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Subject: [EXTERNAL] Amended Planning Application RU.22/0776 - Transport Objection on behalf of Poets Corner Residents Group
Date: 14 December 2022 13:20:24
Attachments: [image002.png](#)
[Weybridge Business Park Amended Application Transport Objections SWTP v3 131222.pdf](#)

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Please see attached Transport Objections report on behalf of the Poets Corner Residents Group. The report responds to the Traffic Assessment Addendum (TAA) dated 18 October 2022 submitted by the applicants in support of the amended planning application.

Can you please ensure that a copy of our report is forwarded to the relevant highway officer at Surrey County Council for information as it highlights information relevant to their consideration of the application. In particular we note from the SCC consultation response dated 12th December 2022 that the officer refers to a 'worst case' trip generation exercise having been carried out, but this is incorrect as the applicant has failed to provide any analysis of the potential use of the site as a Parcel Distribution Centre. The applicants TAA report contains TRICS trip rates for this potential land use within its Appendix B but fails to include any assessment of this option. Our attached report provides traffic forecasts and impacts for the Parcel Distribution Centre option (utilising the TRICS trip rates supplied by the applicant). This shows that a Parcel Distribution Centre generates many times more traffic, particularly HGVs, than the two options considered by the applicants in their TAA. Therefore the 'worst case' scenario required by SCC has not been provided or considered.

This is a significant omission of key transport information and needs to be brought to the immediate attention of the highway officer. The name of the SCC contact has been redacted in the consultation response so I am unable to copy them in, hence my request for you to do so.

Can you please confirm receipt of this message and further confirmation that the highway officer has been notified.

Kind regards,

Simon Watts

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Weybridge Business Park, Addlestone, KT15 2UP

Amended Planning Application for 3 Industrial Units

LPA Ref: RU/22/0776

Amended Application Transport Objections

Poets Corner Residents Group

December 2022



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1. Introduction

- 1.1.1 This report responds to the amended planning application for the redevelopment of the Weybridge Business Park site, Addlestone Road, Weybridge. The amended scheme is supported by a Transport Assessment Addendum (TAA) prepared by mode transport planning dated 18 October 2022.
- 1.1.2 The changes to the proposed development comprise a 5% reduction in overall floor area, from 17,820m² to 16,925m²; a 27% reduction in car parking spaces from 180 to 131 spaces; a 38% increase in the number of HGV loading bays at Building 100, from 13 to 18 bays. In addition, the design of the site layout has been reconfigured with revised building positions, amended car park and service yard layouts and revised site access positions.
- 1.1.3 This report focuses primarily on the amended planning application. However, reference is made to our objections to the original planning application where they remain relevant. Full details of those are as set out in our original "Objection on Transport and Highway Grounds" (June 2022) report and our "Further Objections on Transport and Highway Grounds" (July 2022) report.

2. Transport Objections

2.1 Adopted Baseline

- 2.1.1 The applicant continues to rely on the former office use as the relevant baseline for impact assessment. Our objections to this principle are set out in our earlier reports and whilst it is acknowledged that the former use of the land is one factor to be considered, the current/vacant use of the site is also a material consideration.
- 2.1.2 The site has been vacant for several years and generates no traffic. The return of the site to full office use is a theoretical possibility, but one with no reasonable prospect of being fulfilled. Therefore, the weight to be given to this scenario is very low. It is a matter of fact that, following a long period of vacancy, the true net impacts arising from the future re-use of the site would be experienced against the current baseline position of zero traffic generation and that scenario should be afforded significant weight.

2.2 Traffic Generation and Net Traffic Impacts

- 2.2.1 The TAA presents a revised calculation of trip generation for the proposed development. This is based on the same TRICS multi-modal trip rates for "Industrial Estates" and "Commercial Warehousing" as used in the original Transport Assessment. Inevitably the application of these trip rates to the amended gross floor area of the development (which has reduced by 5%) brings about a proportional reduction in traffic generation (also 5%).
- 2.2.2 Whilst the two alternative TRICS categories presented in the TAA represent two possible land use scenarios for the future redevelopment of the site, Appendix B of the TAA contains TRICS outputs for a third possible land use scenario based on "Parcel Distribution Centres". However, no analysis of this potential end use has been included.
- 2.2.3 As this is a speculative development without an identified end user, all three of the possible land use scenarios are valid. Table 1 (next page) compares the traffic generation for all three, using the TRICS trip rates supplied by the applicant.

Table 1 – Comparison of Traffic Generation for Potential Land Uses - All Vehicles

Land Use Scenario (16,925m ²)	AM (08:00-09.00)		PM (17:00-18:00)		DAILY*	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
Industrial Estate	0.522	88	0.594	101	5.659	958
Commercial Warehousing	0.144	24	0.080	14	1.509	255
Parcel Distribution Centre	0.873	148	1.112	188	16.41	2777

*TRICS data for Industrial Estate and Commercial Warehousing covers 5am to 9pm only. Parcel Dist Centre is 24hr data

- 2.2.4 The trip rates for the Industrial Estate and Commercial Warehousing options are taken from the TRICS data in Appendix B of the applicant’s original Transport Assessment Report (April 2022) and the rates for the Parcel Distribution Centre are from Appendix B of the latest TAA (October 2022).
- 2.2.5 It is noted that two slightly different search criteria were used by the applicant to obtain the Parcel Distribution Centre trip rates in TAA Appendix B. The first was based on three survey sites in Feltham, Nottingham and Slough and the second based on two sites in Lincoln and Slough. The resulting trip rates were almost identical, with the second search indicating a slightly higher daily trip rate. For robustness the results from the second TRICS search have been used in the above table.
- 2.2.6 Table 1 confirms widely varying traffic generation forecasts for the development, with the Parcel Distribution Centre option generating significantly higher trip numbers than the other two possible land uses, yet this has not been included in any of the analyses in either the original TA or the current TAA.
- 2.2.7 A similar pattern is observed in respect of HGV traffic forecasts. Table 2 shows a comparison of the three proposed land use options. Again, these are based on the applicants TRICS data.

Table 2 – Comparison of Traffic Generation for Potential Land Uses - HGVs

Land Use Scenario (16,925m ²)	AM (08:00-09.00)		PM (17:00-18:00)		DAILY*	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
Industrial Estate	0.027	5	0.005	1	0.326	55
Commercial Warehousing	0.059	10	0.017	3	0.555	94
Parcel Distribution Centre	0.228	39	0.165	28	5.298	897

*TRICS data for Industrial Estate and Commercial Warehousing covers 5am to 9pm only. Parcel Dist Centre is 24hr data

- 2.2.8 Table 2 shows that the parcel distribution centre option generates between 10 and 16 times more HGVs per day than the other two land use options. Significant increases are also predicted during AM and PM peak periods, with between 4 and 33 times more HGVs compared with either an Industrial Estate or Commercial Warehousing use.
- 2.2.9 In addition to these HGV movements, the TRICS data indicates that a substantial number of LGVs would also be generated by the Parcel Distribution Centre option. The daily trip rate for LGVs (taken from Appendix B of the TAA) is 3.574 trips/100sqm/day indicating a total of 605 parcel delivery van movements per day.
- 2.2.10 The impacts of site generated traffic for the three land use scenarios, expressed as net increases and percentage changes in traffic flows, are set out in Table 3.

Table 3 – Daily Traffic Flows and Impacts

OPTION A - 'Industrial Estate'

Location	Existing		Development Traffic		Net Change		% Change	
	All veh	HGV	All veh	HGV	All veh	HGV	All veh	HGV
Addlestone Rd (west of site access)	2256	159	729	55	729	55	32%	35%
Link Road (two-way section)	4858	98	958	55	958	55	20%	56%

OPTION B - 'Commercial Warehousing'

Location	Existing		Development Traffic		Net Change		% Change	
	All veh	HGV	All veh	HGV	All veh	HGV	All veh	HGV
Addlestone Rd (west of site access)	2256	159	194	94	194	94	9%	59%
Link Road (two-way section)	4858	98	255	94	255	94	5%	96%

OPTION C - 'Parcel Distribution Centre'

Location	Existing		Development Traffic		Net Change		% Change	
	All veh	HGV	All veh	HGV	All veh	HGV	All veh	HGV
Addlestone Rd (west of site access)	2256	159	2349	897	2349	897	104%	564%
Link Road (two-way section)	4858	98	2777	897	2777	897	57%	915%

- 2.2.11 In the above table 'existing' traffic flows are extracted from Appendix C of the mode Technical Note dated 29 June 2022. The 'proposed' trip generation is calculated using the applicants multi-modal TRICS trip rates applied to the revised gross floor area in the amended planning application. The predicted development traffic flows on Addlestone Road (west of site access) have been adjusted downwards to account for the now proposed 45 space car park served from Hamm Moor Lane (i.e. a proportion of 'car' trips will avoid Addlestone Road as they are directly accessed from Hamm Moor Lane).

- 2.2.12 The table demonstrates that the proposed development will significantly increase traffic on the roads serving the site. In the case of the parcel distribution centre option, over 2,700 vehicle movements per day are predicted including 897 HGV movements per day. This represents a 564% to 915% increase in daily HGV numbers on Addlestone Road and Link Road respectively.
- 2.2.13 As previously noted, the daily traffic generation forecasts for 'Industrial Estate' and 'Commercial Warehousing' used in the above analysis are based on TRICS 16-Hour surveys (from 05:00 to 21:00). The applicant has previously confirmed that the site will operate on a 24-Hour basis and therefore the actual volumes of trips per day for these two land use options (and percentage increases) over a 24 hour period will be greater than stated in the tables.
- 2.2.14 As also noted earlier, the applicants have provided no analysis of the impacts of the 'Parcel Distribution Centre' option in any of the supporting information for either the original or amended planning applications. This is a serious omission as the TA and TAA only consider the impacts of the less intensive 'Industrial Estate' and 'Commercial Warehousing' options for the site.
- 2.2.15 Table 3 demonstrates that the traffic increases are substantial, particularly in the case of the parcel distribution centre option, and given the current congestion problems on the local road network, as set out in our previous objection reports, the proposed impacts of the development are considered unacceptable.

2.3 Pedestrian / Cyclist Amenity

- 2.3.1 Our previous concerns about the environment for pedestrians and cyclists remain, particularly in the context of the significantly increased levels of HGV traffic indicated in the new TRICs data presented by the applicant.
- 2.3.2 Pedestrians and cyclists using Addlestone Road are particularly vulnerable to increases in HGV flows due to their close proximity to passing vehicles, increasing their sense of fear and intimidation and decreasing their sense of safety and amenity. There are no cycle lanes in the area and the footways on Addlestone Road and Link Road directly abut the carriageway, affording little separation between pedestrians and vehicles.
- 2.3.3 Paragraph 104 of the National Planning Policy Framework deals with the consideration of transport issues in relation to plan-making and development proposals. Sub-paragraph 104(d) requires that "*the **environmental impacts** of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.*"

- 2.3.4 The applicant has failed to give adequate attention to this matter. The use of Addlestone Road as a route to Heathside School and St Georges College is discussed in our original transport objections (June 2022). The route is also used by pedestrians and children accessing the various infant and junior schools in Weybridge including St James Primary School and Bright Horizons day nursery and pre-school. Our previous concerns about the accuracy of the applicant's pedestrian survey results, set out in our further objections report (July 2022) still remain. However, the latest HGV forecasts clearly indicate that the potential for conflicts between pedestrians/cyclist and HGVs is high and that the environment for these vulnerable road users will be significantly compromised.

2.4 Parking Provision

- 2.4.1 The amended planning application seeks to reduce the overall level of car parking from 180 spaces to 131 spaces. This represents a 27% reduction compared with only a 5% reduction in the gross floor area of the development.
- 2.4.2 In our previous objection reports we raised concerns about the potential risk of under provision, leading to displacement of parking off-site. These concerns are now increased due to the disproportionate reduction in proposed car parking relative to the reduction in floorspace.
- 2.4.3 The parking accumulation assessment set out in the TAA has been based on TRICS data for the 'Industrial Estate' land use option and therefore is not representative of the significantly higher levels of traffic generation that could occur with other options. In any event, a TRICS based parking accumulation analysis is only one indicator of potential parking demand. The significant under provision relative to SCC parking standards, as set out in our previous reports, still applies and raises material concerns as to whether the planned levels of parking are adequate.
- 2.4.4 Further evidence that parking is inadequate is shown by the TRICS data at Appendix B of the TAA. One of the sites used in the TRICS analysis is a DHL distribution centre in Slough. That site has a smaller floor area of 15,583 sqm but employs 897 staff and provides 798 parking spaces; six times the number proposed here.
- 2.4.5 We note that the amended application proposes an increase in the number of HGV loading bays for Building 100. A total of 18 bays are now proposed, compared with 13 in the original application. This further highlights the potential for a high intensity site occupier, as referenced in our original objections and now confirmed by the applicants latest TRICs information.
- 2.4.6 We also note that there is no provision for LGV/van parking but, as set out in paragraph 2.2.9, up to 605 van movements per day are likely to be generated and this will require dedicated parking provision.

2.5 Other Matters

- 2.5.1 The previous concerns set out in our earlier objections in respect of insufficient detail in the Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) remain unchanged and should be read alongside these current objections. The DSP only considers one access route to the site, from M25 J11 whereas in practice a proportion of vehicles will have origins and destinations to the east of the site and will travel via Weybridge to locations within the M25 ring and for access to the A3 and M25 J10. The potential parcel distribution centre use will add significant numbers of HGVs to these routes but no assessment of these impacts has been undertaken.
- 2.5.2 We note that updated Noise and Air Quality reports have been submitted in support of the amended planning application. However, these only consider the reduced traffic flow forecasts for land use Options A and B. Therefore, whilst our previous concerns regarding the adequacy of the Noise and Air Quality assessments remain unchanged, those concerns are particularly relevant now in light of the fact that they do not take account of the applicants latest TRICS information which significantly increases the predicted traffic volumes and HGV proportions. For robustness these reports should be updated to also include analysis of Option C.

2.6 Conclusion

- 2.6.1 In view of the latest TRICS trip rate information supplied by the applicant, the proposed increase in HGV loading capacity and disproportionate reduction in car parking provision, the amended proposals will result in unacceptable traffic impacts. No assessment of the environmental traffic impact of the development has been carried out by the applicant, but the very large increases in HGV flows set out above show that such impacts will be substantial. The proposals therefore conflict with paragraph 104 of NPPF. The failure to provide adequate mitigation for the traffic impacts created by the development also brings the proposals into conflict with Policy SD4 of the Local Plan.



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