# Topic Paper: Retail and Town Centres

# December 2017

To accompany Guildford borough Submission Local Plan: strategy and sites



## **Alternative formats**

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# Contents

1.	Purpose of this topic paper	5
2.	Policy context	6
	National context	6
	National Planning Policy and Guidance	6
3.	Evidence	9
4.	Appraisal	10
	Consultation feedback	10
	Review of the borough's hierarchy of retail and service centres	10
	Need for additional floorspace for town centre uses	19
	Sequential assessment of sites to accommodate main town centre uses	23
	Impact assessments for main town centre uses	28
5.	Local Plan Policy Approach	30
6.	How has feedback received from the Draft Local Plan consultations informed the revised policies?	32
7.	Next steps	34
Ap	opendix A: NPPF definitions of terms used in this topic paper	35
Ap	pendix B: Site sequential assessments – meeting identified needs	36
	opendix C: List of Guildford Town Centre primary and secondary opping frontages	52
Ap	pendix D: Maps of town, district and local centres	54

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# 1. Purpose of this topic paper

- 1.1 This topic paper is one in a series, which sets out how we have developed the key strategy within the Guildford borough Submission Local Plan: strategy and sites document. Each topic paper will look at the relevant national and local policy and guidance that informs the Submission Local Plan. Topic papers explain how the strategy has developed and the data, evidence and feedback that has informed the choices made in formulating the policies.
- 1.2 The intention of the topic papers is to provide background information; they do not contain any policies, proposals or site allocations. Topic papers have been produced to accompany the submission of the Local Plan to the Secretary of State for examination.
- 1.3 The issues covered by this topic paper are:
  - The need for additional floorspace for town centre uses
  - Sequential assessment of sites to accommodation town centre uses
  - Review of Guildford borough's hierarchy of retail and service centres
  - Requirement for an **impact assessment** to support planning applications

## 2. Policy context

### National context

2.1 Relevant legislation is set out in the overarching <u>Town and Country Planning Act 1990</u> and the <u>Planning and Compulsory Purchase Act 2004</u>.

### **National Planning Policy and Guidance**

- 2.2 The <u>National Planning Policy Framework (NPPF)</u> sets out the overarching planning policy framework, supported by <u>National Planning Practice Guidance (NPPG)</u>. Our policies must be positively prepared, justified, effective and consistent with national policy. Local Plans should be consistent with national policy as set out in the NPPF, and should have regard to national planning guidance set out in the NPPG.
- 2.3 The NPPF requires us, in drawing up our Local Plan, to recognise town centres as the heart of our communities, and to include policies to support their *vitality* and *viability*. *Vitality* and *viability* mean respectively the *liveliness* and the *economic resilience* of our centres.

#### Sequential test for the allocation of main town centre uses

2.4 The NPPF paragraphs 23-27 concern planning for town centres. Paragraph 23 states that local planning authorities should:

'allocate suitable sites in centres to meet the retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important to meet that needs for retail, leisure, office and other main town centre uses are met in full, and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of available sites'; and

'allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting identified needs in other accessible locations that are well connected to the town centre.'

- 2.5 The definition of *in centre*, *edge of centre*, *out of centre* and *out of town* locations in the NPPF is different for the various town centre uses. These terms are fully explained in the definition of terms at Appendix A. The maps at Figures 3 and 4 show the town centre boundary and its edge of centre locations for different uses.
- 2.6 This sequential approach (in paragraph 23 of the NPPF) to allocating town centre use within centres is also reflected in the NPPG (Ensuring the vitality of town centres; paragraph 001). In accordance with the NPPG, in planning for town centres, we should assess the need for main town centre uses, and plan to meet those needs in full, adopting a 'town centre first' approach. A summary of our assessment of needs is set out at later at Section 4b), with our sequential assessment of where to accommodate those needs presented in Appendix B of this topic paper.

- 2.7 In applying the sequential test, the PPG (Ensuring the vitality of town centres; paragraph 011) advises that we should *"recognise that certain town centre uses have particular market and locational requirements that mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification."*
- 2.8 Such uses may include for example, for bulky goods difficult to sell from town centres, garden centres which require large outdoor areas, county hotels, small convenience shops for passing motorists, large office headquarters which need car parking. Many of these require large land areas, but may generate relatively low sales values.
- 2.9 Offices are included within main town centre uses, but have been considered in a separate Employment Topic Paper. Leisure uses are also considered in more detail in relation to tourism in the Leisure and Tourism Topic Paper.

#### **Local Context**

- 2.10 The Council's <u>Corporate Plan 2015-20</u> emphasises the importance of Guildford town centre as a principal regional shopping centre, with a vibrant night-time economy. It aims to reinforce the shopping and heritage attractions in the town centre with high-end shopping and further pedestrianisation of Guildford Town Centre. This will be delivered though the work programme of the Town Centre Regeneration Strategy (2017) (informed by the 2015 Town Centre Masterplan), as well as the new Local Plan. An important element of this is the regeneration of the North Street site (policy A6 of the Submission Local Plan), and other brownfield sites within the town centre.
- 2.11 As explained in Section c), the new Local Plan is not able to include all vacant / underused town centre sites, due to flooding and land assembly issues. Work to deliver the Town Centre Regeneration Strategy is happening already and will take place alongside delivery of sites that the new Local Plan will allocate for development.

#### **Neighbourhood Plans**

- 2.12 Neighbourhood Planning enables Neighbourhood Forums and Parish Councils to develop a plan setting out a vision and planning policies for their designated neighbourhood area. Those 'Neighbourhood Plans' which are successfully adopted will form part of the statutory development plan for the area that they cover. Where a Neighbourhood Plan is adopted or emerging before an up-to-date Local Plan is in place, the local planning authority should take it into account when preparing Local Plan policies.
- 2.13 There is currently one adopted Neighbourhood Plan (Burpham), one emerging, postexamination Neighbourhood Plan (Effingham), and one progressing towards examination (East Horsley) within the borough. Six other Parish Councils are also currently producing Neighbourhood Plans.
- 2.14 In extending the boundary of the Kingpost Parade, London Road local centre to include the new Aldi store, and in drafting the new Local Plan policy E9 for local centres, we have identified potential conflicts with the adopted Burpham Neighbourhood Plan and have noted these below.

- 2.15 There is a degree of conflict with Burpham Neighbourhood Plan Policy B-FD 5, and policy E9 of the Submission Local Plan: strategy and sites in relation to the Aldi site, an A1 use. A community (D1 or C2) use would be unlikely to be suitable for units in the Local Centre under the proposed Local Plan policy E9 and a residential use would be unsuitable. Whilst noting the neighbourhood plan's support for a community use on this site, any planning application would need to be treated as an exception to Policy E9. The Council took the strategic policy decision to restrict non-retail ground floor uses in district and local centres under new Local Plan policies E8 and E9 to units in the A use class and to main town centre uses with a shopfront. This was in accordance with NPPF paragraph 23, which seeks to promote competitive, vibrant and attractive retail centres.
- 2.16 Kingpost Parade has historically had low to zero vacancies and, at the time of the Council's latest survey of local centres (May 2017), was fully occupied with 100% A-class uses (63% of which were Use Class A1)<sup>1</sup>. The borough's other local centres and two district centres have also experienced low vacancy rates in previous years. The intention is therefore that policies E8 and E9 should ensure the retention of strong and active (non-designated) shopping frontages in the centres. The National Planning Practice Guidance emphasizes the importance of keeping retail land allocations under review in order to take account of market signals and these policies will therefore need monitoring regularly in the light of future retail surveys, market signals and changes to national planning guidance.
- 2.17 Policy B-EMP 2 of the Burpham Neighbourhood Plan is also in conflict with Policy E9 of the Regulation 19 Proposed Submission Plan, as it allows potential change of use of any Class A ground floor use to a D1 or D2 use. Policy E9 allows change of use from an A1 use in a local centre only where the proposal meets certain criteria related to loss of vitality and viability, amenity, character and appearance.
- 2.18 For a change of use from an A1 ground floor retail unit in a local centre to a use other than one within part A of the Use Classes Order, policy E9 also requires that the alternative use has to be a suitable main town centre use requiring a shop front. Developers must also supply a minimum of 12 months' worth of evidence of marketing the site for its current use if the existing use provides for everyday needs under Policy E9, whereas, for change of use of a Class A ground floor use to a D1 or D2 use, policy B-EMP 2 requires only six months' marketing evidence.
- 2.19 The weight given to an emerging plan will depend on, among other things, the extent to which there are unresolved objections to the plan (NPPF paragraph 216). Therefore, an emerging neighbourhood plan will pick up weight once evidence of consultation is published and the level of unresolved objection is known. At time of writing, the Effingham Neighbourhood Plan has been through examination, has resolved any remaining objections, and is progressing towards a referendum. The East Horsley neighbourhood plan has been submitted for examination but not been examined and is therefore accorded very little weight at this stage. Details are available at <a href="http://www.guildford.gov.uk/neighbourhoodplanninginformation">http://www.guildford.gov.uk/neighbourhoodplanninginformation</a>

<sup>&</sup>lt;sup>1</sup> Source: Guildford Borough Council retail surveys, May 2017 Guildford borough Topic Paper : Retail and Town Centres

## 3. Evidence

3.1 The National Planning Policy Framework requires us to develop policies based on up to date evidence. Our evidence comprises documents that have helped inform past and current stages of our Local Plan policy development.

The key evidence relevant to retail and service centres is:

- <u>Retail and Leisure Study Update September 2015 (published October 2015) and 2017</u> Addendum (published February 2017)
- Town Centre Vitality and Viability Reports 2010 and 2011
- Annual surveys of centres (data held by the Council)
- 3.2 Further information and copies of the evidence base documents are available on the Council's website at: <u>http://www.guildford.gov.uk/newlocalplan/evidencebase</u>.

## 4. Appraisal

4.1 The following section highlights the main issues considered in formulating the Local Plan policy approach for retail and service centres in our borough. It also highlights key consultation feedback from the previous consultations.

### Consultation feedback

- 4.2 As part of developing the Local Plan we consulted at the following main stages:
  - Issues and options (October 2013) which identified a range of issues and potential options for how we should plan for Guildford borough
  - Draft Local Plan (July 2014) which outlined our preferred approach for planning for Guildford borough
  - Proposed Submission Local Plan (June 2016) which included the policies and sites that we had intended to submit for examination
  - Regulation 19 Proposed Submission Local Plan (June 2017) a targeted consultation on proposed changes to policies and sites
- 4.3 Comments received as part of the consultation stages have been taken into account in preparation of the Local Plan. The main issues raised in all four consultations, together with our response, are set out in the accompanying Consultation Statement.
- 4.4 Details of how the feedback from the consultations informed the revised policies E7, E8 and E9 are in section 5 of this topic paper.

### Review of the borough's hierarchy of retail and service centres

- 4.5 As part of preparing our new Local Plan we must define a network / hierarchy of centres, and assess the need to expand these centres to ensure a sufficient supply of suitable sites.
- 4.6 There is a long-standing hierarchy of retail and service centres across the borough designated in successive Guildford borough Local Plans, which is currently set out in the Local Plan 2003. Centres were included if they met the criteria listed for local, district, and town centres in the national planning policy of the time. We have used this established hierarchy, along with our annual surveys, Retail and Leisure Study Update 2015 and February 2017 Addendum (both available at http://www.guildford.gov.uk/newlocalplan) as the starting point in considering a suitable hierarchy of centres, a suitable boundary for each centre, primary and secondary shopping frontages (where suitable and meaningful), and primary shopping areas, as required by national planning policy.
- 4.7 Guildford borough has a single town centre, the largest in Surrey County (in relation to floorspace and number of units)<sup>2</sup>. For decades the borough has had two district centres, one in Ash, and one in the rural village of East Horsley.
- 4.8 The borough has many individual, stand-alone shops and very small parades of only neighbourhood significance that serve only their immediate surrounds. In line with national planning policy, we will not designate these as centres. Shops located in rural areas but outside

<sup>&</sup>lt;sup>2</sup> Promis report 2015, Experian

Guildford borough Topic Paper : Retail and Town Centres

of designated centres which serve the everyday needs of local people will be protected through the Local Plan, subject to a period of marketing to determine demand for their services.

4.9 The borough's 21 proposed local centres range from the small centres with only five to 10 commercial premises or community facilities, through medium sized local centres with between 10 and 15 premises, to large local centres, such as Woodbridge Hill in Guildford which has 29 units.

- 4.10 The smaller ones function to provide for everyday retail and service needs for the local population of that immediate area. Some of the larger ones also include a number of comparison stores, such as bicycle and antique shops which people may travel some distance to visit.
- 4.11 The proposed new hierarchy of centres is listed in the table below and illustrated on the map at Figure 1 in this section:

Town centre			
Guildford			
District centres			
<ul> <li>Urban</li> <li>Wharf Road, Ash</li> <li>Rural <ul> <li>Station Parade, East Horsley</li> <li>Ripley</li> </ul> </li> </ul>	Each of the proposed <b>three district</b> <b>centres</b> has at least 30 non-residential units, including a supermarket and local services such as a bank, and public and community facilities such as meeting hall, etc. They function as district centres because of the number and range of retail, services and community uses.		
_ocal centres			
<ol> <li>Hurban local centres (one in Ash, and 12 in Guildford town)</li> <li>Aldershot Road, Westborough</li> <li>Collingwood Crescent, Boxgrove</li> <li>Kingpost Parade, London Road, Burpham</li> <li>Epsom Road, Merrow</li> <li>Kingfisher Drive, Merrow</li> <li>Madrid Road, Guildford Park</li> <li>Southway, Park Barn</li> <li>Stoughton Road, Bellfields</li> <li>The Square, Onslow Village</li> <li>Woodbridge Hill, Guildford</li> <li>Woodbridge Road, Guildford</li> <li>Worplesdon Road, Stoughton</li> <li>Ash Vale</li> <li>The Street, Tongham</li> </ol>	<ul> <li>Seven rural local centres</li> <li>Bishopsmead Parade, East Horsley</li> <li>Effingham</li> <li>Fairlands</li> <li>Jacobs Well</li> <li>Send</li> <li>Shalford</li> <li>Shere</li> </ul>		

4.12 This hierarchy would be created by making the following changes to the Local Plan 2003 hierarchy:

#### Designate Ripley as a district centre

4.13 Ripley stands out amongst Guildford borough's local centres due to its size and catchment in relation to other local centres. It is active and busy and benefits from passing trade due its location adjacent to the busy B221. It has a wide range of non-residential units (52 as of May 2017). These include a supermarket, a hotel, several estate agents, solicitors' offices, home furnishing and antique shops, a pharmacy and hairdressers, public houses, restaurants and a community hall.

#### Remove the designation on Manor Road, Stoughton

4.14 Manor Road, Stoughton (a local centre in the 2003 Local Plan) has lost many units to residential use over the years, with the remaining non-residential units now spread out at opposite ends of the existing centre. As it no longer performs the role and function of a local centre, it is proposed to remove the local centre designation in the new Local Plan.

#### **New local centres**

4.15 Jacobs Well has been included as a new local centre because of its number and range of shops, which fulfil local everyday needs. Three other new local centres will be built as part of mixed-use strategic developments on the allocated sites of Blackwell Farm, Gosden Hill Farm and the former Wisley Airfield. The location of each of these will be determined by planning applications and when developed they will be designated in the next Local Plan review.

#### Redefine the centre boundaries

- 4.16 In considering whether to amend the defined boundary of each centre, we referred to inhouse retail survey data and the recommendations of the Retail and Leisure Update Study 2015. This study identified centres where the contraction of existing boundaries could provide greater focus on protecting key local facilities. It also identified those centres where expanding the boundary could strengthen retail and service facilities, thereby helping to stimulate development and investment.
- 4.17 The Figure 1 table shows the proposed changes to the boundaries of the town centre and local and district centres.

# Redefine the primary and secondary shopping frontages and Primary Shopping Area (PSA)

- 4.18 The Submission Local Plan has simplified the town centre shopping frontages by reducing them to primary and secondary only, removing the tertiary and specialist frontages designated in the 2003 Local Plan. This is to accord with the NPPF's definition of primary and secondary frontages (see Appendix A for definitions).
- 4.19 We do not consider it would be suitable or helpful to designate primary and secondary frontages for the borough's district and local centres, due to the size and distribution of uses in most of these centres. In addition, our retail surveys show that these centres generally function well without any other designation.

Guildford borough Topic Paper : Retail and Town Centres

4.20 We used the primary and secondary shopping frontages to define the Primary Shopping Area (PSA) for Guildford Town Centre (see Figure 3). The PSA is the boundary used for undertaking a sequential test for retail uses where an alternative site could be available within the town centre. For further information on this test, see section c) Sequential assessment of sites to accommodate main town centre uses.

#### Areas and sites excluded from the centre hierarchy

- 4.21 Small parades of shops that primarily serve the immediate local neighbourhood are not classed as centres in national policy; we have therefore not designated any neighbourhood parades in the Local Plan.
- 4.22 *Out of centre* locations are not sequentially preferable for new main town centre uses and are therefore not included in the hierarchy of centres (see paras. 4.40-4.55 for information on the sequential test). An *out of centre* location is one that is neither in, nor on the edge of a centre, but is within the urban area. With the exception of the two main out of centre food stores in the borough (Sainsbury's Superstore, Clay Lane, Burpham, and Tesco Superstore, Ashenden Road, Guildford), the majority of out of centre retail floorspace in the borough is located around the junction of Woodbridge Road and Ladymead.
- 4.23 Ladymead, an out of centre retail park, is located approximately 1.5km north of Guildford town centre, north of its junction with Woodbridge Road. Along the Woodbridge Road junction is an area of car and home-goods showrooms. Both Ladymead and the northern end of Woodbridge Road accommodate mainly retail warehouses. These are large stores specialising in the sale of bulky goods (such as carpets/floor coverings, furniture/furnishings, electrical goods, and DIY items), and catering mainly for car-borne customers. Ladymead Retail Park was approved prior to the town centre first government policy introduced in the mid-1990s. The planning permission for this retail park specifically excludes retail sales of food for consumption off the premises (i.e. convenience retail).
- 4.24 We considered whether Ladymead Retail Park should be designated as a centre. Given its proximity to Guildford town centre, large amount of retail floorspace in one location (over 20,000 sq m), lack of convenience offer (due to planning conditions), and relatively poor accessibility by public transport, it is not considered suitable to designate for further town centre floorspace. Overall, it plays a complementary role in providing large, single or two storey units selling bulky DIY and home goods, with significant surface car parking.



Figure 1: Map of the borough's retail and service centres

Centre in hierarchy	Changes from Local Plan 2003	Reasons
Town centre		
Guildford Town Centre	<ol> <li>Reduce extent of boundary by removing areas west of Guildford Railway station and east of London Road / Epsom Road junction, which are in predominantly residential use.</li> <li>Remove tertiary and specialist shopping frontages (see Appendix C)</li> <li>Redraw Primary Shopping Area (PSA) based on primary and secondary shopping frontages</li> </ol>	<ol> <li>Residential is not a main town centre use, so where it is on the periphery of the town centre, it should be removed from the boundary as it does not need to be protected</li> <li>To accord with national planning guidance in the NPPF for shopping frontages</li> <li>To update the Policies Map to reflect the changes in point 2.</li> </ol>
District centres		
Wharf Road, Ash	<ol> <li>Centre contracted to exclude houses on edges of centre at 229 Shawfield Road and adjacent to Budgens at 14 Wharf Road</li> <li>Exclude yard area of Shawfield Rd and Ash Hill Road</li> </ol>	Residential is not a main town centre use, so where it is on the periphery of a district centre it should be removed from the centre boundary, it as it does not need to be protected
Station Parade, East Horsley	Boundary of the centre contracted slightly to remove residential flats at Maranello House and Horsley Court flats	Residential is not a main town centre use, so where it is on the periphery of a district centre it should be removed from the centre boundary, it as it does not need to be protected
Ripley	<ol> <li>Upgrade from a Local to a district centre.</li> <li>Extend boundary of the centre to include Budgens and Rio House to the south</li> <li>Remove area of housing along Rose Lane</li> </ol>	<ol> <li>To reflect the number and range of units in the centre that sell everyday goods and services, as well as more specialist units</li> <li>To include existing and potential sites for retail, leisure and service provision; to support the centre's function.</li> <li>Residential is not a main town centre use, so where it is on the periphery of a centre, it should be excluded from the boundary as it does not need to be protected</li> </ol>
Urban local centres	·	
Aldershot Road, Westborough	No change	The local centre functions well
Ash Vale (was Ash Vale Parade in 2003 Local Plan)	Extend area to the west to include the Tescos (west of the local centre) and its surface car park, and the adjacent Rowden Works site	To support the centre's function. Due to its condition and location, it is no longer suitable to protect Rowden Works for employment use.
Bishopsmead Parade, East Horsley	No change	The local centre functions well

#### Changes to the Local Plan 2003, proposed in the Regulation 19 Submission Local Plan: Strategy and Sites (June 2017)

Guildford borough Topic Paper : Retail and Town Centres

Collingwood Crescent,	No change	The local centre functions well
Boxgrove		
Epsom Road, Merrow	No change	The local centre functions well
Kingpost Parade, London	Extend the centre to include Aldi supermarket on the	Site is on the edge of the existing local centre and performs a
Road, Burpham	opposite side of London Road.	valuable local retail function
Madrid Road, Guildford Park	Reduce centre	To improve its function
Southway, Park Barn	No change	The local centre functions well
Stoughton Road, Bellfields	No change	The local centre functions well
The Square, Onslow Village	No change	The local centre functions well
Woodbridge Hill, Guildford	No change	No expansion required as centre already well-served with many occupied units including retail, a café, a restaurant, banking and a local supermarket.
Woodbridge Road, Guildford	No change	A compact linear parade with a good mix of retail, leisure and service uses.
Worplesdon Road, Stoughton	Remove houses adjacent to 204 Worplesdon road and two houses adjacent to 127a Worplesdon Road and adjusted the curtilage of 123 and 125.	Retail and service uses are focused along the western carriageway of Worplesdon Road with a petrol station and local supermarket on the eastern side.
The Street, Tongham	Extend the centre to the south to include adjacent offices at the Kiln and The White Hart pub and its surface car park.	The centre boundary comprises a small parade of shops with no potential to accommodate new retail and service offer. Given the amount of residential planned in the areas on sites in a variety of ownerships, it has not been possible to find a site for a larger supermarket, which this area will need.
Rural local centres		
Bishopsmead Parade, East Horsley	No change	The local centre functions well
Effingham	No change	The local centre functions well
Fairlands	No change	The local centre functions well
Jacobs Well	Proposed new local centre	Proposed for local centre designation due to its post office and other uses.
Send	No change	The local centre functions well
Shalford	Contract centre to remove everything east of junction	Town centre uses have become fragmented due to the change of
	of Kings Road with Station Road	use of commercial units to residential.
	Extend centre slightly to the north by the station to include retail and services uses including Snooty's grocery store and vacant storage unit with parking north of existing centre boundary.	
Shere	Contract local centre to remove areas of predominantly residential ground use at ground floor level	Change of town centre uses to residential has dispersed the town centre uses, weakening the centre.

Guildford borough Topic Paper : Retail and Town Centres

The new Local Plan allocates mixed use strategic sites which include new local centres. These are to be delivered as part of proposed urban extensions at:	Proposed new local centres	These new local centres are to be formally designated only once they have been built, and added to the Policies Map at the next Local Plan review. Once the sites have been developed, they will be treated as local centres for planning application purposes.
<ul><li>Gosden Hill Farm; and</li><li>Blackwell Farm</li></ul>		
<ul> <li>And:</li> <li>As part of redevelopment of the former Wisley airfield</li> </ul>		

#### Need for additional floorspace for town centre uses

- 4.25 We commissioned external consultants to prepare a needs assessment for retail and leisure uses across the borough; the findings and recommendations of this assessment informed the site allocations in the Submission Local Plan. The <u>Retail and Leisure Update</u><u>Study 2014</u>, published in September 2015, identified objectively assessed need as floorspace requirements to 2033. The Study was updated with an <u>Addendum</u> published in February 2017, which updated the forecast retail and leisure floorspace requirements over the Plan period to 2034 and projected to 2036. These forecasts took into account the latest 2014-based population projections (released in May 2016) and the latest Experian forecasts of available expenditure. The revised forecasts also included adjustments to existing convenience goods market shares to take account of key store openings since completion of the 2014 household survey, including Waitrose on York Road, Guildford Town Centre, and Aldi, on London Road, adjacent to the Sainsbury's Superstore at Clay Lane.
- 4.26 Paragraph 1.5 of the 2017 Addendum advises that retail and leisure forecasts carried out over a long time are inherently less certain and should be treated with caution, mainly due to changes to the impact of economic, demographic and market trends. The allocations in the Submission Local Plan therefore take into account the indicated requirement to 2030, rather than to the end of the Local Plan period.
- 4.27 The methodology for forecasting floorspace needs used in the study and addendum was based on a standard constant market share approach. This does not take into account any potential uplift in market shares and capacity (quantitative need) that could occur due to the 'claw back' of expenditure from competing centres to new retail floorspace in town centre locations, for example the new Waitrose store in York Road and a new anchor store as part of the proposed North Street scheme. Nor does it make any adjustment for planned comparison retail developments outside the study area, for example Kingston Borough's Eden Quarter scheme, which is likely to reduce Guildford Borough's forecast capacity. It does however allow an increase to forecast capacity resulting from an uplift in market share/retention for committed schemes that are already trading (including Waitrose).
- 4.28 The 2017-based forecast borough-wide need for **comparison retail** floorspace, assuming constant market share, is shown in the table below. These figures are cumulative:

	2020	2025	2030	2034	2036
Net capacity (sq m)	1,130	10,965	28,202	32,665	37,595
Assumed gross capacity (sq	1,614	15,664	40,289	46,664	53,707
m)					

Borough-wide assessed floorspace capacity for comparison goods

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 7, Table 1 Note: The gross floorspace capacity assumes a 70% net/gross floorspace ratio

4.29 As can be seen from the table, short-term need is relatively small; however, there is a sharp increase in need towards the end of the Plan period. This ties in with the nature of planned development of sites in the Local Plan, as a number of the larger retail and mixed use housing allocations are anticipated to be completed in the last two five-year periods of Guildford borough Topic Paper : Retail and Town Centres

the Plan. The latest assessment of capacity in the 2017 Addendum also includes a comparison goods need/capacity breakdown for Guildford town centre, which shows a similar picture – see table below:

Guildford Town Centre assessed floors	pace capacity for comparison goods
	pade dapadity for demparicen geode

	2020	2025	2030	2034	2036
Net capacity (sq m)	3,313	11,812	26,699	30,551	34,811
Assumed gross capacity (sq	4,733	16,875	38,142	43,645	69,730
m)					

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 7, Table 1 Note: The gross floorspace capacity assumes a 70% net/gross floorspace ratio

4.30 The identified need for **convenience retail** floorspace, assuming constant market share, is as shown in the table below<sup>3</sup>. These figures are also cumulative:

	2020	2025	2030	2034	2036
Option 1: Foodstore-format floorspace (sq m net)	357	1,102	1,869	2,503	2,774
Sq m gross for option 1, using 70% net/gross ratio	510	1,574	2,630	3,576	3,963
Option 2: Local supermarket/deep discount format floorspace (sq m net)	672	2,077	3,523	4,717	5,228
Sq m gross for option 2, using 70% net/gross ratio	960	2,967	5,033	6,739	7,468

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 7, Table 1

- 4.31 The forecast capacity over the Plan period identified in the table above represents an increase from capacity identified in the previous 2014 retail study over a similar period. This is mainly due to less planned convenience floorspace than identified in the 2014 study and adjustments to market shares to take account of the Waitrose and Aldi stores, which allowed for increased consumer expenditure retention in the borough.
- 4.32 In addition to the identified need arising from population and expenditure growth across the Retail Study area, the Retail and Leisure Update Study 2014 (paragraphs 7.63 to 7.74) found that planned housing on the mixed-use strategic developments and locations of growth proposed in the draft Local Plan would also generate a need. These are additional to the identified overall need for the borough.
- 4.33 The future capacity identified for new strategic development sites is based on the assumption that 50% of available convenience goods expenditure of people living in new homes on the strategic sites will be spent in existing foodstores in the area. This is considered a reasonable assumption, as a significant proportion of residents of these new homes can be expected to work away from the strategic site where they live, and may visit food stores there or on their journey home from work.

<sup>&</sup>lt;sup>3</sup> The row of figures under option 2 assumes that residual expenditure capacity is taken up by a supermarket (e.g. Co-Op, Budgens, etc) and/or 'deep discount' retailer (e.g. Aldi, Lidl, Netto, etc) trading at lower average sales levels of £6,500 per sq m in 2016 (Retail and Leisure Study Addendum, 2017, p8).

- 4.34 For Ash and Tongham, there is potential to claw back some spending that leaks to foodstores in Rushmoor District. Assuming that there is potential to retain 75% of spending from new housing development in Ash and Tongham area, a new supermarket could be supported. As no suitable, available and viable site has been identified for allocation, this would need to come forward under draft Local Plan Policy E9 as suggested by the NPPF, and summarised at paragraph 2.6, bullet point 4 of this Topic Paper.
- 4.35 The Study identified future need for convenience floorspace at the planned strategic housing growth areas identified in the Regulation 19 Submission Local Plan (2016). This new retail floorspace could be accommodated within their new local centres, whilst Slyfield Regeneration Area could support a local convenience store of approximately 200 sq m (gross). See figures in the table below:

	Foodstore/ Local Format (sq m gross)	Convenience/Deep Discount (sq m gross)
Blackwell Farm	466	951
Gosden Hill Farm	414	845
Slyfield Area Regeneration Project	207	423
Fomer Wisley Airfield	435	888
Ash and Tongham	377	770

4.36 The identified need for floorspace for food and beverage uses (use class A3/A4/A5), (assuming provision at 15%-20% of the forecast capacity for comparison floorspace<sup>4</sup>) is between 2,350 sq m to 3,133 sq m in 2025 increasing to 7,000 sq m and 9,333 sq m by the end of the plan period (2034). These figures are set out in the table below and are cumulative and gross. The evidence underpinning the retail study points towards strong indicated signs of interest in Guildford Town Centre from food and beverage operators<sup>5</sup>. This has been reflected in an adjustment to the capacity of the allocation for the North Street site A6 in the Local Plan, from 3,000 to 6,000 sq m approx. food and drink (A3) uses and drinking establishment (A4) uses between the 2016 and 2017 versions of the Regulation 19 Submission Local Plan.

#### Forecast borough-wide floorspace capacity for food and beverage uses

	2020	2025	2030	2034	2036
Projected comparison	1,614	15,664	40,289	46,664	53,707
floorspace (gross sq m)					
15% of comparison floorspace	242	2,350	6,043	7,000	8,056
to A3/A4/A5 uses (sq m)					
20% of comparison floorspace	323	3,133	8,058	9,333	10,741
to A3/A4/A5 uses (sq m)					

Source: Guildford Retail and Leisure Study Addendum 2017, Appendix 7, Table 1 Note: The gross floorspace capacity assumes a 70% net/gross floorspace ratio

4.37 The 2017 Addendum recommends that the forecast need for A3-A5 floorspace should be directed to Guildford Town Centre as a priority to help increase competition and choice and to attract new town centre users, perhaps as part of a new retail or leisure scheme for the town centre. This would also be in line with national and local planning policies in relation to

 <sup>&</sup>lt;sup>4</sup> This approach is based on the assumption that between 15% and 20% of the forecast capacity for new comparison goods floorspace could support a mix of new leisure services including cafés, restaurants, takeaways, pubs and wine bars.
 <sup>5</sup> Retail and Leisure Study Addendum, 2017, p17, paras 4.20-4.21

sequential site assessment (see the next section c)) for more information on this.

- 4.38 The Study considered the main commercial leisure uses that can help to improve the overall vitality and viability of town centres. The trend for health and fitness uses is shifting from provision out of centre to within town centres. This is helping to create a wider range of attractions and activity in town centres, particularly in the evenings and at weekends. Strong demand was identified for health and fitness facilities in the borough, with forecast population growth potentially providing for an additional 5,192 gym members living in the borough, which would support two new gyms to 2034.
- 4.39 The Study also advised of quantitative capacity for up to five additional cinema screens (to add to the nine existing) within or on the edge of Guildford town centre.

# Sequential assessment of sites to accommodate main town centre uses

- 4.40 The National Planning Policy Framework (NPPF) recognises town centres as the heart of our communities, and aims to support their vitality and viability (liveliness and economic success) through a town centre first or sequential approach to retail planning. This has been government policy since the mid-1990s.
- 4.41 The sequential approach is intended to achieve two important outcomes :
  - To locate main town centre uses generating many trips inside centres (or failing that well- connected edge of centre sites). These locations are likely to be the easiest locations to access by non-car means of transport and will be centrally located to the catchments established centres serve, thereby **reducing the need to travel.**
  - To accommodate these uses in centres whenever possible in order to enable people to undertake **linked trips**, which enable increased competition and customer choice.
- 4.42 The NPPF defines town centres as areas predominantly occupied by main town centre uses which must be defined in the Local Plan. Town centres also include district centres and local centres, but not small parades of shops significant only to the neighbourhood, nor existing out of centre areas of main town centre uses (unless defined in the Local Plan).
- 4.43 As set out in Section 2, the NPPF defines *in centre, edge of centre, out of centre* and *out of town* locations for the various town centre uses. For ease of reference, these have also summarised in Figure 2 below for retail, offices and other main town centre uses.
- 4.44 Figure 3 shows the primary and secondary shopping frontages and the primary shopping area (PSA). Note that the boundary of the PSA for Guildford town centre as adopted in the 2003 Local Plan has been revised to take account of the NPPF definition. The revised PSA boundary excludes the easternmost edge of the High Street, London Road and Epsom Road; these areas are currently secondary frontage but not sufficiently well connected to be included within the PSA.

	In centre	Edge of Centre	Out of centre	Out of town
Retail	Primary Shopping Area** (PSA) – defined area where retail development is concentrated (which generally comprises primary and adjoining secondary frontages*)	Locations well connected and up to 300m of the PSA	Locations not in or on the edge of a centre, but not necessarily outside the urban area	Locations out of centre that are outside the existing urban areas
Offices	Town centre boundary	Locations within 300m of a town centre boundary and locations within 500m of a public transport interchange	Locations not in or on the edge of a centre, but not necessarily outside the urban area	Locations out of centre that are outside the existing urban areas
All other main town centre uses	Town centre boundary	Locations within 300m of a town centre boundary	Locations not in or on the edge of a centre, but not necessarily outside the urban area	Locations out of centre that are outside the existing urban areas

\* Note: Primary frontages are likely to include a high proportion of retail uses such as food, drink, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

\*\*The PSA applies only to the town centre. For district and local centres, the boundary of those centres is used for the purpose of the sequential test. District and local centres do not have an 'edge of centre' and a proposal is either considered to be 'in' or 'out' of those centres.

#### Figure 2: Sequential locations for main town centre uses (from NPPF 2012)

For ease of reference, we have mapped these for Guildford town centre in Figures 3 and 4.

- 4.45 The number and variety of sites that can be promoted through the new Local Plan for development of town centre uses in Guildford is severely restricted by the level of flood risk on brownfield sites available for redevelopment (mostly owned by Guildford Borough Council).
- 4.46 Consideration of development potential of riverside sites within Guildford Town Centre involves an interplay between the **town centre sequential test** (set out at NPPF paragraph 24) and the **flooding sequential test** (set out at NPPF paragraph 101). The flooding sequential / exceptions test is based on wider sustainability issues, such as selecting the most sustainable locations for major trip-generating uses, regenerating the town centre riverside, and making efficient use of brownfield land. Under the flooding sequential test, a site may only be suitable for development if there are no alternative suitable sites that are less at risk of flooding to accommodate the proposed uses.

- 4.47 Unfortunately, two prominent riverside Council-owned sites in Guildford town centre Portsmouth Road and Bedford Road surface car parks – are currently unsuitable for development due to their flood risk level and lack of existing buildings on the sites (both are cleared and in use as temporary surface car parks. Flooding issues aside, either of these sites could be suitable in principle for main town centre uses (excluding retail) such as food and drink, leisure and offices.
- 4.48 There is potentially scope for redevelopment of a site in Flood Zone 3b that is already developed and a new use would not lead to increased flood risk vulnerability. Policy P4 (3) of the Submission Local Plan states that: "Development proposals in the 'developed' flood zone 3b will also only be approved where the footprint of the proposed building(s) is not greater than that of the existing building(s) and there will be no increase in development vulnerability. Proposals within these areas should facilitate greater floodwater storage."
- 4.49 Also owned by the Council is the existing Guildford Cinema site and vacant bar. This site is also restricted by being within the functional floodplain (zone 3b), although minor development, or replacement or change of use of the existing building on the site is possible for certain uses, as set out in the NPPF (para. 104) and Planning Practice Guidance<sup>6</sup>.

<sup>&</sup>lt;sup>6</sup> Paragraph: 033 Reference ID: 7-033-20140306 Guildford borough Topic Paper : Retail and Town Centres



# Figure 3 : Proposed Centre (the Primary Shopping Area) and edge of centre locations for retail development at Guildford Town Centre

Note that the revised PSA boundary excludes the easternmost edge of the High Street, London Road and Epsom Road, which are secondary frontage but not considered sufficiently well connected to be considered PSA (see para. 4.47).

Guildford borough Topic Paper : Retail and Town Centres



# Figure 4 : Proposed Centre and edge of centre locations for main town centre developments, excluding retail, at Guildford Town Centre

NOTE: 500m from a public transport interchange applies to edge of centre offices only

- 4.50 Many of the town centre sites currently affected by flood risk could benefit from flood management infrastructure currently planned in the Wey catchment. The Environment Agency is planning flood management infrastructure in the Wey catchment, including appraising new flood alleviation schemes in Guildford town. This is an ongoing project led by the Environment Agency, outside of the Local Plan process.
- 4.51 The Council's Major Projects Team are planning and helping to facilitate the delivery of schemes, in liaison with developers, which will address transport issues in the town centre, including peak hour traffic congestion, car parking, and providing safe cycle and pedestrian routes. They are focusing on those sites that are more complex and challenging to deliver and that have obstacles to delivery, such as flooding or infrastructure issues.
- 4.52 Appendix B sets out the outcome of our assessment of potential sites to accommodate objectively assessed needs for retail uses within, and on the edge of existing centres. This includes sites considered in drafting the proposed strategic site allocations for the Local Plan that were deemed either unsuitable or unavailable.

#### Offices in and on the edge of town centres

- 4.53 Unless it can be justified that offices have particular market and locational requirements that mean they can only be accommodated in a specific location, then under the NPPF sequential test we must direct them to sites within the centres, or failing that to edge of centre locations. See Figure 2 and Appendix A for a definition of 'edge of centre' for office development.
- 4.54 The Guildford Borough Employment Land Needs Assessment 2017 considers need across the borough for employment uses and assesses the potential for intensification of existing sites to accommodate offices and research and development uses. It also identifies Strategic and Locally Significant Employment Sites that can appropriately provide offices, research and development, industrial, warehousing and storage uses, as referred to in Submission Local Plan policy E2.
- 4.55 A separate Employment Topic Paper sets out the sequential assessment to meet the identified need for offices, including consideration of special locational requirements.

#### Impact assessments for main town centre uses

- 4.56 Under the NPPF paragraph 26, applicants must submit an impact test for proposals for retail, leisure and office development outside of town centres if the development is over 2,500 sq m (gross) of floorspace. This is the default threshold unless the local planning authority sets a different locally appropriate threshold.
- 4.57 National Planning Practice Guidance<sup>7</sup> advises that in setting a locally appropriate impact assessment threshold for planning applications, it will be important to consider the:
  - scale of proposals relative to town centres;

<sup>&</sup>lt;sup>7</sup> Paragraph 016 Reference ID: 2b-016-20140306 Guildford borough Topic Paper : Retail and Town Centres

- the existing viability and vitality of town centres;
- cumulative effects of recent developments;
- whether local town centres are vulnerable;
- likely effects of development on any town centre strategy; and
- impact on any other planned investment.
- 4.58 The Retail and Leisure Update Study 2015 (paras 9.20 to 9.28) considered this issue and concluded that a single borough-wide local impact assessment threshold of 500 sq. m would be appropriate, for the reasons given in that study. This threshold has been included in policies E7, E8 and E9 of the Submission Local Plan (June 2017) as the new impact assessment threshold for proposed retail, leisure and office development outside the town centre or outside any of the district or local centres.

## 5. Local Plan Policy Approach

- 5.1 The strategy for retail planning taken in the Submission Local Plan responds to the requirements of national policy, the results of our evidence and considers responses put forward during each of the stages of public consultation, as described in section 4.
- 5.2 The two draft policies included in the (Regulation 18) draft Local Plan 2014, covering Guildford Town Centre and district and local centres were reworked prior to publication of the Submission version for consultation. There are now three policies for town, district and local centres (policies E7, E8 and E9), which are all wider in scope than the 2014 draft policies. The new policies include greater detail relevant to development management, including new wording to cover permission for changes of use within shopping frontages.
- 5.3 We found that there would have been inherent conflict between applying new strategic policies, which include defining Primary Shopping Areas and primary and secondary shopping frontages, alongside the 2003 Local Plan shopping frontage policies. The decision was therefore taken that the Strategy and Sites Local Plan will include policies which provide for a full replacement of all relevant 2003 Local Plan policies (see Appendix E: Superseded Policies), including the detailed policy elements needed for development management in terms of retail and town centre issues.
- 5.4 A local impact assessment threshold for retail, leisure and office development has been included as part of policies E7, E8 and E9 of the Submission Local Plan (June 2017). This is in line with the NPPF (paragraph 26), which allows for impact thresholds to be set locally by local planning authorities. The set threshold of 500 sq m adheres to the national Planning Practice Guidance, which gives advice on setting an appropriate local threshold (see section 4(d) of this topic paper). Developments proposing new retail, leisure or office floorspace above this threshold in edge-of-centre and out-of-centre locations will be required to submit an impact assessment. The impact assessment will be required to demonstrate the impact that the proposal will have on existing, committed and planned public and private investment in the centre or the catchment area of the proposal and the impact of the proposal on the vitality and viability of the town centre (up to five or ten years from when the application is made depending on the scale of the proposal).
- 5.5 The evidence referred to in the 2014 Retail and Leisure Study Update showed that there is modest scope for additional retail floorspace in the borough's main centres; it also indicates that stores with floorspace over 500 sq m gross are unlikely to be a purely local facility and will tend to draw trade from outside of their immediate local catchment. As a result it is unlikely that standalone out-of-centre stores and shopping destinations (e.g. retail units in retail parks) will seek floorspace below this threshold. These points provide clear justification for the 500 sq m local threshold chosen and it is reasonable for applicants proposing developments of this size or above to demonstrate that their proposals will not have a significant impact on the town centre.
- 5.6 Between the 2016 Regulation 19 Local Plan (which covered the period 2013-33) and the 2017 Regulation 19 Local Plan (which covered the period 2015-34) the comparison retail floorspace growth requirements for the borough to meet local need (which will be

concentrated in the town centre under policy E7) were reduced from 46,955 sq m to 41,000 sq m gross. This takes account of revised needs figures published in the 2017 Addendum to the Retail and Leisure Study Update 2014 and a reconsideration of the capacity and suitability of the North Street redevelopment site for comparison retail and other uses. In addition, five other sites in the Local Plan contain an element of retail use as part of a proposed mixed use allocation; these are site policies A6: North Street, Guildford; A7: Land and buildings at Guildford railway station; A25: Gosden Hill Farm, Merrow Lane, Guildford; A26: Blackwell Farm, Hogs Back, Guildford; and A35: Former Wisley Airfield, Ockham.

5.7 Two of these sites had their proposed retail floorspace capacity reduced, as follows:

	2016 Reg. 19 Local Plan (sq	2017 Reg. 19 Local Plan (sq
	m gross)	m gross)
A6: North Street	45,000	41,000
A26: Blackwell Farm	550	500

5.8 In addition the Normandy and Flexford mixed use site (site A46), which was allocated in the June 2016 version of the Plan for 1,100 homes, a nursing or residential care home, travelling showpeople plots and a total of 700 sq m retail (A1) and 400 sq m service (A3-A5) floorspace was removed from the June 2017 consultation version. This was a high sensitivity Green Belt site and was previously allocated only on the basis of its ability to provide a secondary school; this school is now proposed to be provided instead on the preferable location of Blackwell Farm (site A26).

# 6. How has feedback received from the Draft Local Plan consultations informed the revised policies?

- 6.1 The main representations at each consultation stage and our responses to them are set out in the accompanying Consultation Statement.
- 6.2 The Council received various comments from individuals, organisations, neighbouring authorities and parish councils regarding the Plan's approach to retail and town centres. These comments led to revisions to policies E7, E8, E9 and the site allocations. Changes to these parts of the Plan that were influenced by comments received during the Regulation 18<sup>8</sup> consultation in June 2014 included:
  - Upgrading Kingpost Parade, London Road, Burpham from a local to a district centre and extending its boundary to include former Green Man pub site (now Aldi), petrol station and car showroom
  - Introducing a local retail impact assessment threshold in policies E7, E8 and E9
  - Providing a residential element to the allocated North Street regeneration site of up to 400 homes (C3 use) and reducing the comparison retail element from 45,000 to 41,000 sq m (also in response to the updated evidence base)
- 6.3 To take account of representations made during the June 2016 Regulation 19 consultation the Council made further alterations to the draft policies, supporting text and justification. These changes were relatively minor in nature and designed to improve the policies' readability and clarity, or provide further detail where necessary. The main changes in relation to the retail policies were as follows<sup>9</sup>:
- 6.4 Policy E7: Guildford Town Centre:
  - Added references to historic character and assets
  - Enhanced reference in text to high quality design and environmental standards
  - Deleted the vision, which came from the Town Centre Masterplan
  - Removed policy wording that was non-specific and added it as supporting text
  - Corrected error of leaving out reference to A5 use in criterion 4 of the policy
  - Updated amount of development proposed in response to changes to evidence base (2017 Addendum to Retail and Leisure Study 2014 Update)
  - Deletion of text from reasoned justification related to flooding as it did not aid understanding of the policy
  - Updated the key evidence box, removing the Town Centre Masterplan
  - Amended Monitoring Indicators box
- 6.5 Policy E8: District Centres
  - Clarified the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
  - Expanded those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
  - Corrected an error regarding reference to local centres in a policy on District centres

<sup>&</sup>lt;sup>8</sup> Regulation 18 of the Local Planning Regulations 2012

<sup>&</sup>lt;sup>9</sup> Full details of the main changes are in the Full Council report for the meeting of 16<sup>th</sup> May 2017, available online at <u>www.guildford.gov.uk</u>

- Simplified wording in relation to the A uses
- Ensured consistency in the 4 bullet points with policies E7 and E9
- Added two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
- Added definition of 'main town centre uses' to Reasoned Justification
- 6.6 Policy E9: Local Centres
  - Clarified the relationship between the Primary Shopping Area and the District Centre. The NPPF requires Primary Shopping areas to be defined
  - Expanded those uses that will be supported in the centre beyond just retail uses to include other main town centre uses
  - Simplified wording in relation to the A uses
  - Added two new sentences clarifying changes of use from A2-5 to other town centre uses at ground floor level and confirm this does not include residential use or Office use
  - Last sentence of policy moved to more appropriate policy E5
- 6.6 The Council held a further targeted consultation in June 2017 on proposed changes to policies and sites following the previous 2016 Regulation 19 consultation. This prompted a number of further representations on the Plan on issues relating to retail and town centres; however, we did not consider that any of these representations warranted further change to the Plan or its supporting evidence base.

### 7. Next steps

- 7.1 The draft Local Plan strategy on retail and town centres responds to the requirements of national policy and the results of our evidence.
- 7.2 This topic paper accompanies the Submission Local Plan: strategy and sites that is to be submitted to the Secretary of State in December 2017. For more information, please visit: www.guildford.gov.uk/newlocalplan.

# Appendix A: NPPF definitions of terms used in this topic paper

#### Edge of centre:

- For retail purposes: a location that is well connected and up to 300 metres of the PSA
- For all other main town centre uses: a location within 300 metres of a town centre boundary.
- For office development: as per retail, but this includes locations outside the town centre that are within 500 metres of a public transport interchange.

In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

**Out of centre:** A location that is not in or on the edge of a centre but not necessarily outside the urban area

Out of town: A location that is outside the existing urban areas

**Primary Shopping Area** (PSA): Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages that adjoin and are closely related to the primary shopping frontage.

Because of the definition of 'edge of centre' for retail purposes, the 'centre' for retail purposes is in effect the PSA.

**Primary frontage:** Primary frontages are likely to include a high portion of retail uses, which may include food, drinks, clothing and household goods.

**Secondary frontages:** Secondary frontages provide greater opportunities for a diverse range of uses, including restaurants, cinemas and businesses.

#### Town centre:

Area defined on the local authority's proposal map, including the *primary shopping area (PSA)* and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References in the NPPF to town centres or centres apply to city centres, town centres, district centres and local centres, but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out of centre developments, comprising or including main town centre uses, do not constitute town centres.

#### Main town centre uses:

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

# Appendix B: Site sequential assessments – meeting identified needs

# Local Plan Sequential Assessment for Comparison and Convenience Retail and Leisure Uses

The table on the following pages sets out our consideration of the potential of sites within the borough to accommodate objectively assessed needs for comparison and convenience retail and leisure uses of over 100 sq m. This includes sites that are currently suitable and available to contributing to meeting those needs over the plan period, and sites that were considered in drafting the proposed strategic site allocations for the Local Plan, but assessed as either not suitable or not available.

The identified borough-wide Objectively Assessed Need for comparison and convenience retail floorspace is shown in section 4(b). For retail need assessments there can be greater certainty in assessments for shorter time period, so we are therefore aiming to meet identified needs to 2030, and will review needs before this.
#### SITES FOR COMPARISON RETAIL USES



Suitable and available for new comparison retail Unsuitable and/or unavailable

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Guildford Town	Centre/Guildfor	d Urban Area				
North Street Regeneration site (including bus station)	In centre (currently mostly edge of centre)	Yes	Majority of site is within ownership of M&G. Will also need a CPO.	Yes	41,000 sqm	Allocated as site A7 in the Submission Local Plan. This is the key site within the Primary Shopping Area to accommodate comparison retail uses. The primary landowner is intending to complete a retail-led mixed-use scheme in years 6-10 of the new Local Plan. A sequential assessment will not be required for this site, as the land is to be allocated in the Local Plan. However due to the potential floorspace increase in one location, an impact assessment will be required at planning application stage.
Land and buildings at Guildford Railway station	Edge of centre	Yes (for limited amount, as not a major destination for retail)	Yes	Yes	500	Planning application (14/P/02168) for a mixed-use redevelopment of land and buildings on the east side of the station (appeal against refusal of permission is currently being considered, ref APP/Y3615/W/16/3161412). Site owner Network Rail has advised the Council that it intends to retain its depot and sidings on the east side of the site, which will therefore be unavailable in any future development.
London Road Station surface car park	Out of centre, based on revised PSA boundary	No	No	No	N/A	Site is out of centre based on the revised PSA boundary and therefore would be sequentially unsuitable for additional retail uses.
Tunsgate Square	In centre	Yes	No	Unknown	N/A	Site is unavailable as application approved for refurbishment, reconfiguration and extension of the Tusngate shopping centre in March 2015. This scheme will result in a 3,236 sq. m increase in A3 uses (restaurant and café) and overall reduction of 1,455 sq. m A1 retail. Construction commenced in 2016.
White Lion Walk	In centre	Yes	No, existing leases	N/A	N/A	The landowner of the site has expressed interest in redeveloping the site for housing uses. As the site falls within a secondary retail frontage, under the Local Plan a redevelopment would need to retain the existing amount of retail floorspace, however a housing

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
						redevelopment is unlikely to provide scope for further retail expansion.
Guildford Library	In centre	Yes	No	Likely to be but dependent on site to relocate library	N/A	No, needed for library unless a suitable alternative site can be found.
Bedford Road surface car park	Edge of centre	No	Yes, site is Council-owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for retail development, as redevelopment would reduce flood storage and increase flood risk.
Portsmouth Road surface car park (Plaza site)	Edge of centre	No	Yes, site is Council-owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for retail development, as redevelopment would reduce flood storage and increase flood risk.
Guildford Cinema, Bedford Road	Edge of centre	Potentially, subject to flood risk mitigation and viability	Potentially – Long lease is coming to its end; Council freehold	Unknown	N/A	In Flood Zone 3b (functional floodplain) and existing building on site; surrounded by hard surfaced land, so redevelopment is possible provided it does not increase flood risk. Site allocated in the Submission Local Plan under policy A2, which also requires that development should achieve a reduction in flood risk, i.e. flood risk betterment.
Mary Road surface car park	Edge of centre	No	Yes, site is Council- owned	No	N/A	Developer would need to fund an assessment of contamination risk and cost of likely remediation. Site not considered suitable, as sites that are more central are viable and available.
Dolphin House	Edge of centre	Yes	No	Unlikely	N/A	Site unlikely to be available for redevelopment within the plan period; Potential to include a slight increase in retail floorspace, however six long-leasehold flats on upper floors make land assembly difficult. Redevelopment of this site for retail, including re-provision of five flats unlikely to be viable.
BT telephone exchange, Leapale Road	In centre	Yes	No	N/A	N/A	Site is occupied and unlikely to become available during the Plan period.
Ladymead Retail Park	Out of centre	No	<u>Unknown</u>	N/A	N/A	Site is out of centre and therefore sequentially unsuitable for additional retail uses; the size of the existing retail park and its location only 1km from the town centre also makes it

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
						unsuitable to allocate.

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Outside Guildfor	d Town Centre	e/ Urban Area				
Surface car park, rear of 16-22 Station Parade, Ockham Road South, East Horsley	In centre	No	Yes, site is Council- owned	N/A	N/A	Site is in a local centre, however is unsuitable as needed at present for car parking at busy times.
Former petrol station, south of Talbot Inn, High Street, Ripley	In centre	Yes	Yes	Yes	90	Site allocated in the Submission Local Plan as site A45. Has planning permission (application ref. 16/P/00608).for up to 26 residential units to the rear and 2 retail/commercial uses on the High Street frontage, comprising 90 sq. m floorspace (flexible A1, A2, A3 or A4 use). This permission was granted on appeal in August 2017.
Former fire station, Ladymead	Out of centre	Yes; although out of centre, its location is considered suitable for a bulky goods furniture store	Yes - site sold by SCC to furniture store company	Yes	3,725	Application 15/P/02450 for a bulky goods furniture retail warehouse approved in July 2016.
Potential Development Area J3 identified in Guildford's Green Belt and Countryside Study (north of Keens Lane / part of site 61 in 2014 Draft Local Plan).	Out of town	No, as suitable more central sites are viable and available	Yes – Suggested for retail by site promoter	Probably, given existing use value	N/A	Land within 400m of SPA (residential development prohibited under Thames Basin Heaths SPA Delivery Framework; retail development would require submission of a Habitats Regulations Assessment).

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments					
New proposed g	New proposed growth locations										
Blackwell Farm, Hogs Back	Out of town; will be in centre if planning permission granted for strategic mixed-use developm ent	Yes, provided planning permission granted for strategic mixed-use development	Yes	Yes, as part of strategic site	Approx. 500	To be accommodated in a new Local Centre as indicated in Submission Local Plan policy A26. Centre to be designated through later additions to the Proposals Map.					
Gosden Hill Farm, Meadow Lane	Out of town; will be in centre if planning permission granted for strategic mixed-use developm ent	Yes, provided planning permission granted for strategic mixed-use development	Yes	Yes, as part of strategic site	Approx. 500	To be accommodated in a new Local Centre as indicated in Submission Local Plan policy A25. Centre to be designated through later additions to the Proposals Map.					
Former Wisley Airfield, Ockham	Out of town; will be in centre if planning permission granted for strategic mixed-use developm ent	Yes, provided planning permission granted for strategic mixed-use development	Yes	Yes, as part of strategic site	Approx. 500	To be accommodated in the new Local Centre as shown in the draft masterplan for the wider site in latest outline planning application (application 15/P/00012, appeal currently under consideration). Site allocated in Submission Local Plan (site A35); local centre to be designated through later additions to the Proposals Map.					

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Land to the south of Normandy and north of Flexford	Out of town	No	Yes	N/A	N/A	Draft site allocation A46 removed from the Local Plan due to the potential impact on high sensitivity Green Belt; in addition, site sequentially unsuitable for retail, as other suitable more central sites are viable and available.
Slyfield Area Regeneration Project (SARP)	Out of centre	No, as suitable more central sites are viable and available	Yes	Unknown	N/A	Site allocated (policy A24) in new Local Plan for residential and light industrial uses. Delivery timescale dependent on relocation of the sewage treatment works.

### SITES FOR CONVENIENCE RETAIL USES

Suitable and available for new convenience retail Unsuitable and/or unavailable

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments				
Guildford Town	Guildford Town Centre/Guildford Urban Area									
North Street Regeneration site (including bus station)	In centre	No	Yes	Unknown	N/A	Allocated as site A7 in the Submission Local Plan. This is the key site within the Primary Shopping Area to accommodate comparison retail uses. The primary landowner is intending to complete a retail-led mixed-use scheme in years 6-10 of the new Local Plan. Given the recent opening of nearby Waitrose, there is no need to allocate another food store within the plan period.				
Land and buildings at Guildford Railway station	Edge of Centre	Yes (for limited amount – not a major destination for retail)	Yes	Yes	700	Planning application (14/P/02168) for a mixed-use redevelopment of land and buildings on the east side of the station (appeal against refusal of permission is currently being considered, ref APP/Y3615/W/16/3161412). Site owner Network Rail has advised the Council that it intends to retain its depot and sidings on the east side of the site, which will therefore be unavailable in any future development.				
London Road Station surface car park	Out of centre, based on revised PSA boundary	No	No	No	N/A	Site is out of centre based on the revise PSA boundary and therefore would be sequentially unsuitable for additional retail uses. Sale of the site for redevelopment currently considered unviable due to the reduction in income from the existing car park.				
Tunsgate Square	In centre	Yes	No	No	N/A	Site is unavailable as application approved for refurbishment, reconfiguration and extension of the Tusngate shopping centre in March 2015. This scheme will result in a 3,236 sq. m increase in A3 uses (restaurant and café) and overall reduction of 1,455 sq. m A1 retail. Construction commenced in 2016.				
White Lion Walk	In centre	Yes	No, existing leases	N/A	N/A	The landowner of the site has expressed interest in redeveloping the site for housing uses. As the site falls within a secondary retail frontage, under the Local Plan a redevelopment would need to retain the existing amount of retail floorspace, however a housing redevelopment is unlikely to provide scope for further retail expansion.				

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Guildford Library	In centre	Yes	No	Likely to be but dependent on site to relocate library	N/A	No, needed for library unless a suitable alternative site can be found.
Bedford Road surface car park	Edge of Centre	No, in in zone 3b functional flood plain.	Yes, site is Council-owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for retail development, as redevelopment would reduce flood storage and increase flood risk.
Portsmouth Road surface car park (Plaza site)	Edge of centre	No, in zone 3b functional flood plain	Yes, site is Council-owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for retail development, as redevelopment would reduce flood storage and increase flood risk.
Guildford Cinema, Bedford Road	Edge of Centre	Potentially, subject to flood risk mitigation and viability	Potentially – Long lease is coming to its end; Council freehold	Unknown	N/A	In Flood Zone 3b (functional floodplain) and existing building on site; surrounded by hard surfaced land, so redevelopment is possible provided it does not increase flood risk. Site allocated in the Submission Local Plan under policy A2, which also requires that development should achieve a reduction in flood risk, i.e. flood risk betterment.
Mary Road surface car park	Edge of Centre	No	Yes, site is Council- owned	No	N/A	Developer would need to fund an assessment of contamination risk and cost of likely remediation. Site not considered suitable, as sites that are more central are viable and available.
Dolphin House	In centre	Yes	No	Unlikely	N/A	Site unlikely to be available for redevelopment within the plan period; Potential to include a slight increase in retail floorspace, however six long-leasehold flats on upper floors make land assembly difficult. Redevelopment of this site for retail, including re-provision of five flats unlikely to be viable.
BT telephone exchange, Leapale Road	In centre	Yes	No	N/A	N/A	Site is occupied and unlikely to become available during the Plan period.
Ladymead Retail Park	Out of centre	Not suitable for allocation –	Unknown	Unknown	N/A	Site is out of centre and therefore sequentially unsuitable for additional retail uses; the size of the existing retail park and its location only 1km from the town centre also makes it unsuitable to allocate. In addition, the planning permissions for the retail park and individual

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments				
		see comments				buildings that have been replaced prohibit sale of food and drink for consumption off the premises.				
Outside Guildfor	Outside Guildford Town Centre/ Urban Area									
Surface car park, rear of 16-22 Station Parade, Ockham Road South, East Horsley	In centre	No	Yes, site is Council- owned	N/A	N/A	Site is in a local centre, however is unsuitable as needed at present for car parking at busy times.				
Former petrol station, south of Talbot Inn, High Street, Ripley	In centre	Yes	Yes	Yes	90	Site allocated in the Submission Local Plan as site A45. Has planning permission (application ref. 16/P/00608).for up to 26 residential units to the rear and 2 retail/commercial uses on the High Street frontage, comprising 90 sq. m floorspace (flexible A1, A2, A3 or A4 use). This permission was granted on appeal in August 2017.				
Former fire station, Ladymead	Out of centre	No, more central suitable sites available	No	Unknown	N/A	Application 15/P/02450 for a bulky goods furniture retail warehouse approved in July 2016.				
Potential Development Area J3 identified in Guildford's Green Belt and Countryside Study (north of Keens Lane / part of site 61 in 2014 DLP).	Out of town	No, as suitable more central sites are viable and available	Yes – Suggested for retail by site promoter	Probably, given existing use value	N/A	Land within 400m of SPA (residential development prohibited under Thames Basin Heaths SPA Delivery Framework; retail development would require submission of a Habitats Regulations Assessment).				

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments					
New proposed g	lew proposed growth locations										
Blackwell Farm, Hogs Back	Out of town; will be in centre if planning permission granted for strategic mixed-use developme nt	Yes, provided planning permission granted for strategic mixed-use developmen t with a new local centre	Yes	Yes, as part of strategic site	660	To be accommodated in a new Local Centre as indicated in Submission Local Plan policy A26. Centre to be designated through later additions to the Proposals Map.					
Gosden Hill Farm, Meadow Lane	Out of town; will be in centre if planning permission granted for strategic mixed-use developme nt	Yes, provided planning permission granted for strategic mixed-use developmen t with a new local centre	Yes	Yes, as part of strategic site	600	To be accommodated in a new Local Centre as indicated in Submission Local Plan policy A25. Centre to be designated through later additions to the Proposals Map.					
Former Wisley Airfield, Ockham	Out of town; will be in centre if planning permissio n granted for strategic mixed-use developm ent	Yes, provided planning permission granted for strategic mixed-use developmen t with a new local centre	Yes	Yes, as part of strategic site	600	To be accommodated in the new Local Centre as shown in the draft masterplan for the wider site in latest outline planning application (application 15/P/00012, appeal currently under consideration). Site allocated in Submission Local Plan (site A35); local centre to be designated through later additions to the Proposals Map.					
Land to the south of Normandy and	Out of town	No, as suitable more central	Yes	Yes, as part of strategic site	N/A						

Site	Location (for retail)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
north of Flexford		sites are viable and available				
Slyfield Area Regeneration Project (SARP)	Out of centre	No, as suitable more central sites are viable and available	Yes	Yes	N/A	

### SITES FOR FOOD AND DRINK USES



Suitable and available for new food and drink uses Unsuitable and/or unavailable

Site	Location (for food and drink, Use Classes A3, A4 and A5)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
In and edge of Guildford Town Centre						
North Street Regeneration site	In centre	Yes	Yes	Yes	6,000	Allocated as site A7 in the Submission Local Plan. This is the key site within the Primary Shopping Area to accommodate comparison retail uses. The primary landowner is intending to complete a retail-led mixed-use scheme in years 6-10 of the new Local Plan. Suitable floorspace for food and drink uses reflects the latest retail needs study (the Retail and Leisure Study 2017 Addendum) and represents an increase from 3,000 sq. m in the Proposed Submission Local Plan (2016).
Land and buildings at Guildford Railway station	In centre	Yes	Yes	Yes	1,500	Planning application (14/P/02168) for a mixed-use redevelopment of land and buildings on the east side of the station (appeal against refusal of permission is currently being considered, ref APP/Y3615/W/16/3161412). Site owner Network Rail has advised the Council that it intends to retain its depot and sidings on the east side of the site, which will therefore be unavailable in any future development.
London Road Station surface car park	In centre	Potentially for limited amount – not a major destination for retail	No	No	N/A	Sale of the site for redevelopment currently considered unviable due to the reduction in income from the existing car park.
Tunsgate Square, High Street	In centre	Yes	No	Unknown	N/A	Site is unavailable as application approved for refurbishment, reconfiguration and extension of the Tusngate shopping centre in March 2015. This scheme will result in an increase in A3 (restaurant and café) and corresponding reduction in A1 retail. Construction commenced in 2016.
White Lion Walk	In centre	Yes	No, existing leases	N/A	N/A	The landowner of the site has expressed interest in redeveloping the site for housing uses. As the site falls within a secondary retail frontage, under the Local Plan a redevelopment would need to retain the existing amount of retail floorspace, however a housing redevelopment is unlikely to provide scope for further retail expansion.

Site	Location (for food and drink, Use Classes A3, A4 and A5)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Guildford Library	In centre	Yes	No	Likely to be but dependent on site to relocate library	N/A	No, needed for library unless a suitable alternative site can be found.
Bedford Road surface car park	In centre	No	Yes, site is Council- owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for a commercial redevelopment, as it would reduce flood storage and increase flood risk.
Portsmouth Road surface car park	In centre	No	Yes, site is Council- owned	N/A	N/A	In Flood Zone 3b (functional floodplain), and no existing building footprint, therefore unsuitable for a commercial redevelopment, as it would reduce flood storage and increase flood risk.
Guildford Cinema, Bedford Road	In centre	Potentially, subject to flood risk mitigation and viability	Yes – Long lease is coming to its end; Council freehold	Yes	1,000	In Flood Zone 3b (functional floodplain) and existing building on site; surrounded by hard surfaced land, so redevelopment is possible provided it does not increase flood risk. Site allocated in the Submission Local Plan under policy A2, which also requires that development should achieve a reduction in flood risk, i.e. flood risk betterment.
Mary Road Surface car park	In centre	No	Yes, site is Council- owned	No	N/A	Developer would need to fund an assessment of contamination risk and cost of likely remediation. Site not considered suitable, as sites that are more central are viable and available.
Dolphin House	In centre	Yes	Not available for redevelopment within plan period, six long-leasehold flats on upperfloors makes land- assembly difficult	Unknown	N/A	Not available during Plan period.
BT telephone exchange, Leapale Road	In centre	Yes	No	N/A	N/A	Site is occupied and unlikely to become available during the Plan period.

Site	Location (for food and drink, Use Classes A3, A4 and A5)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Ladymead Retail Park	Out of centre	Not suitable for allocation – see comments	Unknown	Unknown	N/A	Site is out of centre and therefore sequentially unsuitable for additional retail uses; the size of the existing retail park and its location only 1km from the town centre also makes it unsuitable to allocate. In addition, the planning permissions for the retail park and individual buildings that have been replaced prohibit sale of food and drink for consumption off the premises.
Outside Guildford Town Centre						
Surface car park, rear of 16-22 Station Parade, Ockham Road South, East Horsley	In centre	No	Yes, site is Council- owned	N/A	N/A	Site is in a local centre, however is unsuitable as needed at present for car parking at busy times.
Former petrol station, south of Talbot Inn, High Street, Ripley	In centre	Yes	Yes	Yes	90	Site allocated in the Submission Local Plan as site A45. Has planning permission (application ref. 16/P/00608).for up to 26 residential units to the rear and 2 retail/commercial uses on the High Street frontage, comprising 90 sq. m floorspace (flexible A1, A2, A3 or A4 use). This permission was granted on appeal in August 2017.
Former fire station, Ladymead	Out of centre	No, as suitable more central sites are viable	No, recently acquired by furniture store	Unknown, but likely	N/A	Application 15/P/02450 for a bulky goods furniture retail warehouse approved in July 2016.
Potential Development Area J3 identified in Guildford's Green Belt and Countryside Study (north of Keens Lane / part of site 61 in	Out of town	No, as suitable more central sites are viable and available	Yes – Suggested for retail by site promoter	Probably, given existing use value	N/A	Land within 400m of SPA (residential development prohibited under Thames Basin Heaths SPA Delivery Framework; retail development would require submission of a Habitats Regulations Assessment).
New proposed growth locations						
Blackwell Farm, Hogs Back	Out of town; will be in centre if planning permission granted for strategic mixed- use development	Yes, provided planning permission granted for strategic mixed- use development with a new local centre	Yes	Yes, as part of strategic site	550 (A2-A5 uses)	To be accommodated in a new Local Centre as indicated in Submission Local Plan policy A26. Centre to be designated through later additions to the Proposals Map.

Site	Location (for food and drink, Use Classes A3, A4 and A5)	Suitable	Available	Viable	Suitable floorspace (net sqm)	Comments
Gosden Hill Farm, Meadow Lane	Out of town; will be in centre if planning permission granted for strategic mixed- use development	Yes, provided planning permission granted for strategic mixed- use development with a new local centre	Yes	Yes, as part of strategic site	600 (A2-A5 uses)	New local centre as shown in draft masterplan
Former Wisley Airfield, Ockham	centre if planning	Yes, provided planning permission granted for strategic mixed- use development with a new local centre		Yes, as part of strategic site	550 (A2-A5 uses)	New local centre as shown in current outline planning application (amended application 15/P/00012 refused April 2016, appeal started October 2016, ref APP/Y3615/W/16/3159894, awaiting decision)
Land to the south of Normandy and north of Flexford	Out of town	No, as suitable more central sites are viable and available	Yes	N/A		Draft site allocation A46 removed from the Local Plan due to the potential impact on high sensitivity Green Belt; in addition, site sequentially unsuitable for retail, as other suitable more central sites are viable and available.
Slyfield Area Regeneration Project (SARP)	Out of centre	No, as suitable more central sites are viable and available	Yes	Unknown	N/A	Site allocated (policy A24) in new Local Plan for residential and light industrial uses. Delivery timescale dependent on relocation of the sewage treatment works.

# Appendix C: List of Guildford Town Centre primary and secondary shopping frontages

The following ground floor shopping frontages are designated in the Submission Local Plan: Strategy and Sites, in Policy E7 and in the Policies Map:

Location	Proposed shopping frontage designation
High Street (59-163 on the North side, 46-160 on the South side)	Primary
Commercial Road (26-33)	Secondary
Leapale Road (1-10)	
Woodbridge Road (2-10 and 90-109)	
North Street (39-87 on the South side and 24-6 on the North side)	Secondary
White Lion Walk (1-27), Tunsgate (4-25) and Tunsgate Square (1-14)	Secondary
Swan Lane (1-28), Market Street (2-27), Jeffries Passage (4-16). (Between North Street and High Street)	Secondary
Woodbridge Road (89a-College House)	Secondary
Southern end of Chapel Street (numbers 1-11 and 13- 25) and Castle Street (2-12) and Phoenix Court (1-10)	Secondary
Sydenham Road (1-1c)	Secondary
Debenhams	Secondary
Chertsey Street (York House to Old Baptist Church)	Secondary
Haydon Place (64-94)	Secondary
Angel Gate (1-10)	Secondary
Friary Street (1a-20)	Secondary
13 Friary Street	Secondary
High Street (26-44 and 162-Trinity gate on the South side, 23-53 and 167-255 on the North side) around the junction with Epsom Road (16-21) and London Road (4a-20)	Secondary



## Appendix D Maps of town, district and local centres















































