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Tom Horwood
Joint Chief Executive of Guildford and
Waverley Borough Councils

Dear Councillor

PLANNING COMMITTEE – WEDNESDAY 11 JANUARY 2023

Please find attached the following:

Agenda No Item

Late Sheets - Late Representations and Corrections/Amendments/Updates - 11 Jan 2023
(Pages 1 - 24)

Yours sincerely

Sophie Butcher, Democratic Services Officer

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Planning Committee

11 January 2023

Late Representations

Since the last date for the submission of views on applications/matters before the Committee this evening, representations in respect of the under mentioned applications/matters have been received. The letters, copies of which will be available for inspection by councillors at the meeting, are summarised below.

Item 5 – Planning Applications

22/P/01336 – (Page 15) – Land bounded by the Friary Centre Bus Station, North Street and Leapdale Road, Guildford

Since the publication of the Committee Report, a further 58 letters of objection have been received. These set out the following comments:

- lack of public consultation, further engagement is required [Officer Note: The application has been notified in accordance with relevant legislation. In addition to the notification letters which have been sent to properties in the area immediately surrounding the site, site notices were erected around the area and notices were also published in the local press. The same consultation was carried out when the amended plans were received. Although it is not a statutory requirement, the applicant has also carried out a wide ranging consultation exercise with local stakeholders and members of the public];
- the development is too high and would harm the character of the town;
- inadequate parking is provided;
- reduced bus access to the town centre;
- loss of existing public car parks;
- the scheme is not viable;
- not enough resident parking on local roads and issuing resident permits to the new residents of the scheme will make the situation worse;
- impact on highway safety;
- proposal will overshadow the town turning it into a bad impression of a New Town development;
- the size of the proposed bus station is inadequate;
- the proposal will damage the central business district;
- the proposal is oppressive and will keep people away from visiting the town;
- style of the buildings are unimaginative and totally out of keeping with such a historical town;
- lack of daylight to streets and proposed residential units;
- some comments received in support of the application are identical. Concerns also raised regarding that some responders may not live in the borough [Officer Note: Using a template to submit comments on a planning application is not unusual and

may result in comments which are similar to each other. Using a template does not invalidate the comments which have been made. In addition, the consultation process is open to all, irrespective of whether or not they live in the borough];

- to use ugly 1960s built high rise buildings as a precedent and a reason that these 13 storey buildings will not look out of place is implausible [Officer Note: This is incorrect. Officers do not rely on other taller buildings as a justification for the current proposal. Each of the proposed buildings are considered to be appropriate in their own right];
- no affordable housing and this is 'overcome' by providing 20 shared ownership flats and a possible extra 28 [Officer Note: The 20 shared ownership properties proposed (plus the possible addition of 28 more) would be classed as affordable housing];
- just because this site is a brownfield site it should not mean that town planners should allow absolutely anything to be built there;
- there is no proposed biodiversity [Officer Note: This is incorrect. The proposal would result in a biodiversity net gain of 201%];
- increased traffic in the area;
- lack of local infrastructure (schools, doctors, hospitals etc);
- fire safety hazard from the tall residential buildings [Officer Note: No objection has been raised by the Health and Safety Executive];
- increased pollution;
- proposal brings no enhancement to the streetscene;
- concerns regarding the use of concrete as the main construction material;
- the density of the proposal is too great;
- a town centre should be a place for all the community to meet and should not be turned into a large housing area. The proposal would be better suited to a site on the outskirts of the town;
- the Council should reflect upon the beauty of Zaha Hadid unique architectural developments;
- no planting or open space between the blocks [Officer Note: This is incorrect, the plans show the numerous areas of open space and landscaping are proposed as part of the development];
- no assessment of the durability of the buildings;
- object to the demolition of any existing buildings;
- impact on the safety of shoppers;
- the proposal will be visible from miles around;
- closing of Leapale/Commercial Road will detrimentally affect the flow of traffic through the town centre and restrict access to disabled pick up points, leading to longer queues of traffic;
- removal of parking which is used by worshipers who attend St Saviours Church;
- the town doesn't need more apartments;
- the accommodation should be mainly affordable housing;
- more greed from the council against the wishes of residents;
- concerns regarding the loss of public space and amenities;
- is it okay for the Council to alter listed buildings? Building owners can't do it under any circumstances but the Council will turn a blind eye if it benefits them financially [Officer Note: The application is not made by the Council. The alterations to the listed

building have been assessed against relevant local and national policies and is deemed to be acceptable. This is set out in the report associated with application 22/P/01337];

- the proposal is utterly ill-conceived madness;
- at a time when we are looking at reduction in reliance on cars, surely we should be doing all we can to increase the public transport offerings available, not limiting this and paying lip service to all the efforts that are being made to reduce our carbon emissions;
- it should be a priority to ensure there is room to expand the number of bus stands, bus routes and frequency of journeys starting, ending and passing through the bus station in the coming years;
- the design and scale of the proposal has changed dramatically since the original consultation which took place nearly 18 months ago, however this development is now becoming overbearing for the location, given the height of the development. There also appears to be a lack of green space from the original proposal;
- there is no choice in housing. There is space to include a selection of town homes alongside the flats, not everyone wants to live in a flat;
- there's little thought on the long-term vision for the town and its housing, this development will be dated design wise long before its even built;
- adverse impact on views and harm to the conservation area;
- loss of light and wind tunnels will result;
- the compromises are too great, the result is poor and out of kilter with the Guildford historic streetscape;
- if this scheme is accepted it is an enormous lost opportunity to set the Guildford town centre up for decades and probably more than a century beyond;
- believe it will make access to shopping in Guildford less easy, less attractive and easier and better to go elsewhere, which no one would wish for the town;
- proposal will not augment or complement the existing infrastructure - they just sound like expensive flat blocks with some after thoughts to try and make people happy;
- more family housing is needed, not apartments;
- does the town need more commercial units when a large number are already vacant;
- the proposal needs more landscaping and tree planting;
- the mix of dwellings is not acceptable; and
- concerns regarding the financial viability assessment.

Since the publication of the Committee Report, a further 67 letters of support have been received. These set out the following comments:

- like the height of the buildings to provide more housing on brownfield sites and the lack of parking to promote sustainable transport;
- would like to see more effort for biodiversity, for example a living wall for the bus station;
- the Council should make adequate provision for food waste collection from the flats;
- Guildford needs to evolve and redeveloping this run down eyesore is a great start;
- not only will this rejuvenate a derelict / 'brownfield' part of the town centre the developer is making significant contributions to local education and infrastructure;

- while design is a subjective matter the scheme is policy compliant and on planning balance should be supported;
- the application is well balanced;
- the town centre is sorely in need of more housing and the provision of retail and community spaces seems well thought-out;
- modernise a largely unattractive section of North Street which has needed updating for many years. However, height of tallest block needs to be reconsidered and a compromise with Surrey County Council is needed;
- the architectural style of the development is attractive, and while not necessarily in keeping with the historic centre of Guildford, it will provide a pleasant modern counterpoint;
- transform North Street from the 'ugly sibling' of the High Street into a destination of its own right, and help usher Guildford into becoming the bustling modern town;
- the proposal will significantly improve Guildford;
- the proposal is a sustainable solution for the current derelict site and will provide open and modern facilities while respecting and complementing the town's historic features;
- provides 473 new homes without eroding the countryside, a much needed new bus station and will bring life back into the town centre which is rapidly declining;
- be a major boost to the retail and leisure sector;
- the buildings are taller than would ideally like to see but appreciate this is probably necessary to render the scheme viable and a small price to pay when taking account of all the benefits;
- important element is that all the proposed development is built to the highest specification, using good quality materials, considering sustainability and likely climate change. Some buildings are taller than many would like but if this allows the site to be profitable for the developer, using the best materials, than so be it;
- Guildford urgently needs more housing and this will ensure the centre of Guildford can prosper and encourage businesses to invest;
- it is right to have limited parking in the town centre to encourage the use of public transport and park and ride;
- now is the time to embrace change and redevelop this depressing and neglected area which detracts from Guildford in many ways;
- if people object to urban sprawl and building on green field sites then they have to accept that building tall is acceptable and
- far too dense to provide acceptable modern living standards.

A further letter has been received which neither objects or supports the proposal. The following comments are noted:

- SCC and the bus operators objected to the proposed entry and exit and alterations to the way traffic is re-routed after stopping up of Commercial Road and Woodbridge Road from North Street end. It would be reassuring to know what different arrangements, if any, for the entry to the bus station was agreed after St Edwards' discussion with SCC;

- it has been noted that two independent highways consultants had examined the proposals and were content with the alterations proposed by St Edwards. Have their reports been made public [Officer Note: Both reports have been added to the Council's website];
- there are better solutions in keeping Leapale Road one-way, restricting North Street two-way down to the Leapale Road junction with a turn-around facility and making Chertsey Street one-way to York Road. North Street would be one-way extended to Leapale Road junction and maybe restricted to traffic between 10 am to 4 pm like the High Street;
- keeping Leapale Road one-way removes the traffic exiting on to Onslow Street and facilitates buses entering the bus station and exiting it more conveniently;
- other alterations to Onslow Street northbound would facilitate entry of buses turning right before the roundabout towards the bus station since only buses would exit on to Onslow Street; and
- two-way cycle lanes could be incorporated in Leapale Road and Chertsey Street and cycle lanes designed to enter and exit Leapale Road/Woodbridge Road. The cycle lane could exit on to Onslow Street southbound that would be reduced to two lanes since bus lane would no longer be required.

Comments have also been received from the Surrey Hills Planning Advisor. The following comments are noted:

- only just learned today (04.01.23) of this planning application which is on the agenda for 11th January. I do not appear to have been consulted on this application in the same way as I had previously been consulted on major and/or high-rise development proposals (e.g. Guildford Station 14/P/02168) beyond the AONB but which might possibly harm its setting [Officer Note: The AONB Planning Advisor was not consulted on this planning application as it is located in the middle of the town centre. It is not located in the AONB and is at its closest point is more than one kilometre from the AONB];
- the Surrey Hills AONB Management Plan Policy P6 is a material planning consideration and...has not been considered either in the application submission or in the Officer Report to Committee. It reads: "*Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted*" [Officer Note: Although a Townscape and Visual Impact Assessment (TVIA) has been submitted with the proposal (as opposed to a Landscape and Visual Impact Assessment (LVIA)), the submitted TVIA does still offer an assessment of the proposal on both the AONB and AGLV. The TVIA also references the Surrey Hills AONB Management Plan. Notwithstanding the fact that this proposal is located within the middle of the built-up area of the town centre and is over one kilometre from the AONB, given the comments above, Officers have added a section to the report which assesses the proposal against relevant AONB policy requirements. This additional section can be found under 'Clarifications' on this Late Sheets];
- whilst the application has been supported by a townscape and visual impact assessment within one kilometre of the site, in the time available to me today, I have not so far seen on the Council's website, any proper assessment of the impact on views from the Surrey Hills AONB to the west and south. Normally, a Landscape and Visual

Impact Assessment would be expected. The assessment should include the collective impact of the permitted redevelopment of Guildford Station and this site [Officer Note: See Officer Note above. In addition, it is noted that the TVIA includes the cumulative impact of permitted and extant schemes such as Guildford Station];

- I have though noticed a photomontage within the townscape and visual impact assessment taken from a position on The Mount to the west. Without having been able to assess properly the proposal from various AONB viewpoints initially my main concern from this photomontage relates to the proposed 13 storey building both because of its sheer height and light colour contrasting with the dark background of Guildford's townscape that would make it all the more conspicuous and incongruous a feature in that viewpoint;
- without evidence seeking to demonstrate there would be no harm to views from the AONB and there being insufficient time with my other commitments in the next couple of days for me to elaborate upon my initial concerns and for Officers to consider such advice in order to report to Committee, the Council may feel it is not in a position to permit the application, if so minded, on 11 January [Officer Note: It is considered that the submitted TVIA does assess the impact of the proposal on the AONB and a number of vantage points within and in close proximity to the AONB have been tested. This will be set out in the addition section which is provided elsewhere in this Late Sheet]; and
- I would not be so concerned were the height of the 13-storey building reduced to, say, nine storeys. Even then the collective heights and massing of the buildings would be substantial.

A further email was received from the AONB Planning Advisor on 07.01.23. It notes the following additional points:

- well done for having negotiated some height reduction but I consider there should be more. I still consider 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 [Officer Note: The Officer Report clearly sets out why the proposal would not have a harmful impact on the character of the town centre. Officers do not rely on the Guildford Station development as a reason for recommending approval]; and
- if the Committee are nevertheless minded permitting the scheme, I would ask that more muted coloured external materials are used so the tallest building would not form such a prominent and incongruous feature. It may well have the support of architects, but I would question whether this would prove to be another example of such architect supported schemes that the public dislike, especially in the future, and associate as being a planning mistake, as we have seen in the past. Being so tall the

harm caused would be all the greater [Officer Note: The materials are already secured by condition and would need to be agreed with Officers].

Members have also directly received written correspondence from Surrey County Council in a letter dated 19 December 2022. A rebuttal to this from the applicant was received and circulated to Members on 10 January 2023. Both of these letters are provided in full as an appendix to these late sheets.

22/P/01337 – (Page 297) – Land bounded by the Friary Centre Bus Station, North Street and Leapdale Road, Guildford

Four letters of objection have been received. The following points are noted:

- demolishing any building should be considered a last resort - both from an environmental point of view, as well as a historical point [Officer Note: This Listed Building Consent application does not seek the demolition of the listed building, only its repair following the demolition of the non-listed building which is attached to it]; and
- several 19th and first half of the 20th century buildings are shown to be demolished [Officer Note: See comment above].

Other comments made relate to the main application and not matters which can be considered as part of this listed building consent.

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 black ink, appearing to read 'K. Stewart', written in a cursive style.

Katie Stewart
Executive Director
Environment, Transport and Infrastructure

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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.

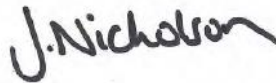
This proposal is a once in a generation opportunity to significantly improve the bus station, deliver an exceptional piece of public realm and unlock the pedestrianisation of this key section of North Street outside the entrance to the Friary Centre, which is much needed in Guildford and is an important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

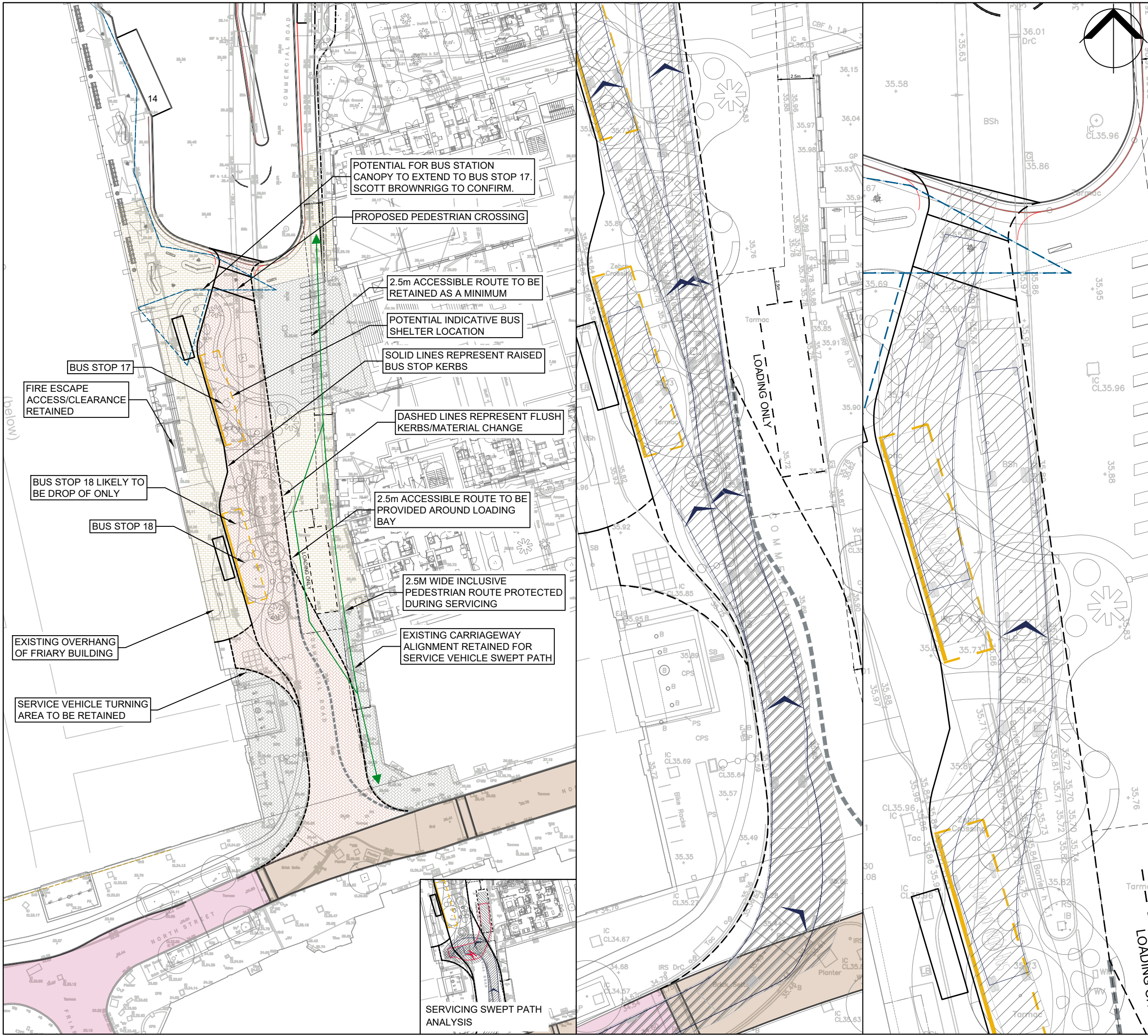
We hope that addressing these points clearly and concisely is useful for the various members in considering the merits of each claim made by SCC. We will readily provide any further information or answer any questions should it be helpful or needed.

Yours sincerely,



Jack Nicholson
Land and Development Director
St Edward Homes

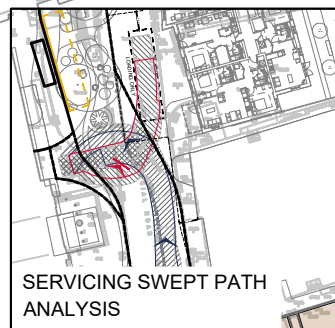




NOTES:
 1. THIS DRAWING IS INDICATIVE AND SUBJECT TO DISCUSSIONS WITH LOCAL & NATIONAL HIGHWAY AUTHORITIES. THIS DESIGN IS ALSO SUBJECT TO CONFIRMATION OF LAND OWNERSHIP, TOPOGRAPHY, LOCATION OF STATUTORY SERVICES, DETAILED DESIGN AND TRAFFIC MODELLING.
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Planning Committee

11 January 2023

Update/Amendment/Correction/List

Planning Committee Membership

Please note the Planning Committee Membership as detailed below:

Councillor Fiona White (Chairman)

Councillor Colin Cross (Vice-Chairman)

Councillor Jon Askew

Councillor Chris Barrass

Councillor David Bilbé

Councillor Chris Blow

Councillor Ruth Brothwell

Councillor Angela Goodwin

Councillor Angela Gunning

Councillor Liz Hogger

Councillor Marsha Moseley

Councillor Ramsey Nagaty

Councillor Maddy Redpath

Councillor Pauline Searle

Councillor Paul Spooner

Authorised Substitute Members:

Councillor Tim Anderson

The Mayor, Councillor Dennis Booth

Councillor Guida Esteves

Councillor Graham Eyre

Councillor Andrew Gomm

Councillor Steven Lee

Councillor Nigel Manning

Councillor Ted Mayne

Councillor Bob McShee

Councillor Susan Parker

Councillor George Potter

Councillor Jo Randall

Councillor John Redpath

Councillor Will Salmon

Councillor Deborah Seabrook

Councillor Cait Taylor

Councillor James Walsh

Councillor Keith Witham

Councillor Catherine Young

22/P/01336 – (Page 15) – Land bounded by The Friary Centre Bus Station, North Street and Leapale Road, Guildford

Article 31 Holding Direction

On 10 January the Secretary of State in exercise of his powers under Article 31 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, hereby directed Guildford Borough Council not to grant permission on these applications without specific authorisation. This direction is issued to enable him to consider whether he should direct under Section 77 of the Town and Country Planning Act 1990 that the application should be referred to him for determination.

This direction does not prevent the Planning Committee from considering the application, forming a view as to the merits of the proposal, resolving to grant subject to a s106 legal agreement or, if so minded, refusing permission. The direction prohibits the issuing of a planning decision for approval until such time as the direction is lifted.

The purpose of this direction is, as stated, to enable the Secretary of State to decide whether or not to call the application in for his decision.

Given the above, the recommendation on page 20 of the agenda should now read as follows:

RECOMMENDATION:

That planning permission is approved, subject to:

- (i) Confirmation from the Secretary of State that the application can be approved by the Local Planning Authority;**
- (ii) The conditions set out in this report;**
- (iii) That a s.106 agreement be entered into to secure:**
 - provision of a unit within the scheme which may be used by the NHS as a health or medical care facility or in lieu of this a primary healthcare contribution;**
 - education contribution;**
 - police contribution;**
 - contribution towards the off-site provision of children's playspace;**
 - management and future maintenance of all open space (private and public) and the public realm within the site (with the exception of the North Street pedestrianisation);**
 - that all areas of public realm remain publicly accessible twenty four hours per day except for identified reasons, in perpetuity where they replace the width and**

alignment of Woodbridge Road and Commercial Road, and for the lifetime of the development in all other locations;

- contribution towards bus service priority improvements;
- the provision of a minimum of three car club vehicles for a minimum of five years; £50 worth of free travel for car club vehicles for each residential unit and three year's free membership of the car club for all initial occupants of the residential units;
- provide each dwelling with a combined cycle/bus voucher of £250, at a total cost of £118,250;
- SANG (Suitable Alternative Natural Green Space) and SAMM (Strategic Access Management and Monitoring) contributions;
- that the bus station improvements (as approved through this application), North Street Square, North Street pedestrianisation and Friary Square to be commenced as part of phase one of the development and completed in full prior to occupation of an agreed number of dwellings within phase one, or by a date to be agreed, whichever is the sooner;
- that the applicant must undertake an early stage viability review if the scheme does not commence within 18 months of the full grant of planning permission. The applicant will cover the Council's costs of independently assessing the review;
- the provision of either (a) 20 on-site shared-ownership dwellings delivered in phase one of the development and that the applicant uses reasonable endeavours to deliver a further 28 on-site shared-ownership dwellings, subject to receiving funding from Homes England, OR (b) securing a late stage viability review; (as set out in the report, option (a) is Officer's recommended approach); and
- the completion of the remaining public realm works within set timescales to be agreed.

If the terms of the s.106 or wording of the planning conditions are materially amended as part of ongoing s.106 or planning condition(s) negotiations, any changes shall be agreed in consultation with the Chairman of the Planning Committee and lead Ward Member.

(iv) That upon completion of the above, the application be determined by the Executive Head of Planning Development / Joint Strategic Director Place. The recommendation is to approve planning permission, subject to conditions.

(v) If, after 12 months has elapsed since the resolution of the Planning Committee to grant planning permission, the s.106 agreement is not completed then the application may be refused on the basis that the necessary mitigations to offset the impact of the development cannot be secured.

AONB / AGLV

Please could Members consider the text below which relates to the impact of the scheme on the AONB / AGLV.

Impact on the setting of the AONB / AGLV

It is noted that the 'Impact on wider townscape' section of the Officer Report does clearly set out the importance of protecting the AONB and in particular its setting. However, given the criticism of the Surrey Hills AONB Planning Advisor, it is considered to be important to add further clarity to the matter. The short section below should be read together with the main body of the Officer Report.

As already noted in the Officer Report policy P1 of the LPSS advises that 'the Surrey Hills Area of Outstanding Natural Beauty (AONB), as shown on the Policies Map, will be conserved and enhanced to maximise its special landscape qualities and scenic beauty...Great weight will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting'. As regards the AGLV, policy P1(5) states that 'development proposals within the AGLV will be required to demonstrate that they would not harm the setting of the AONB or the distinctive character of the AGLV itself'.

The NPPF at paragraph 176 notes the following: '...development within their (AONB) setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'.

Planning Practice Guidance on Natural Environment - Landscape also emphasises the importance of protecting the setting of an AONB. At paragraph 3 it refers to the statutory duty imposed by the Countryside and Rights of Way Act 2000 when considering development proposals situated outside an AONB. It states '*the duty is relevant in considering development proposals that are situated outside National Park or AONB boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas*'.

It is noted that the Surrey Hills AONB Management Plan is also a relevant consideration. In particular, policy P6 states that '*development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted*'.

Although a Landscape and Visual Impact Assessment (LVIA) has not been submitted, a Townscape and Visual Impact Assessment (TVIA) has been received with the application. This has been updated to reflect the changes which have been made to the scheme. The TVIA recognises the importance of the AONB (and AGLV) and its setting and makes specific reference to the Surrey Hills AONB Management Plan. The Council's Urban Design Officer notes that TVIA and addendum have been carried out in accordance with the best practice guidance set out in the Landscape Institute and Institute of Environmental Management and Assessment 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition) and Natural England's 'An Approach to Landscape Character Assessment'. The assessment has been prepared by a Registered Practice of the Landscape Institute and has considered the setting to the AONB (and by virtue, the setting of the AGLV also). Officers consider that the

TVIA provides sufficient information to enable the scheme's impact on the AONB to be assessed and a full LVIA is not deemed to be necessary.

As regards this proposal, the AONB is located approximately one kilometre from the site to the west, south and east. The AGLV boundary follows a similar boundary, but in places is closer to the town centre. The site is located in the middle of the town centre and is surrounded by other built form and urban development, which includes numerous buildings which are of a considerable scale and bulk. It is also important to remember that the site forms part of a site which is allocated in a recently adopted plan for a large-scale regeneration project. For a redevelopment of the scale set out in the allocation it is inevitable that the proposal will result in changes to views in and around the town centre.

It is noted that the proposal, due to its scale, would be visible from a number of vantage points. This includes locations which are either within or close to the AONB boundary. Of the viewpoints considered in the TVIA, viewpoint three (from St Catherine's Hill) and viewpoint four (from the Hogs Back) provide a representative assessment of views from the AONB towards the town centre.

As regards viewpoint three (St Catherine's Hill) it is noted that the changes made to the proposal mostly remove the proposal from view at this location. The proposal would sit behind evergreen trees and the buildings would be indiscernible within the view. As such, although the top of the marker building may just about be visible, it would not have a harmful impact on views from the AONB to the north and therefore, its setting would be protected.

The proposal would be clearly visible in viewpoint four which is taken from the Hogs Back. However, it is noted that all of the proposed buildings would be well below the skyline and would be set against both the existing buildings in the town centre and against the context of the Guildford Station development which is now being constructed. While the view over Guildford from the Hogs Back is important, as it takes in the county town of Surrey, one would reasonably expect to see urban forms of development, including taller and larger buildings. Through the pre-application and assessment of the application, the applicant has also made amendments to the scheme which have reduced the overall heights of some of the buildings, including the marker building. Therefore, any impacts have sought to be minimised.

However, having said that, even the marker building would not appear overly incongruous in its setting. The AONB Planning Advisor does note that the lighter colour of the marker building may make it more conspicuous in this view. Firstly, on this point it is noted that even if the finish of the building is lighter than its surroundings, this fact in itself is very unlikely to result in any fundamental harm to the setting of the AONB, which at this point is approximately 1.2 kilometres away from the site. Secondly, it is noted that there are numerous other buildings in the town centre which have a lighter material finish. In addition, the lighter colour helps the building to assimilate with its surroundings in many of the short distance views. If the marker building was finished with red brick, it would become more imposing on its immediately surrounding buildings, including St Saviours Church. As such, the proposal would not, in Officers view, have a harmful effect on the setting of the AONB.

Officers consider that the character and appearance of the landscape, and the scenic beauty of the AONB / AGLV would be conserved and not detrimentally affected by the scheme, which therefore complies in this regard with the local plan policy LPSS P1 and the Surrey Hills ANOB Management Plan policy P6 noted above.

Heads of Terms

Page 20 of the agenda. Officers recommend that the following additional Heads of Terms are added and considered by Members:

- allowing bus emergency access to the bus station through the new Friary Square (subject to a clarification of what circumstances will constitute an 'emergency'); and
- the applicant shall use reasonable endeavours to provide improved staff and customer facilities at the existing commercial kiosks and staff accommodation at the northern end of the bus station.

For the avoidance of doubt, and as set out in the report, the contribution towards bus service priority improvements would total £1.5m.