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30th November 2018

Dear Jessica

WA/2018/1815: Land opposite Milford Golf Club, Station Lane, Milford

Summary

Witley Parish Council objects to planning application WA/2018/1815 for 200 houses on land opposite Milford Golf Course. It understands that this site has been allocated for housing but urges WBC to test this application rigorously to satisfy themselves that it delivers sustainable development, with the necessary infrastructure improvements; and that 200 homes does not represent over-development.

Our concerns about this application can be summarised as follows:

- There is already traffic congestion in the area at peak times. The additional traffic generated by this development will make that considerably worse. The further impact of the traffic that will be generated by the Dunsfold and Aarons Hill developments has not been considered.
- Station Lane is a narrow road with inadequate pavements that floods regularly. It is unrealistic to suggest that pedestrians or cyclists should use Station Lane to access Milford Station or Milford village, in its current condition.
- The area to the west of the site, which is the location of the proposed SANG, is in Flood Zone 3. The Lead Flood Authority have recommended refusal of the application because there is inadequate consideration of flood-risk and run-off.
- The SANG is a very peculiar layout, requiring pedestrians to cross Station Lane twice in order to complete the circular walk. More than three-quarters of the walk appears to be on boardwalk, which will be costly to construct and maintain in perpetuity.
- Conditions included in LPP1 when the site was allocated have not been met. The application is for 200 houses, not the original 180. There are no footpaths or cycle paths connecting the site to the wider area. Flooding issues have not been adequately addressed. And the proposed improvements to the Station lane / Church Road junction are minimal. All these points were laid out in LPP1 para 18.13.
- WBC have not produced a Habitat Regulation Assessment, which we understand is a requirement before the application is approved.
- There is insufficient infrastructure – particularly school places and doctors - to support additional residents.
- S106 funding is directed at Godalming Leisure Centre rather than Milford-based projects.

These points are developed further below:

1. Traffic and Transport

Station Lane and the Church Road junction are already very congested at peak times. This has worsened since the Leithfield Park development was completed. An additional 74 cars leaving the site (Transport Assessment para 6.3) will make the queue to exit from Station Lane into Church Road extremely long. The additional housing planned or proposed at Dunsfold and Aaron's Hill will make the situation considerably worse.

We would question the Traffic Assessment calculation of an additional 74 cars leaving the site in the morning peak. That seems unrealistically low for 200 houses. The basis for the calculation is not given in the transport report.

The proposals to slightly widen Station Lane at the Church Road junction to allow vehicles to turn left may alleviate potential congestion somewhat, but we are still concerned that long queues will build up. In that case drivers may start to use Rake Lane as a rat-run, which will have safety implications for pedestrians (see below).

The bridge over River Ock is very narrow, not wide enough for two cars to pass without mounting the pavement; and elsewhere Station Lane is too narrow for two lorries to pass. It is unclear what is proposed to alleviate this. A priority chicane has been mentioned, but we are not convinced that this will address the issue without causing knock-on problems.

The information provided about buses and trains is inaccurate. (Travel Plan 2.24 and 2.26) There is only one train per hour in each direction outside peak times, not two. The 503 bus only operates on three days a week, not daily. There is no community bus service. And it is not possible to travel from Guildford to Basingstoke directly by train.

The station car park is consistently full, often by 7.30am. The peak time trains are generally full and standing by the time they reach Guildford.

And finally on transport, we question whether the impact of the level crossing has been considered by the transport assessment consultants. The barrier is lowered 12 times per hour during peak train times for an average of 90 seconds, which introduces a bunching of traffic eventually arriving at the Church Road junction.

2. Road safety for pedestrians and cyclists

The pavement along Station Lane is narrow (45cm over the Ock bridge, against the Highways manual recommendation of 1.5m) and poorly lit. Pedestrians are at constant risk of being clipped by vehicles. The flooding in Station Lane (see below) makes walking a thoroughly unpleasant experience for much of the year. Given the state of the pavement, it is disingenuous to suggest that this development offers sustainable routes to public transport, shops and schools using Station Lane. Indeed, the first thing pedestrians leaving the site will have to do when they leave the site is cross Station Lane to the pavement on the opposite side of the road.

As mentioned above, we are also concerned that if long queues form in Station Lane more drivers will use Rake Lane as a rat-run. Rake Lane is a narrow lane with no pavements. It is used by children walking from Milford Station to Rodborough School. Any increase in traffic will make it unacceptably dangerous.

Children going to and from Milford Station already experience considerable difficulty crossing Station Lane in safety from and to the bottom of Rake Lane due to the volume and speed of traffic and the relatively poor sight lines. There is a strong case for some physical measures to reduce the speed of traffic on Station Lane to enable children to cross in safety.

From what we can understand, the proposed route for children living in this development to Rodborough School is to exit the site and cross Station Lane to the pavement on the other side of the road, walk down

Station Lane and then cross it again to get to Rake Lane. There will therefore be more children walking on the narrow pavement and more children potentially at risk of being injured on Rake Lane.

Cyclists also struggle to negotiate Station Lane because of the flooding and potholes.

This application does not make it clear how the needs of pedestrians and cyclists will be met. Refuges are mentioned, but it is not clear where they are nor whether the road is wide enough to accommodate them. A zebra crossing is mentioned, but it looks as if this is very close to the bend by Upper Sattenham. The design of the twin crossings to get pedestrians safely to and from the SANG to the west of Station Lane is not clear. Surrey County Council do not appear to have commented on any of these proposals.

The idea of a refuge in Church Lane opposite the doctor's surgery is in theory a good one, but it will eliminate the only space for delivery lorries outside the shops.

We welcome the augmentation of the left turning lane at the Station Lane / Church Road junction, but would wish to see a pedestrian refuge there as well to help pedestrians crossing the top of Station Lane.

3. Flooding

We note and support the recommendation for refusal of this application by the Lead Flood Authority regarding the size of the proposed SUDs. We share the concerns that additional run-off will cause flooding to homes in Church Road, Ockfields and Busdens.

While it may not strictly speaking be a planning matter, we think it is necessary to point out that Station Lane is in a deplorable state through lack of maintenance by three different parties: Surrey Highways have failed to clear a number of gullies and culverts which are now completely blocked; the Environment Agency has failed to clear the culverts under the bridge at the top of Station Lane; and Milford Golf Club (who originally owned the development site) have failed to maintain the dry stone retaining wall along a considerable length of Station Lane. The wall is now in a state of total collapse in some places. The considerable volumes of surface water run off being discharged from the Golf Club onto the pavement and carriageway of Station Lane cannot drain into the surface water system due to the blockages in the surface water system.

As a result, Station Lane already floods regularly throughout the year. Any increase in run-off or additional water in the Ock will make this situation worse. Apart from the SUDs on-site, there is no mention of measures to alleviate flooding.

The River Ock floods regularly, as residents of Ockfields and Busdens will confirm. A number of trees are identified for removal, which will again increase the risk of flooding.

We note that Thames Water have not responded to the developer's request for comment and would suggest that they be asked to so before the application is progressed.

4. Design of the site

We are pleased to see that there are 60 affordable homes included in the application and that these are "pepper-potted" throughout the site. We will seek to ensure that this promised number of affordable homes are actually delivered.

It is difficult to judge whether there is adequate parking on the site. Much of the parking seems to be in the form of garages, which, experience tells us, are rarely used for cars. We would prefer resident parking to be in the form of car ports or off-street spaces.

We are concerned that there is only one road to access / exit the site. With so many houses, this seems potentially dangerous in the event of an emergency.

It is pleasing to see on some diagrams included in the application that there are two access points for pedestrians from the site to Station Lane, meaning that residents of the site do not have to use the main road entrance to come and go on foot. We would like to see that principle extended considerably. Access from the rear of the site to and from Busdens and Church Lane would allow pedestrians and cyclists to travel through the site, making journeys to Rodborough School, Milford Station and Milford Village much safer and more pleasant. Indeed, this was a recommendation of policy SS6 in the LPP1 allocation of the site (see below) and was also raised by members of the public at the consultation that the developers held before submitting the application. The developers themselves say in the Design and Access statement that

“The arrival of the existing and subsequent development patterns of the surrounding area along key historic routes has resulted in many short ‘dead-ends’/cul-de-sacs, and limited connections to the surroundings.”

By failing to provide pedestrian routes through the site this development actually increases the problem.

5. SANG and Environment

The design of the SANG which is proposed to mitigate the impact of the development on the Wealden Heaths SPA is unusual. We are surprised that it has been approved by Natural England and would welcome evidence that it has actually been approved. There is nothing in the application to support this.

The circular walk is split into two halves, requiring walkers to cross Station Lane twice in order to complete it. Because the land regularly floods, roughly three quarters of the walk is on a raised boardwalk. This will be costly to construct and maintain in perpetuity.

Natural England have stated that a Habitat Regulation Assessment will be required, but this is not included. In the light of the European Court of Justice decision that established the extent to which mitigation may be taken into account at the screening stage (People Over Wind and Sweetman) we question whether a full HRA should have been undertaken by WBC prior to the submission of this application?

The Shadow HRA that has been provided lacks detail – there is no mention of the resident birds, nor of the impact on otters, voles and other wildlife. It is very unclear how many trees will need to be removed.

6. Conformity with LPP1

Local Plan Part 1 removed this site from the greenbelt and allocated it for 180 houses. This application is for 200 houses. The following recommendations are noted in paragraph 18.12:

- *Capacity requirements at the Station Lane/ Church Road junction and A3100/A286.* These are minimal.
- *A flood-risk / run-off assessment, given that part of the site lies within an area of identified high and medium flood risk.* This has not been completed to the satisfaction of the Lead Flood Authority.
- *Sustainable transport measures* – as noted above, Station Lane does not provide safe, easy access to the station, shops or schools.
- *On site footways and cycle ways linking to the recreation space and Station Lane in the West and Church Road or Busdens Way to the West.* These are not included.

7. S106 Allocation

We note that an S106 contribution of £163K has been requested for Godalming Leisure Centre. We would suggest that supporting a project in Milford, such as Rodborough School's planned leisure facilities, which will be shared with the local community, would be a more appropriate use of any S106 leisure funding.

Should you wish to discuss these matters please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "Sarah Nash". The signature is written in a cursive style with a small dot at the end.

Sarah Nash

Clerk to Witley Parish Council