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6<sup>th</sup> July 2018

Dear Sirs

### **WAVERLEY BOROUGH COUNCIL (WBC) DRAFT LOCAL PLAN PART TWO**

I write on behalf of Witley Parish Council (WPC) who has considered the draft Local Plan Part Two document and submit the following comments as its formal response to your consultation.

#### **Policy DM7: Accessibility and transport**

WPC questions how conditions restricting HGV movements on certain developments are monitored. This issue affects Witley parish significantly, particularly by HGVs travelling to and from the Tuesley Farm site, which impacts Station Lane and the surrounding areas of Milford. WPC would wish to see this policy or supporting text strengthened to include measures on the implementation and monitoring of conditions.

How will WBC deem which locations are 'appropriate' for the retention and enhancement of public transport infrastructure, service and interchange facilities, and how will this be monitored? Milford and Witley Station car parks are already at capacity. Has WBC sourced any evidence from Network Rail relating to this issue? Particularly with the level of housing directed at Milford, it is not accepted that the station has the capacity to accommodate this level of housing, or Station Lane for that matter, if sustainable methods of transport are being promoted.

Network Rail's Route Utilisation Study, which included the Portsmouth Direct line, showed that there was no scope for increasing capacity on the service by operating extra trains and the latest passenger surveys (and the experience of people living in the Parish) is that all the peak hour trains are full to standing after Guildford, and most are full after Milford; the overcrowding standard, by comparison, envisages that no one should stand for more than 20 minutes. This is clearly not met now and impossible to meet in the future.

The junction of Church Road / Station Lane is particularly problematic; and further development in Milford will exacerbate the issues already experienced at this hotspot.

WPC would wish to see more focus in the document on pedestrian access paths/routes linking new housing sites to the centre of villages, and the importance of these pedestrian links, and footpaths more generally, being lit at night. It is accepted that the document seeks to reduce car traffic and the reliance on cars more generally, but as cycling is not everybody's preferred mode of transport, there needs to be well thought out provision of safe routes for pedestrians.

#### **Policy DM7: Parking**

WPC supports statement *b)iii in DM7 "Allows for effective access by service and emergency vehicles at all times ..."*, however would like to see this strengthened to require new residential roads to be designed to allow for on-street parking that does not restrict access to emergency vehicles, as it is inevitable that on-street parking will still happen.

**Statement e) "Include adequate car parking spaces and cycle storage in accordance with the Council's parking guidelines".** It is understood that for new developments WBC will adopt the parking guidelines of Surrey County Council, which could be as few as two spaces per house for a three or four-bedroomed house and 1 or 1.5 spaces per unit for smaller properties. WPC disputes that this is adequate in an area with such limited public transport and suggests that higher minimums are set in villages. The parish council would like to encourage the use of car ports or open spaces, rather than garages as garages often get used for storage rather than parking

WPC notes that the latest plans for the strategically allocated site at Milford Golf Course appear to envisage very little parking and only limited access for would-be parkers, with many houses accessible only on foot.

#### **Policy DM8: Trees, Woodland, Hedgerows and Landscaping**

WPC would wish to see this policy include reference to works/tree removal around train stations. The mass clearance of trees in these areas is happening frequently, particularly in Witley, which is impacting on the visual environment locally, as well as the stability of the banks around train stations.

In relation to potential housing development sites WPC would wish to see stronger policies on the protection of landscape heritage, which would encourage planting of further trees or replacement trees of suitable species, as well as the retention of mature trees already present.

#### **Para 3.7**

Typo should read 'These' instead of 'There'.

#### **Para 3.13 "Witley Neighbourhood Plan Group have indicated that they are examining options for new community facilities, which may require a further minor adjustment to the Green Belt boundary".**

This is noted; however WPC would like to know at what stage WBC would require this information, or would this amendment to the Green Belt be considered a 'factual update' which would allow the neighbourhood plan to agree the precise boundary? WPC is still exploring options for the siting of a community facility so would request that this paragraph remains in the document to allow for this to happen through the neighbourhood plan process. WPC will continue to engage with WBC officers on this issue.

#### **Para 3.14: Removal of land to the north-west of Milford from the Green Belt**

WPC still asserts that the Secretts site would be a more suitable location for housing in the parish and, considering this, would prefer the Secretts site to be removed from the Green Belt rather than the area of land to the north west of Milford. There is too much housing capacity being expected of Witley which has numerous landscape constraints, i.e. SPA and AONB. Too much housing is being forced into Milford which is currently a village, and in addition to the 180 homes allocated at Milford Golf Course, WBC is seeking to concentrate a further 220 homes in the Moushill Mead/A3 junction side of the village, with no real consideration of infrastructure capacity and environmental constraints. WPC still believes that the Woking uplift should not have been accepted by WBC, as the parish does not have the capacity to accommodate these higher levels of housing without having a detrimental impact on the existing environment.

#### **Policy DS4**

WPC would expect the appropriate infrastructure to be in place to support an increase of 270 dwellings at Aaron's Hill. The local primary school, Green Oaks, has been threatened with closure in recent months, however it is hoped that WBC will work with Surrey County Council to ensure that this facility remains in existence to cater for the increase in population in this area over the plan period.

#### **Para 4.39 "There are limited opportunities to accommodate additional development on previously developed land, and as such land is proposed to be removed from the Green Belt"**

WPC does not accept this statement as true. Additional development could be accommodated on previously developed land at the Secretts site, which would reduce the need to remove as much of the proposed greenfield land to the north west of Milford from the Green Belt.

#### **Policies DS27-DS31**

The housing allocation policies make no mention of the requirement for SANG provision, which Natural England has already advised will be required to mitigate the impact on the Wealden Heath SPA. This is such an

important, fundamental issue that could affect the deliverability of all the housing sites in Witley, so should at the very least be referenced in these policies, and elsewhere in the plan.

#### **Policy DM15: Self-build and Custom Housebuilding**

We note the requirement to include at least 5% of plots for self or custom build properties. Whilst we support this in the case of genuine self-builders, we hope it is not going to become a loophole whereby developers can avoid paying CIL by offering some houses with very limited customisable features. It is not entirely clear what the definition of custom housebuilding is, and WPC would welcome more explanation of this within the document.

#### **Para 6.30 Local Centres**

There is no defined local centre for Witley however there are shops in the village i.e. newsagents, convenience store, hairdressers and a specialist basket shop. WPC believes the village could warrant having an allocated area.

The defined local centre for Milford does not extend far enough. There are several shops and services that have been excluded from this map. WPC would wish to see the following areas included:

1. The parade of shops opposite Milford Club on Church Road
2. Tesco and the kitchen design shop on Portsmouth Road (between the roundabout and The Refectory)
3. The chiropractic clinic on Portsmouth Road (between the Co-op and Milford Village Hall)
4. Secretts Farm Shop on Portsmouth Road
5. Milford Village Hall
6. AVS on Chapel Lane
7. Milford Bowling Club on Chapel Lane
8. The numerous shops on Portsmouth Road from Milford Village Hall towards the Guildford & Godalming By-Pass (Mitchells Fabrics, drycleaners, fish and chip shop, post office, hair salon and pharmacy).

#### **Waverley Land Availability Assessment (LAA) May 2018: Site 676: Land south of Franklin Court, Brook Road, Wormley & Site 677: Land off Bridewell Close, Wormley**

It is noted that both sites are included within the most recent LAA. There is significant local opposition to the inclusion of these sites in the LAA as having potential for development for the following reasons:

- **Road safety:** Unsuitable speed limit on Brook Road, poor road markings which encourages on street parking which in turn restricts traffic flow, inadequacy of station parking and the overspill onto surrounding roads as a result, the siting of two care homes and a school, all having vulnerable road users.
- **Density:** The number of properties proposed for the size of the footprint, 22 houses, is overdevelopment on a site currently housing eight homes.
- **Impact on Franklin Court:** Consideration would need to be given to the access to the properties from both Brook Road and Bridewell Close. Adequate entrance capability, vehicle capacity, and traffic movement in and out of Franklin Court must be taken into serious account and consideration as Bridewell Close is the only approach entrance into a the Bridewell Park development of 72 properties situated in Franklin Court, being a community of more than 200 people and more than 100 vehicles.
- **Surface water drainage:** There appears to be no storm water drains on the downhill part of the sites. New developments with associated hard standing will result in a considerable volume of water having to be properly taken away and it is not clear where any such water could go.

I trust you will take these comments into consideration when reviewing your plan before formal submission and would appreciate confirmation of receipt of this response.

Yours sincerely



Sarah Nash  
Clerk to Witley Parish Council