

John Busher
Specialist – Development Management (Majors)
Guildford Borough Council
Millmead
Guildford
Surrey
GU2 4BB

10th January 2022

ISSUED VIA EMAIL

Without Prejudice

RE: The Friary Quarter – North Street Regeneration, Guildford Planning Ref. No. 22/P/01336

Dear Mr Busher,

We are writing in relation to the open letter received from Surrey County Council (SCC) Highways addressed to the Guildford Borough Council (GBC) members on the 19th December 2022, in response to our planning application specifically in regard to the bus station amendments contained within our application.

There are several matters within the letter we would like to draw your attention to prior to our application being considered by the Planning Committee. Before addressing the inaccuracies of SCC's letter specifically, we wanted to touch on our overarching vision for our proposed bus station amendments.

Our proposal is a once in a generation opportunity to deliver a comprehensive and high quality new neighbourhood on this important town centre site. A major part of these proposals is of course to bring forward a high quality, reconfigured and refurbished new bus interchange.

The existing bus station is not fit for purpose and has been criticised for too long for being inaccessible, dark, outdated and unsafe. Our plans will significantly improve the experience of existing bus users and attract many more bus users in the future. The plans have also been designed in conjunction with various stakeholders and the community, with consultees having had many opportunities to comment and influence the designs over the years. The bus station designs form part of one of the most comprehensive consultation exercises that our business has ever undertaken.

Not only will this development house over 1,000 new residents, who will indeed use the buses, but it will create a new destination in the town centre which will attract many more visitors and provide much needed new jobs in the future – all creating more journeys and bus usage.

Whilst our proposals reduce the number of bus stands and redirect some of the bus journeys around the gyratory system, the benefits that flow from the reconfigured northern access and egress are huge.

By SCC's own admission, the average length of journey time is only increased by 21 seconds in the AM peak and in fact actually decreases by 3 seconds in the PM peak. This feels like a proportionate and reasonable price to pay to create a beautiful new pedestrian prioritised section of North Street and unlocks over 1.6 acres of beautiful new public realm for the community to enjoy.

Notwithstanding the limited impact on bus journey times, we have also offered to commit £1.5 million to be contributed towards bus infrastructure projects in the future to assist in alleviating these increased journeys. This is a significant investment to make on top of an already vast infrastructure package.

Our consultants have demonstrated time and time again that the new bus interchange will not result in any reduction of services from the existing timetable, which is 52 departures per hour. The new 16 bus stand proposal can accommodate up to 92 departures per hour, which demonstrates an increase of 77% from today's timetable, proving there is sufficient headroom secured for future growth. This has been independently verified by two separate consultants instructed by GBC.

This capacity is being secured on the back-drop of a continued reduction in bus services nationally, as a result of an ongoing decline in usage. This decline is no doubt as a result of poor quality facilities and inconsistencies in services and a lack of subsidies and funding. SCC has announced themselves that they will be implementing a County wide reduction in bus services, which is currently out for consultation.

The new bus interchange proposed in our scheme will be more open, safe, welcoming and light and will include significantly more seating, technology, signage and wayfinding to improve the experience for all users. The designs also feature a glazed wall to protect bus users from inclement weather, and a striking new architectural canopy. These designs integrate the bus station into the new Friary Square landscaped pocket park and create a sense of arrival into Guildford town centre that this wonderful town deserves.

It is difficult to see how our proposals could "reduce customer satisfaction" from the existing facility, as claimed by SCC, as it is also difficult to see how any marked improvements to this facility will be realised if this scheme were not to come forward, as funding or subsidies would not be made readily available locally or nationally to improve it. That is why the facility has continued to decline over the years.

There are a number of inaccuracies and claims within SCC's letter which we have sought to address in turn below.

1. Reduction in Bus Capacity

SCC's letter incorrectly states that our proposals reduce the capacity of the bus station by 42%. They claim that we are reducing the number of bus stands from 28 to 16. That is factually inaccurate.

For clarity, please see the below which shows a comparison of the number of bus stands and layover spaces of our proposals against the existing bus station:

	Existing	Proposed	% Change
Bus Stands	22	16	(27%)
Layover	6	6	-
TOTAL	28	22	(21%)

Whilst our proposals result in a reduction in the number of bus stands, we have undertaken detailed technical analysis showing that with the number of services today, and indeed even before COVID reduced the number of services, the new bus station proposals can accommodate the services and further growth in the future as detailed above.

To reiterate, there are currently 52 departures per hour. Before COVID there were 73 departures per hour and our 16 bus stand facility will have the potential capacity for 92 departures per hour.

Indeed, if further bus usage is required in the future there are a number of off-site options available in close proximity to the site, which could pick up any additional capacity over and above what could be secured in this facility. Examples include bus stands at Guildford train station, or as a part of the 'Shaping Guildford's Future' town centre masterplan work, such as on Bridge Street or within the Bedford Wharf development area.

2. Accessibility

We are disappointed that SCC consider our proposals to not be accessible for all users. We have worked extensively with our accessibility consultants, our designers, SCC, GBC and various accessibility groups in the Borough to ensure that our proposals significantly improve accessibility for all users.

The current bus facility does not meet modern accessibility requirements. Our proposals improve wheelchair accessibility to the various bus stands significantly from the existing conditions. We are widening concourses and footpaths and removing obstructive brickwork pillars and are creating a more visibly open concourse which will both physically and visually enable wheelchair users to manoeuvre around the facility.

We are creating tactile paving, we are creating even levels and pausing points, where there is currently sloping or change in levels, we are delivering appropriate signage and technology for those who are visually impaired and we will ensure an appropriate management strategy is implemented with the operators once the new bus station is built and operational in conjunction with GBC.

These are all clear commitments we have made within our application documents. It is difficult to see how SCC has concluded that our proposals are not accessible for all users.

We have submitted various detailed technical reports demonstrating our proposals are indeed accessible and have been designed to the appropriate standards and we would welcome sharing these with the various members or stakeholders to provide further information.

3. Maintaining a Southern Access Point

SCC has stated that they believe maintaining a southern access will overcome the majority of their concerns. They have claimed that maintaining this access would not have a significant impact on the Friary Square pocket park. For context, we have appended a landscaped masterplan showing our proposed pocket park, including the landscaping, informal play spaces, and rain garden.

We have also attached a mark-up plan showing the impact of including a southern access, overlaid onto our proposed Friary Square pocket park. We have drawn this to demonstrate the significant impact that SCC's proposal would have on this key piece of new town centre public realm. To achieve a passenger drop-off and further bus stands in this location as requested, the majority of the new soft landscaping, play spaces and rain garden in this space will be lost. It will become dominated by roads.

We are not only concerned with the physical impact on the public realm but the change of the proposed character of this area. The current plans create a pedestrianised new pocket park which is safe and welcoming for all to enjoy, whilst SCC's request will maintain the current dominance of large vehicular movements in this part of the town centre.

The current design for the pocket park creates a flat and level surface which is accessible and welcoming to all and SCC's request for a bus lane to dissect through this space would introduce kerbs limiting accessibility, not to mention affecting quiet enjoyment of this space, knowing the buses are constantly driving through it.

Whilst the current designs propose that servicing vehicles and emergency vehicles will have occasional access to this area, this is vastly different from over 29 buses per hour travelling through this space. This would indeed increase further if more buses are required in the future, as SCC claim they will.

Summary and Conclusion

We strongly feel that SCC's request to maintain the southern access is not reasonable or justified in light of our detailed technical analysis.

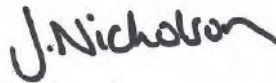
This proposal is a once in a generation opportunity to significantly improve the bus station, deliver an exceptional piece of public realm and unlock the pedestrianisation of this key section of North Street outside the entrance to the Friary Centre, which is much needed in Guildford and is an important first step towards realising the 'Shaping Guildford's Future' Town Centre Masterplan.

Whilst we appreciate that the provision of buses is very important, it is also fundamental that we make the best use of prime town centre land. Having such a dedicated facility is unusual in a town like Guildford. We believe that such land should be used for true public benefit, including beautiful public realm, vibrant and exciting uses, play space and should be used to facilitate investment and provide jobs.

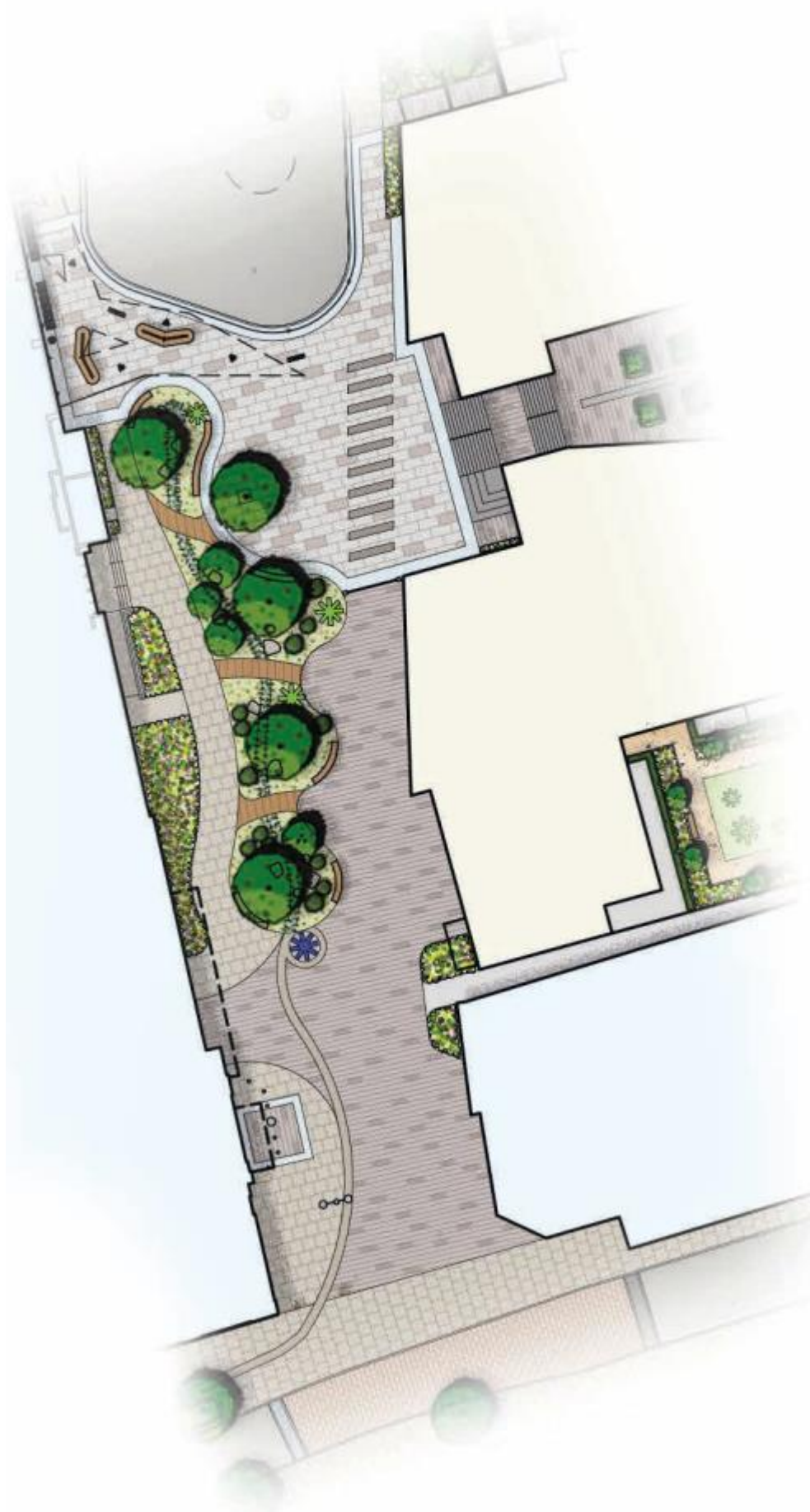
The bus station simply cannot get any bigger in this location without fundamentally impacting on the viability, vitality and the placemaking opportunities that this development would bring.

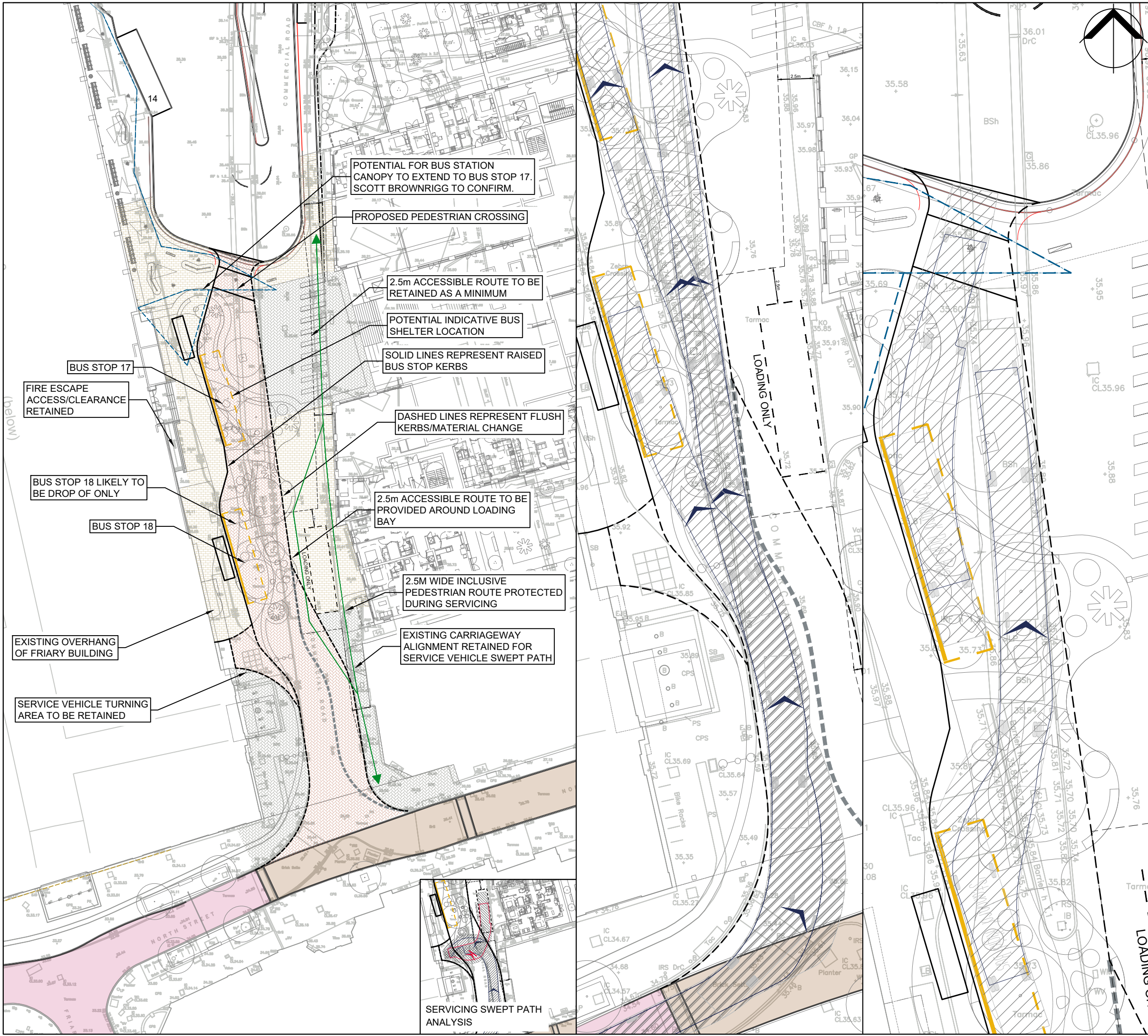
We hope that addressing these points clearly and concisely is useful for the various members in considering the merits of each claim made by SCC. We will readily provide any further information or answer any questions should it be helpful or needed.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'J. Nicholson', with a stylized, cursive flourish at the end.

Jack Nicholson
Land and Development Director
St Edward Homes





NOTES:
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