para 3 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.

6/ IMPACT ON THE TOWN

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 some 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 verified views have been provided to show how Leapale Road will look in the future, there is one artistic impression in the Design and Access statement at Page 265.

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 letter submitted by the Surrey Hills AONB (21-8-2023 on Planning Portal) summarises the issues related to this development and the wider town centre succinctly:

My concern centred not just on this proposal for tall buildings but the cumulative effect of several proposals, including permissions, for tall buildings on the character of Guildford at the foot of the Surrey Hills AONB. In my judgement, they harm important public views from the Surrey Hills AONB to the town forming part of the setting of the Surrey Hills AONB. a Problem has been no height of buildings policy for Guildford.

I note that this latest application reduces the height of the 13 storey building and makes a few other changes. That is an improvement, but I would have preferred the changes to have gone further in reducing the heights of buildings. The current brick external colour of the previous tallest building again is an improvement of the previous light colour that would have contrasted with the dark background of other buildings and accentuate its incongruous nature when seen from higher ground of the AONB.

I also note that the Borough Council had earlier intended to adopt an SPD on the height of buildings or to have one included as a policy in its local plan. It is regretted, that was not progressed. What this latest application and previous proposals highlight is the urgent need for the Borough Council to prepare and adopt a formal policy controlling more tightly the heights of further buildings within the town. Guildford is an historic town and full of character in many places. Being close to the Surrey Hills AONB it is important to the setting of the AONB which Government, Local Plan and Surrey Hills AONB Management Policies seek to protect as explained in my advice set out below on the previous application. Guildford should not be allowed to go the way even of approaching the high rise development of Woking which does not border the AONB, as does Guildford, and where the circumstances are different. Therefore, irrespective of the Borough Council's determination of this current application, the Borough Council is urged to progress and adopt as soon as possible a height of buildings policy statement to form a material planning consideration in determining planning applications and not wait for the next review of the Local Plan.

The Society also endorses the concerns on views and their creation documented comprehensively in the **Guildford Residents Association (GRA) Letter 15/9/2023**_– Lodged on Planning Portal 23/9/23

The Society also notes the Town Centre Views SPD discusses detractor buildings e.g. Surrey Police and Onslow House when viewed across Dapdune Walk to the Town Centre.

The SPD also states that

“4.8 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.

The Society contends that the Mass and Scale of the North Street Development is creating a new detractor building when viewed from many directions.

The Society would also highlight.

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, a full illustration of these issues can be found in HERITAGE section below.

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 Proposed Development plus cumulative scheme

If you look at the illustrations provided in rough form at Section 4 above you can see a mess of conflicting designs with no coherence on the entrance to Guildford.

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 affect 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 it 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 Proposed Development plus cumulative scheme

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



Representative view 12 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 D4: Achieving High Quality Design and Respecting Local Distinctiveness** 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 who noted in their letter 11-11-2022 that:

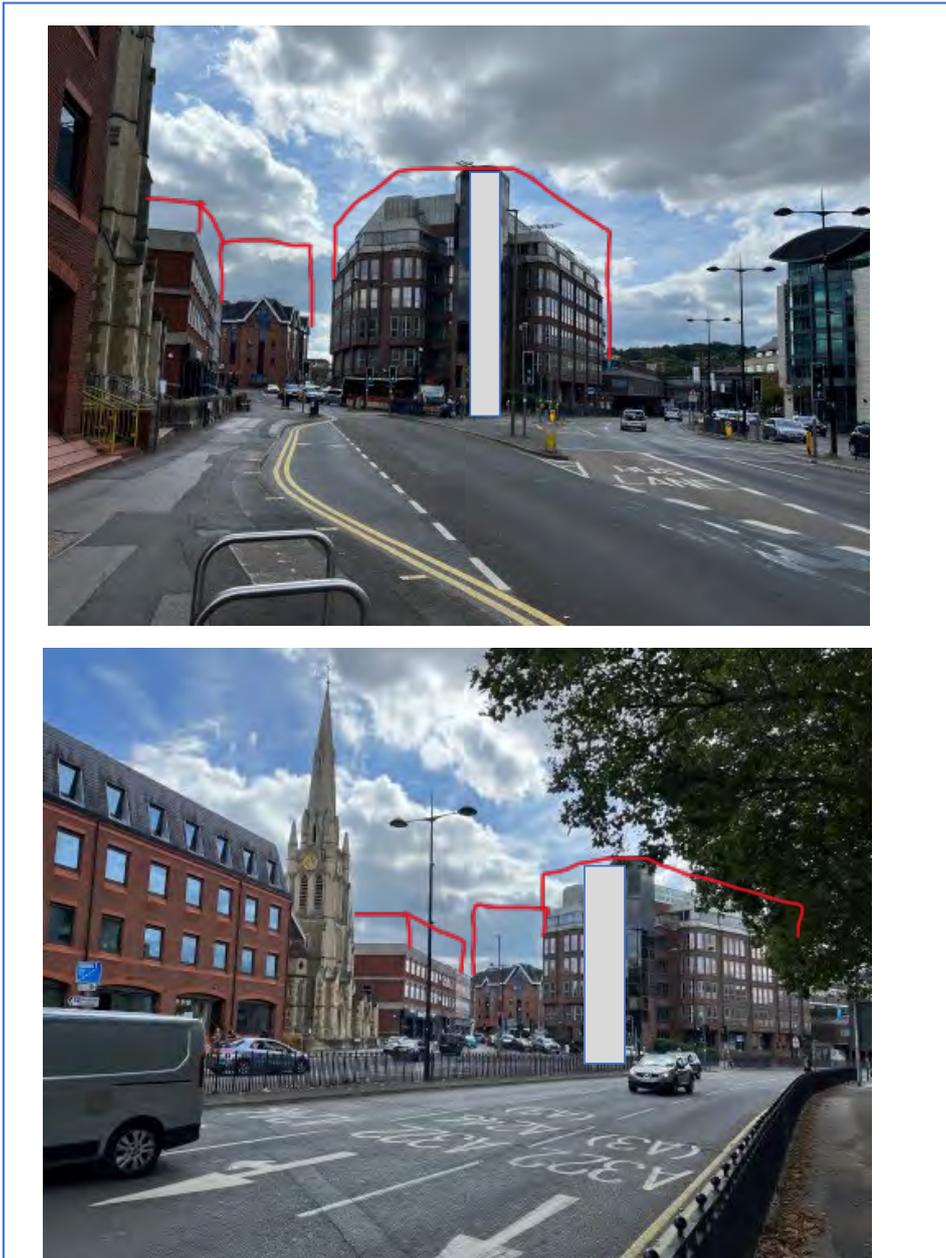
Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of the NPPF, in particular paragraph 195.

7/ HERITAGE

(Decision Notice: 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.)

There is a particular risk to the setting of St Saviours Church (Historic England - Grade II Listed) 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 potential 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 our rough diagram on next page.

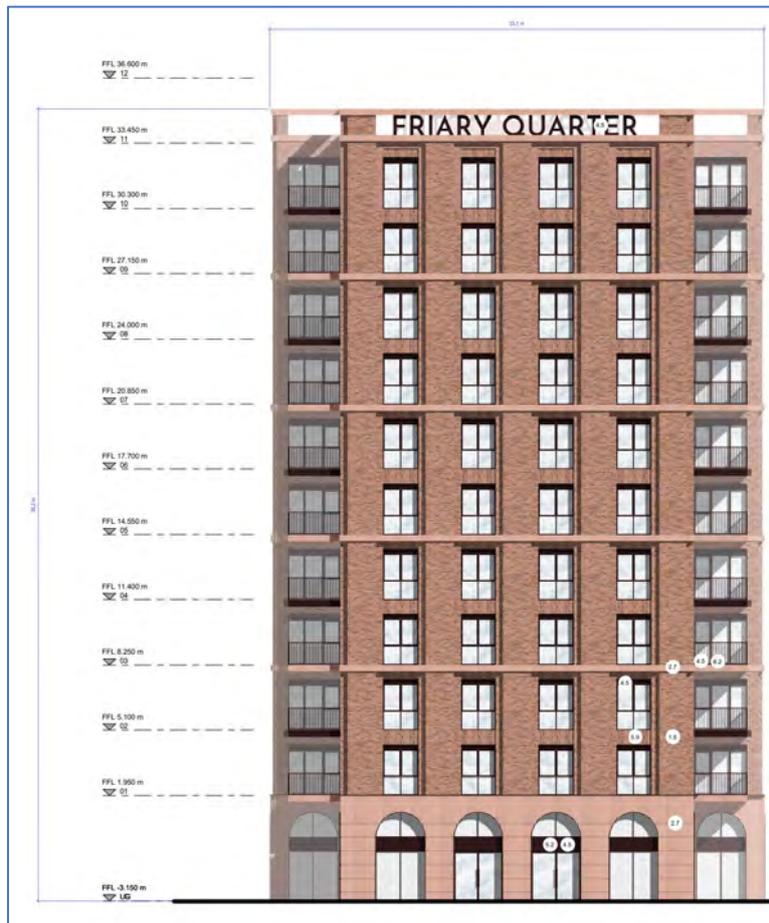


We are aware of three schemes that affect the end of Woodbridge Road, see more detailed illustrations below.

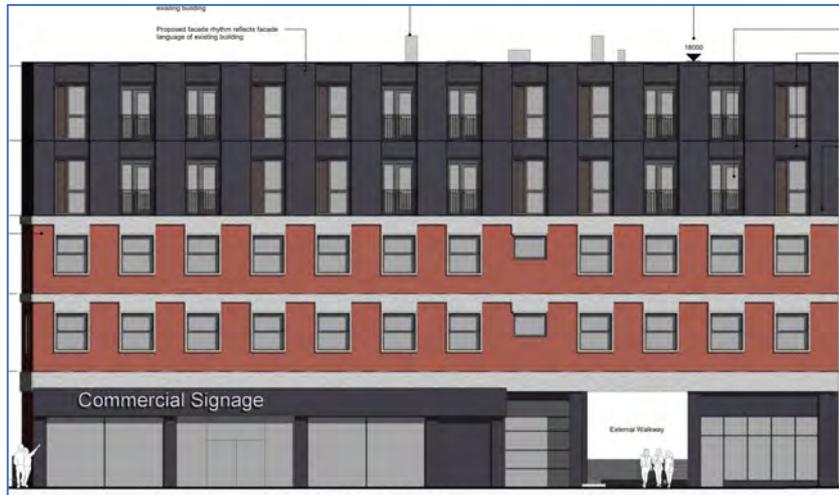
No 1 Onslow Street



North Street



89 Woodbridge Road – a proposed PDR withdrawn but it is possible a revised proposal will be submitted. This will add two stories to the existing building



If these developments are proceeded with; they will represent a drastic uncoordinated change to Woodbridge Road. At the very least there should be visualisation exercise completed to understand how the streetscape might develop in this area.

We note that Historic England in their letter of the 18th August still express concerns concluding “*that the ‘application does not meet the requirements of the NPPF, in particular paragraph 195 and believe harm could be reduced further.....’*”

8/ TRANSPORT

The Decision to refuse the original application 22/p/01336 had points 1,2,3 related to transport.

Buses

(Decision Notice - 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,)

(Decision Notice - 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,)

(Decision Notice - 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.)

We understand SCC and GBC are now content that the revised scheme as represented by 23/P/1211 has broadly solved the issues documented in the decision letter.

The Society believes the reduction of bus stands is acceptable particularly as new bus stands are to be provided at Guildford Station (Solum Development), 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 and has recently been extended to areas of Guildford.

Unfortunately, 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.

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.

The Society requests that, at least, passive provision is made for opportunity charging of electric charging of EV- Buses, which may have to include accommodation of load balancing capabilities. This technology is rapidly gaining popularity on the continent and installation has started on a couple of routes in London. In addition to charging batteries, these chargers also allow EV Buses to be lighter as lower capacity batteries can be installed with confidence.

Surrey County Council in their note 21-9-2023 mention in their notes to the case officer that they anticipate moving Park and Ride Services from the bus services to use the 4 stops being provided at the north end of North Street. This would avoid the need to use stops in the bus station. One assumes this moving of the services would likely require cross Guildford Services to be instituted e.g. Artington to the Merrow, it would also potentially increase bus traffic along Leapale Rd and also buses 'U' turning at York Road roundabout.

The Bus Station has one limitation, which should be documented, for bus operations in that as configured 'bendy' buses will never be able to use the facility.

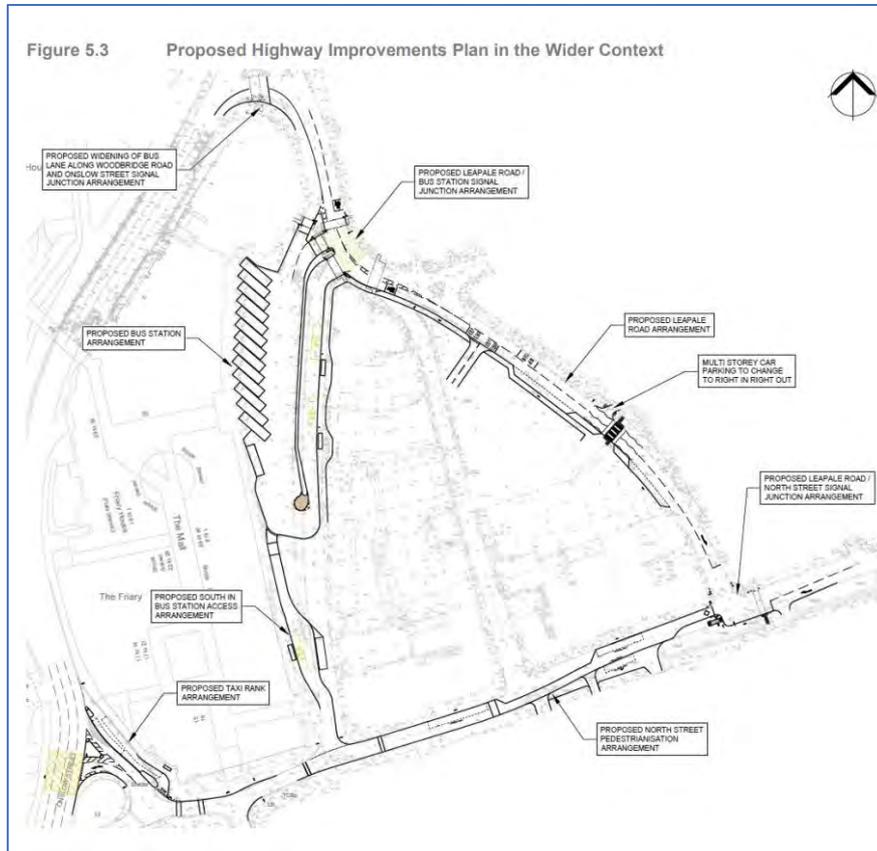
We note the consultants used a wall to wall turning circle form Alexander Dennis E200 which has a lesser turning radius than the commonly adopted 12.5 M radius. It is noted buses on the swept path analysis will come close to pavements. Other bus types may even overlap the pavement – has this been examined?

The Society believes the layover lane in the middle of the Bus Station is operationally difficult as bus drivers will need exceptional accuracy when backing out of bus stands. This will make for slower operations which may be an issue as traffic builds up. This will need careful management.

The Society accepts the revised bus station proposals remove the reasons to be concerned about bus timings accessing the Bus Station for services from the South and West.

Road Network

The Society remains concerned about aspects of the road network:



Leapale Road from North Street to Onslow Street appears to be a very complex arrangement trying to fit in buses, Deliveries to the North Street Site, Parking Access, and through vehicular traffic. In particular The Society considers that:

- a) A right turn into the Leapale Rd Car Park could cause queuing along North Street and delay bus traffic. (Note cars often queue in Leapale Road at present at present, for a left hand turn, but the effects are limited by the road being one way).
- b) Leapale Road ceases to be interceptor car park for traffic from north Guildford as access will be far easier from the east. Has this been factored into the traffic plans.
- c) Though traffic on Leapale Road seems to be a unknown factor. Should all efforts be made to discourage through traffic and use Stoke Road/York Road instead.

Commercial Vehicles

The weight limit is to be 7.5 tons, has this been agreed with retailers affected e.g. Marks and Spencer.

Gyratory Yellow Box.

A large amount of traffic comes from the west to access Millmead, down Bridge Street, the yellow box could cause traffic to back onto the Onslow Street/ Bridge Street junction compared to the current arrangements, effectively blocking flow out of Bridge Street. The Society believes this junction needs to be optimized in a different manner – or commit to far more intelligent traffic light signaling than is currently implemented.

Cycling

The Society notes the generous provision of cycle stands which is to be commended.

It is not clear if the pedestrian part of North Street will accommodate cycle paths, it is understood North Street is proposed as a cycle route as part of the evolving SMC and cycle route Strategy.

We also note the concerns expressed by Active Travel England in their note of the 14th September. They highlight in para 5 that the Guildford Local Cycling and Walking Plan which is under development references that North Street is planned to be part of the Core Cycle network which highlights that cyclists and pedestrians will co-exist in North Street. No detail is provided as how this is going to be accomplished.

Pedestrians

One of the desire lines for pedestrians is to reach the station. This, as currently planned, will be an awkward trip across numerous pedestrian crossings. Many, at appropriate hours, will use the Friary Centre and Bridge across Onslow Street. This route is quick and easy BUT ends in a poorly signposted route using ramps in the car park. Shouldn't this route be properly recognised and proper signage (including hours of operation) be provided?

We believe the scheme should not be consented without clarifying these traffic issues.

9/ VIABILITY AND AFFORDABLE HOUSING

(Decision notice - The applicant has failed to satisfactorily demonstrate that providing a greater quantum of affordable housing)

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 at the same time to budget considerable sums on a revised scheme and possibly the costs of an appeal. St Edwards also state in their letter of 19th September 2023 that they need to achieve 3% to 4% growth in revenue per annum over cost inflation over the lifecycle 8 years of the scheme.

The scheme seems, on the data presented, to be an 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 of the large developers.

- c) Will elements of the scheme be sold on, as has happened at the Solum development at the Station.

10/ OTHER COMMENTS

- a) The Society notes the letter from Thames Water 30-8-2023. Thames Water highlight issues with Drainage, Main Water Mains and protection of a Source Protection Zone for groundwater abstraction. These are assumed to be solvable issues, but it is hoped the developer has budgeted for the costs involved?
- b) Fire risks. The development correctly will allow for charging of EV's in the garage and Cycles. Electric Cars, which are covered by rigorous construction and use regulations, are probably a minimal fire risk. Sadly Cycles appear to be less controlled and there have been several spontaneous fires. Electric fires are complex to control has this been discussed as part of the design process?
- c) **(Decision notice** The site lies within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area (TBHSPA). In the absence)
This note 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.
- d) **(Decision Notice** In the absence of a completed planning obligation the development fails to mitigate its impact on infrastructure provision.)
The Society in relation to contribution towards the off-site provision of children's play space, asks has space for this been identified within easy access of the site?

Yours Sincerely

Alistair Smith

Chair - The Guildford Society

(23-p-01211 Revised North Street Scheme V3)