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11<sup>th</sup> February 2021

Dear Mr Doyle

**20/P/02155 | Hybrid planning application for the redevelopment of part of the allocated site for the Slyfield Area Regeneration Project for a mixed-use development (known as Weyside Urban Village)**

The Society, despite our support for the overall objectives and many aspects of the scheme, object to approval of the planning submission as it stands.

We support providing housing on this brownfield site, in a location that can be made sustainable within the Urban area of Guildford.

The Society is aware that the proposed development has been subject to a long development process, reflecting the ambition of the project and complexity of the site.

We welcome the general approach as outlined in the application with a masterplan, parameter plans and design codes to which all subsequent detailed applications must comply. We consider the application is based on good urban design principles.

There are lessons from this approach, including standards adopted, that could usefully inform other major sites in Guildford Borough.

Inevitably in a plan of this scope and magnitude there are aspects which we believe require comment, or objection. We in particular object to issues related to Transport, Flooding, and Building Density.



## 1. Placemaking - Comment

The Society supports the placemaking approach proposed, and especially welcome the breaking down of the scheme into character areas to respond to adjacent areas of the site and to provide local areas of identity to scale the overall scheme. We are pleased to see the consideration being made to have quality of design using similar building forms within each character area in the scheme as well as predominantly using brick as the main wall material. We hope this will result in quality neighbourhoods, such as that exemplified by the Accordia Scheme in Cambridge.

Design Codes 5 and 6, set out clear principles and are illustrated with good precedent images which should be referenced to assist other architects follow up the details.

It is good that materials for each area are noted and a hierarchy is given to them from; primary walls; secondary materials; windows; and roof materials. We believe that suggesting four different bricks with a range of three bricks being acceptable to each character area requires more discipline and control. A concern is to avoid there being too much variety and not enough identity being formed to actually create a sense of placemaking. The best examples of placemaking have very few materials and limited palettes for example e.g., Bath, Edinburgh, Clifton Bath, Summerton Oxford, Charlottesville Guildford etc.

The design codes should be simplified to the use of three bricks across the development and the use of only two bricks being applied to each character area. If the brick choices were reduced there is still ample opportunity to create variety with the secondary materials and roof variations that can be applied. Simplifying the choice of brick will give more chance to creating a clear and lasting identity to the four character areas of the Weyside Urban Village.

Design Code 2 . 'Blue and Green' Infrastructure emphasises the importance of these elements needing to be the glue to act as agents to pull together the four character areas and create an overall identity and sense of placemaking to the urban village.

Public art, feature bridges and landmark buildings to each specific area will add to placemaking and local identity.

We believe the central area of the site presents a major opportunity for an interesting design of Buildings running down to a River Crossing. The proposed Bridge could be used as a signifier for the whole development. We would be interested to see this area detailed further.



We endorse the ideas in 11 Placemaking which cover standardising street furniture etc., across the scheme.

## 2. Building Design -Comment

Although a lot of detail has been provided there are aspects that are missing.

The Planning Statement notes that dwellings have to be within the Nationally Described Space Standards

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard_Final_Web_version.pdf)

It should be recognised that these are minimum standards continue a long tradition of modern UK housing having some of the worse space standards in Europe.

We propose a scheme of this size and longevity should aspire to more and set out clear local standards for

- Double Aspect Design for all Dwellings
- Internal Space Standards that exceed minima and provide for Home Working and Study. This is especially important in a post Covid environment.
- We agree with generous windows, but we believe the guide needs strengthening on providing shade e.g. should designs incorporate Brise Soleil.
- Outside Space Standards need setting which also includes private space.

The aim must be to produce a high-quality development that matches or exceeds schemes elsewhere in the country, many were illustrated in the recent Planning for the Future White Paper. We note other councils have implemented improved housing standards locally.

## 3. Energy - Comment

Passivhaus is a design process and standard that produces the highest environmental results. As a Society we believe this development should set the 'Green Agenda' for Guildford, we don't believe the proposed standards embodied in the Energy Statement match these.

The use of Air Source Heat Pumps is proposed. It is unclear whether the dwellings are designed to accommodate these units which normally require a heat exchanger externally and can cause noise. There needs to be a statement as to how these are effectively integrated, and noise abated.

The best buildings for energy efficiency often use a heat exchanger to condition incoming air from outgoing air. This may involve ceiling spaces being used for ventilation ducts. Building standards for the site need to accommodate this.

#### 4. Utilities - Comment

We note that Thames Water have expressed concerns related to the supply of fresh water to the site. There needs to be reassurance that these matters can be addressed in a timely manner. It is noted construction will take water resources.

Does this issue with Water supply imply issues in other major locations in Guildford, and is a major network upgrade required?

Other sites in Guildford appear to be struggling with supply of facilities such as electrical power we hope this is not an issue with this scheme, and that power is available for a move to electric vehicles.

#### 5. Flooding - Object

We note the revised NPPF out for consultation has changes that should be considered in the planning application – amendments underlined.

*160. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.*

*166. - the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.*

The submitted plans are silent on the matters highlighted in the revised NPPF, does consideration need to be given to making sure flood resistant ground floors are provided if there is a danger of flooding.

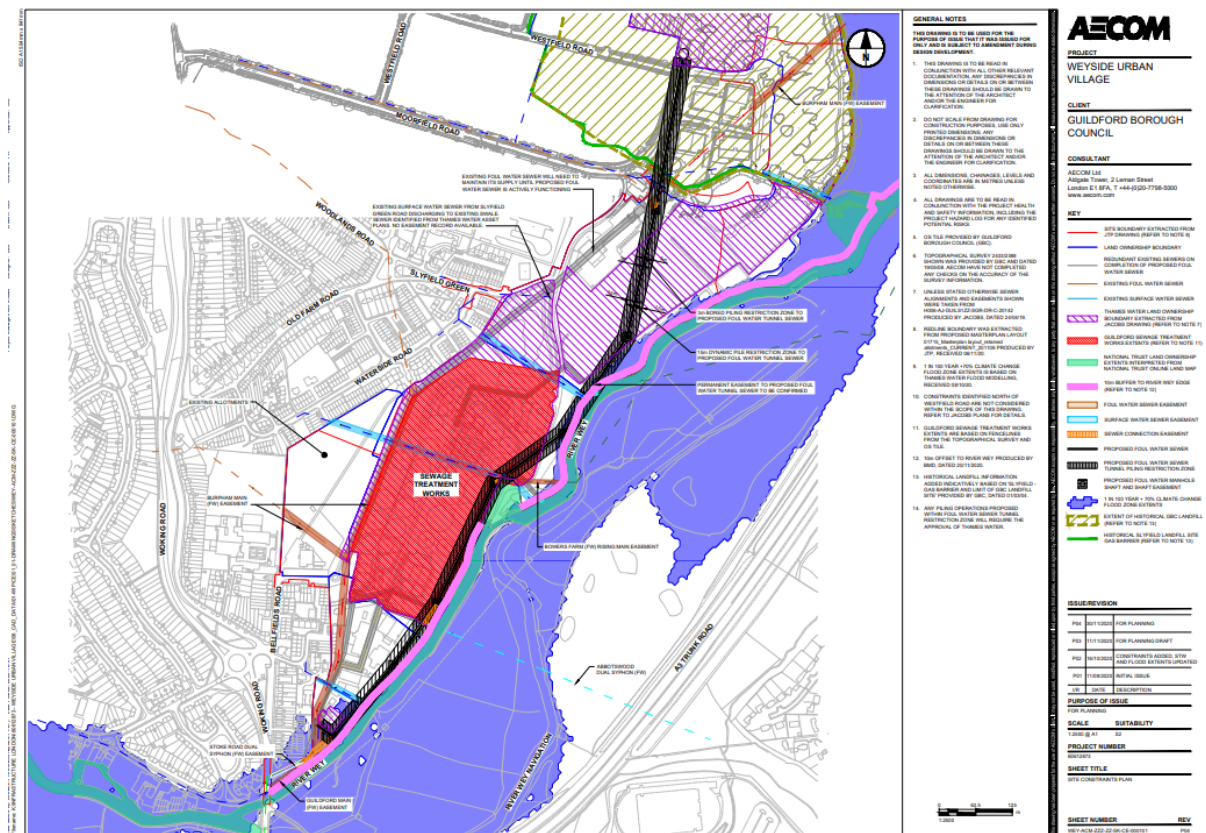
The Site is low lying and depends on good drainage to keep Ground Water Levels at an acceptable level. Although the site has three green corridors leading to the river these are replacing a considerable area of currently scrubland with hard surfaces abounding on the adjacent built areas. The green corridors are also crossed by a major transport corridor in the form of the spine road and various footpaths.

The Wey is also sensitive to locks and weirs being closed with notable effects in areas such as Whitmoor Common.

There are also discussions on going to improve flood protection measures in the Town Centre.

The Riverside Park to the east of the development, is an important flood plain area; but flooding needs to be managed so it doesn't become inaccessible for major portions of the year.

The new Sewer, which is a large structure that links the existing Sewer mains to the new STW at the north of Slyfield runs for a length along the River. This could potentially block subsurface drainage to the river causing the site to have rising ground water levels, has this been modelled?



We are uncertain Flooding issues are properly understood for the site.

## 6. Transport – Object

Transport is a perennial issue in Guildford particularly at peak hours.

The main routes are overloaded for large parts of the day and secondary routes and 'rat runs' are also congested. The Woking Road can be particularly bad, an indication of this is that the many garages on Slyfield tend to stop offering customers lifts to Guildford Town Centre and Rail Station during peak hours and run to Woking instead.



Markides Associates have completed a lot of detailed and extensive work on the Transport Assessment. We do note that:

The traffic analysis is based on 2014 figures, using growth factors obtained by comparing modelled flow in 2031 with a base year in 2009. Appendix K shows some of these growth factors to be negative. This doesn't appear to be a credible result especially for the Woking Road.

The A3 improvement plans appear to have been dropped by Highways England, if these were ultimately re-instated would this make a major change to traffic patterns.

### 6.1. Active Travel (Cycle, Pedestrian)

Active Travel (Cycle, Pedestrian) is not well catered for in the Town as too often cycleways are inadequate and not properly separated from vehicular traffic. We note that the Draft changes to the NPPF includes (proposed change underlined)

*73. - The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

As presented, we consider alternative transport modes are not as attractive as they should be

#### 6.1.1. A3 Ladymead Junction

Overly dependent going to Guildford on a poor route through the congested Woking Road, A3, Ladymead Junction. Should consideration be given to:

The cycle route could go behind the eastern bridge columns by digging out the triangular area behind as has been done to relocate the hard shoulder when widening motorways.

For the route to the Town and Mainline station to be used by other than the most hardened cyclist needs at the very least a safe and smooth traffic light controlled path over the A3 off slip and A25, not just a succession of Toucan crossings.





Improve the hostile environment at the A3 underpass and Ladymead junction by addressing: lighting, planting, decoration and noise attenuation.

One must question encouraging Active Travel through a polluted underpass, and across one of the most congested junctions in the borough?

#### 6.1.2. Cycle Corridor to Guildford Station

The plans to open an cycle corridor to the main station by making Walnut Tree Close 'friendly' for cycles is welcomed. It is not clear whether SCC is committed to this approach.

#### 6.1.3. Active Travel Route Alternative

An alternative route across the Wey and under the Wey to the west of the Sports Centre to Parkway is possible but needs bringing up to a proper standard, using National Cycle Route 223 as a basis. We believe with sensitive development and a proper link to the proposed new bridge across the Wey Navigation into the development that this could give a viable attractive route into the town and too the station.

The planning submission states that 'The site also has excellent walking and cycling facilities along the River Wey towpath as Footpath 49.' Planners must rise to the challenge of providing proper Active Travel Corridors and not rely on using inadequate local facilities. The Wey towpath is NOT a Active Travel Corridor as it is a muddy restricted path and not suitable for pedestrians and cyclists.

We believe the Weyside development should be accompanied by a proper committed plan to implement proposed Active Travel Corridors particularly to the south of the site.

With proper development this could provide a high-grade link to Parkway and on over Stoke Park to service London Road Station, Guildford College, George Abbott School, and the east end of Guildford Town Centre.

#### 6.1.4. Active Travel to the North

We also believe Active Travel to the north has not been considered sufficiently. An opportunity exists to access easily Bowers Lane and then create an underpass under the A3 to avoid travel over the busy Clay Lane Bridge over the A3.

## 6.2. SMC in the Development

This appears to have been downgraded considerably with an access for cars now being allowed up the SMC into the site from the Southern access. The Southern Junction, see below, seems very meagre to accommodate queuing vehicles. We believe the SMC should be designed to limit car and van traffic to short sections by using the access from the North.

We remain disappointed that the Council has failed to provide the SPD on the SMC. A SMC is only attractive if it is part of a considered and implemented network for the town.

We also fail to understand the re-routing of the SMC to be beside the river at the southern part of the site. This is a retrograde step compared to the original proposals where the SMC ran along the northern boundary.

Provided that the SMC is a true SMC, and that Buses are electrified that there is any reason not to revert to the original plans.

An issue at the Southern end is the desire to retain the pump house which narrows access to the site. Provided that the SMC is a true SMC and that buses are electrified we believe having the pump house in the centre of a one system, as it is at present is a reasonable compromise.

We noted that the representative of Markides Associates was not positive on allowing cars access at the southern end of the site at one of the public events.

## 6.3. Southern Access

This appears to be too small if cars and vans are now being allowed up the SMC into the site. This entails cars & vans sharing a Woking Road Junction into the site going North. The Junction seems very meagre to accommodate queuing vehicles and has a point just inside the site where buses cannot pass. This is a recipe for a very congested junction, which could back up to the Ladymead junctions.

We consider this junction needs a redesign.



#### 6.4. Northern Access

This covers the entrance to Slyfield industrial area (Moorfield Rd) and the roundabout with its junction to Woodlands Rd which is a Car (&Van) access point to the Weyside development.

The proposed improvements look inadequate and how traffic will be impacted on Jacobs Well Rd and Salt Box Rd to the north is unclear. Consideration should be given to widening the left hand lane going north along the Woking Road from Woodlands Rd past the junction with Moorfield Road and past the junction with Jacobs Well Rd. Southbound should the southern slip road into Moorfield Road needs a longer length than was shown on the drawings.

How the SMC will operate through Slyfield is unclear due to the lack of an SPD, and this will have a impact on the junction.

#### 6.5. The Long View

We note the NPPF revisions (Underlined) propose:

*22 - Strategic policies should look ahead over a minimum 15 year period from adoption<sup>15</sup>, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*

Weyside needs to consider the likely transport needs 30 years in the future.

### 7. Car Parking - Comment

We agree with the strategic background presented in the Parking Statement' concerning likely developments in vehicle usage.

The Weyside development is proposing to have 1320 car parking spaces (equivalent to 2.15HA of space devoted to parking), which as the Parking Statement notes cars may be parked for 97% of the time.

This is a significant area in the 40HA devoted to the development once 11HA for the Sewage Works is accounted for and an area for relocated council depot and a commercial development.

The site needs to be designed carefully to ensure the site it is not compromised by parking needs. The Society commends the proposals to use podium parking –

particularly if it can be partially sunk as many of the potential sites are on the old settlement tanks. We do question the parking court and street parking provision and suggest the use of small multi-storey car parks on the edge of the development might be more appropriate.

We endorse the ideas presented in section 4.6 of the Parking Statement and also note that the developers of Wisley Airfield are thinking about this seriously. This includes considering how parking space can be minimised or repurposed over time. See the example of the Chelmsford development.

<https://www.guildfordsociety.org.uk/Chelmsford.html>

As we noted the NPPF revisions (Underlined) propose:

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Weyside needs to consider the likely parking needs 30 years in the future. We have yet to see these concepts reflected in the Design Guide. The plans for parking need to be adaptable to allow for more electrical points in time. Preserving flexibility on parking provision is essential as we are likely to experience a change in demand over the years ahead – we may switch from under-provision to over-provision.

## 8. Green Space - Comment

We note the aspiration to have a minimum 10 M greenspace along the Wey Border. This green space is a key unifying area for the development and also forms an important margin to the river and parkland opposite. The Society believes it can be improved by:

- a) Moving the Southern end of the SMC as proposed.
- b) Revisiting Car Parking would enable parking areas to be removed and the depth to the River increased leading to more green space.
- c) The Society believes the green corridor needs to be considered not as a park but as green area well planted that shields to an extent Weyside from the river whilst providing the necessary breaks to make the river visible at appropriate points.

The site masterplan incorporates green fingers running from the Wey through the site. We believe these are compromised by being not generous enough and being asked to perform too many functions. They also need to have proper connections to the river as they are natural areas to have a glimpse of the River and landscape



beyond. The proposed 1500 homes on the site will put pressure on the green areas in the site which will be an important amenity.

Although the landscaped river corridor is generally 20-30m wide between river and buildings as shown in Design and Access Statement Part 6. It is important that this is planned to accommodate significant planting both existing and new field trees in the 10m river edge Navigation Corridor and other landscaping, with paths etc., closer to the housing.

#### 9. Density - Object

Ultimately the site is planned to have circa 1550 dwellings. The Masterplan shows a dense urban settlement. The Society has yet to be convinced that the development will provide spacious attractive accommodation and surroundings. We would ask that matters such as car parking and ultimate housing numbers are reviewed.

We are concerned that the development as proposed is overbuilding on the site within the height parameters proposed (with which we agree). Although we fully accept the need to provide housing in Guildford it does need to be of high quality, and as highlighted above use adequate standards for space and outside access.

The detailed design needs to be fully developed so that the balance of Housing numbers vs. Housing Standards vs. Viability can be fully considered. The society is concerned a modification could be submitted later, to add extra housing if viability is not up to expectations. (This comment also relates to 10. Below)

#### 10. Allotments - Comment

The moving of the allotments is subject to a legal judgement against the council. This matter will need to be resolved to the satisfaction of all parties, as it has a direct impact on the design and viability of the development.

#### 11. SANG Provision -Comment

Although considered as a separate planning application we have included our comments on 20/P/02173 | The change of use of the site to 45.9 hectares of land to publicly accessible open space and Nature Reserve to facilitate a Suitable Alternative Natural Greenspace (SANG). | Land at Burpham Court Farm, Clay Lane, Guildford, GU4 7NA for completeness

We support the creation of a SANG at Burpham Court Farm

We do offer the following comments that we believe would improve the scheme.

a) Parking Provision does not appear generous enough, it should be improved.

- b) The proposed Pedestrian Crossing should be provided but in the form of a underpass or bridge. Clay Lane is a busy road and having a crossing close to a bend is major risk.
- c) The border between the Sang and the Exclusion Area for Biodiversity is not stated, how is this going to be provided.
- d) The Sang access point at the southern end needs to provide detail as to how a footpath/bike path will link into the Weyside Development.

## 12. Management and Viability - Comment

On a scheme of this magnitude and complexity little information is available as to how the project will be managed for a period of 10-20 years. Effectively the programme is integrating Weyside village, the Sewage Works Move, SANG Provision, upgrades for electrical power and changes to the local roads.

There needs to be a statement as to how the program is to be managed, including clear accountabilities, and delivered. How budgets and costs are to be managed is critical.

Yours Sincerely



Alistair Smith

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