

GGG Response

October 2015

Allies and Morrison Guildford Masterplan Report

August 2015

Summary

- ▶ GGG (Guildford Greenbelt Group) are committed to preserving the Greenbelt around Guildford and preventing urban sprawl. Our vision is for the regeneration of Guildford's town centre into a vibrant accommodation hub for our borough with excellent living spaces. We believe this can be achieved by developing Guildford's considerable brownfield opportunities. The Masterplan for Guildford is crucial and central to the development of the Local Plan as a whole. Get this right and the rest will follow including revenue streams achieved by creating appealing living and working conditions.
- ▶ GBC (Guildford Borough Council) want Guildford to become an economic powerhouse but this should not be the primary objective. The transport and other infrastructure constraints require us to look very hard at innovative ways to achieve the extra residential accommodation required placing as little burden as possible on these. The draft Masterplan is a valuable start and does look at brownfield opportunities. However we are concerned that there is over concentration on office and retail space at the expense of much needed housing. This will put pressure on the green spaces around Guildford that are dear to town and country dwellers alike and will place an ever greater burden on infrastructure. We accept that some gradual proportionate infill growth within the villages is required to fulfil local village needs but not large scale development of the Greenbelt.
- ▶ This response includes some of the findings of our Brownfield Group which has included input by key professional consultants, architects, surveyors and engineers etc. When completed the Masterplan will form part of the Evidence Base that will inform the next iteration of the Draft Guildford Borough Local Plan so it is very important that we get it right. The report as it stands is a good start but it fails to fully take advantage of brownfield development opportunities for increased residential development in the town and provide good evidence of demand for non residential development expansion.

What is missing from the Masterplan?

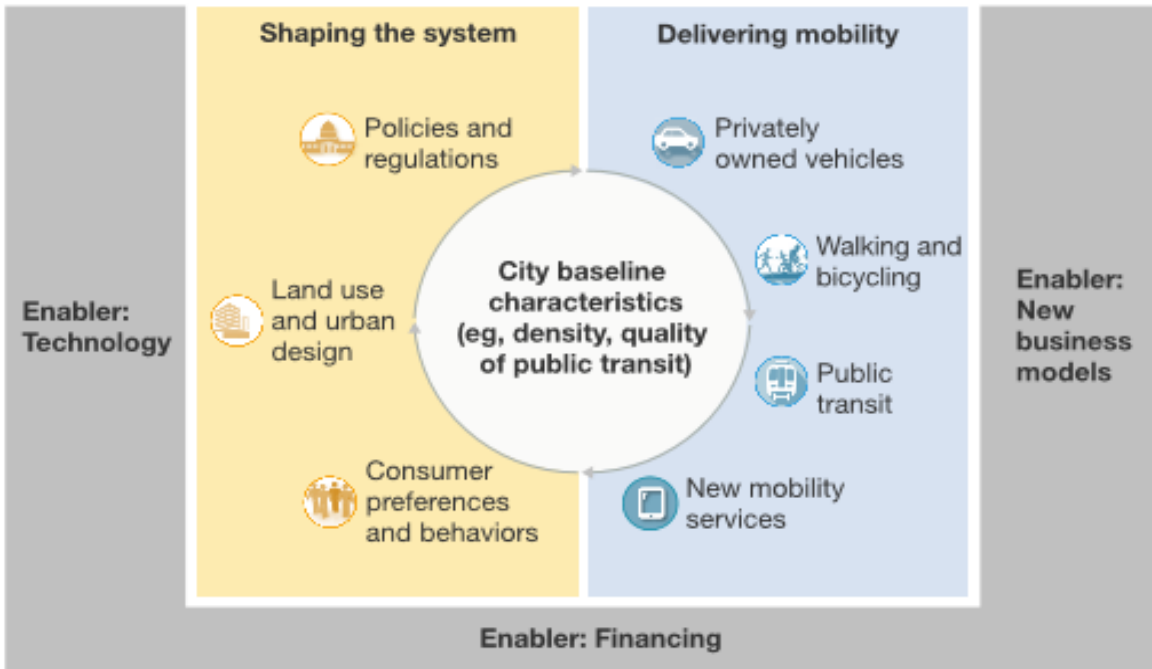
- ▶ It needs to maximise the potential for residential development on brownfield there are only 2,551 units proposed in the town centre which is insufficient
- ▶ There is a bias favouring the expansion of shopping and offices at the expense of new housing without any recorded evidence of actual demand given for any size categories within these sectors
- ▶ It needs to provide a reconciliation of the new Masterplan sites to the original sites 20-42 of the 2014 draft Local Plan in order to explain the very modest proposed gain of only 500 residential units despite the inclusion of Walnut Tree Close, Woodbridge Meadows and an increased density at the station
- ▶ It needs to include an analysis of the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- ▶ It fails to recognise the central government initiative for residential brownfield development or to describe how new government funding streams may be obtained
- ▶ It fails to recommend how non-planned windfall residential expansion can be encouraged by changing local planning policy to promote change of use to residential for existing brownfield sites
- ▶ There is no **substantial evidence** given in the report of demand for different types of development despite the fact that the report was commissioned to be “commercially based, aspirational yet deliverable, and driven by a thorough understanding of the retail, residential and leisure market in Guildford town centre”

Why Guildford should be the residential accommodation hub for the borough

- ▶ Changing demographics - a shift to smaller households means that there is a need for smaller units (we already have enough large houses around Guildford and its catchment area)
- ▶ Smaller units by their nature make more efficient use of land and can be delivered more cheaply - so therefore are more affordable (with a small "a")
- ▶ Smaller units can be delivered in denser clusters enabling them to fit in closer to the existing town - reducing journey times for more people, allowing walking to the station, places of employment and for going shopping/going out
- ▶ More efficient use of infrastructure and services (e.g. better and more frequent bus services within the town and better and more frequent links to the villages encouraging a modal shift away from the car and less pollution)
- ▶ More units in Guildford will provide much needed economic impact for the town's GDP e.g. more spend in the shops and restaurants (a good example is Woking where a new restaurant is opening every month and shops are trading well because of the residential expansion in the town centre)

Masterplan should prioritise housing in the urban area to facilitate a modal shift

A framework for understanding urban mobility.



The recent McKinsey and Co article “Urban mobility at a tipping point” highlights how planning needs to respond to the balance between developed density and urban mobility. The Masterplan needs to embrace the opportunity for Guildford to create sustainable modal shift by clustering high density development around the station and Walnut Tree Close and to facilitate less reliance on the private car by suggesting ways in which our local public transport can be transformed. We need to look at imaginative ways in which we can free Guildford from the gridlock which is holding the town back. If we extend the suburbs to the wider borough we will further strangle our town. A sustainable model needs to offer a real travel choice to our residents which promotes a bus and train service every 15 minutes and to set a trend of declining car ownership. Guildford needs to imitate a typical Swiss town with sufficient infrastructure where the travel decision is between bus or train or uber taxi but not by private car.

GBC car parks have been largely ignored as a residential development opportunity

- ▶ The report needs to include a full review of all GBC car parks to examine the potential for increasing the total number of spaces and decking existing car parks with flats
- ▶ GBC currently owns 24 public car parks which provide 7,808 spaces of which 58% are surface and 42% are multi-storey
- ▶ The developed footprint comprise 25.7 acres of “surface” and 3.72 acres of “multi-storey”
- ▶ Average car park density is 200 spaces per acre for surface and 1000 spaces per acre for a 5 deck multi storey
- ▶ If for example 3 acres of the current surface allocation is redeveloped as multi storey this will provide a very significant increase in total spaces and free up 23 acres of surface car park for development
- ▶ If 23 acres of the remaining surface car park area is decked with 5/6 storey flats leaving the existing surface car parks underneath this could provide an additional 1000 housing units at 40 flats per acre

Problems with the Central Infrastructure Levy (CIL) make the plan undeliverable

- ▶ In terms of viability assessment the report in Section 5 clearly demonstrates that the GBC current draft CIL rates (£500 psm for residential/£200 psm for retail/ Nil for other) distorts the real development potential of brownfield development and should be revised forthwith.
- ▶ Currently the redevelopment of Woodbridge Meadows for residential is not justified because the CIL is taken as £500 psm.
- ▶ Urgent consideration needs to be given to a zero % CIL for residential brownfield development in line with current central government policy.
- ▶ For all other forms of development that are not residential development of brownfield we would recommend that the only equitable path is that GBC should adopt a Gross Development Value Hierarchy “Percentage” based on the GVA value hierarchy in section 5 delivery. (see next slide)

The proposed value hierarchy does not reflect demand and is out of step with CIL

The Masterplan uses a completed development value hierarchy which although has strong local evidence for residential development (the Barratt scheme in Walnut Tree Close is being sold off the plans) is aspirational and patchy for retail and poor for offices. These values also show the current discrepancy and unfairness of the proposed CIL charges which logically should be set as a percentage of completed development value. Except for residential development of brownfield which should be set at nil.

Masterplan completed development value £ psf



GBC hold all the cards to accelerate the development of brownfield within 5 years

- ▶ GBC are in strong position to fast track the brownfield development process. They hold all the cards. All they need is the determination to see it through.
- ▶ They are the Planning Authority and can provide agreed development briefs with detailed guidance on surrounding infrastructure proposals which developers can respond to with confidence to make early planning applications that can be fast tracked.
- ▶ In many cases they are the majority land owner and do not have the long delays and problems of site assembly.
- ▶ Where land needs to be acquired GBC have CPO (compulsory purchase order) powers for the better planning of the area. They can apply for a CPO as step one and during the CPO process before a CPO is ratified the landowner will often see the advantages of selling by agreement and take part in the sharing of development gains. This will accelerate the process.
- ▶ GBC are in a very good position to structure JV (joint venture) agreements with open book development appraisal based on market value. All parties will be able to participate to mutual advantage and gain confidence from a transparent valuation process.
- ▶ GBC are in an excellent position to facilitate relocation to another site they own and can also fast track any new planning consents required.
- ▶ This should all be quite enough to make development of brownfield happen within 5 years.

Lack of evidence of demand

- ▶ The plan proposes an addition of some 500,000 sq ft of retail space. There is no evidence of demand to support this.
- ▶ The plan proposes an addition of some 500,000 sq ft of office and hotel and leisure space . There is no evidence of demand to support this and there is no logical breakdown between these widely different use classes.
- ▶ It is not unreasonable to require clear evidence to justify the considerable expansion of these use classes particularly in view of the fact that office rents and retail zone A rents have been almost flat lining in Guildford for some years evidenced by sizeable vacancy rates in both sectors.

Patchy demand for retail in Guildford means we do not need 500,000 sq ft of new space

- ▶ The Masterplan does not demonstrate any strong retail demand to support an expansion of 500,000 sq ft of retail space. Retail centres in the UK are fragile and need to be maintained not expanded due to the fact that the internet has shrunk high street margins in the “clicks and mortar” war
- ▶ The statement “with high levels of retail rental values and growth it is important to maintain the town’s current diverse retail offer” is out of touch and a voice from the past. It makes no mention of actual zone A price, actual growth rate, actual vacancy level, actual level of enquiries
- ▶ The report admits that “agents identify that congestion is a key issue which may constrain retail growth”
- ▶ The report states that “despite strong economic drivers, Guildford has experienced a lack of major development in the Town Centre in recent years” and that “the town lacks the number and quality of anchor stores expected for a town of Guildford’s size and status”.
- ▶ This is not a description of a town with strong demand. The opposite in fact. How many department stores are waiting to get in?? How many chains want to open new branches?? Why did Land Securities walk away from the secondary position in North Street?? Why could John Lewis try and negotiate 5 years rent free??
- ▶ It is not unreasonable to require clear evidence to justify the considerable expansion of retail particularly in view of the fact that retail rents have been almost flat lining in Guildford for some years. The bold conclusion “This review of retail demandpresents a predominantly positive picture” is clearly over stated.

What does 500,000 sq ft of shopping space mean in practice ?

- ▶ We have been asked by a Guildford resident to clarify what retail space sizes mean in practice
- ▶ 500,000 sq ft is a lot of new retail space. It will not be delivered without a great number of detailed feasibility studies simply because someone has to finance it, build it, lease it and sell it to a pension fund
- ▶ An average department store is 150,000 to 250,000 sq ft which could be on 3 to 5 levels
- ▶ An average supermarket is 50,000 sq ft
- ▶ An average medium sized store is 5,000 sq ft Boots or WH Smiths
- ▶ An average shop is 1,000 sq ft (20ft frontage and 50ft depth)
- ▶ The reason we need to know about actual demand is that there are already 2 department stores in Guildford and the big store sector is not doing all that well. If someone wants to come in no doubt one of them could sell their freehold or assign their lease?
- ▶ Despite the lack of evidence of demand, even if we put in 250,000, half of what is suggested, that would mean 150,000 sq ft for a large store and we would still have enough space for 10 Boots stores and 40 normal units and 20 small speciality units
- ▶ AND importantly the spare 300,000 would be enough for 600 1/2 bed flats

As at October 2015 it is not difficult to find empty shops in Guildford

- ▶ High Street 8 empty units
- ▶ Tunsgate 26 empty units
- ▶ Jeffries Passage 3 empty units
- ▶ Market Street 1 unit closing down
- ▶ Angel Gate 3 empty units
- ▶ Chapel Street 1 empty unit
- ▶ Quarry Street 3 empty units
- ▶ Phoenix Court 4 empty units
- ▶ The Shambles 1 empty unit
- ▶ *One quick way of checking the trading health of a High Street is by counting the number of charity shops. Guildford High Street has 5.*

Poor demand for offices in Guildford does not mean we need another 500,000 sq ft of space

- ▶ The Masterplan reveals a complete lack of office demand which does not support an expansion of 500,000 sq ft of office space
- ▶ There is not a single statement that supports actual demand for offices
- ▶ The commentary is clear: “Take up in Guildford is at historically low levels”
- ▶ It gets worse: “A number of sites with office proposals are being promoted with reduced floor space in favour of residential development including Station View and the Plaza site”
- ▶ And worse: “Values have historically been insufficient to support redevelopment”
- ▶ It is not unreasonable to require clear evidence to justify the considerable expansion of offices particularly in view of the fact that office rents have been almost flat lining in Guildford for some years. The conclusion: “this review of office demandpresents a predominantly positive picture” is clearly over stated.
- ▶ An expansion of 10,000 sq ft per annum over the plan period equivalent to an additional 1,000 additional office workers per annum is plenty. This would total 200,000 sq ft leaving 300,000 sq ft over for 600 additional housing units.

Walnut Tree Close and Woodbridge Meadows

- ▶ YES we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. BUT first we must make 100% use of our urban brownfield before we consider building in the countryside.
- ▶ Walnut Tree Close with its desirable location next to the river and Woodbridge Meadows have the best potential for adding housing close to the centre of Guildford. New flood resistant housing structures (see next slide) close to the river, the station and the town centre, will mean much less strain on our transport infrastructure.
- ▶ It is in fact much easier for developers to build on virgin countryside so we need to provide them with incentives to develop brownfield by setting the CIL at 0% for previously developed land which is to be redeveloped for residential.
- ▶ In Page 109 the Masterplan seems to be very thin in terms of “principles” for the future of Walnut Tree Close which is somewhat in contrast to the other five areas in the “framework” (ie the core town centre, Bedford Wharf, Millmead, the Station Area and Woodbridge Meadows). All statements are prefaced with “coulds”, and there are too few “wills”. The net result is that it gives the impression of a plan, but in reality there seems to be little commitment on precisely how the space will be used.



Example of a flood resistant residential development on Bognor Sea Front



Walnut Tree Close, Woodbridge Meadows and Station development area analysis

Area - 61 ha (151 acres)

Residents - 1,976

Population Density - 32.3/ha

Low population density

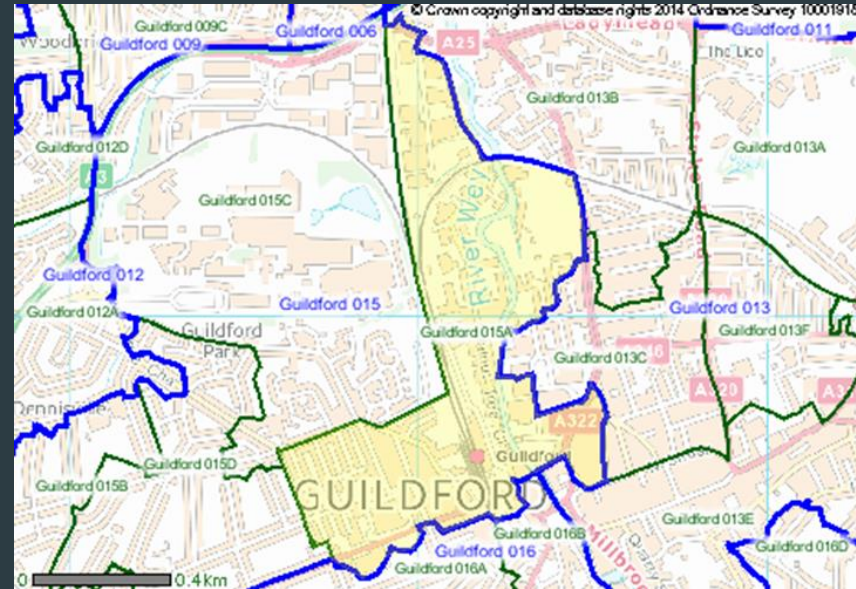
Existing dwellings - 921

15.1 dwellings/ha

Low housing density

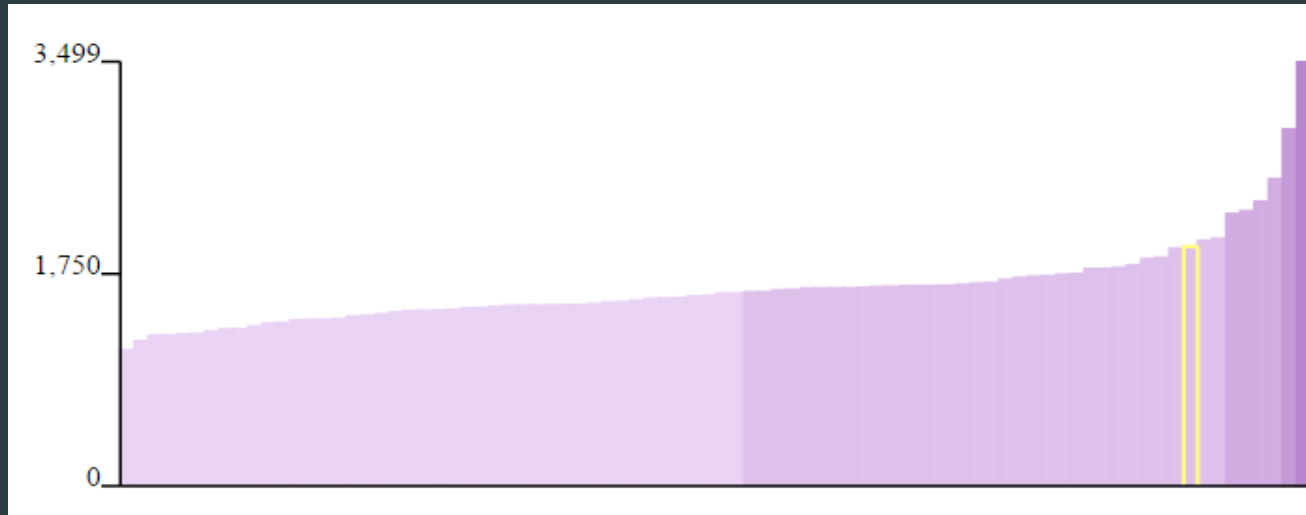
**Typical town centre target
minimum - 100 dwellings/ha**

Data from 2011 census



Exceptional opportunity for town centre housing
GBC owns a high percentage of area
Private sector has already taken initiative on a few individual sites.
GBC must now facilitate the private sector initiatives further and provide an overall detailed development brief for the area

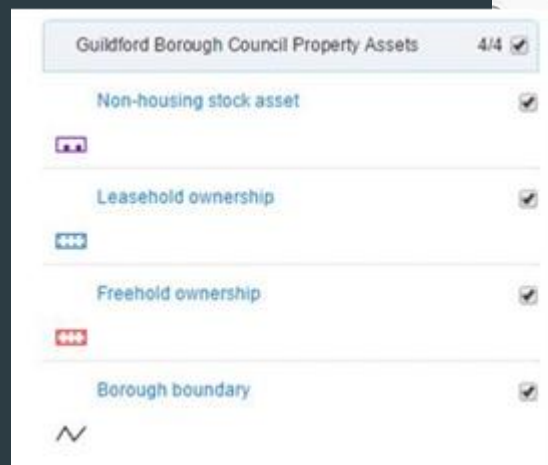
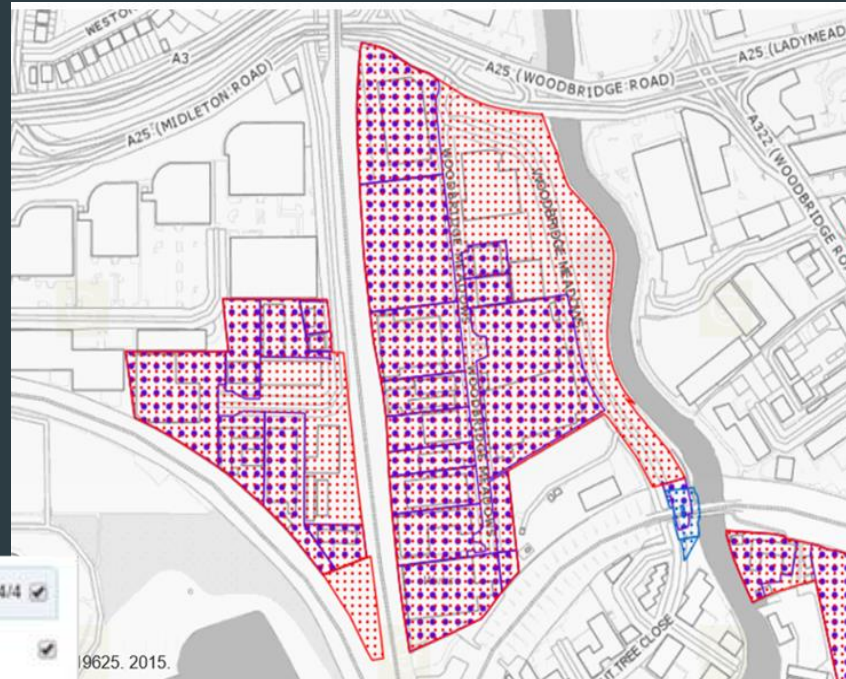
Population Density in Walnut Tree Close Area (Guildford 015A)



- Graph shows population densities across Guildford Borough
- Walnut Tree Close density (in yellow) only slightly higher than rural villages
- Illustrates the opportunity available in this central zone
- Rezone to housing
- Relocate businesses to vacant units on existing business parks
- GBC owned vacant site available in Woodbridge Meadows

Woodbridge Meadows

- Large area owned by GBC (all shaded areas)
- One large site vacant
- One site temporary car parking
- Could be developed within 5 years
- Develop areas marked in purple



Area owned by GBC

Phased Redevelopment

- ▶ Develop detailed layout plan for entire area
- ▶ Park alongside river, cycle track separate from road, school, etc
- ▶ Rezone from light industrial and commercial to housing
- ▶ Offer incentives for businesses to move to other sites
 - ▶ Business rates holiday
- ▶ Develop empty sites immediately, other sites as they become available
- ▶ Emphasis on “starter” homes, price to reflect land ownership by GBC
- ▶ Buildings in flood zones designed in accordance with RIBA guidelines

Contrast in Woodbridge Meadows



GBC owned - vacant site



Private sector development

GBC must follow private sector - seize opportunity to provide housing
Area could provide up to 4,000 additional much needed dwellings
Leaves 20% of area for green spaces, new schools, medical centre, etc
Private sector developers are already building and want more sites.

Infrastructure Needs in Walnut Tree Close Area need to be established

- ▶ Play areas (in park), new primary school
- ▶ New medical centre
- ▶ Small scale local shops
- ▶ Traffic is a major issue
 - ▶ Area suffers from prolonged traffic jams
 - ▶ Causes poor air quality for residents
 - ▶ Creates stressful conditions leading to accidents

Infrastructure Needs - Traffic Issues need resolution in Walnut Tree Close

Air Quality

Prolonged traffic jams

- High particulates, NOx

No monitoring underway

Need central govt funding

Solutions include tunnel

LPG preferred fuel

- Public transport vehicles
- Licensed taxis

Road Safety

44 injuries in 5 years

4 serious injuries

27 involved pedestrians and/or cyclists

Needs improvement

Include in plan

The need for an historic visitor attraction hub to make Guildford a destination

- ▶ We believe that the importance of a visitor attraction hub could be much better articulated in the Masterplan. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.
- ▶ Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any another stereotypical centre found anywhere around London. Just imagine a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.



Infrastructure problems are not tackled effectively

- ▶ Guildford needs considerable investment in its infrastructure in terms of roads, bridges, sewers and electricity. The masterplan makes no reference to the cost of these works or how they are going to be funded.
- ▶ The draft Local Plan was effectively put on hold because 20,000 objections were received. These included a general concern about the erosion of the Greenbelt but also in many cases the inadequacy of our infrastructure to cope with the development proposed.
- ▶ Although GBC are spending a lot of money on the Masterplan consultants (£290,000) they do not appear to be asking the right questions about infrastructure requirements and the cost.
- ▶ There is surprisingly little detailed evidence of traffic flows and analysis undertaken in the report. Without this information it is difficult to understand how a traffic plan has been created.

Inadequate masterplan infrastructure logic

- ▶ Unfortunately both scenarios 1 and 2 will have less traffic capacity than at present due to bus gates and road reduction and thus will increase traffic congestion in the town.
- ▶ Neither scenario provides a solution to the bus interchange save for saying they will stop in Onslow Street where they will impede traffic flow.
- ▶ Neither scenario safeguards a new route over the river and railway.
- ▶ Neither scenario provides a wide full pedestrian route from the station to the High Street

Impact of proposals on existing infrastructure needs to be considered

- ▶ Scenario 1 will require the demolition of the north side of Bridge Street and building a new wider bridge.
- ▶ Scenario 1 will incur the cost of demolishing Friary Bridge and building a new pedestrian bridge.
- ▶ Scenario 1 will require the demolition of the High Street bridge and the building of a new higher (to let the tow Path pass below) 4 lane wide bridge.
- ▶ Scenario 2 may be simpler to achieve and offer a better pedestrian experience connecting the High Street and River Wey if the A281 crossing can be replaced with a more imaginative solution. It will offer a better view at the end of the High Street than would be the case with Scenario 1. However, the close proximity of the three-way junctions at each end of Friary Bridge may make a satisfactory junction management solution more difficult to achieve and it is vital that detailed evidence of current (and likely future) journey flows is obtained to test the feasibility of both Scenarios.

Housing number of 2551 in the Masterplan could be increased by 250% +

- ▶ The total housing number given in the masterplan is 2,551
- ▶ There is a need to provide reconciliation to the draft local plan development on a site by site basis
- ▶ There is an untapped opportunity to provide more housing units at many locations including:
 - ▶ Woodbridge Meadows
 - ▶ Walnut Tree Close
 - ▶ The Station
 - ▶ Existing GBC car parks
 - ▶ Sites identified for retail
 - ▶ Sites identified for offices

Housing number shown understates the full potential

Source	Description	Possible housing units
Draft Local Plan	Sites 20-42 original total number	1939
Masterplan	Masterplan addition of new brownfield sites	1207
Masterplan and Draft Local Plan	Opportunity for increased density on existing identified sites and new sites	1000
Station	Increase for decking over	500
GBC Car Parks	Estimated unexplored potential	1000
Retail	Estimated 250,000 sq ft not required	500
Offices	Estimated 300,000 sq ft not required	600
Total		6746

The masterplan needs to fully exploit the station opportunity

- ▶ Neither scenario takes advantage of the air rights over the station tracks.
- ▶ Recommending intensification of the existing application is the right direction. However it needs to go much further by decking over the existing tracks and station with rails, platforms and car parks underneath and a major new station redevelopment with a futuristic glass atrium and 1000 + residential units and a 200 bed hotel above.
- ▶ The A&M plans do not include any reference to the “Wessex” plan to lengthen platforms and add 3 new platforms to the station in fact they show housing where the new platforms are proposed. Modal shift to accommodate the traffic reduction that the A&M plan requires will need a lot more than a new bus route from Burpham to the University, rail will have to play a major part.



Terms of reference omissions

- ▶ The consultants have failed to deliver their full Terms of Reference in respect of the following points in their agreed brief with GBC:
 - ▶ Raise the profile of, and better integrate, the town centre's many heritage assets including Guildford Castle and its gardens and Guildford Museum, and those on and closer to the High Street
 - ▶ Demonstrate MAXIMUM appropriate densities for sites, showing scale, massing and capacity
 - ▶ Facilitate access by sustainable modes, tackle traffic congestion in and on the approaches to Guildford town centre, and make appropriate arrangements for servicing, resulting from an iterative dialogue and testing with the GOTCHA project team.

Conclusion

- ▶ The masterplan is a start but in reality a great deal of work needs to be done to make it a viable proposition to meet Guildford's needs and make the town a centre of excellence for a new type of town planning
- ▶ The importance of a visitor attraction hub needs to be better articulated
- ▶ The CIL needs to be revised to incentivise brownfield development
- ▶ GBC needs to accelerate brownfield redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 5 years
- ▶ The report needs to include an analysis of the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- ▶ The Masterplan is unbalanced, too cautious and self limiting. This response clearly shows that there is enough space in the town to build a minimum of 6,700 additional residential units
- ▶ The Masterplan proposes an excessive amount of retail and offices for which there is no evidence of demand