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Dear Jessica

WA/2019/1095: Land opposite Milford Golf Club, Station Lane, Milford – Reserved Matters

Summary

Witley Parish Council objects to this application. The proposal is for too many houses in too small a space, with inadequate parking and minimal public play areas. The affordable housing is not pepper-potted throughout the site but is concentrated in a few areas. The site is not integrated into the village, with just one access road. The SANG is not an attractive place for people to walk their dogs. Flooding, traffic congestion and harm to the natural environment remain major concerns.

These points are expanded below:

Parking

We are very concerned about the lack of parking on the site. The developers have used the Surrey County Council guidelines (1 parking space for 1 bedroomed properties; 2 spaces for two bedroomed and 2 ½ spaces for 3+ bedrooms) despite an acceptance that this area has a greater dependency on cars than elsewhere in Surrey because public transport is so poor.

Of the 200 dwellings, 67 in total have below the recommended number of spaces. This is made up of

- 57 three-bedroomed properties with only 2 spaces;
- 5 of the two-bedroomed flats with only 1 space;
- and 5 of the four-bedroomed houses with only 2 spaces.

The concern is increased by the fact that 12 of the larger properties have an integral garage, which counts as a parking space. We would not anticipate that these will be used to park cars, but rather for storage, thus reducing the parking spaces by 12.

There are 34 unallocated spaces for the whole site, which is not a lot for visitors, carers, workmen, deliveries etc.

The emerging Witley Neighbourhood Plan encourages the use of car ports rather than garages, on the basis that these are more likely to be used for parking. This suggestion was not taken up by the developers.

For anyone who is unfamiliar with the site, we would point out that once the site is full there is nowhere else to park. Station Lane is not an option.

Over-crowded site

Paragraph 5.5 of the Design and Access Statement calculates the housing density as 32.7 dwellings per hectare, using only the area of land that is possible to develop as the basis of the calculation. This is considerably higher than any of the surrounding areas in Milford. It supports our impression that the site is over-crowded, with the size of the houses and bedrooms barely meeting the national space standards. The gardens of the houses are generally very small and the flats have no private amenity space at all. The play areas (LEAP and LAP) are the minimum size required under Waverley guidelines.

Affordable housing

We are pleased to see that 30% of the homes will be affordable. However, there is no information about the split between social-rented and help-to-buy properties.

We have concerns about the location of the affordable housing. In its Affordable Housing Supplementary Planning Document (July 2019) Waverley Borough Council states *“The Council expects the affordable homes to be distributed throughout the site in small clusters of approximately 10 units, dependent on the scale and design of the development. Locating affordable housing at the end of a cul-de-sac should be avoided where possible. Affordable homes should face private market units as neighbours, in order to promote an inclusive, sustainable community.”*

We acknowledge that the design of the site pre-dates these guidelines but make the observation that this development does not meet the standard. 17 out of the 60 affordable homes are clustered in a group in the south west corner of the site, at the end of a cul-de-sac. The remaining affordable homes are in three groups, not facing private units as neighbours. This cannot be described as the “pepper-potting” we had hoped for.

Housing for the elderly

The Housing Needs Assessment that was carried out for the Witley Neighbourhood Plan identified the need for more housing for the elderly. It is disappointing that this development makes no contribution to this. There are only eight bungalows and these do not appear to be wheel-chair friendly. None of the houses or flats are identified as being age-adaptable, with wider doors, room to install a stair lift and a downstairs wet room.

Self-build / custom-build homes

There is no information about self-build or custom-build homes. We understand that WBC expects 5% of houses on sites of more than 20 homes to be offered as self-build or custom-build.

Electric car charging points

It is good to see that every house will have an electric car charging point. We are, however, puzzled as to how charging facilities will work for the flats as only 20% of the flats have charging points. Will those be shared? And if so, where will they be sited?

SANG

The design of the SANG was specified in the outline planning application and was widely condemned then as not meeting Natural England’s guidelines. We now have a little more detail about the construction. In very small print in Figure 14 of the Construction Environmental Management Plan we now learn that the boardwalk will be more than 1m high on the section that runs through the section north of the Golf Course, east of

Station Lane, and also in the parts closest to the Ock on the western section. It does not say how much more than 1m, nor whether railings will be necessary for safety. It is also disturbing to note that the boardwalk will be made of plastic / resin, rather than wood. We are concerned for the residents whose gardens back onto the SANG to the east of Station Lane, who will now have a raised boardwalk at the end of their gardens. There is little information about the proposed tree work in this area, but we trust as much screening as possible will be retained.

Our conclusion, when we saw the original SANG design, was that it is not a place we would choose to walk our dogs. Nothing in this application has changed that.

Ecology

A new environmental planning consultancy has produced the Construction Environmental Management Plan (CEMP) for this application. They correct the calculations of their predecessors and conclude that the greater crested newt and the dormouse will not be under threat during construction. Given that two experts have come up with two different conclusions, do we need a third opinion? Could independent advice be sought from SARG (Surrey Amphibian and Reptile Group) or ARC (The Amphibian and Reptile Conservation Trust)?

Integration into Milford

There is only one road into the site, despite this road being described as the “main” access or the “primary” access. The two footpaths / cycle paths from the site both access Station Lane, and both these require pedestrians / cyclists to immediately cross the road as there is no footpath on the western side of Station Lane. This does not feel like a site that is integrated into the village.

We acknowledge that a possible link to Busdens at some point has been included in the plans, but at the moment there is no connection with areas to the west of the site. This means that a safe route to Rodborough School for children on the site and those arriving at Milford Station has not been secured.

Pedestrian safety

Whilst there are improvements planned for Station Lane which will improve pedestrian safety, there is one stretch of pavement that urgently requires improvement before the route to the station from the site can be described as safe. This is the section on the eastern side of Station Lane, closer to the station. This improvement is outlined in Condition 46 and the requirement is that a plan is produced before submission of the reserved matters application. We cannot understand why this submission was made with that condition still outstanding.

Flooding

Whilst it looks unlikely that the site itself will flood, we do remain concerned about the impact of run-off from the development into the Ock and into Station Lane. The land either side of the Ock and Station Lane flood increasingly regularly already and we cannot believe that there will be less water coming off the site once the houses are built than there is currently. Therefore flooding is to be expected. The application addresses that by specifying a boardwalk in the SANG that needs to be more than 1m high in places and finding it necessary to mention the arrangement for cars that cannot turn right out the site if there is flooding in Station Lane.

No improvements to the drainage in Station Lane are planned. Whilst the developers have agreed to clear the culverts under Station Lane which should alleviate flooding in the short term, we cannot see how these will be maintained in the future.

Transport

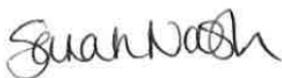
Although we are aware that transport matters were part of the outline planning application, for the record, we strongly believe that Surrey County Council's Highways Department were incorrect in their assessment that the traffic congestion at the Station lane / Church Road junction will not be severe. There is still a great deal of concern from local residents that the minimal improvements to that junction will not address the considerable congestion which will occur and that the junction is an accident waiting to happen.

Consultation with Witley Parish Council and the Witley Neighbourhood Plan Steering Group

Since outline planning permission was granted, the developer has attended several meetings with Witley Parish Council and the Witley Neighbourhood Plan Steering Group to discuss the draft proposals for the site, which was a requirement following the outline planning permission. The developers were made aware of the policies in the emerging Witley Neighbourhood Plan, which has just completed its Regulation 14 Consultation. It is disappointing that the matters discussed at those meetings have not been implemented in this submission.

I trust you will take these comments into consideration.

Yours sincerely



Sarah Nash
Clerk to Witley Parish Council