



Jessica Robinson  
Senior Planning Officer  
Waverley Borough Council  
The Bury  
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GU7 1HR

29<sup>th</sup> January 2019

Dear Jessica

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

Witley Parish Council appreciates that some of its earlier concerns about this application have been addressed. However, there are still a number of issues that are outstanding, and some new events which lead us to object to the application once again.

Since the initial consultation for this site, the application for 262 houses at Ockford Park has been approved. We sincerely hope that the additional strain on the infrastructure that this will cause was taken into account when this development was considered, and the various statutory bodies made their assessments.

**Transport**

Surrey Highways' assertion that there will not be severe traffic congestion in the centre of Milford as a result of this development is quite extraordinary. As people who live there, we know that there is already traffic congestion in the centre of Milford. This can only get worse when an additional 200 houses are built.

The applicant's own transport consultants admit that the modelled queues at the Station Lane / Church Road junction are shorter than the observed queues. Their explanation for this makes absolutely no logical sense, which would suggest that their model is wrong.

The Station Lane / Church Road junction is already extremely dangerous. Drivers turning right out of Station Lane need to negotiate vehicles coming south down Church Road, possibly with their left indicator on because they have just turned left at the roundabout; vehicles waiting to turn right into Station Lane; and vehicles travelling north up Church Road. Some of these vehicles are very large lorries, which need both sides of the road in order to manoeuvre. Any additional traffic can only make this significantly worse.

In the near future there will also be additional vehicles coming from Cranleigh, Dunsfold, Ockford Ridge and new developments in Milford and Witley. We assume that this traffic has been taken into consideration by Surrey Highways when modelling the impact of this development, which makes it even more extraordinary that they have not raised concerns. In the light of newly approved Ockford Ridge development in particular, could Surrey Highways please give Witley Parish Council written assurances that they have revisited the concerns about traffic congestion highlighted by residents in the many objections to this application.

The only way that complete gridlock can be avoided will be for people to change their behaviour to avoid the traffic. It would be good to think that they might start using public transport, but that is realistically not an option here. People might start leaving early for work to beat the traffic, but is it fair to expect people to have to leave for work at 6.00am?

Motorists may seek ways to avoid the Station Lane/Church Rd junction by using Rake Lane, which is the last thing we want, given the increased danger this would pose to pedestrians.

We need to see transport proposals that will alleviate the impact of the increase in traffic before this application is approved. It may require some radical thinking. And the cost should, of course, be borne by the developers.

### **Pedestrian safety**

The proposals to improve pedestrian safety in Station Lane are now clearer and we are pleased to see more pedestrian crossings have been planned.

However, the lack of adequate pavements has not been addressed and there are still too many places where people are required to cross the road to reach a safe place to walk. The pavements are still below the minimum standard width in some places. The current plans do not offer safe routes for pedestrians to walk to the station, the shops or the schools.

One of the most dangerous places for pedestrians to cross will be across the end of Station Lane, either to continue along Church Road or to turn right to go to the station. There they will face three lanes of traffic, with cars coming at them in all directions. There is no pedestrian refuge planned for this area, presumably because it would be tricky for the large lorries.

And there is very little planned to improved road safety in Rake Lane. Secondary school children from the new development will be walking along Rake Lane to get to Rodborough School. They will not choose to walk via Station Lane / Church Road / Petworth Road which is longer. They will therefore add to the number of children who already use this route, which has only a "virtual pavement". At dusk and after dark it is extremely difficult to see pedestrians in places. This route needs better lighting and some physical speed reduction measures, particularly as it is likely to become a rat run.

We are pleased to see that a Safety Audit has been commissioned. It is a great pity that this is not yet available.

### **Sewers**

In a letter dated 20 December 2018, Thames Water stated that they had "identified an inability of the existing foul water network infrastructure to accommodate the needs of this development proposal." Yet, in a letter dated 10 January 2019, after communication with the applicant, they state "We are pleased to confirm that there will be sufficient foul water capacity in our network to serve your development, so long as your phasing [*for the occupation of houses*] follows the timescale you've suggested." Forgive us if we are not convinced. What is the change of decision based on? Thames Water have not included any information about the expansion or reinforcement of the network. We trust that officers at Waverley are making sure that the assertion that there is capacity is supported by facts.

A further concern is whether all the other developments that are planned were considered when the capacity was assessed. Does the decision take account of the 262 homes just added at Ockford Ridge? What about the 200 homes in the Guildford part of the Ockford Ridge site? We are upstream of those houses. If there are capacity issues in future, then we will be the ones with foul water flooding our homes and our streets.

## **Flooding**

The Lead Local Flood Authority have questioned the run-off rate from the SUDs that will be installed at the site. The area is very prone to flooding and that any miscalculation could spell disaster for Busdens, Ockford Ridge and Station Lane. The recalculated figures have yet to be received.

We also note that Thames Water have stipulated that no surface water should end up in the sewers and we hope that this will be taken into account in the calculations.

## **SANG**

Natural England have approved the SANG provision and they must believe that it will be sufficiently attractive to persuade residents to walk their dogs there, rather than the nearby SPA. We, however, don't feel that many people will choose to walk their dog on a boardwalk, constrained on both sides. The dog will need to be on a lead, partly because the ground either side of the boardwalk will be wet and muddy and partly because the route crosses Station Lane in two places. The SANG ticks all the boxes, but that does not make it a place that people will choose to visit.

We are disappointed at the lack of consultation about the future management of the SANG. Witley Parish Council has an excellent reputation for maintaining its open spaces for the benefit of local residents. It will be us that people come to in five years' time, when a board rots or a fence falls over. Who will be responsible for signing off the SANG as having been constructed as specified before the houses are occupied? We would ask that we have a role in the creation and maintenance of the SANG going forward.

## **S106 / CiL contributions**

We can see no evidence in the paperwork the leisure contribution destined for Godalming Leisure Centre has been reconsidered, despite our request, supported by many local residents, for it to be directed to Milford-based leisure facilities. It seems grossly unfair that Milford residents should bear the pain of this development without seeing any benefits.

No contributions are currently identified for schools, doctors' surgeries or community services. It will be a scandal if the opportunity to enhance the local infrastructure is missed by the failure of Waverley to request these payments.

## **Conformity with LPP1**

The applicant makes frequent reference to the fact that this site was allocated in LPP1, which means they do not have respond to certain issues raised by residents. We do not accept this.

They are also still failing to comply with the conditions laid out in LPP1, paragraph 18.12:

- *Capacity requirements at the Station Lane/ Church Road junction and A3100/A286.* Despite the revised plans, these remain inadequate.
- *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 still not been completed to the satisfaction of the Lead Flood Authority.
- *Sustainable transport measures* – Station Lane still 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.* We acknowledge that there are land ownership issues to be resolved here but would appreciate some commitment to attempting to implement this.

## **Waverley Planning Portal**

And finally, we would like to record how difficult it is to use the Waverley Planning portal to review an application of this size. Finding the relevant document is the first hurdle, especially when there are many with almost identical names. Documents then take forever to download. Plans can be impossible to read because they don't expand correctly. Trying to download all the files to a zip folder is impossible because there is a download limit. We have used our very best efforts, but it is quite possible that we have missed something important.

I trust you will take these comments into consideration.

Yours sincerely

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**