

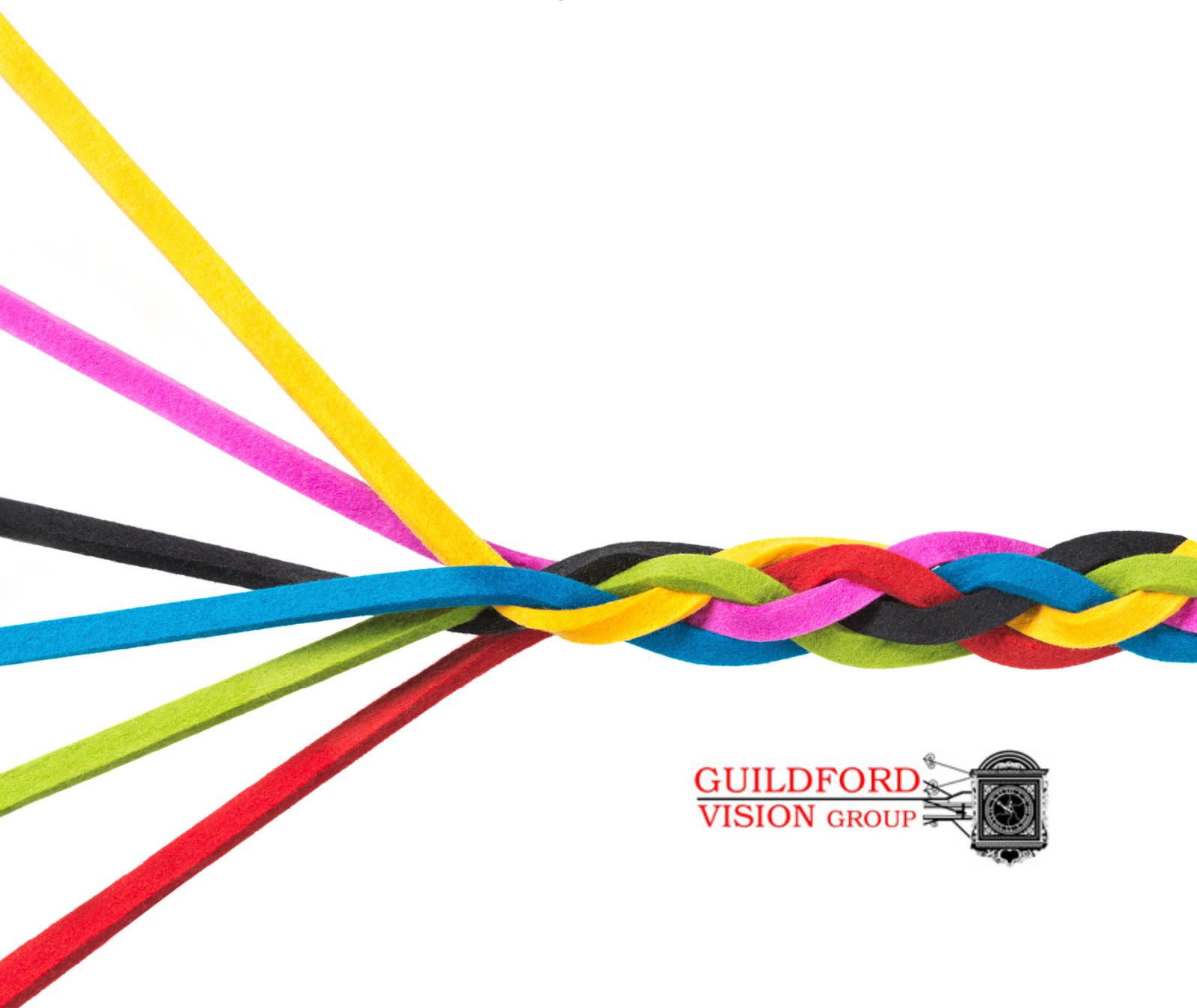
PRP

Guildford Borough Council
Proposed Submission Local Plan

Regulation 19 Consultation Response

Guildford Vision Group

July 2017



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Architecture
Urban Design
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Landscape
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Project Services
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Transport Planning
Interiors
Research

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1. Introduction and Background Information

- 1.1 PRP was formally appointed by Guildford Vision Group (GVG) in May 2017 to represent it in the submission of a detailed response to the regulation 19 consultation on the proposed submission Local Plan for Guildford Borough Council (GBC).
- 1.2 Guildford is a gap town and the focus of a number of particular problems. The town has confined road, rail and river corridors, topographical issues and a historic core, all of which add to the complexity of Guildford along with a major investment deficit in infrastructure.
- 1.3 GVG, which is comprised of people who have long resided in the borough, and who often have relevant professional expertise on planning matters, was established on 21st March 2012 at a public meeting with the aim of working towards a deliverable masterplan for Guildford. Initial activity analysed the state of the town centre and identified 17 issues. Several background documents are appended to this consultation response, including The History of GVG (appendix 1), and 'Who is GVG' (appendix 2).
- 1.4 GVG produced a document in 2013 entitled 'Guildford on the Way' (appendix 3) which serves as a helpful summary of the aims of the group and was supported by members of the public and included their contributions. This document was submitted as part of the response to the Guildford Local Plan Regulation 18 consultation in 2014 by both GVG and The Guildford Society.
- 1.5 GVG has identified 17 key issues related to the town centre which require addressing:
 1. Road safety
 2. Pollution
 3. Traffic blight
 4. Traffic management
 5. Lack of pedestrianisation
 6. Proper use of riverside
 7. Flood prevention
 8. Railway station
 9. Bus station
 10. Cycleways
 11. Access and parking
 12. Housing
 13. Student accommodation
 14. Business space
 15. Social buildings
 16. Arts & education provision

17. Leisure facilities
- 1.6 From these 17 issues GVG has set itself six keys goals to transform the town centre:
1. Wider pedestrianisation of the town centre
 2. Exciting new public space and a reinvigorated riverside
 3. Redirection of traffic away from the town centre
 4. An integrated road and rail hub
 5. More town centre housing
 6. A new bridge for a better East-West link
- 1.7 Sustainable, environmental and infrastructure solutions can be forthcoming but only realistically with comprehensive, integrated and master planned solutions. The draft local plan fails to recognise or make a case for this, or any approach to capture and address any of the '17 issues' GVG has identified.
- 1.8 GVG notes that, although Guildford has been one of the most economically successful towns over the past 30 years, this position is under threat from infrastructure deficit and a lack of commercial space and housing. GVG also notes the emerging desire, via LEPs and County Councils, to collaborate in an arc of towns around London, stretching from Cambridge via Oxford to Reading, Guildford and Ashford. This is a major opportunity for high tech businesses in particular to collaborate. Guildford, with the right vision and leadership, can build on its strengths, based on the University and the associated Research Park, to take advantage of this opportunity.
- 1.9 Town centres are subject to major challenges due to changing patterns of retailing, new transport possibilities e.g. autonomous cars, and the need to become far more environmentally benign. GVG believes the Plan is a missed opportunity to position Guildford town centre for the future.
- 1.10 In particular, land use for the whole of the town centre has not been considered effectively e.g. GVG is aware of several sites that may be subject to redevelopment in the planning horizon that are not in the Plan. Environmental factors are also inadequately covered e.g. District heating, power generation and flooding. Finally, traffic issues are not addressed nor the interchange between modes of transport.
- 1.11 The draft plan proposes a Guildford with a quantum leap in shopping space that will be inaccessible due to inadequate transport provision. New housing is scattered around the edges of the town centre with inadequate provision made for transport and other facilities. Proposed employment centres may exacerbate transport difficulties e.g. more cross-town commuting.
- 1.12 The GVG proposals provide an opportunity to build an environmentally friendly town centre, with the flexibility to optimise housing and commercial space.
- 1.13 A key ambition of GVG is to enable growth whilst delivering environmental quality for the community through a comprehensive, masterplan-led solution. The current draft Local Plan fundamentally fails to consider how this can be achieved in the town centre, and indeed the wider borough.

- 1.14 These fundamental goals are central to this consultation response and are relevant to many of the specific policies being consulted on.
- 1.15 In 2016, GVG persuaded the council to commission a town centre masterplan, the first of its kind since 1943, through Allies and Morrison Urban Designers. However, GVG was concerned that the undisclosed brief did not require the masterplan to adequately address road and other infrastructure issues. Accordingly, GVG feels it has had limited value. In response to the perceived limitations of the masterplan and using professional town planners, GVG has commissioned and published its own masterplan for the entire town centre (appendix 4) in January 2017. This has received support through press, newsletters and social media and at a number of public events.
- 1.16 The National Planning Policy Framework (NPPF) is very clear on the role which town centres have to play in the growth of boroughs:
- Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.*
- Local planning authorities should assess and plan to meet the needs of main town centre uses in full, in broadly the same way as for their housing and economic needs, adopting a 'town centre first' approach and taking account of specific town centre policy.*
- 1.17 It is considered that the draft plan presented by GBC has fundamentally failed to consider this most basic of planning principles and on this issue alone the Plan is unsound. There are a number of more specific planning policies on which GVG has comments. They are addressed in turn throughout this document.
- 1.18 This submission builds upon much of the previous work undertaken by GVG which has submitted representations on the previous consultations of the Local Plan in 2014 and 2016 (appendix 5).
- 1.19 The Regulation 19 consultation includes a significant amount of red-lined (amended) text and policies, each and many of which will, separately and in the context of the entire Local Plan, have some impact on other elements - particularly on the town centre and its crucial infrastructure. It also substantially alters the evidence base without any impact assessment on the Local Plan itself and on any unaltered policy and associated commentary. In its response GVG has attempted (to the best of its ability) to assist the Council to understand how the proposed submission draft Local Plan falls short of the requirement to be a forward-looking Plan that is balanced and sound.
- 1.20 The GVG Masterplan has been prepared to meet all stated criteria of the policies in the draft Local Plan, as well as meeting criteria to mitigate the 17 issues identified by the group. In addition, it has tested its masterplan to ensure that it is practical and deliverable. GVG has concerns, as detailed below, that the draft plan is not sound and will fail to be pass examination stage, with consequential impact on Guildford and its environs.
- 1.21 Overall the draft Local Plan demonstrates reluctance by GBC to build new housing before infrastructure is provided. Whilst GVG understands this reluctance it does not demonstrate the forward thinking that is required for Guildford over the next 20 years. It does not provide solutions which GBC can begin to implement without fundamental reliance on external agencies (as is the case with much of the enabling infrastructure in the draft submission Local Plan). If the Plan is carried out as presented by GBC, there will be an increase in population in the wider borough with none of the associated increase in social or physical infrastructure that is required. The pressure that will be put on Guildford town centre from the growth of the

borough, and indeed that of surrounding boroughs, will lead to excessive stress on the already failing infrastructure in the town.

- 1.22 Through properly masterplanning the town centre, alongside a fundamental redesign of the physical infrastructure, the GVG Plan is able to deliver substantial additional benefits over and above just housing growth including business space, environmental benefits, tourism, leisure power solutions, and flood defence.
- 1.23 GVG is therefore extremely concerned that the proper masterplanning of the town centre and the Area Action Plan for the town centre are not being prioritised alongside the Local Plan and instead being delayed until after potential adoption of what GVG would consider to be inconsistent policies.
- 1.24 The opportunity to deliver a world class town centre can be achieved but requires a co-ordinated approach with all interested parties, and in which the GVG Plan can play a part.

2. Local Plan Consultation Requirements

- 2.1 Of the 12 Core Planning Principles set out in paragraph 17 of the National Planning Policy Framework (NPPF) the first clearly states that planning should:

Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues.

- 2.2 As a town, Guildford plays a much wider role than just providing for the immediate needs of those in the borough. Its sub regional role means that the future of Guildford town centre will have significant bearing on those living within the much wider sub-regional area. The recent South East Missing Links Study 2016 identified the importance of South East Region towns collaborating over commercial activities to ensure the region continued to prosper as a vital economic engine for the country. Guildford is a key centre in the South East Region.

- 2.3 GVG has consistently attempted to engage with GBC to bring forward a comprehensive Plan for Guildford town centre which addresses the significant opportunities and constraints currently experienced in the town centre. The previous Allies and Morrison masterplan and updated Town Centre Regeneration Strategy fall significantly short of resolving these issues, even if there was an intention shown to adopt them in policy.

- 2.4 Paragraph 155 of the NPPF goes on to state that:

Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

- 2.5 The 17 issues as outlined previously represent the *collective vision* as set out in para 155 of the NPPF and that GVG consider itself to represent a *wide section of the community*. GVG has engaged with officers and senior staff within GBC via a series of meetings since its formation. For reasons that are unclear, the council has expressed only cursory interest with the details of the GVG Plan, and has studiously ignored reference to it in any communications and consultations. From 2012 to 2017 the message from the council has consistently been that they have been too busy with Local Plan issues to address the issues around the town centre (which is central to the GBC area!) or make officer time available. Requests for collaboration and further information have been met with indifference over a dozen or so meetings with GBC and no information has been voluntarily supplied. Much of the information which GVG has reviewed has been obtained through Freedom of Information requests. GVG has been frustrated by the non-engagement of GBC. This is in direct contradiction to para 155 of the NPPF which forms a fundamental consideration in the development of the GBC Local Plan.

- 2.6 In examining the Local Plan the appointed inspector will need to consider the conformity with paragraph 182 of the NPPF which states:

The Local Plan will be examined by an independent inspector whose role is to assess whether the Plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a Plan for examination which it considers is "sound" – namely that it is:

- **Positively prepared** – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the Plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.7 GVG is pro-growth and recognises and embraces the need for housing but also considers that Guildford town centre should be regarded as key infrastructure for both the Borough and the wider region. It should be afforded a properly considered place and detailed plan in the Local Plan rather than matters being left to chance and piecemeal development. Delivery of housing in a quality environment should be equally as relevant to plan making.

2.8 It is the opinion of GVG that the proposed Local Plan in its current form cannot be considered as sound and it is with these criteria in mind that this response has been prepared against individual policies contained within the draft Local Plan. Similarly, it is against these same criteria against which the GVG Masterplan has been prepared.

2.9 The council previously undertook a regulation 18 consultation on the Plan in June 2014 to which the GVG provided a detailed response (appendix 5)

2.10 As per the Planning Practice Guidance (PPG) [Paragraph: 017 Reference ID: 12-017-20140306]

Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The local planning authority must take into account any representation made, and will need to set out how the main issues raised have been taken into account. It must also consult the Strategic Environmental Assessment consultation bodies on the information and level of detail to include in the sustainability appraisal report.

2.11 Overall, it is considered by GVG that previous consultation responses by it and other interested groups such as the Guildford Society have not been taken into account in the preparation of this regulation 19 draft plan. Accordingly it is considered that the basic conditions of plan making, as set out within regulation and government guidance, have not been complied with and the plan is unsound.

Statutory Duty to Co-operate

2.12 The Duty to Cooperate (DTC) Topic Paper which forms part of the evidence base is acknowledged. However there are some shortcomings as to how the council has sought to comply with the DTC as set out in the Localism Act 2011, and amended by the Planning and Compulsory Purchase Act 2004. The DTC is not a duty to agree but the NPPG is clear that *local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.*

2.13 In addition to cooperation with surrounding local planning authorities, other bodies are subject to the DTC as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013.

2.14 These bodies are:

- the Environment Agency
- the Historic Buildings and Monuments Commission for England (known as Historic England)
- Natural England
- the Mayor of London
- the Civil Aviation Authority
- the Homes and Communities Agency
- each clinical commissioning group established under section 14D of the National Health Service Act 2006
- the National Health Service Commissioning Board
- the Office of Rail Regulation
- Transport for London
- each Integrated Transport Authority
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
- the Marine Management Organisation.

2.15 Having reviewed the DTC Topic Paper and the policies contained within the draft Local plan, GVG believes there is a high level of ambiguity and uncertainty around the delivery of infrastructure to support the level of housing allocation and the impact this will have on the traffic in the town centre.

2.16 The Topic Paper references the Local Strategic Statement (LSS) produced by the Surrey Strategic Planning and Infrastructure Partnership. The memorandum of understanding appended to the Topic Paper demonstrates that it has been agreed by all local authorities in Surrey, but there is no reference to Highways England which controls the A3, the principal route through the borough. We presume that it has been removed because GBC has as yet failed to reach agreement with Highways England.

2.17 The PPG also sets out that:

Close cooperation between district local planning authorities and county councils in 2-tier local planning authority areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.

Paragraph: 014 Reference ID: 9-014-20140306

- 2.18 Communication between GVG and Surrey County Council suggests that this element of the DTC has not been satisfied either, particularly regarding transport infrastructure.
- 2.19 It is the opinion of GVG that the Statutory Duty to Cooperate has not been complied with and accordingly the draft Local Plan is unsound on this basis alone.
- 2.20 Irrespective of the DTC having failed, the draft Local Plan has no vision for the town, no plan for delivery, and sets a course for ad hoc development which will frustrate most of the Local Plan objectives as listed.

3. Proposed Submission Local Plan - Policy Responses

POLICY S1: Presumption in favour of sustainable development

- 3.1 As set out in the previous representations, GVG is actively pro-growth and supports well designed development as part of strategic solutions recognising the sub-regional role of Guildford.
- 3.2 At paragraph 4.1.4 additional text has been added to reasoned justification of policy S1 which suggests that the presumption in favour of sustainable development will not apply to sites listed under footnote 9 of paragraph 14 of the NPPF. This is clearly correct in policy terms but specifically for Guildford this would assume that the council employs a 'brownfield first' approach to achieving housing supply. GVG would agree with this as an approach, but this message is inconsistent in the Local Plan and not reflected in appropriate infrastructure or support. GBC should be promoting the delivery of suitable brownfield sites early in the Plan process. More recognition is required to the alternative delivery strategies required should the main allocated sites not come forward or delivery rates be slower than anticipated.
- 3.3 GVG also recognises the historic failures of successive Councils in Guildford to plan proactively and comprehensively over decades. This has led to there being relatively little brownfield land that can be brought forward by the market in such a way as to: A) deliver as much development as it could were it masterplanned; and B) not place such a burden on historically poor and unresolved infrastructure as to constitute sustainable development. For this reason, as much as any other, GVG has been campaigning for proper joined up urban planning to bring about transformation, development and growth in a sustainable way in our core town centre. This approach could equally apply to the outlying residential estates in north-west and north Guildford, where GBC freeholds also predominate.

POLICY S2: Planning for the borough - our spatial development strategy

- 3.4 It is clear from the wording of policy S2 that the housing requirement, in addition to the provision of employment and retail space, has been altered to reflect the change in Plan period from 20 years to 19 years. The rationale for this change remains unclear.
- 3.5 The proposed submission Local Plan removes Table 1 - Planned Delivery between 2018 and 2033, making it impossible to understand where housing growth will come from to meet the annual housing target as set out in the policy.
- 3.6 Table 2 which sets out the hierarchy of retail and service centres, has also been deleted from policy S2 which further undermines the commitment of GBC, as a fundamental principle of the Local Plan, to deliver housing in the town centre first.
- 3.7 It is therefore suggested that the detail on planned delivery and settlement hierarchy is reintroduced into the final version of the plan to ensure it is clearer on where growth is coming from and the rate of delivery for the borough.

POLICY H1: Homes for all

- 3.8 GVG supports the focus within the Local Plan to provide high quality homes to meet a range of needs across the borough.
- 3.9 The reasoned justification in para 4.2.3 sets out the need for development as supported by the SHMA and addendum report 2017. This demonstrates that there is a high need for one bedroom (40%) and two bedroom (30%) dwellings. These dwellings are clearly more suitable in a town centre environment and this provides further justification for the role of Guildford

town centre as recipient of housing. It highlights the requirement for a comprehensive regeneration of the town centre to be placed at the centre of the Local Plan.

POLICY H2: Affordable Homes

- 3.10 GVG supports the provision of affordable housing as part of providing mixed and sustainable communities across the borough.
- 3.11 However, under the second bullet point of policy H2, it states that the Council will seek affordable homes on *sites providing five or more homes, or sites of 0.17 ha or more regardless of the number of homes.*
- 3.12 This policy does not reflect the established national policy as set out in the Written Ministerial Statement of 28 November 2014. The Council can only implement a lower threshold, where schemes of six or more dwellings can contribute cash payments towards affordable housing and tariff style items, in 'designated rural areas' under Section 157 of the Housing Act 1985. GVG is concerned that this policy will have a viability impact on the delivery of important smaller infill sites in the town centre that will contribute towards the successful regeneration of the wider town centre.
- 3.13 It is therefore suggested that this policy is amended to ensure it is viable, deliverable and consistent with national guidance.

POLICY P2: Green Belt

- 3.14 GVG is committed to the protection of the metropolitan green belt as set out under policy P2. A fully co-ordinated and deliverable vision for the town centre as set out by the GVG would reinforce the protection of the green belt by reducing the pressure on the green belt to deliver housing.
- 3.15 A strengthened brownfield first strategy within the Local Plan would support the aspirations of GBC to protect the green belt. The co-ordinated delivery of housing within the town centre will deliver substantial environmental benefits, whilst providing more housing than currently planned. This approach is currently fundamentally ignored by GBC and will not be achieved through the piecemeal approach to development currently being promoted by the council. Continuation of piecemeal development will put at risk the green belt boundaries for successive Local Plans, making the proposed boundary realignments unsound as they could not be defended as being permanent.

POLICY P4: Flooding

- 3.16 Bullet point 3 of policy P4 sets out that:
- Development proposals in the 'developed' flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s)*
- 3.17 The centre of Guildford is affected by flooding from the River Wey. Large parts of the town centre alongside the river are within flood zone 3b. If the wording of policy P4 is to be followed, there is no restriction, other than the established development management policies, on the height of the buildings that could be developed on the sites. The GVG Masterplan seeks to avoid earlier mistakes and addresses the central issues around flooding, to the benefit of the town centre and better provision of housing in a materially improved setting.
- 3.18 The flooding topic paper which forms part of the evidence base for the Local Plan sets out at para 5.9 that:

The Council's Level 1 SRFA notes that some of Guildford's functional floodplain (flood zone 3b) has historically been built upon. The document therefore differentiates between the 'developed functional floodplain' and the 'undeveloped functional floodplain'. Whilst the NPPF states that the functional floodplain should be reserved for water storage and flow in times of flood, the SRFA argues that development or redevelopment in the 'developed functional floodplain' may be acceptable when flood risk betterment, appropriate mitigation and risk management can be achieved and implemented.

Given the findings of the Level 1 SFRA, it is reasonable to argue that the functional floodplain does not need to be entirely excluded from development and can contribute to accommodating the borough's objectively assessed needs, if betterment, mitigation and management can be achieved.

- 3.19 Whilst the main thrust of policy P4 complies with guidance on sequential and exception tests, the requirement of development proposals to not be greater than the footprint of the existing building fundamentally undermines the potential of town centre sites to deliver significant levels of housing or other uses.
- 3.20 The GVG Masterplan considers an innovative solution to protection of future residents from flood risk by raising the street level above current levels. It places car parking and other compatible uses on the lower ground floor or undercroft, while residential units are placed on upper floors with dry access provided in the event of a flood.
- 3.21 Furthermore the second point of bullet point 3 states that:
- Proposals within these areas should facilitate greater floodwater storage.*
- 3.22 The masterplan as prepared by GVG seeks a strategic approach to the potential for floodwater storage in areas of functional flood zone through the provision of substantial sustainable urban drainage systems. These could be accommodated under areas of public open space. The provision of large areas of tiered public open space around Guildford Wharf, Walnut Tree Close and Woodbridge Meadows will also allow for the improvement of the area of functional floodplain within the town centre.
- 3.23 The delivery of policy E7 in relation to Guildford town centre supported by Guildford Town Centre Regeneration Strategy 2017, with the previous links to the Allies and Morrison draft Town Centre Vision (2015) and the Guildford Town Centre Masterplan (2015) now having been deleted.
- 3.24 Whilst the Allies and Morrison vision and masterplan previously sought to avoid the areas of functional flood plain for development, the Guildford Town Centre Regeneration makes reference to the provision of *Enhanced Amenity and Flood Protection*. This section recognises the potential for development in areas of flood zone but does not satisfactorily set out a solution or conjoined strategy to deal with these fundamental issues. The document states that:
- As sites and schemes are investigated in more detail, viability issues will invariably come in to play and decisions will need to be made as whether to progress certain major projects. This is one of the reasons that the Town Centre Regeneration Strategy and its associated Work Programmes are intended to be 'living, flexible documents'.*
- 3.25 GVG submits that this level of ambiguity and lack of commitment is simply not good enough to support the delivery of material quantities of housing in the town centre. This requires a co-ordinated and comprehensive approach. This is what GVG recommends and have allowed for under its preferred approach for the town. The current approach of GBC (see appendix 6 with

site marketing particulars) through piecemeal development of town centre sites does not allow for a co-ordinated approach to flood risk which is of significant importance for the success of the wider development strategy for the borough, or other strategic objectives such as power delivery and district centres. It also at the same time fails to positively and comprehensively address urban form that currently contributes to flooding.

POLICY P5 - Thames Basin Heaths SPA

- 3.26 Policy P5 requires all sites of over 50 net new dwellings to provide avoidance and mitigation measures for the SPA. The importance of the SPA and mitigation is understood and respected by GVG. However the imposition of mitigation measures on individual town centres presents a viability constraint which favours use of green belt sites rather than brownfield.
- 3.27 There is already a good proportion of open space within the town centre (in a borough with 89% of the land designated as green belt). More would come forward if a deliverable masterplan is approved. This can be then counted towards provision of SANG land with no requirement to provide contributions to other land outside of the town centre.
- 3.28 Within Guildford much of the urban area is under provided for open space on a pro-rated basis, it is the surrounding common areas that give Guildford its character and, if preserved, these should be sufficient to provide sustainable alternative natural green space for any and all development in the town centre without requiring further SANG. The increased riverside park proposed by GVG (and the Allies and Morrison plans) would add to the provision of accessible green space for residents and visitors to the town centre.
- 3.29 It is therefore suggested that the requirement for town centre sites, developed as part of a comprehensive plan, to contribute to SANGs land is removed from the Local Plan to increase the viability of these sites to develop sufficient affordable housing units, and to help meet the additional infrastructure burden.
- 3.30 The Evidence Base includes a viability assessment dating from 2014 which is considered to be historic in plan making terms and should be updated. The Infrastructure Delivery Plan has gone from 'the developer will contribute' to 'funded by the developer' Affordable housing viability comes after SANG, CIL s106 and so forth. There is absolutely no indication in the Local Plan that a single affordable housing unit would be built on this basis.

POLICY E1 - Meeting employment needs

- 3.31 Policy E1 has been revised to reflect the change in the lifetime of the Local Plan. However, as a result, the number of class B1 jobs has been increased from 3,200 to 4,100. The reason for this increase is unclear and has not been referenced within the summary of changes to the Local Plan which accompanies the document. However, in direct contradiction to this increase, the amount of floorspace allocated for these jobs has decreased from a range of 37,000-47,000 sq m to a range of 36,100 - 43,700 sq m. Again the reason for this change remains unclear and requires further clarification. GVG recognises and supports the success of the University of Surrey in supporting the formation of a series of technology based industries in the borough. The Plan should recognise the need to support this growth, both at the research park, and elsewhere in borough by the provision of appropriate accommodation.
- 3.32 GVG believes the allocation of the Walnut Tree Close and Woodbridge Meadows sites as employment zones is consistent with backward-looking planning but not the forward-looking Plan that GVG is seeking. If 10 Ha of employment land from both of these areas was relocated to either the Gosden Hill Farm or Blackwell Farm allocations (both to be served by the SMC and new rail stations), they would displace land for appropriate residential densities at 30-40 dwellings per hectare (DPH) giving a total of up to 400 homes. However, the area

which would be created at Walnut Tree Close and Woodbridge Meadows through rezoning would be appropriate for densities of up to 200 DPH delivering up to 2,000 homes. This would deliver a net increase of 1,600 homes across the lifetime of the Plan for an equivalent land take.

POLICY E2 - Location for new employment floorspace

- 3.33 The first part of policy E2 sets the sequential approach which needs to be followed to determine where new office and research & development floorspace will be located. Guildford town centre has given preference to areas within 500m of a transport interchange, and then to strategic employment sites.
- 3.34 The second part of policy E2 has been changed to now state that the *sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan*.
- 3.35 The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in policy E1.
- 3.36 Paragraph 4.416 within the definitions section of policy E2 states that:
- When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will each be treated as a transport interchange.*
- 3.37 GVG has considered the impact of Guildford West (Park Barn) being considered as a transport interchange. This would reinforce the rationale of GVG promoting the provision of high density, residential units on Woodbridge Meadows with provision of health, retail and leisure facilities alongside the amenity of the River Wey navigation. It is the most sustainable and arguably deliverable site in close proximity to the town centre where the freehold is mostly owned by the council. GVG identifies the ability to provide 1,300 dwellings at this location in addition to 5,000 sq m of other uses including retail, health care and sports facilities.
- 3.38 GVG has also considered the impact of the proposed Guildford East (Merrow) station being considered as a transport interchange. It supports this proposal as it enables access to employment both in the town centre and in the research park via the rail network (Guildford West). GVG notes careful phasing of rail station development, and associated rail services, is required to bring the infrastructure into operation before housing and commercial space is made available in large quantities.
- 3.39 Whilst Woodbridge Meadows is zoned for Employment Uses in the Plan, there is no specific allocation or strategic site. This is despite the freeholds being in the Council's ownership, significant amounts of land being vacant or underused and the need for a comprehensive flood protection scheme to hold water upstream of the constraint caused by the 1930s A25 Guildford Bypass southbound bridge which is low over the river.

POLICY E6 - The Leisure and Visitor Experience

- 3.40 The introduction to policy E6 sets out the aspirations of GBC for leisure and visitor experience and at paragraph 4.4.56 text has been added to state that:

The Local Plan aspires to improve and diversify the leisure and visitor experience in the borough. Stimulating vibrant town and district centres, encouraging the provision of additional

visitor and business accommodation in appropriate locations, protecting our special natural landscapes and preserving our historic built environment will be important to achieving this.

- 3.41 GVG wholeheartedly agrees with this statement of intent from GBC but this underlines the importance for a more co-ordinated approach to the development of the town centre than is currently being planned for under the draft document.
- 3.42 It is recognised that retailing is undergoing a major transition and complementary leisure experiences are essential in order to extend dwell times. Guildford is clearly well placed to bring forward the River Wey navigation as a visitor experience, complementing amenities such as the Castle, Sports Centres, and surrounding Green Belt. The introduction of pedestrianisation and removal of traffic from the town centre, which are not provided for in the Plan, can produce additional benefits.

POLICY E7 - Guildford Town Centre

- 3.43 In the introductory text to Policy E7 the Vision, as previously set out, has been removed and replaced with reference to the Guildford town centre as described in the spatial vision on page 22 of the draft Local Plan.
- 3.44 The removal of the vision for Guildford town centre and replacement with more generic spatial vision for the borough fundamentally undermines the thrust of Policy E7 and is again indicative of the watering down of the 'town centre first' approach by GBC in meeting the development needs of the borough or aspirations of the community. It is recognised that GBC may not have the skills, resources or appetite to deliver major solutions but others have, and a quality Local Plan is an essential pre-requisite to delivery.
- 3.45 Later at 4.4.74, additional text has been added in reference to public realm which now states that:
- We will ensure the public realm is enhanced and insist that all new development will be of the highest design and environmental standards. We will also take opportunities to reconnect the town centre to the amenity of the riverside.*
- 3.46 This again highlights the piecemeal approach to development of the town centre which is being taken by GBC. If public realm is to be delivered to the highest quality then a co-ordinated approach is required, such as that demonstrated by the GVG Masterplan. The GVG Plan brings together the riverside with the pedestrian areas of the town centre through planned and connected cycle routes and footpaths along desire lines while removing the serious blight of traffic from pedestrian and activity concentrations.
- 3.47 Turning to policy E7 itself, text has been deleted from this policy which previously stated that by 2033 Guildford town centre will have:
- More varied uses during the evening and night time, including along the riverside with residents and visitors feeling safe;
 - Active use of the riverside and river;
 - More effective routes within and across the town centre for pedestrians and cyclists;
 - New public squares and other informal meeting areas.
- 3.48 It is unclear why these elements of policy E7 have also been removed as GVG considers them to be vital in order to achieve successful regeneration of the town centre. No

explanation has been offered by GBC as to why these have been excluded from the Plan and it is requested that these are reintroduced as part of policy E7.

- 3.49 The council in para 4.4.87 states that it will work with partners to deliver the Local Plan and to progress further opportunities within the Guildford Town Centre Regeneration Strategy. No such work has taken place with The Guildford Society, GVG, or Guildford Residents Association and accordingly the ambitions of the community have not been embraced.
- 3.50 In the Reasoned Justification section following the main policy text, further wording has been removed at para 4.486 which related to flooding. As set out previously within these representations, the issue of flooding within the town centre is a vital issue which requires a co-ordinated approach as advocated within the GVG Plan. It is therefore necessary to reintroduce this wording and strengthen it where necessary to reinforce the importance of flood solutions as part of the regeneration of the town centre.
- 3.51 The Allies and Morrison draft Town Centre Vision 2015 and draft Guildford Town Centre Masterplan 2015 have been removed from the Key Evidence supporting this policy with only the Guildford Town Centre Regeneration Strategy remaining in place. This document is considered by the council as having no planning status and can accordingly be ignored by developers. This demonstrates the lack of detailed vision or commitment towards the town centre issues and opportunities on behalf of GBC and highlights the robustness of approach taken by GVG in the vision for the wider area.
- 3.52 Having reviewed the Guildford Town Centre Regeneration Strategy, GVG consider it to be an inadequate document which is flawed on many levels. It fails to recognise or address the key issues on all infrastructure and highways. These require resolution as part of a successful regeneration of the town centre. GVG attributes little weight to the Town Centre Regeneration Strategy and considers that it does not provide an adequate evidence base on which to inform the strategic decisions for either GBC or developers across the lifetime of the emerging Plan.

POLICY D1: Place Shaping

- 3.53 GVG welcomes the importance placed by GBC on place shaping. However, part two of policy D1 relates to 'residential developments' and does not include commercial or mixed use development. Whilst it is recognised that policy D4 deals with Character and Design of all new development it is important that Place Shaping is considered for all uses and in the context of a renewed and vibrant town centre. This policy should be widened to consider all development typologies.
- 3.54 The GVG Plan delivers a more comprehensive mix of uses and services which are not currently met by the historic core or other proposals for the town centre.
- 3.55 Place Shaping could clearly be best delivered through proper master planning and comprehensive development. This is to be contrasted with GBC's marketing particulars (appendix 6) inviting interest from developers on 20 individual sites, thereby mostly frustrating the ambitions incorporated in the Local Plan. The town centre faces complex issues for delivery solutions, particularly if the plan is to address the 17 issues identified by GVG.

POLICY D2: Sustainable, design, construction and energy

- 3.56 GVG supports the laudable policies on ensuring new development minimises the need for heat and energy through quality design and construction, and requiring developers to provide statements as to how this is to be achieved. However, GVG is concerned that the Plan has only taken a very narrow view of the "Energy" position, both in the UK and locally, and reacts

only to minimum NPPF requirements. Requiring developers to utilise only Renewable Energy Sources and then not making any provision for them in the Plan will, in effect, limit the amount of new development possible in the Borough. The GBC-commissioned report by the Centre for Sustainable Energy concluded that only very limited amounts of Renewable Generation was “deployable”.

- 3.57 The Policy section on Energy does not extend far enough into either the general shortage of supply of any energy or the demand side. It does not allow for, amongst others, the impact of electric vehicles, the use of Smart Grids and Battery Farm Storage potential. There is also no mention of the potential for Carbon Sequestration.
- 3.58 GVG takes the view that a review of the general energy provision, both from the National Grid and Renewable Sources needs to be included in the plan. The Local Distribution network operator needs to be consulted as to what power availability there is to support the Borough’s aspirations for both economic and domestic development.
- 3.59 Options for Renewable Local Embedded Energy Centres need to be part of any Plan, along with the consideration of the application of smart grids and battery storage farms. Financial support from the CIL levy could support retrofitting on large warehouse roofs at Slyfield and other big industrial estates, for instance, as GBC is the freehold owner of a number of the industrial estates. Advanced Thermal treatment is in wide use throughout Scandinavia, Europe and the Far East and there are an increasing number of plants in the UK. This has the potential to provide substantial renewable power and heat locally. The minimum requirement should be for all new development to be linked into Smart Grids which then manage and reduce significantly the power usage automatically.
- 3.60 GVG believe a far more proactive approach is needed to the consideration of energy and heat provision in the Plan, leading our town towards a low and zero carbon future whilst still promoting growth, new jobs and homes. As it is, the Plan seeks merely to pass this on to individual developers to deal with the matter on a piecemeal basis.
- 3.61 Only a comprehensively masterplanned town centre will enable sustainable energy to be harnessed and employed successfully and productively. The masterplan approach favoured by GVG would enable sites to be planned in a conjoined way and make it possible to deliver a unique energy network in the town centre with the ability for future phases of development to plug into this in later years of the Plan process. Piecemeal will achieve that outcome and the town centre is one of only three areas in the borough where such benefits can be achieved.
- 3.62 Section 4 of policy D2 sets out that combined cooling heating and power (CCHP) networks will be strongly supported and encouraged. However, the current piecemeal approach being taken to different sites within the town centre by GBC will hamper the viability and deliverability of a CCHP network. The Plan is silent on any potential sites for CCHP central facilities, GVG believes the Slyfield Regeneration Proposals offers potential to provide a ‘state of the art’ CCHP facility.
- 3.63 Overall, the aims of this policy need to be fundamentally reconsidered and the council must recognise the role which a properly masterplanned town centre has to play in the delivery of this policy.

POLICY ID1 - Infrastructure and Delivery

- 3.64 The NPPF sets out at para 162 that:

Local planning authorities should work with other authorities and providers to:

- *assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands*
- *take account of the need for strategic infrastructure including nationally significant infrastructure within their area*

3.65 GVG recognises the vital importance of the new infrastructure that will be required to support and mitigate the impact of the growth set out in the Local Plan.

3.66 Paragraph 4.6.2 sets out the wider definition of Infrastructure under the Planning Act to include *roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces*, all of which are recognised and addressed within the GVG Masterplan.

3.67 The policies immediately following policy ID1 set out the strategy for road investment (ID2), sustainable transport (ID3), and green and blue infrastructure (ID4). However there is no other specific policy relating to other infrastructure, as defined under the Planning Act, to include flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces.

3.68 In relation to rail infrastructure, GVG, as part of its Plan, has produced detailed proposals for the station quarter which enhances the connection of the rail station to bus, road, rail, cycle and footpaths. GVG recognise the required 40% increase in capacity described in the Wessex Plan, Heathrow Southern Rail Access and other studies and has designed new platforms and a modern transport interchange for the future. Increases in services and new journey opportunities afforded by Guildford East and West Stations plus regular services to the villages south east of Guildford, Heathrow etc. will result in the rail station becoming an even more significant hub for the region. The GVG Plan includes detailed proposals for the rail station quarter which enhances the connection of the station to bus, road, rail, cycle and footpaths.

3.69 There is a requirement to consider other essential infrastructure if the Local Plan is to be found sound.

POLICY ID2 - Supporting the Department for Transport's 'Road Investment Strategy'

3.70 As already set out in this consultation response, GVG has concerns that the local plan is silent on the plans and delivery aspirations of other key stakeholders such as Highways England.

3.71 An example of this is where the text in paragraph 4.6.17 has been removed, relating to the agreement of a statement of common ground between GBC and Highways England. In the summary of changes to the Local Plan it is suggested that this text has been removed as this will be agreed closer to the Examination. This position is concerning, as the impact of development upon the A3 and road infrastructure is critical in the development of the Local Plan and it is therefore vital that this is agreed at consultation stage if the Plan is to be found sound. Furthermore, if the A3 is improved as proposed, there will be clear potential for increased north-south traffic through the town and surrounding villages getting to and from the A3.

POLICY ID3 - Sustainable transport for new developments

- 3.72 A substantial amount of text and additional policy has been added to policy ID3 in relation to sustainable development, however, most of this text relates to vehicle movements and car parking.
- 3.73 GBC is assuming substantial modal shift in the town centre. GVG supports this aspiration. However, GVG believes the scale of modal shift proposed by the council – around 40% - will be very difficult to achieve due to the continuing need to access the town centre for retail and commercial activity and the Rail Station.
- 3.74 The inserted text at para 4.6.30a relates to Guildford town centre and recognises the congestion problem, especially the gyratory, as does GVG. The inserted text states that:
- This is, in part, a consequence of a mismatch between the demands for, and supply of, public off-street car parking on the different approach needs. The policy with respect to the provision of additional public off-street car parking is designed to reduce the impact of these trips on traffic volumes and congestion in the town centre. This planning policy will complement future environmental improvements in the town centre realising the Council's 'drive to, not through' concept.*
- 3.75 GVG does not accept this explanation for congestion or the proposed solution.
- 3.76 The revised approach adopted by GBC on traffic completely ignores the role of Guildford as a regional and sub-regional destination. It also ignores the enhanced pull of Guildford if town centre regeneration comes forward at levels as expected by both GVG and GBC.
- 3.77 The approach of GBC is completely at odds with the principles of sustainable development and the requirement for modal shift away from cars to other forms of public transport.
- 3.78 The GBC plan is silent on measures to mitigate North South Traffic through the town centre which will be exacerbated by developments south of the borough e.g. major housing at Dunsfold and significant housing growth in Godalming. In the absence of any substantive plan to by-pass Guildford on a North-South axis, handling traffic from the A281, A3100 and A25, Guildford will have to support an increase North-South Traffic. The GVG Plan allows for traffic to be supported at current levels, whilst reducing accidents and pollution in the town centre. The GVG plan also provides for major environmental wins around areas allocated to housing, leisure, commerce and tourism in the town centre.
- 3.79 GVG supports the concept proposed by the council of 'drive to, not through' the GBC plan does not support this concept practically by creating provision for interceptor 'Park and Ride' car parks, or the better utilisation of bus and rail networks. The only new 'Park and Ride' in the plan appears at Gosden Hill linked to Guildford Station East proposals, but no capacity is proposed. The plan is silent on opportunities based at Shalford Station and north of the town in the Slyfied area.
- 3.80 GVG notes that there are 10,600 car parking spaces in the town centre over 44 car parks. Many of these spaces are in large surface parks that represent a lost opportunity for other uses. GVG are concerned that revenue generation from car parking may be clouding GBC's long-term plan making judgement.
- 3.81 The masterplan as prepared by GVG demonstrates a pedestrian and cycle friendly environment where the gyratory is replaced with a new bridge link to take through traffic away from the town centre and from areas of high pedestrian activity. Whilst GVG accepts that according to the Guildford Town and Approaches Movement Study that highway interventions

are generally unsuccessful in providing infrastructure solutions, the GVG crossing is about removing the maximum areas of conflict between town centre, pedestrians and vehicles. It delivers environmental improvements to the riverside, new homes, and will assist in achieving modal shift.

- 3.82 The bridge link will also remove traffic from the proposed new housing, retail and the visitor areas, leaving the town centre available for an improved pedestrian environment in close proximity to sustainable methods of transport, the retail core and a reconnected riverside. The GVG also allows for the creation of the proper transport interchange centred on a revised and expanded rail station. This crossing can be delivered in a phased approach without disturbing the current town centre.

POLICY ID4 - Green and blue infrastructure

- 3.83 GVG agrees with the principles of additional green and blue infrastructure and recognise the potential of riverside sites within the town centre to provide access to the blue infrastructure of the River Wey. The masterplan as prepared by GVG demonstrates the significant potential for a substantial increase in the amount of green and blue infrastructure in the town centre through a co-ordinated approach and comprehensive delivery. It would result in an improvement in general wellbeing for existing and proposed residents of the area and enhancement to the visitor experience for local attractions and offers a better future for the town as a business centre.
- 3.84 The proposed infrastructure solution from GBC involves retaining a major 4 lane carriageway through the town centre and three lanes past the Town Wharf, at the closest point to the historic core of the town. This would result in the continuation of the physical separation of the town centre from the River Wey, first established in the 1960s. This is completely contradictory for the objectives of the Local Plan. It continues the maximum conflict of people with traffic, with all its consequent dangers and pollution. This is highlighted by the crash map and the INRIX survey (appendix 7) which describes Guildford's record and costly congestion, being the 6th worst place after the conurbations.

4. Site Allocations

- 4.1 The NPPG states that *where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions).*

Paragraph: 010 Reference ID: 12-010-20140306

- 4.2 The approach taken by GBC to the site allocations does not reflect the guidance from government. GVG has considered the phasing of development across the town centre and has fundamentally addressed the 'what, where, when and how' questions to the best of its ability and resources, having been refused access to officers and consultants or their reports.
- 4.3 GVG has, nonetheless, reviewed the identified sites within the GBC Plan and set out comments on each, specifically based on the advice provided within the NPPG. To provide further clarity the relevant site area has been analysed against the same area within the GVG Masterplan and all are included in the appendices 4 and 9 of these representations.
- 4.4 There are however, two distinct issues for each site. Firstly the use and development of the individual site. Secondly, and more importantly, the real value created through combining sites and adopting a comprehensive approach to development, and specifically how this approach can address the 17 issues identified by GVG, unlike the ad-hoc approach intimated by policy A1 and those following.

POLICY A1 - The Plaza, Portsmouth Road, Guildford

- 4.5 GVG would support this site coming forward for redevelopment and notes that an application has been submitted for 104 C2 units. GVG is interested to see if high quality design standards will be applied by GBC to this site, and if the massing is deemed to be appropriate to this location. The two disastrous high rise council blocks, directly opposite, should not be seen as a guide for what might be acceptable for this site.

POLICY A2 - Guildford Cinema, Bedford Road, Guildford

- 4.6 This site is considered by GVG as a key site within the town centre and provides a range of possibilities within the GVG Masterplan for residential, open space and a riverside pedestrian and cycle route between the town centre and rail station. There is also potential for this riverside route to lead from the town centre to a new civic area, the cathedral and the university.
- 4.7 It is noted that there is a key conflict between the requirements and opportunities of the identified and the allocated use of the site. Requirement 4 seeks to *improve the relationship between the built form and the river setting*. Opportunity 1 seeks to *improve the quality of the land around the building, public realm and enjoyment of the riverside, creating a welcoming and well used public space*. This would appear at odds with allocation for the site as a cinema (D2) with 3 to 5 additional screens and approximately 1000 sq m of additional food and drink floor space (A3-A5). The development of the site as a cinema, even with the introduction of food and drink, would be unlikely to provide an active frontage and would not activate the riverside in the way which a mixed use residential scheme could, and where residents would get the benefit of an enhanced setting.
- 4.8 It is clear that it would be better to allocate this site for residential use and the cinema be relocated to North Street as part of the redevelopment of that site under policy A6. The GVG Masterplan indicates that up to 144 residential units could be accommodated on the site with

a proportion of food and beverage provision on the land to support visitors and residents enjoying the riverside.

POLICY A3 - Land between Farnham Road and the Mount, Guildford

- 4.9 This enclosed site fronting the railway (part of the excavation for the tunnel entrance) forms an isolated part of the land south of Guildford Station but has been identified by GBC for the development of up to 70 houses. This 'canyon' site is particularly unsuitable for residential development. It is constrained by the railway, topography and environmental issues. The site is also in close proximity to a number of residential units at Mount Place which require a degree of separation to the proposed units. It is therefore unlikely that the site could yield the amount of units proposed and is better suited to business space or operational rail land rather than residential use. If the station administrative offices, sidings, or even an extension to car parking were to be relocated to this site it would free up much better residential opportunities in close proximity to the station and town centre.
- 4.10 GVG has identified that the site should be utilised as additional sidings, maybe with railway offices or parking built over the lines, to allow for platform zero to be brought forward at Guildford Station and to deliver the improvements in suburban train line services to the town centre from other rail stations within the borough. GVG sees the rail station as a key area in the redevelopment of the Town centre and this site and sites A7, A8 and A11 should be considered together for station redevelopment, together with any requirement to adjust the operational boundary of the railway to allow for new and revised platforms and station facilities.

POLICY A4 - Telephone Exchange, Leapale Road, Guildford

- 4.11 It is noted that this site has now been removed as an allocation within the Local Plan. The reason stated within the summary of changes is that the site is *no longer available* but the reason for this is not clear.
- 4.12 It is understood that the lease of the current occupier will expire by 2025 which is within the lifetime of the proposed Local Plan. It is the position of GVG that this site remains a suitable site for housing and should be considered for CPO by GBC if no longer available. The communications infrastructure contained within the site could be relocated as part of any redevelopment of this site or as part of the adjoining North Street development.
- 4.13 Alternatively the building could be converted into residential use with the limited amount of communications equipment remaining in place.

POLICY A5 - Jewsons, Walnut Tree Close, Guildford

- 4.14 GVG supports the development of this key site and the quantity of housing allocated on the site. However GVG identifies the potential for this site to accommodate 132 dwellings in addition to an enhanced medical centre which can serve both the existing community, university campus and the predicted increase in local population.

POLICY A6 - North Street redevelopment, Guildford

- 4.15 This is a key site for Guildford Town Centre and GVG supports the redevelopment for a range of uses. It is noted there have been four separate failed schemes by MEPC, Hermes, Westfield and Land Securities respectively. It is clear that the successful redevelopment of the site, as envisaged by GBC for decades now, is highly dependent on securing a main anchor tenant. Discussions have been ongoing for some time with John Lewis. It is clear from recent publicly available information that John Lewis, and indeed many anchor retailers, are

unlikely to open any additional stores at present (appendix 8) beyond those identified already. The site should be developed with town centre uses but not subject to overdevelopment.

- 4.16 It is noted that the proposed 41,000 sq m of comparison retail floorspace and 6,000 sq m of food and drink is the same as the forecast for the total borough-wide floorspace capacity for comparison shopping and food and beverage uses as set out at para 4.40 in the Retail and Town Centre Topic Paper up to 2030. The current proposals for this quantum of retail space and 400 dwellings appears to be overdevelopment of the site; when the allocation claims the total retail allocation for the borough. The town centre masterplan will require retail and leisure accommodation at ground floor to create the appropriate quality of environment. This site has not, to date, been included in the GVG Masterplan as it was considered to be at an advanced stage of development. With the likely absence of a major department store and question marks over the site, the site should be redesigned and masterplanned to contribute to needs of an integrated town centre.
- 4.17 It is therefore considered that GBC needs to consider alternative schemes for this site, including its capacity for more housing, in order for the site allocation to be considered as sound. It is also considered that this is a more suitable site for the relocation of the cinema from site A2.

POLICY A7 - Land and buildings at Guildford railway station, Guildford

- 4.18 As with site A3, this site should be considered as a group with sites A8 and A11. GVG is aware of the previous Solum application for 445 units. The amended application is for 438 units and is currently scheduled for a full public inquiry in autumn 2017.
- 4.19 The proposed East/West link, within the GVG Masterplan, would cross the northern part of this site. GVG has discussed the concept of the crossing with the chief executive and development director of Network Rail (NR), both of whom have recognised the enormous amount of work and new ideas brought forward by GVG to secure NR's own plan objectives. They acknowledge the aspirations of the GVG Masterplan. GVG work on the need to expand the rail station for the proposed platform 0, and other new platforms, indicates the station may need to be re-aligned to provide the necessary room, and in particular to avoid very sharp curves on exit from the St Catherine's Tunnel with resultant operational constraints. The proposed Solum development would impact any requirement to revise the operational railway. This reinforces GVG's view that a comprehensive approach to the rail station needs to be taken.

POLICY A8 - Land West of Guildford railway station, Guildford Park Road, Guildford

- 4.20 The site should be considered alongside A3, A7 and A11 as a single group, rather than piecemeal development plots, so as to bring forward a fully integrated transport interchange including capacity for the Heathrow to Gatwick link.
- 4.21 The GVG Masterplan has considered the wider context of this site which demonstrates its importance for access through the station to the town centre. The site provides the opportunity for a mix of uses including the relocated car parking from site A11.
- 4.22 GBC has not made a calculation of the yield of residential units from the site but GVG has assessed the capacity of the site for up to 59 dwellings within the red line boundary as identified by GBC, or 121 if additional land as highlighted within the GVG Masterplan is included.

- 4.23 The GVG Masterplan demonstrates that there are substantial town and local planning objectives, including public realm improvements, which can be derived from a more holistic masterplan approach, including the partial pedestrianisation of Guildford Park Road and other benefits. (See comments in 4.19 above)

POLICY A9 - 77 to 83 Walnut Tree Close, Guildford

- 4.24 The GVG Masterplan shows this site as open space to access the new open space adjoining the River Wey. The Allies and Morrison Plan also shows this site as open space and a key access point to the wider area of open space.
- 4.25 It is therefore unclear why it has been allocated for 3,000 sq m of office space in isolation without consideration of the site immediately to the north or the wider area.

POLICY A11 - Guildford Park Car Park, Guildford Park Road, Guildford

- 4.26 This site should be considered within the Guildford Station cluster of sites with A3, A7 and A8. The site is strategically important for the sub region in the context of Guildford town centre as it provides a direct link between the university, the river and the town in addition to helping the major infrastructure deficit as set out within this consultation response.
- 4.27 In general, the Local Plan is silent on the role of the University, which comprises at least a third of the local economy, within the strategy for the borough. The potential to create physical and social links between the town and the university should be fully considered within the Local Plan, whereas to date these have operated in total isolation from each other.
- 4.28 GVG has supplied designs and routes to create safe tree-lined walkways to the university and cathedral. These have been disregarded by GBC.

POLICY A13 - Kernal Court, Walnut Tree Close, Guildford

- 4.29 This site needs to be considered as a single strategic parcel alongside other sites in Walnut Tree Close such as A10 and A14.
- 4.30 GVG supports the principle of the scheme being allocated for development but would like to see a co-ordinated masterplan approach to sites in Walnut Tree Close to address the 17 issues.

POLICY A14 - Wey Corner, Walnut Tree Close, Guildford

- 4.31 This site needs to be considered as a single strategic parcel alongside other sites in Walnut Tree Close such as A10 and A13. This ribbon of land sandwiched between rail and river is capable of providing a much better contribution to Guildford.
- 4.32 GVG support the principle of the scheme being allocated for development but would like to see a co-ordinated masterplan approach to sites in Walnut Tree Close.
- 4.33 In relation to policy A9, A10 A13 and A14, GVG considers that the entire area of Walnut Tree Close should be allocated for medium density, mixed use development, rather than taking the piecemeal approach that is analogous to the approach of GBC to the rest of the town centre.

POLICY A24 - Slyfield Area Regeneration Project, Guildford

- 4.34 GVG consider this to be a highly constrained site which includes flood risk, ecological and landscape constraints. It is noted that 11ha of the 40ha site is allocated for waste management purposes under the development plan for the area. Once the other uses, such as industrial, open space, and areas for flood risk are accounted for, this would leave a

constrained area to bring forward the proposed 1,500 units which would inevitably have to be delivered at a high density.

- 4.35 In addition to the proposed extension of Slyfield to the south (which is destined to be developed for residential uses at a considerable density) GVG recommends exploring an extension to the north for additional employment uses and a north Guildford Park & Ride at one end of the proposed Sustainable Movement Corridor. This can be achieved by removing an area of Green Belt that is former landfill with a narrower permanent green screen between the employment zone and neighbouring inset village of Jacobs Well. We also note the Plan is silent as to whether Slyfield might be the centre for CCHP facilities.
- 4.36 Given the high amount of industrial and commercial space to the north of the site, GVG consider that this would be a more suitable site for the relocation of industrial and commercial uses from the Walnut Tree Close and Woodbridge Meadows sites. Woodbridge Meadows is best suited to high density, high rise residential development and leisure space.

POLICY A25 GOSDEN HILL FARM

- 4.37 GVG notes that this site will contain the Guildford West Station and a Park and Ride facility. GVG supports these infrastructure improvements. Both Guildford West and Guildford East stations (A59) below will increase pressure on the main rail station both in terms of entry, exits and interchange; reinforcing the need to increase capacity. Travel across the town to employment centres at the Research Park, University and Hospital and the proposed office space in Gosden Hill will be facilitated.

POLICY A26 - Blackwell Farm, Hogs Back, Guildford

- 4.38 GVG recognises the importance of a range of sites coming forward for development in addition to town centre sites. However the development of Blackwell Farm would result in some significant pressure on infrastructure, mainly the A3 and roads leading in to Guildford town centre. If this cannot be demonstrated at this stage then sites such as Blackwell Farm must be reconsidered. The proposed grade separated junction onto the A31, whilst visually intrusive in an Area of Outstanding Natural Beauty, will also have the effect of attracting more traffic onto the Farnham Road Bridge where there is no current plan to accommodate additional capacity.

POLICY A59 - New rail station at Guildford West (Park Barn)

- 4.39 GVG supports the use of this site for a new railway station. In order to encourage modal shift it is important that the town centre sites around Guildford Train Station accommodate the new platforms and infrastructure to allow for an increase in domestic rail services to this station from the town centre.

POLICY A35 - Former Wisley airfield, Ockham

- 4.40 The concerns around highways impact as set out against policy A26 remain the same for this site. GVG is more concerned that the size of site, at 2,000 units, is not big enough to support the proposed community in its own right. GVG believes the development of this site will lead to substantial pressure on the existing infrastructure, both locally and in Guildford town centre, and this is not currently mitigated under the proposed Local Plan.

POLICY A46 - Land to the south of Normandy and north of Flexford

- 4.41 GVG notes that this site has now been excluded as a proposed site within the Local Plan. The reason set out within the summary of changes accompanying the Local Plan states that *an alternative and preferable location for the new secondary school has been found which removes the exceptional circumstances to justify this site.*

- 4.42 Given the sustainable location of this site in close proximity to Wanborough Station, it is disappointing that this site has been deleted. The sustainability appraisal (by AECOM) highlighted 'new residents would have excellent access to the Wanborough train station'. Whilst the secondary school may no longer be required on the site, other uses should be considered on the site which would justify the exceptional circumstances of the site coming forward for development.

Overall Commentary on plans for housing provision.

- 4.43 GVG has provided a comparison of housing delivery between GVG proposals and GBC plans in appendix 9. GVG proposals can deliver approximately 3,367 homes (including student and retirement dwellings) compared to GBC plans of 931 homes in the same area. GVG plans achieve 2,436 more homes which possibly defer further building in greenbelt until next plan period.

5. Conclusion

- 5.1 Guildford Vision Group remains committed to seeing the Borough of Guildford, and particularly Guildford town centre, become a better place. This requires focused attention of providing for high quality growth of housing, commercial space, together with supporting community and infrastructure assets over the next 20 years to cope with the current deficits and predicted increase in population in the borough over this period.
- 5.2 The historical core of Guildford is afforded a high degree of statutory protection but has a very limited mix of uses, either at present or as promoted under the Plan. The GVG Plan looks to the end of the draft plan period and the next and reimagines Guildford in providing a broad mix of higher density, mixed use development while also delivering a range of key environmental improvements. This will include improvements in retail dwell times, better leisure, business, civic, health and other provision. A more organised transport solution giving access to all forms of transport should achieve much greater modal shift. The historic core would remain protected and unchanged.
- 5.3 The particular focus of GVG is to see a robust and deliverable masterplan come forward for Guildford town centre which gives confidence to developers to deliver the project. Such a masterplan can achieve the objectives of the group as set out previously in this consultation response. It can meet the 17 issues as identified by GVG that are not addressed by the Local Plan in any credible way.
- 5.4 A vital element of any masterplan for the town centre is to resolve the existing chronic issues - traffic congestion, record vehicle-related fatalities and serious injury as well as record pollution. The congestion issues will continue to increase. If the proposed increase in homes across the borough is brought forward as set out in the draft plan then the existing failing infrastructure within the town centre will collapse completely.
- 5.5 GVG does not believe it can solve the traffic problem. The GVG Plan is to protect the existing accessibility and capacity of the town centre and to remove the current conflict between vehicles and people within the town centre. It employs better and safer designed roads, cycle routes and footpaths in an integrated, modal shift-enabled plan addressing the first five of the 17 issues identified by the group.
- 5.6 A central feature of the GVG Masterplan is the delivery of a new East-West crossing, linking York Road with Guildford Park Road. This will move traffic away from the centre. It will enable separation of cars from people and cyclists. It will make Bridge Street and Onslow St safer and free from through traffic-free, except for buses, taxis, permitted vehicles and mobility access. It will enable the lower ends of both North St and the High St to be linked together by great public space and amenities along the both sides of the riverside.
- 5.7 The plans suggested by GVG has genuine support from the local community, demonstrated at several public events and on social media. Unfortunately GBC have had limited, engagement with the group, failed to discuss details or to answer its technical questions as a local stakeholder in the Plan making process.
- 5.8 It is the firm intention of GVG to have its evolving Plan considered and it will continue to make representations to the borough as part of the Local Plan examination.