



Comments on the Weyside Urban Village

Planning application no. 20/P/02155

Submitted to Guildford Borough Council 13 April 2021

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Introduction

The following document outlines the concerns and comments that Worplesdon Parish Council (WPC) has about the planning application for the Weyside Urban Village (WUV).

WPC has noted that the local character has overlooked Jacobs Well, which will be visible from the proposed development. As a long-standing community, with a significant number of single storey buildings, this should have been considered within the design parameters. The use of newer developments, or remote developments, does not reflect the local vernacular.

The developments considered as part of the planning submission are: Martyr Road, Boxgrove Gardens and Chantry Quarry, none of which adjoin the proposed development and are, therefore, of minimal effect on the proposed development. WPC accept that these developments have features that should be considered within WUV but so does Jacobs Well, which has been ignored.

The design statement is full of ideology with minimal substance for the actual buildings that will be constructed, and how the proposed development will be managed to completion. Once the planning permission has been awarded, the subsequent submissions to resolve reserved matters will not be shared with the residents of Guildford, and therefore any changes will go through without full consultation, creating a licence to introduce changes. To reduce this possibility, all reserved matters should be subject to the full planning process.

Management of the development over the twelve years to 2033 is of paramount importance to ensure that the development does not become an uncontrolled, uncoordinated mess; this has not been given consideration in the Design Code or within any part of the submission.

WPC objects to this development on the following grounds:

- Overdevelopment of the site.
- Insufficient parking.
- Insufficient transport assessment.
- Lack of mitigation – North Moors and the A320.
- Insufficient electric charging points – future proofing the development for its anticipated lifespan of 120 years.
- Lack of play facilities.

In addition, WPC suggests the following are put forward for Section 106 Agreements connected with the new development:

- ✓ New Village Hall for Jacobs Well.
- ✓ New Scout Hut for Jacobs Well and Burpham troops.
- ✓ Surfacing of the local public rights of way.
- ✓ New bus services to the development.
- ✓ Board walks across the proposed SANG, to mitigate the impact of the annual flooding.

Design

From the extent of the documents, it is obvious that the proposal is to lift off the Trumpington solution and plant it on the site, which is the exact opposite of the proposals made at the community engagement period put forward by WPC.

Jacobs Well has been excluded from the design considerations for the development, whilst areas like Boxgrove Gardens (former ministry of agriculture), Chantry Quarry and Martyr Road have been considered. Reason, they support the design proposal whilst Jacobs Well would be an inconvenience. The Parish Council suggests that a lesser density of properties and reduced height of buildings would be appropriate.

The development represents an overdevelopment of the site. The example of Boxgrove Gardens is 40 dwellings per hectare, whilst the WUV is 116 per hectare or 2.9 times greater. Is this a sustainable proposal? The application is not for a village but a new urban area, without the necessary infrastructure. A significant reduction in the number of dwellings would be appropriate. Indeed, the recent approved development currently being constructed at Keens Lane, within the parish, is 40 dwellings per hectare and this is a precedent that the applicant has ignored.

The documents submitted as part of this application detail a high-water table across the whole site, which is well known to residents of Guildford. Mitigation measures are notable by their absence in the proposals.

The area floods, and the proposed use of undercroft parking will be unavailable in a flood. Even if the parking had been at ground level, flooding would still have made access to parking spaces difficult. An example of this would be Water Lane in Watford, where a development with undercroft parking was not available in a flood. Additional measures are needed to ensure that the car parking is available and access to the dwellings is maintained at all times.

Future proofing of the development is lacking. There is a proposal for two charging points for ten parking spaces. Whilst this is a norm, and we know hydrocarbon vehicles will still be around in 100 years from now (as exemplified by the London to Brighton race, Brooklands and the Goodwood Festivals) the provision of charging points should be significantly increased.

It is unclear how the applicant will engage with the residents of the Borough, or the developer throughout the construction period. The control of the future planning applications, such as detailed elevations etc. is not open to the residents, as demonstrated by the submissions for Keens Lane which are not circulated. Therefore, in the spirit of openness and accountability, the submissions for reserved matters should be distributed for comment.

Guildford is a commuter town and as such, residents need access to the railway station. Without good bus services starting early in the morning and running to late in the evening, the commuter will likely use car parking in the centre of Guildford, or using the partner drop and collect system at the main line station.

The parking on the development is set at 0.9 vehicles per dwelling, which is insufficient for the proposed number of dwellings. There are no new bus services for the development, which would be a mitigation for the lack of parking and offset the need for drop off and pick up from the main line station. The applicant could propose a surcharge on each dwelling to provide new bus services that will be operational from early morning to late evening.

An easy equation is that where there is a dwelling which has a double bedroom, there is likely to be two vehicles. Based on this simple equation, the likelihood is that the development will need in excess of 6,000 spaces for residents and probably half again for visitors.

Is it expected by the applicant that the residents of this development will not have visitors, who will probably access the development through the use of cars (electric or hydrocarbon)? The lack of visitor parking will become a thorn in the side of the Management Company for the development and is an issue that needs to be addressed now by the applicant.

The proposal for 500m² of flexible community facilities suggests that the younger generations have been ignored in this development. Substantial increase in play facilities and open spaces are required to comply with GBC's own standards.

Privacy

Whilst privacy on the development will not be an issue for the new residents, as there will be no precedents within the development, there are concerns regarding privacy for existing residents: as we know, Jacobs Well residents are already complaining about the removal of the screening trees to the new allotments. WUV would be visible from Jacobs Well, especially with the highest buildings.

However, WPC know from the felling of trees for the North Moors Allotments that Jacobs Well has already been subject to light pollution from Slyfield. This development will only add to the visible intrusion into this well-established residential area.

With six-storey buildings, and additional industrial and employment space proposed, this will add to the light pollution that Jacobs Well (an unlit village) is already subject to. Once again, an example of how the local community has been ignored by this application.

Traffic

WPC have reviewed this application, hoping to see comments from SCC Highways, however, as of 10 April 2021, there appears to be no comments submitted. Highways England have provided a holding comment and the requirement to see the traffic modelling and the possible affect it would have on the A3 and the junction with the A3. These comments are important, as these are the highway authorities whose roads would be impacted upon by this development.

The proposed cycling improvements, though welcome, are not extensive as would be required for a development of this size, nor appear to have been programmed in early enough.

There are proposed bus improvements into the site, which is always welcome, though there does not appear to be any long-term bus strategy for this development to connect it to the wider area. There is no mention of how the buses are to be funded. Normally, for a development of this size, a contribution per house would be sought for bus improvements.

A Travel Plan has been submitted. However, a Travel Plan is only effective if managed properly. For a site like this, economies of scale would be possible, and a Travel Plan team would need to be employed

to manage the Travel Plan. Previous experience suggests that on large sites, a contribution from each dwelling should be included to manage and deliver a Travel Plan.

Framework Construction Logistics Plan

1. It is welcome that a framework document has been submitted.
2. It should be part of a wider document, normally called the Construction and Environmental Construction Plan, which covers the whole aspect of the construction.
3. The main contractor is responsible for the final document.
4. In para 3.4 there should be no working on Sundays and Bank Holidays. Any departure from these times would need to be submitted to and approved by GBC. (The operating hours are normally secured by planning condition under environmental health).
5. Site hoarding will need to be erected, not anticipated.
6. No construction vehicles can arrive before the agreed times and park on the highway.
7. An agreed off-site handling area could be defined for construction vehicles, with a delivery in time ethos used.
8. Innovative solutions to deliveries, such as modular construction, should be considered.
9. It should be that all programmed deliveries are set to avoid peak hours and waiting HGVs should be outside of the site.
10. Defined routes for deliveries are required. WPC would recommend avoiding Clay Lane to access/egress the A3.
11. All parking for workers needs to be on site and not on existing roads or future roads when they have been built.
12. Will need to include a Travel Plan for workers.

This should be secured through a planning application for each phase of the development.

Framework Travel Plan Comments

Chapter 3

1. The 2011 Census data has been used for the mode share for the residential element and for the journey to work. There is a concern that this Census data is out of date.
2. Whilst the Census data has been used for the same area, is it relevant for the proposed site and is the proposed development comparable to what is there now?
3. However, the travel surveys for each phase will inform the targets for each phase.

Chapter 4

Residential

1. The planning application is for up to 1,550 dwellings. All calculations need to be based on this figure.
2. For an outline application, the detail of parking is not required, and it is acceptable that the details of parking for each phase should be left to the reserve matters for that phase. However, this needs to be secured by the outline planning condition.
3. As part of the outline application, the level of parking is important. There must be sufficient space within the red line for all proposed land use, roads, parking etc.
4. All proposed parking levels need to be based on adopted parking standards and not on average car ownership levels, as this would lead to over spill parking that is prevalent elsewhere in the Borough.

5. The proposed parking ratio (parking spaces to dwellings) is 0.9 compared to 1.6 if the standards are used.
6. The proposed levels of parking are 700 less than standard. This is a significant reduction.
7. To reduce car use, a Travel Plan will include sustainable alternatives. It is not the level of available spaces that should be used to control car use.
8. There is no mention of allocated (i.e. per dwelling) and unallocated (where a flat or dwelling comes with no parking space conveyed with the property) parking.
9. There is no mention of Electric Vehicle Charging spaces or visitor spaces.
10. This report mentions a Central for London Report suggesting that future-proofing off-street residential parking would enable conversion to other uses, as and when it is no longer needed as a residents' car park. This, however, becomes difficult if residents have bought individual parking spaces. Albeit, parking spaces do not need to be conveyed with the property, they could be leased.
11. It is proposed that each phase would have its own Car Park Management Plan. This is welcome, though we would have expected a Framework Plan to have been submitted in support of this application. Any management plan would need to be secured as a planning condition to any outline approval.

Industrial

1. Table 5.3 sets out the level of parking to standards for the industrial land use, which is welcome.
2. The report goes on to assess the TRICS database to assess parking utilisation for this land use. TRICS is a UK wide accepted database for trip rates and parking. This would be acceptable if the TRICS sites selected were included in this report, so an assessment could be carried out to assess whether comparable sites were used e.g. size, location, age. However, none was included.
3. In Table 5.5 another set of parking numbers is proposed, some 22 spaces below standard with no evidence backing up this number. As the difference is so small, why not just use the parking standards?
4. There is no mention of electric vehicle charging spaces, disabled and visitor spaces.
5. Lowering parking availability without Travel Plan measures could lead to overspill parking.
6. Parking Management Plans will be required.

Local Centre Parking

1. Under GBC parking standards, there would need to be 70 spaces provided.
2. It is expected that trips to facilities in the Local Centre will be made by residents living on site, which is acceptable but would also be used by employees.
3. Again TRICS has been used to inform the potential level of employees. This will only be acceptable if the information from TRICS was included, so an assessment on whether or not the sites used were comparative to this one could be made. None were included.
4. It is proposed that there would be 23 spaces on site for the Local Centre, including some disabled bays. This is a 3rd of the level to standard, which could lead to over spill parking.

Pump House Parking

1. It is proposed that twenty spaces (similar to that of the Aggie Club provision) will be provided for a local community club currently based within the allotment site. This is higher than standards and is welcome.

Gypsy and Traveller Pitches

1. It is proposed that there will be two parking spaces on plot for each of the six pitches.
2. This is more per pitch than is being proposed per dwelling.

Conclusion

The Parking Plan is not acceptable, as the proposed numbers would potentially lead to overspill parking on roads that could have an impact on the safe passage of pedestrians, cyclists, buses and vehicles, particularly emergency vehicles. It is up to the Travel Plan to control the use of the car, not the Parking Plan.

Based on the numbers proposed in the document there will be well over 700 spaces below standard.

There are three possible options either:

1. Raise the number of parking spaces.
2. Reduce the number of dwellings.
3. Both.

Chapter 5

Table 5.1 and Table 5.2 set out the proposed targets over a five-year period. It is very doubtful that they are achievable in such a small time period. However, the actual targets for the Travel Plan will need to be set once the phase specific travel surveys have been undertaken after occupancy.

Chapter 6

There is no mention of who will be responsible for the Travel Plan five years after the last phase has been completed.

Chapter 7

1. There is no mention of pump priming the buses, as a contribution from this development to ensure that buses are operating as early as possible.
2. Everything included in the Travel Plan measures are acceptable, but are they all deliverable?

Access

The impact of the development on the traffic conditions is not material. The consideration that the junction with the Woking Road will not add to the junction congestion is incorrect. WPC know from the works to improve the junction at Stoke Road that congestion was significant and the traffic backed up to the Salt Box Road junction.

Landscaping

There is no proposal for screening of the A3 from the development, which will be the major cause of noise to the development.

In addition, screening to Jacobs Well needs to be addressed in the proposals to ensure that its established environment is not adversely impacted by the development.

Noise

Noise on the site will be from the A3 and this should be addressed for the benefit of future residents of WUV.

The noise that will occur during the development will also need to be addressed, to avoid impact on the new residents when they take occupation whilst other areas are developed.