

GUILDFORD BOROUGH LOCAL PLAN: DEVELOPMENT MANAGEMENT POLICIES ISSUES

Options and Preferred Options

June 2020 Consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012

GUILDFORD VISION GROUP SUBMISSION

A. GENERAL COMMENT

1. Guildford Vision Group was established in 2011 to lobby for the regeneration of the town centre via a masterplan.
2. Overall, in these issues and preferred options under consultation, there's little if any direct reference to the needs of the town centre, especially in terms of infrastructure, or the possibility of the TCMP agreed by the council in July 2019.
3. The town centre, its health, regeneration and development is sufficiently important as to merit a topic in its own right, with supporting development policies.
4. The latter may emerge from the TCMP initiative but they should not be thwarted by inadequate provision within the current document under consultation.
5. The wider town centre is at the heart of the borough's economy, including heritage, leisure and arts assets.
6. Its successful regeneration deserves more direct attention in these development policies.
7. In GVG's view, the lack of attention springs directly from the rushed production of Policy S3 in the LPSS.
8. GVG also believes the town centre boundary is too tightly drawn in the Walnut Tree Close area and should be extended northwards to Ladymead to capture Woodbridge meadows and east to the river. While formal amendment of the LPSS is unlikely, there could be a commitment via a SPD effectively to put the extension on all fours with the formal town centre.
9. Such an extension would allow better management of potential housing sites and associated infrastructure needs in the town centre, especially in the environs of Walnut Tree Close and Woodbridge Meadows.
10. In GVG's interaction with the public over the town centre, three strands have emerged consistently:
 - I. Support for wider pedestrianisation
 - II. Opening up the riverside
 - III. Tackling the gyratory and congestion

All the Items are linked, especially I. and II.. There is little if any reference to a vision of how people's habits might or should change in the way they travel to Guildford town centre and how development should encourage or enforce that. The Parking Standards Topic treats parking on a per-development basis and is not based, for example, on an over-arching policy for much wider pedestrianisation of the town centre and the infrastructure consequences of such a move, which of necessity would mean tackling the gyratory issue, including its impact on safety and pollution.

B. CONSULTATION QUESTIONS

Question 1 – High Density

Agree.

High density should not mean unlimited overall height. In the town centre this should be no more than ten storeys in very limited circumstances, and then only when such height does not adversely affect any development's setting and impact on heritage buildings and adjoining conservation areas. GVG would argue that the topography and current built environment of the town indicates that a general maximum of six storeys would best preserve the town in its setting and properly defer to its heritage.

Question 11 – Air Quality

Agree. We suggest that the gyratory area Bridge St/Onslow Street junction deserves study, with the firm expectation that an AQMA should be established.

Question 13 – Sustainable Drainage

Agree.

Question 15 – Good Design

Agree.

Good design in the town centre will be a crucial factor in securing its future.

The borough should install 3D digital modelling to allow better appreciation of proposed major developments and alternatives, both by the council and by the general public.

Question 16 – Privacy & Amenity

Agree.

In 3) of 'factors to be considered', do the elements sit appropriately alongside the Air Quality Policy?

Question 19 – Public Realm

Qualified agreement.

The policy completely ignores the potential of the riverside through the town as a vibrant area of public realm. While many elements come within the purview of the National Trust, and addressed in part as a separate Topic, it is vital that the riverside through the town centre is comprehensively and sensitively exploited as attractive public realm. It should not be used for surface car parking.

Question 20 – Residential Intensification

Agree.

Question 21 – Agent of Change

Agree.

GVG suspects the policy will become a focus of challenge and has the potential to become a Nimby's Charter.

Question 22 – Wey Corridor & Navigation

Qualified agreement.

The policy rightly protects the corridor and seeks enhancements for public access. It is a 'site by site' approach and does not address adequately the entirety of the navigation as a hugely attractive element of public realm, with much underdeveloped potential as such.

Question 23 – Sustainable & Low Impact Development

Agree.

Question 27 – Heritage

Agree.

It is absolutely vital to protect Guildford's magnificent heritage assets.

Question 28 – Listed Buildings

Agree. However there has to be some flexibility where modern elements and improvements would allow eg better/safer accessibility and utility.

Question 29 – Conservation Areas

Agree, especially in relation to new building heights, mass and roofscapes.

Question 32 – Protecting Open Space

Qualified agreement.

There is no specific reference to the river running through the town centre and its potential for recreation and sport, among other things. This argues again for the town centre to be a specific Topic with supporting development management policy(ies).

Question 33 – Open Space

Qualified Agreement.

The riverside again gets missed out. It is particularly important that the 'linking' provisions eg paths and cycleways are borne in mind re any riverside development.

Question 34 – Sport & Recreation

Qualified agreement. The river and riverside and the potential should be referenced appropriately.

Question 35 – Community Facilities

Qualified Agreement

Yet another example where the town centre and its needs would be better addressed as a separate Topic.

Community facilities in the town centre, given the number of potential developments, will need careful coordination.

Question 37 – Cycling

Agree, with one proviso. Cycling in the town centre should not be unfettered. Cyclists and pedestrians must be able to coexist safely. Pedestrian needs should come before cycling demands.

Question 38 – Parking Standards

Qualified agreement.

There is also little if any reference to a vision of how people's habits might or should change in the way they travel to Guildford town centre and how development should encourage or enforce that. The Parking Standards Topic treats parking on a per-development basis and is not based, for example, on an over-arching policy for much wider pedestrianisation of the town centre and the infrastructure consequences of such a move.

Guildford Vision Group

July 2020