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22nd October 2018

Dear Sir or Madam

**Submission Local Plan: Strategy and Sites - Main Modifications**

I write in response to the consultation on the Main Modifications to the Submission Local Plan: Strategy and Sites document on behalf of Guildford Vision Group (GVG).

As you are aware GVG has been an active participant throughout the regulation 18 and regulation 19 consultations. GVG also submitted a pre-hearing statement to the Planning Inspectorate in advance of the examination and subsequently participated in a number of the hearing sessions.

In summary GVG raised a number of critical issues during the regulation 18 and regulation 19 consultations, and also during the examination which can be summarised as follows:

- Not addressing the settlement hierarchy in formulating the plan and lack of a 'brownfield first' approach.
- Lack of proper town centre policies within the plan. Failure to meet the test of exceptional circumstances by the council in order to justify the release of green belt.
- Lack of development sites identified in Guildford Town Centre and wider urban area and in contrast to the sites identified in the 2017 Guildford Town Centre Regeneration Plan (plans attached at Appendix 4).
- Failure to address provision of infrastructure across the borough within the Local Plan, with only limited plans to address the poor infrastructure in the town centre.
- The suitability of the housing trajectory and the suitability of green belt sites to deliver housing.
- Lack of delivery of a wide variety of homes across the local plan area.
- Overprovision of retail space on the North Street site in relation to the established evidence base.
- Lack of policies for the town centre to address the broad spectrum of issues the town centre faces. Importantly there is no attempt to bring forward policies to promote masterplanning the town centre to provide a joined up approach to infrastructure, spatial strategy, resilience (Flood Prevention, Water and Sewerage, Power etc.).

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The council has gone some way to addressing points raised by the Group. The changes as set out in the Main Modifications document do not go anywhere near far enough. On this basis, GVG is firmly of the opinion that the plan, in its current form (including the main modifications) remains unsound.

In the years leading up to the examination and throughout the hearing sessions, GVG sought to work proactively with the council to identify solutions concerning the town centre and wider urban area. As part of its involvement in the hearing sessions, GVG prepared a draft Statement of Common Ground which was submitted to the council in May 2017 (Appendix 5). Despite submitting this to the council, with a copy to the Inspector, no further response to this was received even though SOCGs have clearly been agreed with other parties involved in the process.

Since the hearing sessions, GVG has continued to meet as a group and most recently, on 16 October, held a public meeting, to receive an update on plan progress, particularly an update on Policy S3, in Guildford with around 150 residents attending. An exit poll at the meeting showed 94% were not confident about the outlook for Guildford and town planning, 89% supported more pedestrianisation, and 93% agreed that the council should address infrastructure issues in the town centre, including safeguarding a route for a new crossing of the railway & river if no other solution is available. The meeting was streamed to the SurreyLive website where over 8500 'hits' have been registered for the video of the event.

The Procedural Practice in the Examination of Local Plans issued by the Planning Inspectorate (June 2016 4th Edition v.1) deals specifically with 'Post-Submission Changes Initiated by the LPA' and specifically states at paragraph 5.22 that:
*The consultation on the proposed change may generate new representations. If so, in the interests of fairness, the Inspector will provide an opportunity to appear at the hearings to those who seek an amendment which follows directly from the LPA's proposed post-submission change(s)10 to the plan.*

GVG is firmly of the opinion that it is necessary to re-open the examinations in the interests of fairness so that further evidence can be heard from GVG and others (including The Guildford Society) on the inadequacies of the modifications proposed.

Turning to the main modifications as proposed by the council, GVG has split the response in to the relevant sections and these will be taken in turn. GVG has not sought to comment on the modifications to the Housing or Protecting Policies within the plan. This is because there are more serious issues with the soundness of the plan, particularly around the town centre and the use of brownfield land.

**MM2 - Policy S2: Planning for the borough - our spatial development strategy**

The council has now selected a flat housing trajectory of 630 dwellings per annum over the plan period (2015-2034) following commentary from the inspector during examination. This trajectory is welcomed as it avoids the stepped Liverpool housing trajectory which was previously being promoted by the council and which the inspector had said would not be a sound approach. In order to deliver a flat housing trajectory it is also recognised that the council has had to make the difficult decision to allocate further additional sites in order to satisfy the requirements of early delivery. However, the flat trajectory still spreads the historic undersupply across the plan period (Liverpool method) which remains contrary to government advice and is likely to require further justification through additional hearing sessions on why the backlog cannot be met in the early plan period.

It is however notable that no town centre sites were considered as suitable candidates for early delivery of housing. Whilst the deliverability constraints of brownfield sites in urban areas is recognised by GVG, there are numerous examples of sites, such as surface car parks within the ownership of GBC, that could be made available for further early delivery. Several of these sites were fully identified by the council themselves in the 2017 Regeneration Strategy (Appendix 4). No evidence has been provided by the council that any consideration has been given towards any additional town centre sites above those previously identified by the council in the Local Plan.

The wording of part 2a) of policy S2 still refers to 41,000 sq m of comparison retail floorspace (gross) provision across the plan period. Our previous comments that were set out in our regulation 19 consultation response and pre-hearing submissions are still relevant in this regard. It is noted that the proposed 41,000 sq m of comparison retail floorspace proposed at North Street is only marginally reduced from the allocation in the May 2014 draft plan and is the same 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 rationale for including this quantum of retail floor space in a single location within Guildford at North Street remains unclear and is even less logical in light of recent trends in retail across the UK. The wording of policy 2a is also at odds with the wording of Policy A6: North Street where the wording of the allocation has been modified to say 'approximately' rather than 'minimum' and it is suggested that wording elsewhere in the plan which relates to retail space is reworded in a similar way, including a material reduction in quantum.

*Table S2b: Spatial Strategy: Distribution of Housing 2015 - 2034 (net number of homes)* shows that 10,592 homes are allocated across the GBC area, of which 2,306 (22%) are in the town centre and wider urban area, and only (863 - 8%) are in the town centre. This is analogous of the fact that the entire spatial strategy does not take a brownfield first approach as advocated by the council.

During the local plan hearing sessions, GVG submitted a document to the council which compared the site allocations in the town centre in the submission local plan to those identified within the GVG masterplan. No further consideration has been given to how these sites could be incorporated into

the spatial strategy or even be considered as candidates for early delivery to meet the significant backlog as identified.

**MM3 - Policy S3: Delivery of development and regeneration within Guildford Town Centre**
The inclusion of policy S3 in response to the inspector's request at the hearing sessions is noted by GVG but does not achieve the objectives or aspirations of the Group and, more importantly, the residents of Guildford. And this is after previous plans failed to address issues or generate action through positive planning. The council consistently abrogates its responsibilities to masterplan the town centre to address local issues, even though it is the major land owner and the relevant authority, and could play a formative role in creating a vibrant Guildford.

In general terms there is a need for basic masterplanning. There is even a distinct lack of any map or plan which indicates which area policy S3 applies to. This should be included. It is vital that policy S3 is applied to a wider area than just the area designated as Guildford Town Centre on the proposals map, and it should apply to the wider hinterland around the town centre where the more significant issues of urban decay exist, as highlighted by the Inspector during the hearing sessions. The GVG masterplan considers the much wider area around Woodbridge Meadows and Walnut Tree Close and this area should also fall under the remit of policy S3. Alternatively, the council should consider the inclusion of a policy S4 to cover the wider Guildford Urban Area as agreed within the joint GVG and Guildford Society submission made during the Planning Examination.

Paragraph 4.1.17 of the introductory text to policy S3 sets out how the delivery of aspirations of policy S3 will be delivered, including the future Area Action Plan (AAP). It remains abundantly clear to GVG that there is no obligation on the council to begin the AAP at any time in the future. This could be delayed indefinitely, as with the 2006 Town Centre Area Action Plan, whilst the town centre continues to fall into decline, including the supporting infrastructure. In order for the plan to be sound in terms of effectiveness it is crucial that there is a clear obligation on the council to begin the AAP immediately upon adoption of any plan, conditional upon other issues of soundness being resolved.

In document ID7 (Points raised during the Spatial Strategy session for response by the Council) the inspector raised a number of key points to the council in relation to the town centre as follows:

- *For exceptional circumstances to exist to release land from the Green Belt, shouldn't it be clearly demonstrated that all opportunities for development in the town centre have been exhausted? Isn't the residential capacity of the town centre much higher than the Council states? How is it that the GBCS looked at potential residential development sites but such an approach does not appear to have been done for the town centre?*
- *Does the plan rely too much on additional retail in the town centre, limiting the opportunity to provide many more homes where both young and old people want to live? Isn't the North Street redevelopment site within the Council's gift to deliver homes early in the plan period?*
- *Should the plan pay more attention to improving the environment in the town centre?*
- *Should the spatial strategy pay greater attention to deprived parts of the urban areas?*

- *Shouldn't the Council be emphasising the need for the University to intensify the use of its sites before new Green Belt land is taken? Areas of surface car parking could be developed.*

It is considered that the council has simply not addressed the rest of the questions and GVG shares the concern of the inspector in this regard. Whilst the intention of policy S3 may be to address the town centre it does not address the connection with the fundamental questions, particularly around Exceptional Circumstances, which are considered to be a matter of soundness.

Paragraph 4.1.20 of the Reasoned Justification accompanying Policy S3 sets out that the Council will play a key co-ordinating aimed at achieving regeneration. It is disappointing to see that the council sees itself as only playing a co-ordinating role in the regeneration of the town centre and fails to recognise the unique role that the council can play as an owner of substantial land holdings across the town centre, and as the planning authority with the appropriate powers.  An example of how councils can play a key role as land holder as well as facilitator of development is the Slough Urban Renewal initiative1 undertaken by Slough Borough Council.

Paragraph 4.1.20 goes on to set out the partners that the council will be working with to deliver policy S3 which include Surrey County Council, Network Rail, National Trust and the Private Sector. None of these parties will initiate and take forward solutions beyond their ownership. GBC, or a third party instructed by GBC, needs to take on this role.

It is notable that nowhere does the council's thinking include resident groups such as GVG, The Guildford Society, Guildford Bike User Group, Holy Trinity Amenity Group, or Guildford Residents Association. Nor does it include any obligation of the council to be the facilitator or to work with the residents of the borough. These are matters which are fundamental to the success of policy S3. Historically the council has a history of consulting residents but not engaging to develop plans acceptable to residents.

**MM23 - Policy D1: Place shaping**
GVG assumes that Guildford, as a borough, will need to grow to ensure its economic future. Thus it is essential the local plan will ensure delivery of high-quality amenity space, places and buildings. Paragraph 4.5.8e of the reasoned justification supporting policy D1 makes reference to the Corporate Plan (2018-2023) where the latter identifies the regeneration of the town centre and other urban areas as one of three strategic priorities in the 'place making' theme. The Corporate Plan is internally produced by the council. It is important that matters driving strategic priorities are placed front and centre in the Local Plan and a commitment is made by the council which cannot be subject to political change at a later date.

Since issuing S3 for consultation, it is noted that Policy D4: Character and design of new development has been deleted with some of the policies transferred into D1, but not all of them.

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[1] https://www.slough-thinkingforward.co.uk/

There is no nowhere in the plan where there are any simple guidelines for mass and scale to protect Guildford in the absence of more carefully formulated policies. Whilst it is anticipated that an element of these should come through in the subsequent Development Management DPD, it would be detrimental to allow a policy vacuum to exist until these policies were adopted, which is some years away.

### MM26 - Policy ID1: Infrastructure and delivery

The introduction to this policy states *Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality.* The policy needs to be far more robust in seeking to plan infrastructure for the town centre where pollution, accidents and congestion are rife. Co-ordinated developer contributions are likely to be a sub-optimal delivery mechanism. A true masterplan for Infrastructure, including alignment of Network Rail, Surrey County Council and the Highways Agency, is required to drive an investment strategy over several years. Sticking plaster solutions e.g. Network Rail's proposed bridge works for the Farnham Road Bridge are a waste of funding and do little to address the town's issues with the major bottleneck of the bridge continuing indefinitely. At Appendix 6 – is attached a report from Motion Consultants Ltd – 'Guildford Gyratory, Highways Matters for Guildford Vision Group' showing how a revision of the transport corridors in the town could provide major benefits, and much of the required resilience, for all forms of movement.

### MM27 - Policy ID2: Supporting the Department for Transport's Road Investment Strategy

During the hearing sessions there was in-depth scrutiny on the delivery of the improvements to the A3 and M25. The reasoned justification which accompanies policy ID2 sets out at paragraph 4.6.18a that the evidence provided at examination demonstrated that, without the implementation of the A3 scheme, the cumulative impacts of development in line with housing trajectory would become severe during the second half of the plan period. It is surely now the case with the revised housing trajectory putting more traffic on greenfield sites that the cumulative impacts would become severe far sooner in the plan period. It is noted that on several key criteria the traffic network is already at capacity.

Paragraph 4.6.18a then goes on to state that a review will be carried out to establish whether this severe impact can be mitigated, but if it cannot then a review of the Local Plan is likely to be required. This is almost certainly the case and it is therefore also patently the case that the plan is set to fail. This cannot be said to be positive planning in plan making terms. A logical step would be for the council to properly consider how the housing trajectory can be retained through the use of sites which would have a much lower impact on the A3 infrastructure, even though they are mostly council-owned sites. There is obvious merit in much stronger consideration of town centre sites where there is much greater access to sustainable transport options. Car ownership is likely to be lower, and is easier to control through development management tools. If holistic masterplanning is required by the council of the strategic sites then it applies equally to the council's own sites.

**Conclusion**

GVG has other concerns related to the plan, e.g. Policy D2 appears to have been substantially weakened in its protection of heritage assets but GVG has focused in this note on the key issue of Policy S3 and interlinked supporting policies.

GVG believe the plan as it is proposed is unsound as it:

- Has weak and inadequate policies for the town centre, which requires a masterplanned approach for the entire area
- In the absence of a proper plan for the town centre housing, utilises precious greenbelt space
- Doesn't address a wide range of Infrastructure issues
- Doesn't safeguard key sites for Infrastructure improvement in the town centre

Finally, GVG, as always, remains ready to engage positively with other parties to create the plan that Guildford so desperately needs, and that the South East economy requires for Guildford to play its rightful role.

To remain productive and helpful to the council, GVG has prepared comments/proposed rewording in detail on Policies
Appendix 1 – Policy S3
Appendix 2 – Policy D1
Appendix 3 – Policy ID1
Also included as referenced in the text above
Appendix 4 – Extracts Guildford Town Centre Regeneration Strategy 2017 Jan 2017
Appendix 5 - Statement of Common Ground May 2018
Appendix 6 – Report from Motion Consultants Ltd - Guildford Gyratory, Highways Matters for Guildford Vision Group

Yours sincerely,

**John Rigg**
Chairman, Guildford Vision Group

Cc        Andy Black, PRP

## Appendix 1 - Policy S3: Delivery of development and regeneration within Guildford Town Centre

| Introduction | GVG Comment |
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| 4.1.12 Guildford town centre has a unique setting and historic character and is the largest retail, service, administrative and commercial centre in the county of Surrey (measured by floorspace and number of units). With good transport accessibility by rail and road, it is one of the key town centres in the South East outside of London. | *Accepted* |
| 4.1.13 The town centre is centred on two linear features, the River Wey, and the High Street that rises up the valley side from Town Bridge. Related to this, the centre has striking topography, with attractive views to the surrounding countryside south and east of the town centre. It is renowned for its picturesque historic High Street and lanes off it, known as 'gates' which link the High Street, the Castle and the other key shopping street, North Street. The setting and the historic street pattern in the central area of the town centre are a vital part of its special character as is the range and concentration of heritage assets. | *The Town Centre has large areas of deterioration and obvious opportunities for a town centre plan with an integrated approach to the serious issues identified in the plan at examination.* |
| 4.1.14 The NPPF states that policies should recognise that residential development often plays an important role in ensuring the vitality of centres and therefore should encourage residential development on appropriate sites. The Council is committed to ensuring that the policies and allocations within the Local Plan, including those within the Guildford Town Centre, are deliverable and its objectives are realised over the plan period. Furthermore, the Council remains committed to supporting any further opportunities for future development and regeneration within the town centre that reinforces its important role and function. The Guildford Town Centre is intended to function as the key focus for a more intense vibrant mix | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.*<br><br>*The council as the principal landowner in the Town Centre has a KEY role in regenerating the town centre – it is not just support* |

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| of uses including residential, office, retail, leisure, tourism, entertainment, and arts and cultural facilities. | |
| 4.1.15 The Council is facilitating the delivery of development through a range of proactive measures. These include:<br>➤ Driving and unlocking key development projects that form a basis for the delivery of the Local Plan (such as at North Street, A6; Guildford Park Road and Bright Hill car parks, A11 and A12);<br>➤ Playing a lead role, working with other delivery partners, in infrastructure interventions that realise growth and regeneration opportunities;<br>➤ Advancing and collaborating on key regeneration opportunities as part of the Guildford Town Centre Regeneration Strategy, which include leveraging its own landholdings as part of efforts to promote mixed use and higher density development supporting the vitality and vibrancy of the town centre. | *Why if the Policy is linked to the Town Regeneration Study have other important sites been left out and not covered by policies (See Page 68 - Regeneration Work Programme – Guildford Town Centre Regeneration Strategy 2017 – attached at Appendix 4)?*<br><br><br>*The absence of a town centre masterplan including the councils own extensive land holdings would mean the policy is weaker than it could be* |
| 4.1.16 In undertaking and further to these actions, the Council will explore the use of a range of mechanisms at its disposal to support regeneration and the accelerated development of housing and mixed-use schemes. These include using, where appropriate, compulsory purchase powers, granting permission in principle, assisting in land assembly and playing a coordinating role with its development partners around development opportunities. | *What is council going to do to bring forward sites identified in the Town Centre Regeneration Strategy 2017?*<br><br>*This paragraph should be reworded to state that the council will play a 'leading role' rather than the 'coordinating role' as set out.*<br><br>*Surely with its landholdings the council can take a more proactive role – not just explore - in delivering this policy.* |
| 4.1.17 The borough's town centre will form the key focus for these measures to support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with careful attention to the Local Plan's design policies, Development Management policies, the provisions of any possible future Area Action Plan, as well as | *Careful attention is not a commitment and masterplanning must be an essential first step.*<br><br>*Suggest replace text by:*<br><br>The borough's town centre will form the key focus for these measures to |

| relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development. | support and accelerate growth in this sustainable location and maximise the use of previously developed land. This will occur with the development of a comprehensive Masterplan for the Town centre which will pay careful attention to the Local Plan's design policies, Development Management policies, and form the basis for the provisions of any possible future Area Action Plan, as well as relevant SPDs including guidance on strategic views into and out of the town centre which will help to guide the appropriate location, form, scale and massing of development. |
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| POLICY S3: Delivery of development and regeneration within Guildford Town Centre | *Comment* |
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| **Coordination of development in the Town Centre** | |
| (1) Development proposals will be encouraged to seek opportunities to enable the future development potential of adjacent sites and not undermine their development potential. | *There can be no co-ordination without masterplanning to secure the broad range of plan objectives including addressing flooding, power, water and movement corridors.* |
| **More efficient use of land and the acceleration of housing delivery** | |
| (2) Major applications will be expected to deliver a mix of uses and include residential development. Residential development in mixed use schemes will be expected to meet identified housing need. | *There must be a **spatial strategy** for the town centre – not all buildings are mixed use. In particular location of commercial activity and housing needs to be identified to optimise transport and create mixed use neighbourhoods.* |
| (3) Schemes must demonstrate that they have made the most efficient use of land both in terms of the quantum of development and the mix of uses. | *Again there needs to be a Masterplan of allocation as development will occur over a 10plus year timescale* |
| (4) In seeking to achieve more efficient use of land and/or accelerated housing delivery and/or regeneration, the Council will where appropriate utilise mechanisms such as its compulsory purchase powers. | *Besides using CPO powers, where appropriate GBC will lead or promote development initiatives to deliver an adopted masterplan. The council may also need to consider alternative management structures to deliver the* |

| | Town Centre e.g. Development Corporations |
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| **Place shaping and character and design of new development** | |
| (5) New development will have regard to:<br>a) the provisions of Policy D1;<br>b) the historic environment, street pattern and topography;<br>c) important views into and out of the town centre from the surrounding landscape;<br>d) views within the town centre of important historic buildings and local landmarks. | *See notes on D1 Below.  The Town Centre in totality should be considered a Strategic Site and thus subject to a proper Masterplan process as proposed in Policy D1 --- 'regard to' what does this mean in practice* |
| (6) Schemes must demonstrate high quality urban design and contribute wherever possible to achieving:<br>a) mixed use developments with active ground floor uses;<br>b) defined public and private spaces which are well-enclosed;<br>c) an attractive and safe public realm;<br>d) legible routes that are easy to understand and to move through, and give priority to pedestrians and cyclists over motor vehicles;<br>e) improved access and views to the River Wey | • *This requires an adopted masterplan addressing environment, amenity, power, water, transport, and spatial strategy*<br><br>• *Why enclosed surely we need open out spaces along the river etc.*<br><br>• *ADD new point f) Schemes must make provision for Infrastructure facilities e.g. Health Care Facilities, Education Establishments and Cultural Facilities.* |
| **Upgrade Town Centre Infrastructure** | |
| | ***Needs a policy related to Policy ID1***<br><br>*Due to the identified infrastructure deficit and record congestion a radical solution is required to sustain the town centre.*<br>*This is the second most important issue critical to enabling Homes and Commercial sites to be developed.*<br><br>*The GVG crossing is but one option (currently the only one) and Motion* |

| | Consultants Ltd Report - Guildford Gyratory, Highways Matters for Guildford Vision Group shows increased resilience and environmental improvements as well as health and safety wins with the crossing and is attached. |
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| **Reasoned justification** | |
| 4.1.18 Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its "Place Making" theme. Key projects to support this and the delivery of the Local Plan include: | |
| (a) Facilitating the delivery of a major new mixed use development in North Street<br>(b) Implementing the vision of the Town Centre Regeneration Strategy<br>(c) Improving the public realm, including surfaces, in key town centre areas | *Note on a)*<br>*North Street is to be masterplanned , surely this should be extended to the whole town centre.*<br>*Note on*<br>*b) This strategy has no designs, plans, proposals on infrastructure, civic or amenity space or housing identified. It is inadequate to deliver what is required.* |
| 4.1.19 This policy and the Town Centre Regeneration Strategy will help deliver the following objectives:<br> (a) enhance the vibrancy of Guildford Town Centre<br>(b) create and foster high quality design<br>(c) protect the town's heritage and overall feel<br>(d) respect existing townscape at both the street and roof level<br>(e) create an enhanced and more positive public realm<br>(f) reduce the concrete environment atmosphere<br>(g) realise the Council's 'drive to, not through' concept to reduce the impact of traffic in the town centre, complementing future environmental improvements<br>(h) link the Town Centre to the train station<br>(i) open up the River Wey and improve connections to the river | *General point this policy needs to be cross-referenced to actual substantive statements/policies on Mass Scale and Sightlines for the towncentre.*<br><br>*Note on c)*<br>*How do you do this with Bedford Wharf and Portsmouth Road Car Parks and the Area around the courts which are awaiting regeneration?*<br><br>*Note on d)*<br>*How is this to be done pending a proper policy?*<br><br>*Note on g)*<br>*Good in principle but how is the council proposing to manage this with THROUGH traffic in Guildford still being a significant volume – doesn't this* |

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| (j) assist in meeting Guildford's housing demand<br>(k) ensure schemes are sustainable and do not lock future development potential<br>(l) promote and create an investment friendly environment | *impact other routes around the town e.g. rat running through Compton.*<br><br>*The whole transport policy in the Plan and in 2014 Town Centre Master Plan and Guildford Town Centre Regeneration Strategy 2017 is just words with no substantive proposals*<br><br>*Note on h)*<br>*Not clear how this is to be achieved*<br><br>*Note on i)*<br>*This should be far stronger with the presumption for a Wey pedestrian cycle corridor on both banks i.e. new developments should leave 20 ft margin from river etc.*<br><br>*Note on k)*<br>*The council need to accept responsibility for professionally masterplanning the town centre and assist developers in others to deliver the plan.*<br><br>*Note on l)*<br>*What does this mean in practice does there need to be a spatial strategy that e.g. puts offices on or near transport hubs etc.*<br><br>*ADD a new para m) promote and create a resident friendly environment.* |
| 4.1.20 Whilst the Council will play a key coordinating role aimed at achieving delivery of development and regeneration, working with partners such as Surrey County Council, Network Rail and the National Trust, the private sector is central to this process. It is important that schemes that seek planning permission are conceived and designed in a manner that considers regeneration opportunities beyond the boundaries of the site. Collaboration | *In the natural absence of pressure to regenerate from the private sector (most of the land is council owned) the Council must take a leading role in putting in place a professional masterplan. Partners such as SCC, Network Rail and the National Trust will only work on their own sites. National Trust is unlikely to be considered as a partner in any* |

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| between adjacent and surrounding property owners in the Guildford town centre, including efforts that seek to maximise regeneration opportunities through mutually supportive design elements, uses and access arrangements are supported. | *regeneration and will only be an important statutory consultee.*<br><br>*The council appear to be seeking to pass the obligations to deliver masterplan objectives without having a masterplan.* |
| 4.1.21 The delivery of housing in the town centre adds to its vitality and vibrancy. The Council regards the town centre as critical in terms of meeting needs for main town centre uses.<br>This includes high trip generating uses such as offices and retail, where there are opportunities to encourage linked trips and maximise the use of public transport networks.<br>However, the town centre also represents the most sustainable location for new higher density housing. Whilst the Local Plan provides for sufficient sites to meet housing needs over the plan period, as part of regeneration efforts, more housing is likely to come forward over the plan period.<br>It is important that this occurs in a manner that makes the most of its central location and is thus developed at a density that maximises its sustainability benefits whilst responding to heritage, design and flooding considerations.<br>Consideration should also be given to the potential to minimise the provision of car parking where this can help optimise the density of development. | *Where are substantive policies to achieve this?*<br><br><br>*Agreed, and if followed up with energy could save unnecessary use of the Green Belt.*<br><br><br>*Needs a masterplan of Infrastructure and Facility improvement to achieve this?*<br><br><br>*It is important that all these elements are delivered through a co-ordinated masterplan led by the council* |
| 4.1.22 The Council will support mixed use development, which can retain or re-provide retail, leisure and employment uses/floorspace in the town centre, in line with national and Local Plan policies. This will help ensure the efficient use of land and presents an opportunity to enhance the vitality of the town centre and increase delivery of homes in sustainable locations. | *The policy should highlight the need for buildings to be designed with flexibility of use in mind e.g. Student Dwellings don't convert easily into Owner occupied Flats – unless this is recognised in the design from day one.* |
| 4.1.23 Enhancing the vitality and vibrancy of the town centre cannot occur solely though more intense uses, nor greater numbers of residents. | *The council need to accept responsibility for masterplanning the town centre and assist developers in* |

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| A quality public realm needs to support day-to-day activities, peoples' well-being, safety and sense of place and forms the basis for the area's attractiveness to residents, workers and visitors. | *others to deliver the plan.* |
| 4.1.24 The public realm includes publicly-owned streets, squares, pathways, parks, publicly accessible open spaces, right of ways, and any public or private building and facilities that are accessible by all. Whilst parts of the town centre reflect high quality public environments, there are areas where this could be improved. This is often in areas | *These will all need to be created within the new areas of regeneration. It is key role for the council to ensure all developers take this policy seriously.* |
| 4.1.25 The enhancement of the public realm and its amenity value will ensure the town centre becomes an even more attractive place to live, work and visit and will be a key component of the area's regeneration. This could occur through a range of interventions such as improving surfacing of public space, providing more generous pedestrian environments, landscaping, street furniture, lighting and public art. The Council will seek contributions toward the improvement of the public realm from developments, where appropriate. The Council will also continue working with Surrey County Council to implement measures that deliver public realm enhancements. | *The first intervention must be a masterplan to set the framework with adequate community involvement.* |
| | **Missing Policy?** *What about Public Social Infrastructure Health, Entertainment, Education and Leisure facilities?* |
| **Key Evidence** The Guildford Town Centre Regeneration Strategy (Guildford Borough Council, 2017) | *And also 2014 Town Centre Master Plan – which in itself is a rewrite/update on the Allies and Morrison proposals? Both have not been adopted by GBC.* |
| **Monitoring Indicators** The number of new homes completed each year in the town centre | *Surely there should be indicators related to increase in Accidents, Pollution, Pedestrianised Space, Bike Lanes Provided, Traffic Congestion etc.* |

# Appendix 2 - Policy D1: Place shaping

| Introduction | |
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| 4.5.1 The design of the built environment has a direct effect upon how places are used. The relationship between buildings, spaces and landscape as well as detailed design and materials are all relevant factors. Good design will influence how people move around our settlements, how they interact and how places make people feel. We place a high value on the importance of good design in the built environment and making places better for people. It is important and fundamentally affects people's lives on a day to day basis. | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.* |
| 4.5.2 The NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Urban design and architecture can contribute to health outcomes through encouragement of more active lifestyles. Development should be encouraged to create places that create mixed communities catering for the needs of different types of people, including the young and old, encourage walking and cycling, improve access to public transport, and ensure that new development connects with existing parks and open spaces for recreation. Building exteriors and public realm should be designed in a way that contributes to pedestrian friendly environments. | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.* |
| 4.5.3 We need to accommodate growth over the plan period including the provision of sufficient residential and economic development in order to meet identified needs as outlined elsewhere in this Plan. | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.* |

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| 4.5.4 It will be important to ensure that new housing and employment areas are designed to respect the existing character of the borough, and create great places for people to live in or use. The development of the strategic sites offers the opportunity of creating their own identity and character. | |
| 4.5.5 Through detailed design considerations we can ensure that design quality is an important consideration in the planning process, but we also have an opportunity now to ensure strategic design considerations are in place. The following policy seeks to provide a strategic framework of requirements to achieve this, to be augmented through a more detailed design policy at a later stage. | *Who is the arbiter of good design as there is no evidence that GBC are capable of judging this?* |
| **POLICY D1: Place shaping** | *Comments* |
| (1) ~~All new developments must achieve high quality design and enhance the environment in which they are set.~~ | |
| (2) ~~Residential developments of 25 or more dwellings should:~~ ~~(a) provide a harmonious, integrated mix of uses, where appropriate, that fosters a sense of community and contributes to inclusive communities that provide the facilities and services needed by them~~ ~~(b) provide places for communities to meet and interact, such as play and recreation and other public spaces~~ ~~(c) be designed to facilitate and promote walking, providing a high-quality environment for pedestrians, and where possible allowing short walking distances to amenities~~ ~~(d) create places that are easy to get to and through, foster active lifestyles, are easy to understand and navigate, and feel safe during the day and night, and~~ ~~(e) be designed to facilitate the delivery of high quality communications infrastructure to support sustainable modern living, and~~ ~~(f) provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists.~~ | *It is noted that these matters have been struck out of the latest policy – surely, they are fundamental and should be included within 3 below.*<br><br>*All of these matters are fundamental in the town centre. The policies listed here should apply in the town centre through identifying regeneration areas as strategic sites. Commercial and Leisure Space also shapes spaces – so why is this left out?* |

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| (3) All new developments will be required to achieve high quality design that responds to distinctive local character (including landscape character) of the area in which it is set. Essential elements of place making include creating economically and socially successful new places with a clear identity that promote healthy living; they should be easy to navigate, provide natural security through layout and design with attractive, well enclosed, and overlooked streets, roads and spaces with clear thought given to the interrelationship of land use to external space. | *ADD Schemes must make provision for Infrastructure facilities e.g. Health Care Facilities, Education Establishments and Cultural Facilities.* |
| (4) All new development is expected to have regard to and perform positively against the recommendations set out in the latest Building for Life guidance and conform to the nationally described space standards as set out by the Ministry of Housing, Communities and Local Government (MHCLG). | |
| (5) New development shall be of a high quality and inclusive design, as per the Design Guide Supplementary Planning Document (SPD), and all new development will be required to address the following; | *Design Guide Supplementary Planning Document (SPD) – it is not clear what this is and doesn't appear to exist?* |
| **Distinct local character** | |
| (6) All new development will be designed to reflect the distinct local character of the area and will respond and reinforce locally distinct patterns of development, including landscape setting. Proposals will take account of local design guidance contained within conservation area appraisals, DPD's, neighbourhood plans and SPDs. | *This paragraph would not apply in several areas across the town centre and wider area as there is no distinct local character.* |
| (7) Given the size, function and proposed density of the strategic allocations it may not always be desirable to reflect locally distinct patterns of development. These sites must create their own identity to ensure cohesive and vibrant neighbourhoods. | |

| Safe, connected and efficient streets | |
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| (8) All new development will be designed to ensure it connects appropriately to existing street patterns and creates safe and accessible spaces. Particular regard shall be given to maximise opportunities for pedestrian and cycle movement and the creation of a high-quality public realm. | *Should this cover modal separation wherever possible.* |
| **Network of green spaces and public places** | |
| (9) All new development will be designed to maximise the opportunity for and linkages between green spaces and public places and include high quality landscaping that reflects the local distinctive character. | |
| **Crime prevention and security measures** | |
| (10) All new development will be designed to reduce opportunities for crime and antisocial behaviour. | |
| **Access and inclusion** | |
| (11) All new development will be designed to meet the needs of all users, this includes the setting of the building in the wider environment, the location of the building on the plot, the gradient of the plot, transport infrastructure and public realm. | |
| **Efficient use of natural resources** | |
| (12) All new development will be designed with regard to efficient use of natural resources including passive solar gain to maximise the use of the sun's energy for heating and cooling. | *Not clear should does this cover PV cell arrays.* |
| **Infrastructure to create smart places** | |
| (13) All new development will be designed in a manner that:<br>(a) supports technological and digital advances, including the provision of sufficient ducting space for future digital connectivity infrastructure;<br>(b) seeks to achieve high quality digital connectivity, enabling Fibre To The Premises (FTTP) where practical;<br>(c) enables mobile connectivity within the development;<br>(d) provides access to services from a range of providers. | |

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| (14) Further innovation and provision for 5G, Wifi and other technologies will be encouraged. | |
| **Masterplans for strategic sites** | |
| (15) Developers will be required to produce Masterplans for Slyfield Area Regeneration Project (A24), Gosden Hill Farm (A25), Blackwell Farm (A26) and the former Wisley airfield (A35) and these will be subject to assessment by a Design Review Panel. The masterplanning process shall engage with the local community. | *Add that Policy S3 Town Centre should be also considered as a Strategic Site and that the Council and Partners is required to produce a Masterplan covering a development programme for next 15-20 years.*<br><br>*Why is North Street Left out as it appears as a Strategic Site 4.1.9?*<br><br>*Also Masterplans for Strategic sites need to accommodate infrastructure resulting from* **Transforming Guildford's town centre and future continues** *- "We have also commissioned David Lock Associates to produce a Strategic Development Framework, which will look at overall high level master planning for strategic sites in the borough, including their connections to and from the town centre."* |
| (16) In order to ensure future cohesive and vibrant neighbourhoods, they must demonstrate how the development responds to the immediate context as well as;<br>(a) Creates functional places<br>(b) Supports mixed use tenures<br>(c) Includes successful public spaces<br>(d) Is adaptive and resilient<br>(e) Has a distinctive character<br>(f) Is attractive<br>(g) Encourages ease of movement<br>(h) Creates a sustainable environment in relation to access to services and facilities | *Strengthen Adaptive and Resilient to include phrases that building can be repurposed or their use changed without major impact on the surrounding built environment* |

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| (17) Planning applications will be consistent with the Masterplans, which must be kept under review. | |
| **Use of Design Review Panel** | |
| (18) In addition to the strategic sites, the Council will expect other large schemes to be subject to assessment by a Design Review Panel. | *Public consultation will also be required as part of this process, including consultation and engagement as part of the design process.* |
| **Villages** | |
| (19) Proposals for new development within villages will have particular regard to; <br> (a) The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape <br> (b) Important views of the village from the surrounding landscape <br> (c) Views within the village of local landmarks | |
| **Ash & Tongham** | |
| (20) In order to avoid piecemeal development and to protect and enhance the existing character of Ash & Tongham and Ash Green, proposals within the area will have particular regard to; <br> (a) The relationship and connectivity with the existing urban area <br> (b) The relationship and connectivity between allocated sites in different ownerships <br> (c) The existing character of Ash & Tongham and Ash Green <br> (d) The future urban edge and its relationship with the surrounding countryside at the allocated site's boundaries | |

| Definitions | |
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| 4.5.6 Local landmarks are prominent buildings within the village such as churches, village schools, public houses and war memorials. This is not an exhaustive list and does not exclude other buildings being referred to as local landmarks as it will differ between villages. Accessible places are those where the public would reasonably have access, and which make provision for safe and convenient access by people with disabilities. | |
| **Reasoned justification** | |
| 4.5.7 It is important that we set out how we will plan positively to achieve very high-quality design for all developments. The NPPF requires the inclusion of a robust policy for design quality and states that permission should be refused for development of poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions. This policy forms the strategic element with more detailed policy to follow as we prepare the Development Management Policies DPD. | |
| 4.5.8 We want to create places that we can be proud of, that are inclusive and promote community and healthy living. We are keen to encourage a mix of uses, particularly on larger sites, but also on smaller sites. This provides the potential to create places where services and facilities are readily accessible to residents, in particular through walking or cycling. We want to create places that allow access to facilities and support the use of sustainable modes of transport. | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.* |

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| 4.5.8a We will expect development to respond to local character and history, reflecting the identity of its context whilst allowing for innovative and forward thinking design. This should include taking account of the existing grain and street patterns and established building lines, local building vernacular and considering the effects upon views, topography, natural features, skylines, landscape setting and character, and the setting of designated and non-designated heritage assets. The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected. Balanced with this is a requirement to develop with flair, imagination and style, reflecting our position as a regional centre and County town. These design considerations will be set out in more detail in the Development Management Policies DPD. This approach is not confined to our urban areas but will be applicable throughout the borough. | *The council need to accept responsibility for masterplanning the town centre and assist developers in others to deliver the plan.* |
| 4.5.8b Historically, development has been focused in the urban areas of Guildford and Ash and Tongham. The Plan identifies a number of strategic sites for development and we will expect masterplans for these sites to be produced as part of the planning process. | *There needs to be a matching obligation placed on major sites in the town centre.* |
| 4.5.8c Development in the villages has been limited due to the Green Belt designation which previously washed over all but one of the villages. Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate. In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies. | |

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| 4.5.8d Regard will be had to various Council documents in assessing the design of new development to ensure that it provides positive benefit in terms of landscape and townscape character, and enhances local distinctiveness. This includes the Residential Design Guide SPD and the Landscape Character Assessment (LCA). The LCA explores how change through built development and land management can be guided to protect, conserve and enhance the landscape character of the borough from the rural countryside to the townscapes in the urban centres. | |
| 4.5.8e Our Corporate Plan (2018-2023) identifies regenerating and improving Guildford town centre and other urban areas as one of three strategic priorities supporting its "Place Making" theme.<br>Development within Guildford Town Centre will need to have regard to a very particular set of circumstances and this policy should be read in conjunction with Policy S3: Delivery of development and urban regeneration within Guildford Town Centre. | *The Town Centre as a totality needs to be designated as an a Strategic site that needs masterplanning* |
| 4.5.8f Innovation is a fundamental theme of the Council's Corporate Plan and the creation of smart places infrastructure across Guildford is a priority. In this regard, the Plan identifies the need for potential future technological and digital advances to be taken into account in planning, regeneration and development decisions. | *Infrastructure of all types is the biggest issue facing Guildford. Proposals to address all Infrastrucutre issues are required.* |
| 4.5.8g The greater part of urban Guildford has good broadband and mobile phone signal connectivity. However, digital connectivity has been identified as a challenge by business, particularly in rural areas. Furthermore, because of the reliance on copper wire connections from street cabinets for many subscribers, download and upload speeds vary greatly. | *Water, power and flooding also need masterplanning* |

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| 4.5.8h The Council considers it essential that new development is planned and designed to enable appropriate digital infrastructure and to be at the forefront of advances in broadband technology. Doing so will help ensure that Guildford borough remains a highly attractive location for businesses and residents alike and development supports delivery of the Government's Industrial Strategy. | |
| 4.5.8i A flexible, but ambitious approach is regarded as appropriate in achieving development that supports innovation and is responsive to the rapid rate of change in relation to digital technology. The provision of FTTP is viewed a desired default technology, however it is recognised that this may not be practical in all cases. Similarly, the Council's aspiration is that connectivity speeds of at least 1Gbps offered by full, symmetric FTTP could be achieved.  FTTP and high-quality connectivity will thus be encouraged in relation to new development, and particularly at development of major residential and employment sites. | |
| 4.5.8j The Council will be working closely with external strategic partners like Superfast Surrey, and Network Rail to optimise fibre network interventions, including enabling the use of "dark" (unlit) fibre and to promote further innovations relating to improving digital connectivity. | |

# Appendix 3 -- Policy ID1: Infrastructure and Delivery

| Introduction | |
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| 4.6.1 The timely provision of suitable, adequate infrastructure is crucial to the well-being of the borough's population, and of its economy. The Guildford borough Infrastructure Delivery Plan summarises the capacity and quality of existing infrastructure, including planned improvements. The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2017, which will be updated as required. Historically infrastructure provision and upgrading has not always kept pace with the growth of population, employment and transport demands, and in parts of the borough some infrastructure is currently at or near to capacity, or of poor quality. | |
| **Policy ID1: Infrastructure and Delivery** | |
| (1) Infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts. To achieve this, the delivery of development may need to be phased to reflect the delivery of infrastructure. | *Should be modified to include reference to Masterplanning in areas of the Borough e.g. Strategic Sites and the Strategic Sites to Town Centre Links Study in that Masterplans will drive delivery plans with Infrastrucutre addressed.* |
| (2) The delivery of necessary infrastructure will be secured by planning condition and/or planning obligation | *And strategic integrated plans with key suppliers such as the Highways Agency, Network Rail, Surrey County Council and the M£ LEP??? The Council needs to be active facilitator of developing and delivering solutions.* |
| (3) When determining planning applications, and attaching appropriate planning conditions and/or planning obligations, regard will be had to the delivery and timing of delivery of the key | *This seems to assume GBC will keep a masterplan of infrastructure Strategy and Delivery current and available?* |

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| infrastructure, or otherwise alternative interventions which provide comparable mitigation. | |
| (4) If appropriate, the imposition of Grampian conditions should be considered as a means to secure the provision of infrastructure when it is needed. If the timely provision of infrastructure necessary to support new development cannot be secured in line with this policy, planning permission will be refused. | |
| (5) The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Appendix C, or any updates in the latest Guildford borough Infrastructure Delivery Plan. The Local Plan also includes land allocated for infrastructure. | |
| | *Recommend an additional Policy* <br> *Policy 6)* <br> *In addition to supporting the Department for Transport's Road Investment Strategy' the council will integrate this policy into plans for the road network managed by Surrey County Council, including the provision of resilient and safe transport corridors in the town centre. This policy will for the town centre support:* <br> ➢ *Separation of modes of transport* <br> ➢ *Better transport interchanges* <br> ➢ *Improve resilience of the road network* <br> ➢ *Reduce pollution, accidents and congestion* <br><br> *Policy ID3 focuses on Sustainable transport for new developments many of its principles should be adopted for the Town Centre which will be a mix of new and existing developments* |
| (5a) Where an applicant advises that their development is unviable with the policy and infrastructure requirements, the | |

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| Council will consider whether these costs were taken into account in the price paid for the site (or any agreement to purchase the site). If these costs were taken into account, as is required by the Council, but there are higher costs associated with the site that were unknown at this time, then the Council will take this factor into account when considering the viability and acceptability of the proposal. | |
| ~~(6) The non-site specific and more general infrastructure requirements are set out in the Planning Contributions Supplementary Planning Document 2011, which will be updated as required~~ | |
| ~~(7) Where appropriate, we will collect the Community Infrastructure Levy from developments in the borough. We will use Community Infrastructure Levy receipts towards providing infrastructure to support development, and will facilitate the spending of up to one quarter of Community Infrastructure Levy receipts originating from each parish and from Guildford town on local priorities to support development.~~ | |
| ~~(8) In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal responsibilities~~ | |
| **Definitions** | |
| 4.6.2 Infrastructure is a very broad term. The Planning Act 2008 as amended defines infrastructure as roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities, and open spaces. Guidance on the CIL advises that infrastructure also includes cultural and sports facilities, district heating schemes, police infrastructure and other community safety facilities. | |

| Reasoned Justification | |
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| 4.6.3 The Infrastructure Schedule that supports this Plan focuses on the following types of infrastructure:<br><br>Strategic Road Network, Local Road Network, park and ride, Sustainable Movement Corridor, bus transport, active modes, and rail<br>Schools, utilities, including electricity and gas distribution and supply, water supply and waste water treatment, flood risk minimising<br>GPs and dental surgeries, hospital and community health care, libraries, cemeteries and sports facilities. | |
| 4.6.4 Maintenance of adequate infrastructure and expansion to meet growing needs is generally the responsibility of the relevant infrastructure provider. Most infrastructure providers work to statutory requirements and have set, short-term planning cycles and asset management plans. This is particularly the case with utility providers. | *Masterplanning and identifying need ahead of being required allows providers to plan ahead and deliver more.* |
| 4.6.5 The Infrastructure Schedule sets out the key infrastructure needed, and the sources of funding, and is provided at Appendix C. This Schedule is also included in the Guildford borough Infrastructure Delivery Plan which supports the Local Plan. This provides more detail regarding future infrastructure needs, and will be regularly reviewed as further detail becomes available, particularly regarding infrastructure needed to support development later in the plan period. By allocating sites for new transport infrastructure, new primary and secondary schools, allotments, and a burial ground, we are facilitating the delivery of some of | |

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| the infrastructure to support this Plan. | |
| 4.6.5a Through the planning system, the Council is able to ensure that there is adequate infrastructure in place to support new development. For instance, where applicable, developers will be required to demonstrate that there is adequate wastewater capacity and surface water drainage both on and off the site to serve the development, and that it would not lead to problems for existing or new users. Where there is an infrastructure capacity constraint, the Council will require the developer to set out what appropriate improvements are necessary and how they will be delivered and may use the planning system to ensure timely provision (e.g. through the imposition of Grampian-style conditions of appropriate phasing). | *Amend first sentence to:*<br>*Through the planning system and its own major projects team, the Council is able to ensure that there is adequate infrastructure in place to support new development.* |
| 4.6.6 The law requires us to ensure that all planning obligations comply with three legal tests. These tests are that the planning obligation is:<br><br>➢ necessary to make the development acceptable in planning terms,<br>➢ directly related to the development, and<br>➢ fairly and reasonably related in scale and kind to the development.<br><br>These legal tests prevent us using planning obligations to fund existing infrastructure deficits, but they can be used where the proposed development would worsen the situation. | *These obligations from the wording mean they apply to all landowners including the council?* |
| 4.6.86a To ensure that the scale of development set out in the Local Plan can be delivered, we have considered the impact of the Plan policies and other | *How is scale defined number of units or does it include mass and height – the local plan is silent on mass and height?* |

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| requirements on the viability of development included in the Plan. On this basis, we require that these impacts and related costs are accounted for in the price paid for the site (or any agreement to purchase the site). Furthermore, in line with paragraph 57 of the NPPF, applicants will need to justify the need for a viability assessment at the application stage. ~~Where an applicant advises that their development is unviable with the policy and infrastructure requirements, we will consider whether these were taken into account in the price paid for the site (or option on the site). If these had been taken into account, but there are higher costs associated with the site, we will consider negotiating.~~ | |
| 4.6.6b In allocating developer infrastructure contributions, we will prioritise Thames Basin Heaths Special Protection Area mitigation and avoidance in order to ensure that we meet our legal duties | *This should be optional for the council to impose as in many cases it is illogical* |
| 4.6.7 We intend to introduce the Community Infrastructure Levy (CIL) to assist in funding infrastructure to support development. CIL must be spent on infrastructure needed to support development in the borough. With the exception of the "neighbourhood portion" of CIL which is passed on to the relevant parish councils, we will decide what infrastructure the CIL money is spent on. We may not use the CIL to remedy existing deficiencies in infrastructure provision unless those deficiencies would be worsened by new development. CIL funds can also be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development. | |
| (4.6.8 Paragraph intentionally blank) | |
| (4.6.8 Paragraph intentionally blank) | |
| 4.6.10 We will allocate a "neighbourhood" | |

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| portion of our CIL funds to parish councils in accordance with national legislation. Parishes and Neighbourhood Forums that have an adopted Neighbourhood Plan will be allocated a larger proportion to spend on their priorities to support development (although CIL receipts cannot be released to the latter). | |
| 4.6.11 Guildford Borough Council is required to retain the neighbourhood portion for the areas of the borough with no parish council, which in Guildford borough is the Guildford urban area and Wisley parish. A working group will be established to prioritise the neighbourhood CIL spending for those areas. This will include ward councillors, existing community groups and neighbourhood forums. | |

| Key Evidence | |
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| **Key Evidence**<br>➤ Draft Guildford borough Infrastructure Delivery Plan 2016 (Guildford Borough Council, 2016)<br>➤ Guildford borough Proposed Submission Local Plan "June 2016": Strategic Highway Assessment (Surrey County Council, 2016)<br>➤ Local Plan and CIL Viability Study (Guildford Borough Council, 2016)<br>➤ Local Plan Viability Update (Guildford Borough Council, 2017)<br>➤ The Community Infrastructure Levy Regulations 2010, as amended<br>➤ Water Quality Assessment Stage 1 Technical Statement and Stage 2 Final Report (Guildford Borough Council, 2017) | |

**Monitoring Indicators**

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| **Annual CIL Receipts** **Annual CIL Spending** | |

It is proposed that with the cinema site, Bedford Wharf could be comprehensively re-planned for a contemporary range of leisure and entertainment uses.  This would be set back from the expanded Riverside Park area but taking its scale from the multi-storey car park and the Bridge Street and Riverside Wharf warehouses to create a concentrated feel to the walk through from the river to Onslow Street.

All of those leisure uses could be nested around an attractive public space in order to foster a spacious experience at Bedford Wharf which runs into the riverside park.  Quality public realm, a strong leisure offer in its own right and potential linkages to cultural amenities could transform Bedford Wharf into a popular place-making destination in Surrey.  It would improve the catchment area spend and keep residents local rather than pushing them out to rival centres and retail hubs.

Additional pedestrianised spaces will increase opportunities for informal performances such as busking and street performers.  During festivals, these spaces can be used to help animate the Town Centre, bringing the town to life and broadening the festival's appeal and audience.  Any new riverside park will add an important social space for performances and could become the focus for new events as well as adding visibility to existing programmes.

![Guildford Vision Group logo]
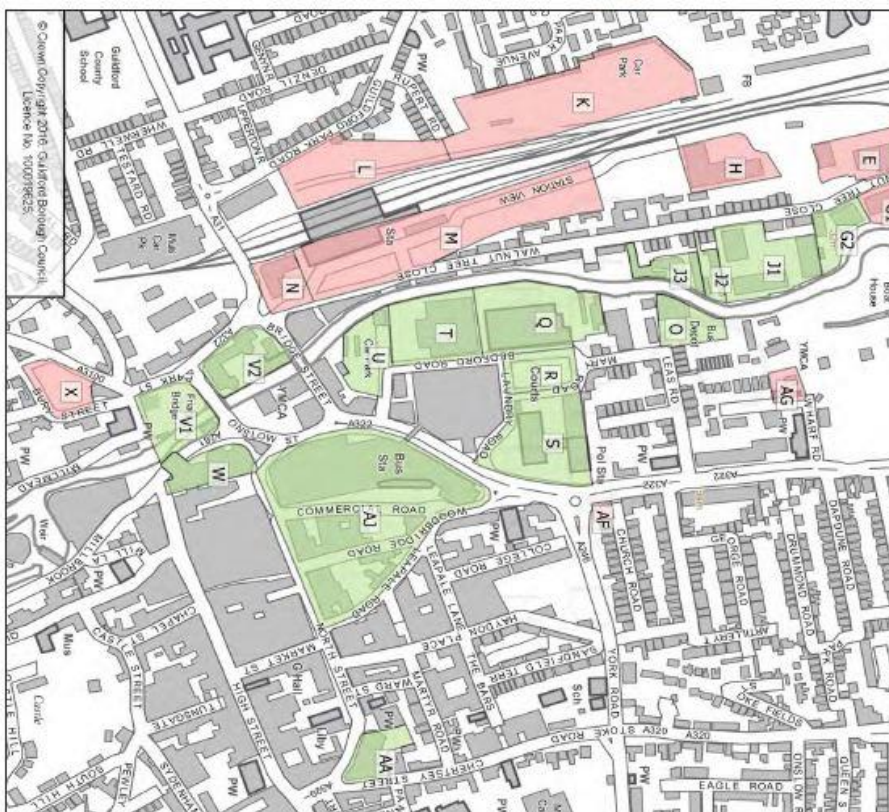
## Regeneration Work Programme

Through examination of the Town Centre Masterplan proposals and their evaluation and viability, feasibility and deliverability assessment by the Council since October 2015 a matrix of possible interrelated schemes has been identified. This work programme is intended to be flexible and will be revisited on a regular basis as a 'living' document.

This provides an approach to maximise the regeneration objectives for housing, growth, and infrastructure development. This work programme has been phased into increments, each building on the previous achievements in a coherent and considered development programme. Taking into consideration appropriate allocation of resources, capital commitments and potential disruption to the transport network, and as such will be a fluid programme designed to react to funding opportunities and movements in the private market and central government. The main concentration is on the schemes with direct Council involvement.



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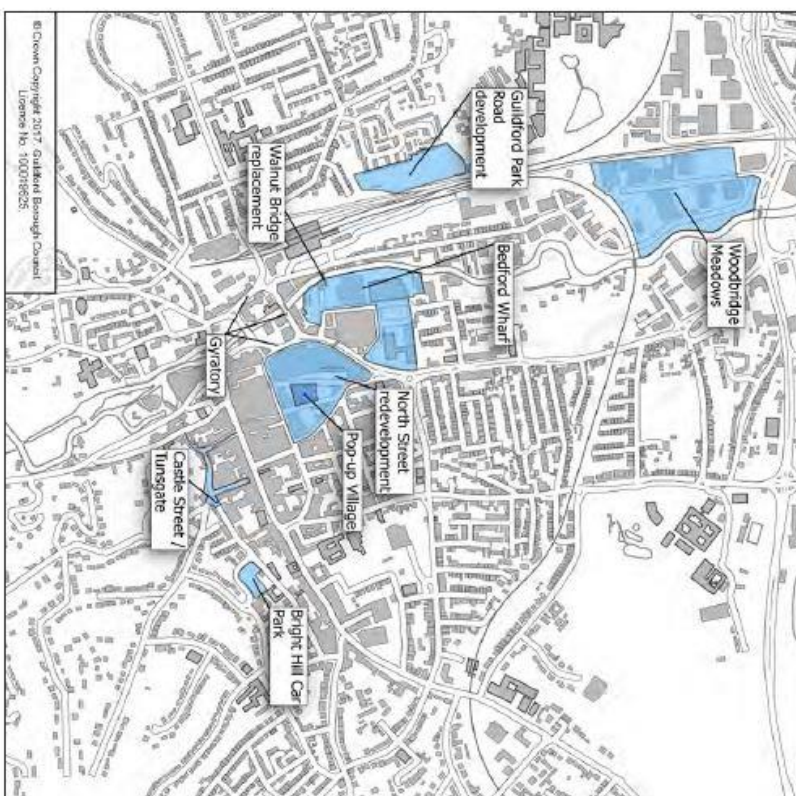
# Appendix 5 - Statement of Common Ground

## Guildford Vision Group ('GVG') and Guildford Borough Council ('GBC') Statement of Common Ground

1 May 2018 – reference the Guildford Borough Council Submitted Local Plan ('**SLP**') for the Examination in Public to be conducted by Planning Inspector Jonathan Bore MRTPI from 6th June 2018

## Purpose

This document is prepared to enable GVG and GBC to express their agreed positions in advance of the forthcoming Examination in Public.

## Common Ground:

### Generally:

1. GBC has had several iterations of plans for Guildford Town Centre including:

   a. 2012:

   b. 2013: Interim Town Centre Framework

   c. 2014: Town Centre Vision

   d. 2015: Town Centre Master Plan ('**TCMP**')

   e. 2016: Town Centre Regeneration Strategy, adopted Jan 2017 ('**TCRS(2017)**')

2. GVG agree with the key ambitions that emerged from the TCMP (although not limited to the seven points set out in the TCRS(2017) p9):

   a. A new community riverside park

   b. New pedestrian and cycle routes

   c. Downgrading the gyratory

   d. Sustainable transport modes

   e. Housing sites balanced with other more traditional town centre uses

   f. A thriving town centre

   g. Protecting and enhancing Guildford's townscape and character

3. GVG also agrees with the other themes (TCRS(2017) p9):

   a. Pedestrianisation

   b. More sustainable travel

   c. Modal shift from reliance on the private car

   d. Development of the riverside

4.  GVG agree the Economic, Social and Environmental Objectives set out in TCRS(2017).

5.  GVG recognises the threats and weaknesses expressed in TCRS(2017) p.18.

6.  The Guildford Economic Strategy 2013 – 2031 identifies that '…the borough experiences high levels of traffic congestion in the Town Centre and on major routes during peak hours. This is a concern for local businesses and residents.'

7.  There are no safeguards for the ambitions of TCRS(2017), because TCRS(2017) is aspirational and has no planning status.

## Infrastructure:

8.  The Surrey infrastructure Study ('**SIS**') https://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/surrey-infrastructure-study highlights (page 40) that "SCC has used technical highway modelling to look at where current and future congestion bottlenecks are and will occur."  This information shows that there are three GBC areas under significant strain:
    a.  Guildford Town Centre
    b.  A3 Guildford
    c.  A3 between the Ripley junction and the A3/M25 (junction 10) Wisley interchange

9.  SIS also notes that the A3 Trunk Road and the A31 (Guildford to Wrecclesham) have existing highways capacity issues.

10.  The Infrastructure Delivery Schedule in the SLP sets out a number of local infrastructure schemes, many of which are earmarked for funding by developers – presumably through CIL.

11.  The approval of the Dunsfold development (in Waverley Borough) will increase traffic on the gyratory and this needs to be mitigated. [See Appendix 1 for reference to FOI response from the Council to GSoc request under EIR].

12.  SIS (p96) highlights the main infrastructure issues.

13.  SIS (p97) sets out the transport projects envisaged in Guildford Borough.

## Affordable Housing and Viability:

14.  The SLP targets affordable housing at 40% of gross housing numbers for developments above a modest threshold.

15. The Viability Report in the Evidence Base dates from 2014 and does not necessarily reflect current market conditions.

16. The development of 177 apartments and offices at 1&2 Station View (09/P/01965) provided 62 affordable units; the development at Guildford Plaza (17/P/00920) provided no affordable homes for 100 apartments; the development at Wey Corner (16/P/00752) will provide 19 affordable homes for 56 apartments; the proposed scheme at Bishops Nissan (17/P/02469 – application submitted and then

withdrawn) showed 191 apartments with no affordable homes; SOLUM, approved on appeal is for 448 dwellings with 48 affordable homes. This batch of development will have yielded just 13.27% affordable homes (129 of 972 apartments built).

17. The Solum scheme, where planning was agreed on appeal, represents inappropriate development. There is scope for improvement to the scheme. (See GBC Leader's comments https://www.youtube.com/watch?v=TSHqBycM1wU and in 'Get Surrey' 28 Feb 2018: '…"Although we cannot take any legal action, we want the best final outcome possible and will do all we can to make sure the least damaging scheme is developed. This includes helping to shape and improve the proposed design as it goes through the next planning stages."

18. Solum was not able to accommodate a full allocation of affordable housing (ca 10% against a target in the SLP of 40%) despite a Community Infrastructure Levy charging schedule not yet being in place.

19. CIL proposed through the SLP is up to £500 psm which is much higher than the levels of other Surrey Local Planning Authorities (SIS p.125).

## Community Engagement:
20. GBC hosted and facilitated a Local Plan Forum until early in 2015. The initiative was not renewed under the current leadership.

21. GBC has excluded GVG from contact with officers, including those at Surrey County Council. GVG is only allowed to approach GBC's Managing Director. [See Appendix 2 for reference to FOI response from the Council to GSoc request under EIR].

## Agreed Differences:
1. GVG maintains that there should be a master plan for the Town Centre forming part of the SLP, representing a strategic plan for the Town Centre and its infrastructure from now to 2034.

2.  GVG believes its proposed new crossing over the river and railway, in a corridor linking York Road with Madrid & Farnham Roads, would support housing delivery (both in the town and across the borough and beyond) and would increase Town Centre resilience.

3.  GBC does not currently have a strategic workable solution for a major mitigation of the traffic issues in Guildford Town Centre.

4.  GVG maintains that all of the land uses in the centre of the town should be part of a master plan, rather than a site by site planning approach as in the SLP, which GVG believes will in no way deliver comprehensive solutions and efficient developments.

5.  GVG does not believe that the SLP promotes even GBC's best strategy for the Town Centre, and that the SLP does not compare favourably to reasonable alternatives such as GVG's master plan.

6.  GVG believes that the failure to deal with infrastructure is not justified based on the infrastructure Baseline and other documents in the Evidence Base, which, taken together, identify that the Town Centre is not sufficiently resilient in terms of flooding, congestion & transport (including impact of A3 incidents and future new out-of-town and out-of-borough housing), electricity supply and sewerage.

## Site and/or Allocation Specific:

7.  GVG believes that the Strategic Movement Corridor ('**SMC**') will make only a small impact on reducing traffic volumes on local roads in and around the Town Centre. It is a single, circuitous route and in no sense does it provide a network with a converging and safe Town Centre hub.

8.  GVG argues that there is a lack of positively prepared planning for the SMC in the Town Centre, especially, for example, around pinch points like the Woodbridge Road railway bridge where the space is inadequate to provide safely separated traffic corridors for buses in each direction, other vehicles in each direction, cyclists in each direction and pedestrians.

9.  The Walnut Tree Close & Woodbridge Meadows areas (zoned for Employment Uses in the SLP) should be master-planned predominantly for residential in conjunction with a positively prepared plan for mitigating flood risk.

10. The North Street site allocation is focused on retail on the basis that there is DEMAND for retail uses in the market.  The SLP should identify NEED which is not necessarily the same as demand. If the SLP was demand-based in all sectors, the SLP would be substantially different.

11. GVG believes that the quantum of retail in North Street scheme is not justified therefore when it is clear that the more pressing need is for new housing.

Signed:

**Guildford Vision Group**

1 May 2018

Signed:

**Guildford Borough Council**

__ May 2018

**Appendix 1 (SOCG) Letter from GBC (Paul Sherman) re FOI**

GUILDFORD
B O R O U G H

| | |
|---|---|
| *Contact:* | Sue Sturgeon |
| *Phone:* | 01483 505050 |
| *Email:* | foi@guildford. gov.uk |

Mr Julian Lyon
Chairman, The Guildford Society

By email only to: GSoc@julianlyon.com

Dear Mr Julian Lyon

**INFORMATION REQUEST REFERENCE: FOI2016/00440**

We have considered your request for information, which was:

*"the basis upon which Guildford Borough Council has assessed the impact of the Dunsfold development and the monetary assessment for mitigation."*

The basis on which Guildford Borough Council has assessed the impact of the Dunsfold development

Guildford Borough Council (GBC) assessed the impact of the development based on the detailed information submitted to Waverley Borough Council (WBC) as part of the planning application. This includes an Environmental Impact Assessment and a Transport Assessment. All of the information submitted in respect of the application is available to view on WBC's website. GBC does not hold this information.

Officers of GBC reviewed the Transport Assessment submitted in support of the application, as did officers of Surrey County Council (SCC) who are the Highway Authority for both Guildford and Waverley's administrative areas. Both organisations concluded that the document provides a reliable assessment of the impact of traffic from the development and serves as baseline for agreeing mitigation. The detailed consultation response from SCC, which considers the impact on roads in Guildford and Waverley, is also available to view on WBC's website.

The Transport Assessment identified a requirement to improve capacity for the junctions of Broadford Road/A281 and the A281/Kings Road in Shalford. The Transport Assessment did not, however, identify any other specific mitigation needed in our administrative area.

The monetary assessment for mitigation

As noted above, the Transport Assessment provided by the applicant did not propose any mitigation for the additional traffic entering the gyratory in Guildford, however, it did show that a considerable increase could be expected. Our concern was that without some measures to create headroom on the gyratory the additional traffic would have a severe impact on the operation of these roads and junctions.

In order to provide this headroom the GBC, in consultation with SCC, identified a number of potential projects to create additional headroom. This includes:

- Guildford Gyratory – A major project, potentially implemented in stages, making three arms of the gyratory two-way and improving public realm and sustainable transport provision.

- Milbrook Car Park / Quarry Street – Either increasing capacity of Millbrook Car Park and/or making Quarry Street two-way at the southern approach from the A281 to allow access to Castle Street Car Park from the South without having to 'u' turn at the gyratory.

- Car Park Pedestrian access improvements – General improvements to make the car parks from the south a more attractive proposition for pedestrians to prevent users driving through the gyratory to access car parks with better pedestrian links.

- Park and Ride Improvements or alternative Park and Ride facilities – Increased park and ride car parking provision and bus services including measures to improve bus journey times and reliability.

- Sustainable Movement Corridor (SMC) – Improvements on the SMC route to help alleviate traffic problems and provide some of the additional capacity through the transfer of town centre trips in the town to accommodate the level of traffic growth to the south.

These are examples of projects that could be used to create headroom and this is not an exhaustive list. These projects are also in the early stages of assessment and the Council does not have fully designed and costed proposals for these schemes.

In order for a financial contribution to be secured it must be able to be demonstrated that the requested contribution is fairly and reasonable related to the development and that it is necessary to make the development acceptable. In order to relate the impact of the development a potential contribution GBC and SCC sought to create an equivalent contribution to the number of trips entering the gyratory, which is 331 vehicles over the three-hour morning peak period.

One method of providing this headroom would be to provide an equivalent additional capacity for Park and Ride for 331 cars on the southern corridor off the A281. In order to calculate a suitable contribution GBC and SCC made the following assumptions:

1. Assume £12,000 per new space to deck an at grade car park
2. Guildford's spaces cost £350 per space per year to manage

Accordingly,

Capital cost: £12,000 x 331 spaces = £3,972,000
Maintenance cost: £350 per year x 10 years x 331 spaced = £1,158,500

Total = £5,130,500

This is one example of how the required headroom could be provided on the gyratory and accordingly both GBC and SCC feel that it represents a fair and reasonable contribution to mitigate the impact of the proposed development. The contribution of £5m was formally requested by SCC in its representation to WBC on the planning application and is to be payable SCC as the body responsible for the local road network.

<u>Other matters raised</u>

The Council currently has no formal plans to provide a deck over the Arrington Park & Ride, if this was proposed in the future it would require a planning application and that would be subject to public consultation.

The Transport Assessment did not identify any significant impacts that would warrant the replacement of Broadford Meadow Bridge or New Pond Road Bridge and therefore this is not included in the infrastructure package secured by the development and I am not currently aware of any immediate plans to replace these bridges. Neither GBC nor SCC concluded that this would be required to make the development acceptable.

I would like to conclude by stressing that GBC is only a consultee on this application; WBC are the determining authority for the application and SCC are the statutory Highway Authority with responsibility for the highway network. GBC have worked hard with both WBC and SCC to ensure that the impact on Guildford is not under estimated and have negotiated what we consider to be a substantial contribution towards mitigating the potential impact of the proposed development.

You should also be aware that, if the application is called-in by the Secretary of State, it would be open to him to approve the application without the contributions that we have negotiated if he does not consider that they meet the relevant tests for planning obligations.

**Copyright and re-use of information**

Please be aware that copyright may exist on information that we provide in response to requests, including attachments.

Where we are providing information that the Council has authored, you may re-use it free of charge unless we have stated otherwise in our response. However, in some cases we do not own the copyright (for example Ordnance Survey owns the copyright for most map information we use). Therefore, where someone other than Guildford Borough Council owns the copyright for the information, please check with us by writing to foi@guildford.gov.uk if you plan to re-use it or if you are not sure whether copyright will be an issue.

**Your right to ask for an internal review**

I trust the above addresses your enquiry. However, if you do not agree with the way I have dealt with your request, you may write to ask the Council to review my decision. Another officer will carry out a review and they will then write to you, letting you know whether they agree with my decision or whether they have reached a different conclusion.

You should write to, Customer Services, Guildford Borough Council, Millmead House, Millmead, Guildford GU2 4BB (foi@guildford.gov.uk). It is important that you clearly state that you are asking for an Internal Review and provide a copy of your correspondence with the Council about this request. We recommend that you include the FOI reference number and "Internal Review" in the email or letter header to help avoid delays.

**Your right to appeal to the Information Commissioner**

You also have the right to contact the Information Commissioner if you believe we have failed to meet our obligations to deal with your request for information. Please remember that they will usually only consider appeals after the Council has had the opportunity to carry out an internal review. More guidance about your rights is available on the Information Commissioner's website at www.ico.org.uk.

Yours sincerely

Paul Sherman

**Guildford Borough Council**
Millmead House, Millmead, Guildford, Surrey GU2 4BB

**Appendix 2 (SOCG) -**

## Ciaran Ward

| From: | Tracey Coleman |
|---|---|
| Sent: | 13 March 2017 10:05 |
| To: | Zac Ellwood; Tim Dawes; Jacqui Barr; Stuart Harrison; Sarah White; Carolyn Patterson |
| Cc: | Paul Spooner; Sue Sturgeon; James Whiteman; Matt Furniss |
| Subject: | GVG Communications [UNC] |

Dear All

Please note and inform your staff, a Forum has now been set-up in order to respond and deal with matters arising from communications with GVG, which will jointly chaired by Anne Milton MP and Paul Spooner Leader of the Council. Please can I ask that all items to be put in front of the Forum come through me in the first instance. This will mean that staff will not need to communicate directly with GVG in the future. A formal response is proved below. Please can I ask all staff to follow this.

Dear xxx,

Thank you for your enquiry to Guildford Borough Council regarding xxxx

As you are aware a Forum with GVG has been set up with Anne Milton, MP for Guildford and Cllr Paul Spooner, Leader of the Council, as Co-Chairs and attended by Lead Members and senior officers of the Council in order to discuss issues and responses. It has been agreed in order to provide a focused approach all enquiries will in future go through the Forum. We will therefore ensure your request will be presented to the Co-Chairs for possible inclusion on the next Agenda which is agreed with both Anne Milton and Paul Spooner.

Please could you ensure that in future you address requests to Tracey Coleman, Director of Planning and Regeneration, as a single point of contact which will ensure your enquiry is considered for the following Forum Agenda.

Regards

**Kind regards**

Tracey

Guildford Borough Council UNCLASSIFIED INTERNAL

# Appendix 6 – Motion Consultants - Guildford Gyratory Highways Matters for Guildford Vision Group

Guildford Gyratory, Guildford

Highways Matters

For

Guildford Vision Group

motion

# Document Control Sheet

Guildford Gyratory

Highways Matters

Guildford Vision Group

This document has been issued and amended as follows:

| Date | Issue | Prepared by | Approved by |
| --- | --- | --- | --- |
| 07/08/2018 | Draft | David Lewis | Phil Bell |
| 18/10/2018 | Final | David Lewis | Phil Bell |
| 22/10/2018 | Final Rev A | David Lewis | Phil Bell |

## Contents

## 1.0    Introduction

1.1     Motion has been instructed by Guildford Vision Group (GVG) to consider the highways and transportation matters associated with their proposed Masterplan for Guildford town centre, referred to as the GVG Masterplan.

1.2     Motion is a local transport planning and infrastructure specialist. Motion's head office is located in Guildford town centre and Motion have extensive experience in the local area and highway network.

1.3     This report considers the key highways matters associated with the GVG Masterplan, relating them to the submission draft Local Plan. In particular, Motion considers the benefits provided by the GVG Masterplan in comparison with the existing highway network and gyratory system within Guildford town centre. This report considers the benefits that the GVG Masterplan provides for vehicle movements through the town centre, as well as enhancements provided for sustainable transport infrastructure for pedestrians, cyclists and public transport users.

1.4     Due to its constrained nature, making the Guildford town centre road network, even in modified form, carry more traffic is not desirable. GVGs aim has been to masterplan and make traffic flow better through the town centre with the aim of reducing accidents, easing pollution and congestion and to build capacity for other modes of transport as an alternative to car use, a radical approach to plan making with a holistic approach to rail, cycle, pedestrian and bus use can increase town centre resilience whilst delivering major environmental benefits.

1.5     Following this introduction, the remainder of this report is structured as follows:

► Section 2 considers the proposed changes to the highway layout and effect on vehicle movements through the town centre;

► Section 3 details the enhancements to cycle infrastructure delivered as part of the GVG Masterplan;

► Section 4 details the enhancements to pedestrian infrastructure and public realm that would be delivered as part of the GVG Masterplan;

► Section 5 details how the GVG Masterplan improves public transport facilities and services;

► Section 6 details how the GVG Masterplan facilities the delivery of a Sustainable Movement Corridor for the town; and

► Section 7 provides a summary and conclusion.

## 2.0    Highway layout and Vehicle Movements

2.1    At present, and as noted in the submission Local Plan Evidence Base, Guildford town centre is dominated by a gyratory system across the river bridges, comprising Onslow Street and Bridge Street, located between the railway station and the primary retail high street. The gyratory system suffers from traffic congestion during peak periods and is a source of conflict points between vehicle and pedestrian movements, as well as other road users.

2.2    The gyratory has multiple junctions with relatively little vehicle capacity between each, leading to exacerbation of congestion, modal conflict and poor air quality.

2.3    The GVG Masterplan will deliver a new vehicle corridor across the river, north of the town centre. This has the benefit of diverting vehicle movements away from the town centre where there are greater conflicts with other vehicle and pedestrian movements. The proposed new vehicle route is indicated at Figure 2.1 below.
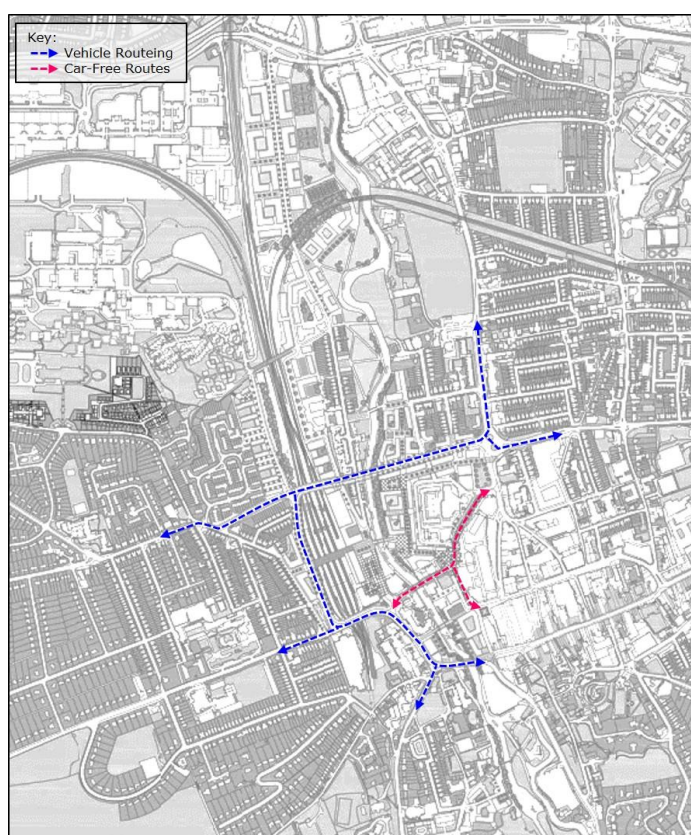


Figure 2.1 – GVG Masterplan Traffic Movements

2.4    The new vehicle corridor would be designed with consideration of emergency vehicle access to the town centre as well as maintaining access for servicing and deliveries, access to parking areas and access for people with disabilities.

2.5    The diversion of traffic movements away from the town centre on the new GVG vehicle corridor provides the opportunity for improved pedestrian, cycle and public transport infrastructure around the town centre as well enhancements to public realm.

2.6    Delay on a journey is predominantly as a result of conflict points between vehicle movements at junctions and interchanges. The current highway network through Guildford town centre and the gyratory is complex with multiple points of conflict between both vehicle movements, pedestrians and other road users.

2.7    At present a vehicle routing from A246, east of the town centre to Farnham Road, west of the town centre, is required to pass through six junctions. Each providing the potential for delay to a journey and congestion. Under the GVG Masterplan, the road network through the town centre would be rationalised and a vehicle undertaking the same east-west route would only be required to pass through three junctions.

2.8    The Table below summaries the number of junctions that a vehicle would need to pass through based on the current gyratory versus the GVG vehicle corridor:

| From | To | Current Gyratory | GVG Vehicle Corridor |
|------|-----|------------------|----------------------|
| A322 Woodbridge Road | A281 Shalford Road | 4 | 4 |
| A322 Woodbridge Road | A3100 Portsmouth | 5 | 4 |
| A322 Woodbridge Road | A31 Farnham Road | 7 * | 3 |
| A322 Woodbridge Road | Guildford Park Road | 7 | 2 |
| A322 Woodbridge Road | Guildford Station | 8 | 3 |
| A246 York Road | A281 Shalford Road | 4 | 4 |
| A246 York Road | A3100 Portsmouth | 5 | 4 |
| A246 York Road | A31 Farnham Road | 7 * | 3 |
| A246 York Road | Guildford Park Road | 7 | 2 |
| A246 York Road | Guildford Station | 8 | 3 |
| A281 Shalford Road | A3100 Portsmouth | 2 | 1 |
| A281 Shalford Road | A31 Farnham Road | 4 * | 2 |
| A281 Shalford Road | Guildford Park Road | 4 | 3 |
| A281 Shalford Road | Guildford Station | 3 | 2 |
| A281 Shalford Road | A322 Woodbridge Road | 6 | 4 |
| A281 Shalford Road | A246 York Road | 6 | 4 |
| A3100 Portsmouth Road | A31 Farnham Road | 2 * | 2 |
| A3100 Portsmouth Road | Guildford Park Road | 3 | 2 |
| A3100 Portsmouth Road | Guildford Station | 2 | 2 |
| A3100 Portsmouth Road | A322 Woodbridge Road | 5 | 4 |
| A3100 Portsmouth Road | A246 York Road | 5 | 4 |
| A3100 Portsmouth Road | A281 Shalford Road | 4 | 1 |
| A31 Farnham Road | Guildford Park Road | 1 | 2 |
| A31 Farnham Road | Guildford Station | 2 | 1 |

| A31 Farnham Road | A322 Woodbridge Road | 4 | 3 |
|---|---|---|---|
| A31 Farnham Road | A246 York Road | 4 | 3 |
| A31 Farnham Road | A281 Shalford Road | 3 | 2 |
| A31 Farnham Road | A3100 Portsmouth | 4 | 2 |
| Guildford Park Road | Guildford Station | 2 | 1 |
| Guildford Park Road | A322 Woodbridge Road | 5 | 2 |
| Guildford Park Road | A246 York Road | 5 | 2 |
| Guildford Park Road | A281 Shalford Road | 4 | 3 |
| Guildford Park Road | A3100 Portsmouth | 5 | 3 |
| Guildford Park Road | A31 Farnham Road | 1 | 2 |
| Guildford Station | A322 Woodbridge Road | 4 | 2 |
| Guildford Station | A246 York Road | 4 | 2 |
| Totals | | 156 | 93 |

Table 2.1 – Comparison of Junctions Passed Through

Note - * including Guildford Park Road

2.9 The GVG Masterplan delivers a substantial reduction in the aggregate number of junctions per vehicle journey of 63 (40%)

2.10 The rationalisation of the town centre highway layout and the creation of the new vehicle corridor will deliver significant benefits in diverting traffic movements away from the town centre, reducing the number of conflict points between vehicles, pedestrians and other road users and provide an alternative route in the town centre when the Farnham Road bridge needs replacing and provide a flood free east-west town centre crossing.

## 3.0    Cycle Infrastructure

3.1    The promotion of cycling as a sustainable mode of travel is a key part of the submission Local Plan and the overall spatial development strategy for the borough. The submission Local Plan states:

*"Our spatial development strategy addresses the development needs of the borough and where that development should be focused, actively managing patterns of growth to make the fullest possible use of public transport, walking and cycling, and focusing significant development in locations which are or can be made sustainable. Achieving sustainable transport has been a key consideration in setting the spatial development strategy"*

3.2    The GVG Masterplan provides a significant enhancement to the cycle infrastructure within the town centre and provides improved cycle connections across the town centre between key destinations. Figure 3.1 below highways the new cycle routes that would be created through the town centre as part of the GVG Masterplan.
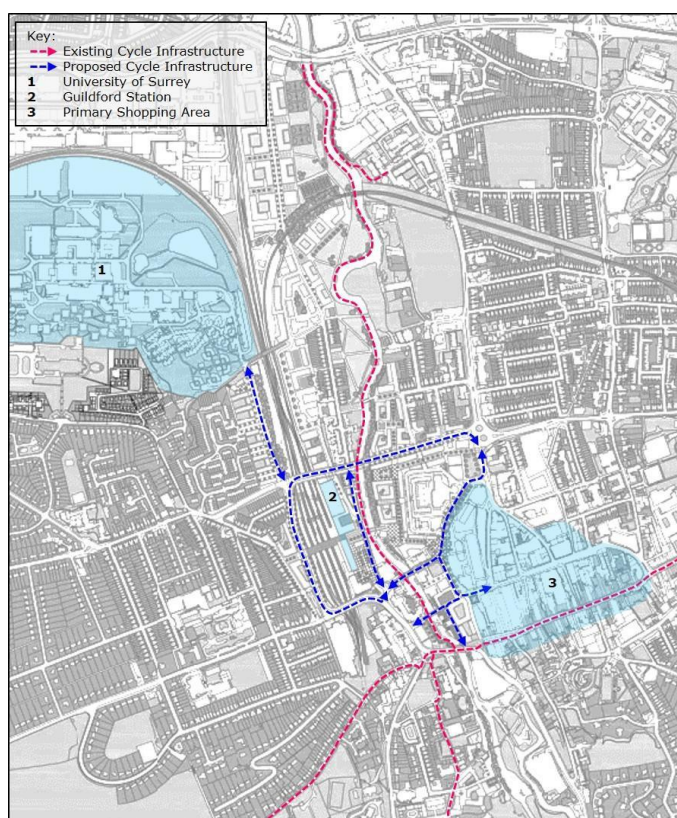


Figure 3.1 – GVG Masterplan Cycle Infrastructure

3.3    Figure 3.1 demonstrates that the GVG Masterplan would provide new dedicated traffic-free cycle routes alongside the new river crossing and along the new Station Road. In addition, cycle friendly routes would be provided through the town centre both in an east-west direction connecting across Bridge Street and Onslow Street bridges and in a north-south direction connecting Onslow Street to Millbrook.

3.4    The new cycle routes delivered as part of the GVG Masterplan provide a significant enhancement to the cycle infrastructure through the town centre. The new routes provide a traffic-free connection across the river and provide cycle friendly connections from the train station to the town centre. In addition, the new cycle routes would link with the wider delivery of a Sustainable Movement Corridor enhancing cycle connectively to existing area of the town and major new developments.

## 4.0 Pedestrian Infrastructure

4.1 The submission Local Plan emphasises the need to encourage pedestrian movements and promote permeability for pedestrians to development sites, in and around the town centre.

4.2 The GVG Masterplan provides a new vehicle corridor across the river, north of the town centre. This has the benefit of diverting vehicle movements away from the town centre where there are currently greater conflicts with pedestrian movements. The creation of the new vehicle corridor and diversion of traffic away from the town centre provides opportunity for the creation of traffic-free routes with enhanced public realm around the town centre, as highlighted on Figure 4.1 below.
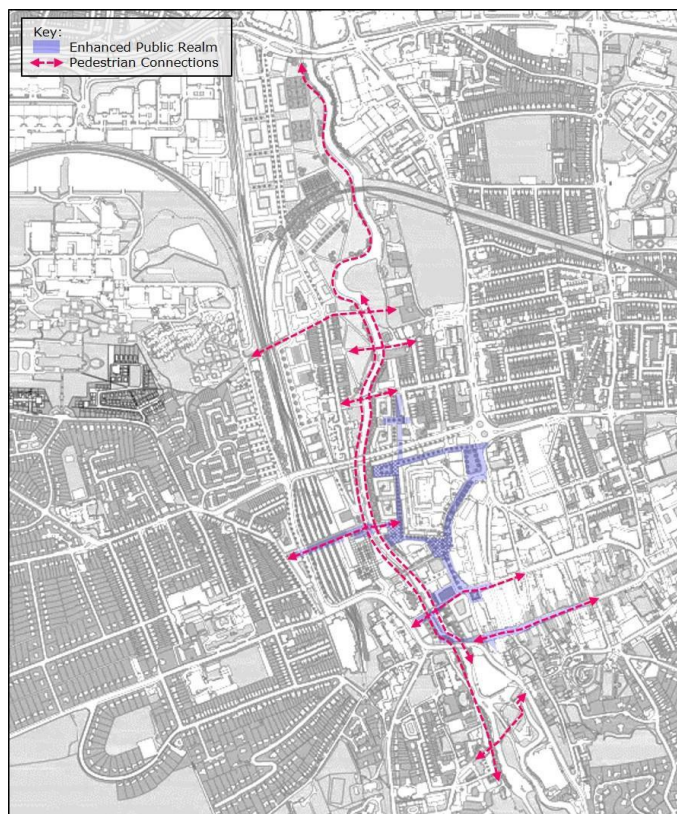


Figure 4.1 – GVG Masterplan Pedestrian Infrastructure & Public Realm

4.3 The GVG Masterplan would deliver traffic free routes on both Bridge Street and Onslow Street, removing conflict between pedestrians and vehicles both along Bridge Street and at the junction of Bridge Street and Onslow Street.

4.4 The removal of this conflict between pedestrian and vehicular provides the opportunity for significant enhancements to the public realm around the town centre and delivers greatly improved pedestrian connectivity between the town centre, Guildford railway station and other key destinations.

4.5 To this extent it is evident that the GVG Masterplan would deliver a betterment to pedestrian infrastructure, connectivity and public realm in and around Guildford town centre.

## 5.0   Public Transport

5.1   As set out previously the submission Local Plan identifies that making the fullest use of sustainable travel opportunities, such as public transport is a key aspect of the spatial strategy and managing the patterns of growth.

5.2   Policy A6 of the submission Local Plan relates to the redevelopment of the North Street site in Guildford town centre for a major mixed use, retail, residential and leisure development. Policy A6 highlights the need to relocate Guildford bus station as part of the delivery of this redevelopment and states that

*"Bus interchange facilities presently provided at Guildford bus station on the site are to be provided in a suitable alternative arrangement to be located either partly or wholly on or off site"*

5.3   The GVG Masterplan provides the opportunity for improvements to public transport facilities around the town centre, including new public transport interchange facilities at both Onslow Street and Station Road West. Figure 5.1 below shows the opportunity for improvements to bus routes and public transport interchanges as part of the GVG Masterplan.
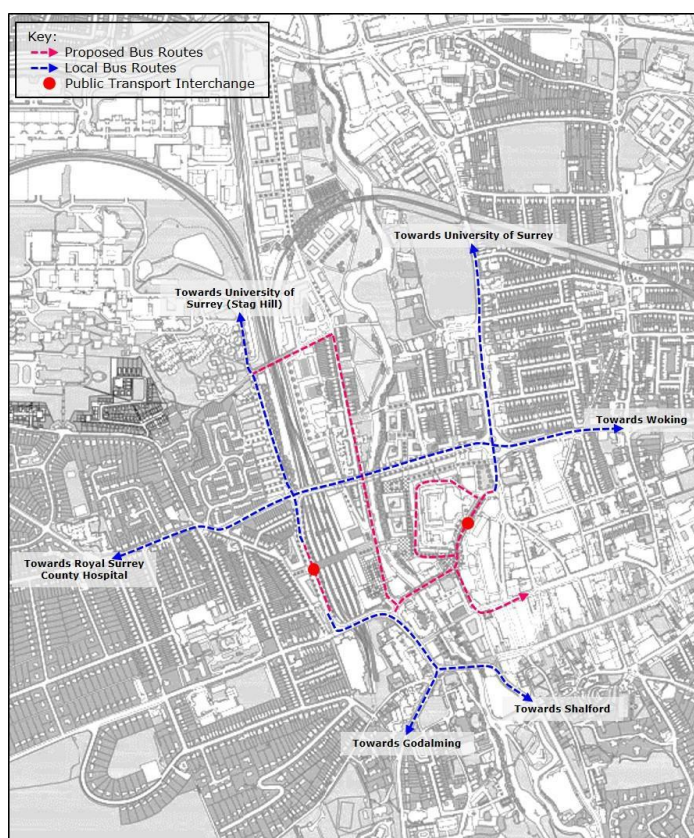


Figure 5.1 – GVG Masterplan Public Transport Improvements

5.4   As demonstrated above, the GVG Masterplan would deliver a new public transport interchange on Onslow Street, facilitating the redevelopment of the North Street site and a new public transport interchange adjacent to the railway station, delivering improved connectivity between rail and bus modes.  Whilst the GVG Masterplan proposes a new public transport interchange on Onslow Street, the layout also provides greater flexibility for alternative locations for a public transport interchange than currently available.

## 6.0 Sustainable Movement Corridor

6.1 The creation of a Sustainable Movement Corridor is a key part of the spatial vision for the borough as set out in the submission Local Plan. The submission Local Plan states that:

*"The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, serving the new communities at Blackwell Farm, SARP and Gosden Hill Farm including the new Park and Ride site, the new Guildford West (Park Barn) and Guildford East (Merrow) rail stations, the Onslow Park and Ride, both of the University of Surrey's campuses, the town centre and Guildford rail station. The aim is for journeys to be rapid and reliable by bus and safe and direct on foot and by bike. The Sustainable Movement Corridor will be implemented in sections during the plan period, largely on existing roads and with the urban extensions at Blackwell Farm, SARP and Gosden Hill Farm, and some sites in the town centre, required to make provision for the corridor"*

6.2 Within the town centre the Sustainable Movement Corridor would seek to create a priority route for sustainable modes of transport through the town centre, between Guildford railway station and the Friary Centre/ North Street development site.

6.3 The GVG Masterplan would facilitate the delivery of the Sustainable Movement Corridor, in particular providing car-free routes along both Bridge Street and Onslow Street. This would create connections between Guildford rail station and the town centre, free from conflicts between vehicles and pedestrian and cycle movements. Bus access could be allowed to a traffic-free route and this would create a priority route for pedestrians, cyclist and public transport between Guildford railway station and the Friary Centre/ North Street development site.

6.4 To this extent it is evident that the GVG Masterplan assists in the delivery of one of the key elements of the spatial vision for the town centre and the borough as set out submission Local Plan.

## 7.0    Summary

7.1    Motion has been instructed by Guildford Vision Group (GVG) to consider the highways and transportation matters associated with their proposed Masterplan for Guildford Town Centre, referred to as the GVG Masterplan.

7.2    This report considers the key highways matters associated with the GVG Masterplan and, in particular demonstrates that the GVG Masterplan would create a new vehicle movement corridor and can deliver major environmental, safety, pollution and transport benefits as well as adding considerable resilience to the system.  The new vehicle movement corridor would divert traffic away from the town centre and this has the benefit of reducing conflict between vehicles, pedestrians and other road users and facilitates the delivery of enhancements to pedestrian, cycle and public transport infrastructure around the town centre.

7.3    As noted in the submission Local Plan Evidence Base, Guildford town centre is dominated by a gyratory system across the river bridges, comprising Onslow Street and Bridge Street, located between the railway station and the primary retail high street. The gyratory system suffers from traffic congestion during peak periods and is a source of conflict points between vehicle and pedestrian movements, as well as other road users.

7.4    The diversion of traffic movements away from the town centre on the new GVG vehicle corridor provides the opportunity for improved pedestrian, cycle and public transport infrastructure around the town centre as well enhancements to public realm.

7.5    The aggregate number of junctions for vehicle movements in the GVG Masterplan versus the current gyratory is 93 versus 156, a reduction of 40%.

7.6    The promotion of cycling as a sustainable mode of travel is a key part of the submission Local Plan and the overall spatial development strategy for the borough.

7.7    The new cycle routes delivered as part of the GVG Masterplan provide a significant enhancement to the cycle infrastructure through the town centre. The new routes provide a traffic-free connection across the river and provide cycle friendly connections from the train station to the town centre. In addition, the new cycle routes would link with the wider delivery of a Sustainable Movement Corridor enhancing cycle connectively to existing area of the town and major new developments.

7.8    The submission Local Plan emphasises the need to encourage pedestrian movements and promote permeability for pedestrians to development sites, in and around the town centre.

7.9    The submission Local Plan identifies that making the fullest use of sustainable travel opportunities, such as public transport is a key aspect of the spatial strategy and managing the patterns of growth.

7.10    The GVG Masterplan would deliver a new public transport interchange on Onslow Street, facilitating the redevelopment of the North Street site and a new public transport interchange adjacent to the railway station, delivering improved connectivity between rail and bus modes.

7.11    The creation of a Sustainable Movement Corridor is a key part of the spatial vision for the borough as set out in the submission Local Plan.

7.12    The GVG Masterplan assists in the delivery of one of the key elements of the spatial vision for the town centre and the borough as set out submission Local Plan.

7.13    On all these aspects of the submission Local Plan Motion finds that the GVG plan improves in the delivery of key elements and substantially improves the town centre for pedestrians, cyclists and buses, whilst improving car journeys and separating modes to greatly facilitate modal shift.