

19 December 2022

Dear Members,

I am writing to set out Surrey County Council's (SCC) strategic objections to the Planning Application 22/P/01336, the proposed redevelopment of land at North Street Guildford, scheduled to be presented to Guildford Borough Council's (GBC) Planning Committee on 11 January.

SCC's concerns are shared by Stagecoach Buses and Safeguard Coaches, both of which have themselves also made formal objections to the planning application by both bus companies. These objections can be viewed on GBC's planning pages by clicking [here](#).

The three main objections are as follows:

1. The proposal to remove the southern access point will lead to increased bus journey times to the detriment of existing and potential bus users. This will prejudice the operation of efficient and resilient bus service operations and compromise bus service reliability, customer satisfaction levels and critically any potential growth in passenger numbers, not only in Guildford but also surrounding boroughs that the network serves.
2. The reduction of the bus station capacity by 42% compared to the current provision, (28 existing bus bays reduced to 16), which when combined with the removal of the southern access point will fail to accommodate future passenger growth to meet the needs and requirements of:
 - a. Surrey's Bus Service Improvement Plan
 - b. GBC's Local Plan Strategic House sites
 - c. SCC's Local Transport Plan (LTP4)
3. It has not been demonstrated that the proposed bus station is accessible for all users.

Unfortunately, in SCC's view, the current Planning Application does not align with the aspirations of our adopted Local Transport Plan 4 and will in fact, make the local bus offer less effective and accessible for residents and businesses. Bus journeys will be longer and less attractive, the bus operating environment will be constrained leading to inefficient services and further delays for passengers, and there will be no scope for bus service growth. For these reasons, SCC is objecting to the Planning Application.

That said, SCC agrees that the bus station is in desperate need of improvement, and SCC officers are keen to collaborate with GBC and the applicant, St Edward, to create a successful, vibrant, and above all, sustainable redevelopment of this town centre site. Indeed, SCC entered into pre-planning application discussions relating to the bus station with GBC officers and St Edward at the start of 2022. Upon learning earlier this year that the bus station would be reduced in size and that it would be provided with just one point of access, SCC raised concerns that these changes to the station's capacity and operation would mean it would not have sufficient capacity or resilience to meet Guildford's future sustainable transport needs. Consequently, these changes also results lead to concerns about the ability of bus operators to

safely enter and exit the bus station and their ability to use the bus station in an efficient manner. Although SCC raised these concerns as early as possible in the process and has been working with the developer and GBC planning colleagues to mitigate them, the final proposed scheme does not allay these concerns.

I set out SCC's detailed concerns here: Should the planning application be permitted, bus station capacity will reduce by 42% compared to the current provision, (28 existing bus bays reduced to 16), which when combined with the removal of the southern access point will:

- a. Lead to increased bus journey times to the detriment of existing and potential bus users.
- b. Fail to accommodate future passenger growth to meet the needs and requirements of Surrey's Bus Service Improvement Plan, GBC's Local Plan Strategic House Sites; and LTP4
- c. Fail to meet the aspirations of the emerging 'Shaping Guildford's Future' project.
- d. Prejudice the operation of efficient and resilient bus service operations,
- e. Compromise bus service reliability, customer satisfaction levels and critically any potential growth in passenger numbers.

More detailed commentary relating to the above concerns is attached in our revised formal response to this planning application.

SCC has had a good working relationship with St Edward and its representatives, and over the last few weeks St Edwards have succeeded in reducing the previously recommended eight reasons for refusal down to just three. In addition, the company has committed to some additional transport mitigation measures that will go a small way towards addressing our concerns. These measures comprise the widening of the Woodbridge Road bus lane between Commercial Road and Onslow Street; the safeguarding of an emergency access point from the south for bus services via North Street; the provision of further expanded passenger and bus staff facilities at the bus station; and the provision of public transport vouchers for new residents. St Edwards have also offered financial contribution by way of partial mitigation against our concerns relating to significantly increased bus journey times on the town centre network arising directly from the impact of the development. Whilst very much welcomed, these combined initiatives do not address the fundamental deficiencies of the proposal that arise from the reduction in bus station capacity and the removal of the southern access point from North Street.

As the highway and transport authority, SCC believes the proposals could easily retain and provide a southern access point without diluting the quality of the development, and with minimal adjustment. If the southern access were provided, it is important to note the following:

- The Commercial Road public realm scheme could be retained mostly as proposed.
- Under the current proposals, the section of North Street from Onslow Street to Commercial Road will remain mostly as existing due to its need to cater for Phoenix Court servicing and providing other vehicles with turning space. As such, the North Street pedestrianisation scheme could be built out as currently proposed if the southern access were retained.
- There would be limited impact upon the proposed public realm and landscaped areas of Commercial Road, thus the look and feel of the proposed scheme could be retained.
- Bus passengers could alight buses outside the Friary Centre, or possibly even closer than is currently the case with the existing station layout.
- The adjustments to the taxi rank at the entrance to North Street in the planning application could also be retained, mostly as currently proposed.
- The main built form of the development would be unaffected, along with the majority of the substantive areas of public realm which can still be created within the development and on all of North Street between Commercial and Leapale Roads

SCC's position has been made clear to GBC as landowner, and as planning authority and to St Edward and its representatives.

SCC remains committed to assisting our partners in delivering an exemplar development in this part of the town that contributes to rather than detracts from the aspirations of both SCC and GBC, as well as national policy. SCC recognises that this development presents a once in a generation opportunity to provide the right infrastructure for Guildford's future. Failure to do so will have far reaching implications, impacting amongst others, town centre air quality, the successful delivery of sustainable local plan strategic housing sites, and the successful operation and growth of bus services in Surrey which clearly serve a very substantial number of residents well beyond the geographical boundaries of GBC.

We recognise that you will need to form an objective opinion at the planning committee but wanted you to do so fully aware of SCC's significant concerns. If you have any questions about our position before the meeting of the Planning Committee, our Transport Development Planning team would be happy to assist at email: tdpguildford@surreycc.gov.uk

Yours faithfully,

A handwritten signature in grey ink, appearing to read 'K. Stewart'.

Katie Stewart
Executive Director
Environment, Transport and Infrastructure