

# WOKINGHAM TOWN COUNCIL

## Comments on Peach Place planning application F/2014/2637

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### 1. GENERAL

- 1.1 Generally, whilst we think that the proposal is an improvement on the application previously submitted, there are several areas where we have reservations. We have therefore concentrated on the areas where we believe that improvements could be made.

### 2. ARCHITECTURE

- 2.1 The triple gable façade of the proposed SU06 retail unit is too high, far too imposing and out of proportion to the rest of the redevelopment. As the roof space will not be used, we see no reason why the height cannot be reduced without compromising the design as a whole.
- 2.2 The attempt to break up the monolithic expanse of the gables by the apparently random scattering of brick projections is very poor.
- 2.3 The choice of a brick colour that veers more towards buff than red, when combined with a grey metal dormer cladding and roofing, creates a particularly drab appearance.
- 2.4 The bland monotony of the units in Peach Street could still be further improved, with more attention being paid to the depth of relief at window and door openings. The introduction of recessed and projecting band courses within the facades, together with more attention to contrasting corner detailing, would greatly improve the overall appearance and break up the distinctly “flat” feeling of these elevations.
- 2.5 We would prefer the flat roofs within Peach Place itself to be pitched, even if only slightly raised.
- 2.6 The slate roofs of the proposed town houses in Rose Street are completely out of keeping with the architectural style of the surrounding historic buildings. This feature, combined with the grey metal-clad dormer windows, produces a drab appearance more reminiscent of back-to-back workmen’s cottages in industrial areas of Lancashire. A simple glance across Rose Street shows predominantly red brick buildings with clay-tiled roofs and, where dormers are evident, the cheeks are clad in vertical clay tiling.
- 2.7 The monotonous uniformity of the roof appearance could be improved by introducing an extension of the party walls upwards into the roofline between units, with a brick parapet detail, accentuating the division between each property.
- 2.8 The dormer windows to the town houses in Rose Street appear to be completely out of proportion to the buildings.
- 2.9 In Peach Place in particular, but generally elsewhere, there appear to be ledges that will be very popular with pigeons. Either the ledges should be removed or anti-pigeon materials should be used from the outset.

### 3. PARKING

- 3.1 We remain surprised and frustrated at the complete absence of a comprehensive parking strategy for Wokingham Town to underpin this application. The Wokingham Town Car Parks Strategy, issued in September 2013, was rapidly withdrawn after public consultation and nothing more has been heard since then.

- 3.2 This frustration is compounded by our understanding that Wokingham Borough Council apparently intends that off-street parking and on-street parking are to be dealt with as separate matters, when it is clear to most people that the two are intrinsically linked. We question how a holistic parking strategy for the Town can fail to recognise this and we cannot understand how this scheme has been developed to the degree that it has without such a strategy being in place.
- 3.3 The Transport Assessment states (paragraph 6.2.15) that *“The car park occupancy data utilised for this application has been collected by Wokingham Borough Council Parking team to inform the Council’s Wokingham Off-Street Car Park Capacity Statement. This statement will be published early in 2015 and the findings of this assessment have been informed by the draft statement and its conclusions”*. However, as the Wokingham Off-Street Car Park Capacity Statement hasn’t yet been published, we are therefore unable to test the validity of the assumptions made about parking, on which the Transport Assessment relies.
- 3.4 We take issue with the *“Parking provision required to support the proposed commercial floorspace”* contained within the Transport Assessment (TA), in particular paragraphs 6.2.3 - 6.2.29, for the following reasons.
- 3.4.1 Paragraph 6.2.4 of the TA states that *“Parking requirements for new schemes are identified using the parking standards contained with the Council’s Managing Development Delivery Plan (adopted 2014)”*.
- 3.4.2 The parking standards contained with the Council’s MDD Plan are *“based on the evidence and research presented in the Parking Standards Study Report 2011”*. (MDD: Appendix 2: Car Parking Standards: paragraph 1.0.2).
- 3.4.3 *“Section 5 - Recommended Parking Standards”* of the Parking Standards Study Report 2011 sets out Use Classes and states that *“the standards are based on the evidence and research presented in previous chapters within this report”*.
- 3.4.4 However, the only apparent *“evidence and research”* in respect of Retail Parking presented in previous chapters of WSP’s Parking Standards Study Report 2011 comprises the following three paragraphs, quoted verbatim:
- “3.6 RETAIL PARKING*
- 3.6.1 There is a wide diversity of parking that can take place for retail uses. Food and non-food uses can generate different levels of demand and can therefore be treated separately. Retail bulk goods such as supplied at garden centres or DIY stores also attract more parking due to heavier take away goods, and changes in facilities, discussed below, can lead to longer durations of stay (affecting parking accumulations).*
- 3.6.2 The increase in provisions of cafes and restaurants in DIY and garden centres also has the effect of increasing dwell times and affecting parking accumulations. It is suggested that careful consideration is given to planning applications which seek to make internal changes to these types of retail use and the implications for parking, especially at busy periods such as bank holidays. In these instances, careful management of the site will be required and it is suggested that conditions are imposed that require management plans for different scenarios to be provided at the planning stage.*

3.6.3 *In retail centres such as those in Wokingham and Woodley, parking is provided centrally in public car parks. It is assumed that any new non-food retail development located within 250 metres of a public car park in Wokingham town centre will have its customer car parking provided centrally in this way. The proposed parking zone is illustrated in Figure 3.1 below. A similar proposed zone is illustrated in Woodley.”*

- 3.4.5 These paragraphs hardly appear to define a conclusive, evidence-based, foundation on which to found a retail parking strategy for a major town centre development.
- 3.4.6 Paragraph 6.2.7 of the TA then assumes the most advantageous use class of A1 - Non-Food Retail, a decision taken “In agreement with the Local Planning Authority”. Is this a pre-determined decision and, if so, on what evidence has it been made?
- 3.4.7 Paragraph 6.2.8 of the TA states that “As the exact location of A3-A5 uses within the scheme is not yet known, it would be impossible to assume a realistic floorspace calculation to accurately apply the standard at this stage”. If so, what validity can be put on the assumptions made?
- 3.4.8 All of the preceding argument is then justified in paragraph 6.2.9, as follows: “This flexibility in applying the standards is in line with paragraph 2.51 of the MDD set out above, which acknowledges that the standards allow for flexibility in their application to accommodate the specific circumstances of development proposals.” In other words, as it’s impossible to accurately apply the MDD parking standards, the MDD allows sufficient flexibility to make a series of highly generalised assumptions, without apparent foundation or evidence to support them.
- 3.4.9 Paragraph 6.2.10 gives a figure of 3,674m<sup>2</sup> (GFA) of new commercial A1-A5 floorspace at Peach Place. Paragraph 6.2.11 then deducts the existing commercial floorspace from the new, to identify the parking requirement generated by the net increase in retail floorspace. However, if the existing commercial floorspace already is served by the existing car parking on site, the required parking has to serve the new floorspace of 3,674m<sup>2</sup>, not the net increase.
- 3.4.10 It might perhaps have escaped the Consultants’ attention that the 50% of the Easthampstead Road Car Park mostly unoccupied is that part located over 250m from the centre. This is the reason that it’s not used and will continue not to be used. As 250m is the criterion assumed by WSP in their 2011 Parking Standards Study for the supply of parking to support Retail Development (see paragraph 3.4.4, item 3 above), the assumption that the spare capacity of the Easthampstead Road car park would absorb 83 of the 145 replacement spaces needed is therefore a highly optimistic assumption which actual current experience contradicts.
- 3.4.11 The assumption in paragraph 6.2.22 that the Waitrose car park can absorb the displacement of 26 cars from Peach Place is flawed; this is restricted to Waitrose customers only and has a maximum two hour restriction. Has anybody actually asked Waitrose whether they would agree to this?
- 3.4.12 The conclusion in paragraph 6.2.24 that the remaining 36 required spaces (25% of the total of 145) can simply be “*accommodated within existing town centre car parks*” is completely unsubstantiated conjecture.

3.4.13 The conclusion in paragraph 6.2.27 that “This section demonstrates that the parking requirement generated by the scheme proposals and the need to accommodate loss of parking in Rose Street car park can be accommodated within existing car parks in the town centre” has patently not been demonstrated.

3.5 Our observations are that:

3.5.1 Short term parking should be on-street, whilst off-street should be reserved for medium/longer term. There is also a demonstrable need for some free parking (e.g. the first hour free) to allow residents to “pop-in” for tasks such as visiting the bank, etc.

3.5.2 There is a pressing need to improve the multi-storey car park above Argos, which is under-used because it’s in such a dreadful state.

3.5.3 We are concerned that the new residential provision, which has no dedicated parking, will increase the pressure in the town generally.

3.5.4 We are concerned about the difficulty of residents on the north side of the town accessing parking which is predominantly in the south and therefore requires crossing the town, thereby increasing congestion.

3.5.5 We are very concerned that there will be no provision for residents' parking in Rose Street and the option offered that they can pay to park in a WBC car park. Why is it assumed that the new residents will not be car drivers?

3.5.6 The fact that Wokingham has several major housing developments in the SDLs, which we hope will bring many additional shoppers into the town centre, has largely been ignored. Whilst it may be the case that the existing car parks have spare capacity and can cope with the displaced 99 spaces (although this hasn't yet been demonstrated by WSP and we would not include Waitrose in this calculation), the capacity of the car parks, ease of access to residents in the south of Wokingham, differentiation between short stay, medium stay, and long stay, along with the charging policy, have yet to be agreed. This means looking at the Virgin Active car park as well as the Easthampstead Road and rear of Denmark Street facilities. The car parking strategy must be an integral part of the overall development.

#### **4. ACCESS**

4.1 Traffic flow would be improved if Wilshire and Rectory Roads could become two-way, even more positively if an area could be obtained from All Saints Church to widen the junction by The Ship.

4.2 The Transport Statement anticipates an increase in cyclists but does not provide many cycle racks other than for Peach Place residents.

4.3 The bus services are emphasised but the plans envisage that buses coming along Broad Street will still be able to go round the Market Place and then down Denmark Street. We understood that, with the redevelopment of the Market Place, this option was to be removed.

- 4.4 It concerns us that pedestrians will still have narrow pavements, which barely allow for a couple to walk side by side and, when they do, no-one can pass them. This is not conducive to family shopping and browsing. The solution of making Peach Street one lane and thus allowing the pavements to be widened has not been discussed. There is an incorrect statement that double yellow lines stop any parking. Lorries regularly park and unload in Peach Street, causing major traffic flow disruption. This problem must be eliminated.

## **5. SERVICING**

- 5.1 We are concerned that there will only be control over those outlets leased from WBC. It will therefore still remain possible for other outlets to continue to be serviced from the front, along Peach Street, which will mean that traffic flow will continue to be adversely affected. Enforcement is needed in relation to deliveries at the front and careful consideration also needs to be given to the timing of rear access deliveries. We wish it to be clear that Peach Street itself should be considered as a fully integrated part of the overall scheme, not just peripheral to the development.
- 5.2 We are concerned that the size of the service area for both retail and domestic uses appears to be insufficient.
- 5.3 Mention is made of the controls that will exist for delivery vehicle access to Peach Place, but there is no apparent effort to improve delivery access to the Peach Street shops. There is a service road (Goatley Way) but larger lorries coming along Peach Street are unable to turn into the entrance of the road. One option is that access should be from Sturges Road and the no entry sign into Goatley Way be removed.
- 5.4 We question whether traders' access to the rear of the shops is sufficient?

## **6. EVENTS**

- 6.1 Peach Place would clearly be a highly suitable area for events, markets, music, etc. It's therefore vital that the design of the central area be made as flexible as possible to accommodate such functions.
- 6.2 With this in mind, it's essential that the design incorporates the following features:
- 6.2.1 A suitable network of power, lighting, and water distribution points, together with appropriate drainage.
- 6.2.2 Adequate facilities and space layout to erect staging for events.
- 6.2.3 The incorporation of bolts and eyes into the fascias of the buildings, so that canopies, banners, wires for lights, Christmas lights, netting, etc. may be strung above the area.

## **7. RETAIL MIX**

- 7.1 Could consideration be given to encouraging Boots to take a second floor and become a bigger (almost 'anchor store') which would potentially attract other retailers?
- 7.2 Has sufficient thought been given to the changing pattern of shopping, given the growth of the internet? Will the town be overprovided with retail units? These should be planned with the greatest flexibility so that future conversion is possible. The shopping mix needs to be given very careful thought.