

JOINT PLANNING COMMITTEE
UPDATE SHEET

Correspondence received and matters arising following preparation of the agenda

WA/2018/1239

LAND BETWEEN NEW WAY AND AARONS HILL, GODALMING

Updates to the report

Page 32 – contribution requested by CCG

Since the drafting of the agenda report, CCG has confirmed that the contribution of £168,298.00 requested towards off-site development of GP capacity would be used to expand existing facilities at Hurst Farm Surgery in Milford in order to mitigate the impact of the proposed development.

Page 41 –Thames Water

Within the comments received from Thames Water, it is stated that they are unable to comment on the foul network capacity. However, further information has been provided by the Applicant in relation to the proposed foul strategy which is discussed on page 100 within the 'Flooding and drainage' section of the report.

In addition, and further to the drafting of the report, Officers have spoken with Thames Water to confirm its position.

In January 2018, a new charging arrangement was published by Thames Water, which came into effect in April 2018. This change came about as all English water and wastewater companies were asked by Ofwat (the economic regulator of the water sector in England and Wales) to change the way they charge customers for new connections. In accordance with this new charging arrangement, Thames Water will, where required, undertake an impact study of new development proposals and where it is established that offsite reinforcement works will be required; these will be undertaken at the cost of Thames Water. In the instance that a developer wishes to proceed with the impact study ahead of permission being granted for the development works, Thames Water will ask the developer to underwrite the costs of the work.

In this instance, it has been confirmed that there is capacity within the existing sewerage network to accommodate 137 units. However, as this does not cover the

entirety of the development proposed, Thames Water would undertake an impact study and proceed to carry out any necessary reinforcement works of the network in order to provide foul sewage connection for all units.

On this basis, there is no overriding objection raised by Thames Water in respect of foul drainage. Officers would recommend that an additional condition (as set out in the relevant section of this update below) is imposed on any grant of permission in order to secure full details of the proposed foul water strategy prior to commencement of development.

Page 43 – Surrey Hills AONB Advisor

As set out within the report, the Surrey Hills AONB Advisor has raised an objection to the proposal. An assessment as to the 'landscape considerations' of the proposed development, wherein the views expressed by the Surrey Hills AONB Advisor have been discussed, has been undertaken on pages 67 – 70 of the report.

However, Officers can confirm that the objection raised by the Surrey Hills AONB Advisor in respect of the impact to the AGLV from development of the site was previously raised with the Local Planning Authority during the Pre-submission Consultation 2016 on the Local Plan 2018 (Part 1). In subsequently adopting the Local Plan 2018 (Part 1), and removing the western section of the application site from the AGLV under Policy RE2, the Council fully considered and addressed the objection of the Surrey Hills AONB Advisor at this time. It would therefore be inappropriate and unreasonable to uphold the objection to the current application on this basis.

Page 48 – Forestry Commission

The Forestry Commission has referred the Local Planning Authority to its Standing Advice in relation to assessing the planning application. This Standing Advice has been jointly published by the Forestry Commission and Natural England in relation to Ancient Woodland and Veteran Trees. Since its issue in April 2014, it was last updated in November 2018.

The Standing Advice defines Ancient Woodland as an irreplaceable habitat, which is important for its wildlife, soils, and recreational, cultural, historical and landscape value. It comprises an area which has been wooded continuously since at least 1600AD. Ancient and veteran trees can be individual trees or groups of trees, and can often be found outside ancient woodlands. All ancient trees are considered to be veteran trees, but not all veteran trees are ancient.

In terms of decision making, the Standing Advice states that the Local Planning Authority should consider: conserving and enhancing biodiversity, and reducing the

level of impact of a proposed development on ancient woodland and ancient and veteran trees. Proposals should be assessed in line with paragraph 175c of the NPPF, and permission should be refused if development results in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless there are exceptional reasons or a suitable compensation strategy in place.

In this instance, an assessment against paragraph 175c of the NPPF has been undertaken on pages 97 and 98 of the report within the 'Trees and landscaping' section. Full regard has been had to the Standing Advice of the Forestry Commission and Natural England, and Officers conclude that the proposal would not result in any loss or deterioration of ancient woodland, ancient trees and veteran trees.

Pages 56 and 126 – Reference to Guildford Borough Council

As set out within the report, the application site adjoins land falling within Guildford Borough, which has been separately promoted for development.

Officers note that there has been a lot of third party interest in the potential future development of the adjacent land and how it would link with the current proposal. In addition, Officers have been made aware of third party objections being submitted to Guildford Borough Council in relation to an application before them seeking permission for 'change of use from agricultural land to public open space and nature reserved with associated hard and soft landscaping, circular pedestrian walk, car parking and highways access to facilitate a Suitable Alternative Natural Greenspace (SANG)' (Reference: 18/P/01958). Officers have referred to this application on page 108 of the report within the 'Impact on SPA and SAC' section.

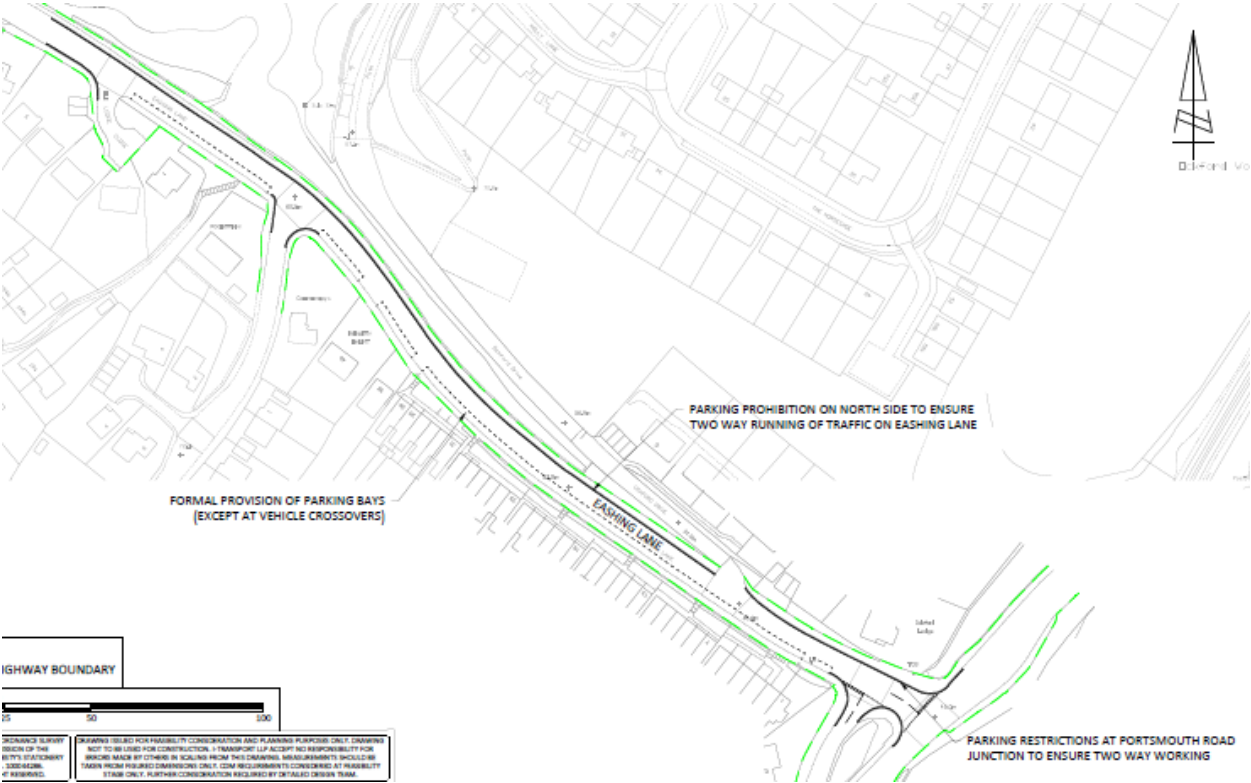
In respect of the future development of the adjacent Guildford land, any application for such development would be submitted to Guildford Borough Council for determination. There is no requirement for the Applicant to submit a cross-boundary application or a masterplan for the whole site to the Council. The impact of any future development within Guildford would be assessed if and when any application is forthcoming. Officers are satisfied that the current application can be successfully delivered in isolation from any potential development of the adjacent land.

To confirm, the separate SANG application is being considered by Guildford Borough Council. There would be a connection between the current application and the SANG application, in that it is intended that the development proposed under the current application would be serviced by the off-site SANG subject of the Guildford application. Delivery of the SANG would be secured by means of a Section 106 Agreement should permission be granted for the current application. This would mean that, in the instance that permission is granted for the residential development, the dwellings would not be able to be occupied until such time that the SANG is completed and is operational.

The acceptability of the SANG is currently being assessed by Guildford Borough Council. However, officers would advise Members that determination of the current application is not precluded by the pending status of the Guildford application.

Page 79 – parking on Eashing Lane

To provide clarification on the first bullet point on page 79, Officers would comment that there are no parking restrictions currently on Eashing Lane. Cars are normally parked on the southern side of the road and occasionally there is parking on the northern side. The proposed scheme to formalise the existing situation would involve double yellow lines being imposed at the junction of Eashing Lane and Portsmouth Road and single yellow lines on the northern side. This would help maintain traffic flow and would apply between the junction with Portsmouth Road and Old Lodge Close.



Page 89 – Heritage considerations – additional information received

It is stated within the report that Officers understand that the applicant intends to submit a further Heritage Statement prior to the committee meeting. Officers can confirm that the following additional Heritage Statement has now been submitted – Built Heritage Briefing Note, undertaken by CgMs Heritage, dated December 2018.

The Briefing Note sets out a summary of the correspondence in relation to heritage during the consultation period. It states that, having regard to paragraph 189 of the NPPF, the level of detail required by applicants to demonstrate the significance of any heritage assets likely to be affected by a development proposal should be proportionate to the heritage assets' significance and no more than is sufficient to understand the potential impact on such significance. In connection with this, the report refers to the judgement of Martin v SSCLG [2015] EWHC 3435 (Admin), which sets out the following points:

- The NPPF paragraphs do not stipulate the form in which information about heritage assets is to be provided or how much information will be needed.
- The tenor of paragraphs 128 and 129 (of the NPPF 2012, which have been updated by paragraphs 189 and 190 of the NPPF 2018) is pragmatic, not prescriptive.
- The policy in the NPPF and relevant guidance allows the decision-makers a wide discretion in the approach they take when assessing the significance of a heritage asset – the NPPF discourages the decision-maker from seeking any more detail than is truly needed to gain an understanding of the likely effects of a proposal on the significance of a heritage asset.
- If the applicant fails to provide enough information, the Local Planning Authority may still be able to gain a full enough picture from relevant material in order to be able to make a decision on the merits of the proposal.
- The amount of information a decision-maker may regard as sufficient is liable to vary from one case to the next.

The Briefing Note goes on to state that the original Built Heritage Statement which was submitted with the application assessed the significance of Westbrook House and Garden, including contribution from their setting, and the impact on this significance arising from the proposed development. The original Built Heritage Statement was based upon historical research and an on-site assessment carried out in June 2018. The significance of the heritage assets is stated out within the Briefing Note as follows:

Westbrook House

Its significance is drawn from its architectural and historical value as a fine Arts and Crafts house with handsome architectural details, materials and proportions, designed by the architect Thackeray Turner in 1899-1900 as a home for himself and his family.

Westbrook House Garden

Its significance is drawn from its aesthetic and historical value as an example of an Arts and Crafts garden designed jointly by Thackeray Turner and the distinguished garden designer Gertrude Jekyll in the early-twentieth century. As an Arts and Crafts Garden, Westbrook Garden is typically designed with outdoor compartments to

provide intimacy, a sense of mystery and anticipation, and sense of solitude and tranquillity. The garden does not survive in its entirety and in the past few years a tennis court and an outdoor pool have been added in the former Arts and Crafts kitchen gardens.

Interlinked significance of the House and Garden

Westbrook Garden provides an appropriate intimate setting for the house and has been designed to include outdoor living spaces as an extension to the indoor spaces of the house. Part of the wooded Wey Valley to the north is integrated within the registered garden and the hence the valley forms an essential part of the setting of Westbrook House and Garden. Indeed, a meandering path connects the house and garden with the valley and the River Wey. The agricultural land to the south and west helps to provide the house and garden with a rural backdrop, although there is limited inter-visibility between this land and the house and garden.

The Briefing Note concludes that the application site forms part of the rural landscape that surrounds the listed house and garden, and therefore it makes some contribution to their significance. The proposed development is stated to result in not more than a minor-to-moderate level of less than substantial harm to the significance of Westbrook House and Garden. The Briefing Note acknowledges that Historic England, within their letter of 16 October 2018, has agreed that the harm to the significance of Westbrook House and Garden would not amount to more than less than substantial harm.

In response to letters submitted by The Victorian Society, Historic England, The Gardens Trust, The Society for the Protection of Ancient Buildings, The National Trust and Third Party objectors, the Briefing Note refers to the submission of two supplementary Built Heritage Clarification Statements. These additional statements provided more information on the significance of the heritage assets and clarified the proposed mitigation measures to reduce the visual impact of the proposed development. The mitigation measures are stated to be:

- Significant landscaping, particularly on the northern and eastern edges to retain separation from Westbrook
- Removal of several chimneys from house types

In setting the above out, the Briefing Note concludes that the application has given special regard to the desirability of preserving Westbrook House and its setting. Further, the Briefing Note concludes that the information submitted by the applicant exceeds the requirements of paragraph 189 of the NPPF and has provided the Local Planning Authority with a proportionate assessment which is more than is sufficient to understand the impact of the proposal on the significance of Westbrook House and Garden.

In response to the submitted heritage information, Officers would comment that the Briefing Note does not, in Officers' view, provide any additional information over and above that which has already been submitted. Rather, the Briefing Note provides a consolidated summary of what the applicant has already submitted and it re-affirms the applicant's position that the submitted information meets the requirements of the NPPF.

Whilst Officers note that the submitted heritage information is based on historical research and an on-site assessment, it is disappointing that the applicant has not visited Westbrook House and its garden. That said, Officers remain of the opinion set out on page 89 of the report – notwithstanding the fact that the applicant has not visited Westbrook House and its garden, the Local Planning Authority as the decision-maker, has sufficient information before it in order to establish the significance of the heritage assets and assess the impact of the proposed development on this significance. Counsel's advice, sought by Officers, is in agreement that the Council has obtained enough information itself to make a decision.

Officers have set out what they consider to be the significance of the heritage asset and the resultant impact on this significance from the proposed development within the 'Heritage considerations' section on pages 85 – 92 of the report.

It is acknowledged by Officers that the adverse effects of the proposed development on the heritage asset identified by Historic England are not purely visual, but rather concern is also expressed in relation to additional noise and traffic affecting the sense of isolation and separateness of the heritage asset.

In having regard to all areas of concern raised, Officers have concluded that the proposed development would result in less than substantial harm to the heritage asset, which is in agreement with the conclusion of Historic England.

Furthermore, in having regard to paragraph 190 of the NPPF 2018, Officers are satisfied that the application has minimised as far as reasonably possible, the adverse effects on the setting of the designated heritage asset.

Officers have proceeded, on this basis, to weigh up the public benefits of the proposed development against the identified harm. As set out on page 92 of the report, Officers are of the view that the public benefits would outweigh the less than substantial harm.

Amendments to the report

Pages 7 and 129 – The reference to “market housing mix” within Recommendation A on these pages is incorrect and should instead read “affordable housing mix”. The

revised recommendation will be set out in the relevant section of this update sheet below.

Responses from Consultees

- County Highway Authority

The County Highway Authority has submitted a note to the Local Planning Authority, which sets out its response to the objections which have been raised by third parties. This note is attached as Appendix 1 to this update sheet.

Additional representations

- Godalming Cycle Campaign (GCC)

GCC has made comments in relation to the incorporation of cycle access improvements within the S278 highway works, and has sought further details in relation to how the financial contributions being sought by the County Highway Authority would be spent. A copy of the Guildford to Godalming Greenway proposal document is attached to the comments made by GCC.

In response, Officers would comment that within the note attached at Appendix 1 from the County Highway Authority, it is advised that the proposal would provide for a scheme of improvements to Bridleway No.6 which would make it an attractive route for cyclists. Improvements to signage and lighting are proposed on either side of the Westbrook Road railway bridge in order to improve cyclist safety.

The financial contributions being requested by the County Highway Authority are set out within their formal response, which is viewable on the Council's website, and on page 31 of the agenda report. In relation to the requested contribution of £318,881 towards Godalming Sustainable Transport Improvements, the County Highway Authority has set out within their formal comments the different schemes that this contribution would likely go towards, one of which is 'cycle route improvements between Godalming and Guildford (Guildford-Godalming Greenway)'.

- Third party representations

3 further letters have been received raising objection on the following grounds:

- Disagreement with the submitted 'Electric Charging Provision Clarification' – if rapid charging points are not provided initially for units, there could be considerable disruption to the community by adding them later. Not to provide sufficient electrical capacity initially may result in a network that does not have

the capacity to accommodate future needs. The Council should insist that fast charging facilities are available at all properties from the outset should the application be granted.

- Impact on rural area – the area is a historic viewpoint overlooking the valley towards Charterhouse School, along with a haven for wildlife.
- Insufficient schools, hospitals and public transport to cope with any more population increase.
- Increased traffic and impact to the surrounding road network – including danger to those travelling by horseback as the local riding school uses the small lanes in the area.
- Failure of the applicant to provide an assessment of the significance of heritage assets that complies with the NPPF.
- Query whether Historic England should be consulted on the published agenda report in light of the significance assessment undertaken by the Local Planning Authority.
- Impact to the structural integrity of Eashing Bridge as a result of increased traffic flow.
- Publication of the Appropriate Assessment (AA) and agreement from Natural England.
- An objection is raised by Guildford Borough Council's SANGs Officer.

In response to the objections, Officers would comment as follows:

The views of the County Highway Authority and Officers in respect of electric vehicle charging points are set out on pages 81 – 83 of the report. A condition has been recommended (Condition 25) which would secure the provision of electric vehicle charging points.

The impact on the surrounding landscape, visual amenities of the area, ecology, location of development in relation to facilities and services, and highways related impacts have all been assessed within relevant sections of the report.

An update to the heritage section of the report has been set out within this update sheet. Officers acknowledge that the applicant has not provided any further information in relation to the significance of the heritage asset over and above that already set out within the report. Notwithstanding this, Officers have expressed a view within this update sheet that the Council has sufficient information before it to make an assessment. Counsel's advice has been sought by Officers, which confirms agreement with this position.

In relation to consultation with Historic England. The obligation to consult Historic England arises under Regulation 5A(1)(a), (2) and (3)(a) of the Planning (Listed Buildings and Conservation Areas) Regulations 1990 owing to the impact of the

proposed development on Westbrook, a Grade II* listed building. Such obligation requires the Local Planning Authority to send Historic England notice of the application; allow 21 days to elapse from completion of the publicity requirements before determining the application; and to take into account any representations received in the 21 day period.

Historic England has provided comments as part of this consultation process, which are set out on page 44 of the report. As stated within its formal response, its advice is offered to assist the Local Planning Authority in determining the application. Historic England has concluded that there would be less than substantial harm to the significance of Westbrook and its garden as a result of the proposed development. Officers have had full regard to the comments received from Historic England and have subsequently undertaken an assessment as to the acceptability of the proposed development in heritage terms. It is for the Council's Members to consider the officer recommendation.

The statutory consultation requirements in Articles 18 and 22 of, and Schedule 4 to, the Town and Country Planning (Development Management Procedure) (England) Order 2015, which are referred to within the third party objection do not apply to this application. This has been confirmed within Counsel advice sought by Officers, and Officers would therefore advise Members that there is no requirement for Historic England to be consulted on the published agenda.

In relation to the impact to Eashing Bridge, the County Highway Authority has confirmed that the Eashing Bridge has a load bearing capacity of 40 tonnes, in line with the EU Directive EU/2015/71. The structural integrity of the bridge is therefore considered by the County Highway Authority to be sufficient to safely accommodate any additional development related traffic which may be generated by the proposed development using this route.

In relation to the Appropriate Assessment and Natural England comments, this is viewable on the Council's website.

Officers acknowledge the objection raised by Guildford Borough Council's SANGs Officer. However, the acceptability of the SANG is a matter to be assessed by Guildford Borough Council as part of the relevant planning application. As set out within the 'Impact on SPA and SAC' section of the report, on pages 107 – 109, Officers are satisfied that subject to the completion of a Section 106 Agreement to secure the servicing of the development by an off-site SANG, the proposed development would not have an adverse effect on the SPA. Further, no objection has been raised by Natural England in this respect.

With regard to the vehicular movements associated with access to and from the off-site SANG from the proposed development, the County Highway Authority has

commented that the estimated 5 visits per hour, based on the size of the SANG, are most likely to occur during off-peak hours and it is considered that such a small number of vehicular movements would not have any material impact on the capacity of the local road network.

Questions arising from Member Committee site visit on 07/01/2019

A number of questions were raised by Members during a committee site visit on 07/01/2019, which Officers would respond to as follows:

- 1) What are the arrangements for the emergency access? – concern was raised that this would be an open access for all users entering and leaving the site

The emergency access proposed onto Halfway Lane, to the north of the site, would be 3.7m wide. Officers consider that it would be reasonable to recommend an additional condition to secure full details of the method of controlling this emergency access point to ensure that it would only be used by emergency services. This is set out in the 'Additional conditions/informatives' section of this update sheet below.

- 2) What is proposed for the existing pylons within the site?

As set out on page 101 of the Agenda Report, there is an existing electricity overhead cable route which traverses the application site. It would be necessary for the overhead cables to be diverted as part of the proposed scheme. Should permission be granted for the development therefore, Scottish & Southern Energy (SSE) has confirmed to the Applicant that it intends to ground and re-route the cables within the proposed estate roads and landscaped margins of the site.

- 3) What is to happen with the existing substation at the site and are any more substations to be provided?

An existing electricity substation is located close to the north eastern corner of the site and this would remain as part of the scheme as it falls outside of the red site line. As set out within the submitted 'Foul Drainage & Utilities Statement' SSE has confirmed to the Applicant that there will be a requirement for two electricity substations within the site to meet the electrical demand from the site. Full details of any substations to be provided on site could be secured by means of a planning condition. A condition is recommended to this effect within the 'Additional conditions/informatives' section of this update sheet below.

- 4) Why was an access via the area of hardstanding off Aarons Hill (former car park) not proposed?

It is acknowledged that there is an existing area of hardstanding adjacent to No. 85 Aarons Hill which is not in active use but was historically used as a car parking area. This area of land is owned by Waverley Borough Council and is subject of a current planning application (Ref: WA/2018/1727) which seeks planning permission for the erection of 4 affordable dwellings on the site. Whilst Officers therefore note that it represents an existing area of hardstanding which could potentially facilitate an access point to the application site, each application is to be judged on its own merits and it would not be appropriate for Members to re-design the proposed development scheme on this basis.

5) How has the chimney concern been addressed? – previous concern was expressed with regard to the chimneys during a Member Briefing

Following a Members' Briefing session on 17/10/2018, during which concern was expressed regarding the height and style of the chimneys proposed within the scheme, the Applicant submitted amendments to the proposal. A 'Chimney Strategy' (Drawing No. 01245_S16 Rev P1) was submitted, setting out the units for which chimneys have been removed and those for which the chimney height has been reduced.

6) Is a copy of the site fly-through shown to Members at the Member Briefing going to be included in the committee presentation?

As the fly-through video does not form part of the formal application documents, it will not be included within the Officer Committee presentation. However, Officers have requested that the Applicant sends a link to, or copy of, the fly-through video to Members ahead of the Committee.

7) Where are the viewpoints taken from for the Landscape Assessment?

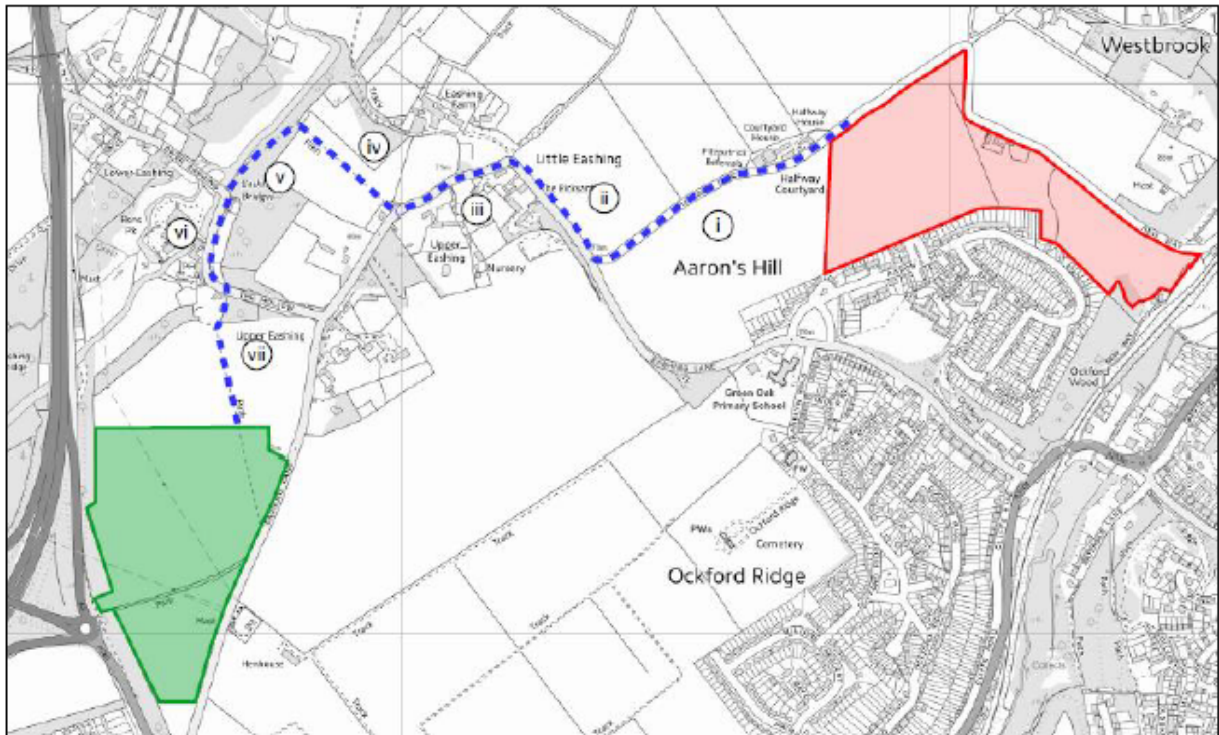
A total of 7 representative viewpoints have been considered as part of the submitted Landscape and Visual Impact Assessment (LVIA). These are set out within Table 3.1 of the LVIA and comprise (1) Eashing Lane (2) Eashing Lane/Halfway Lane junction (3) Halfway Lane/Bridleway 292 (4) Bridleway 6/Ockford Wood Farm (5) Eashing Lane at Upper Eashing (6) Footpath 295 near Norney (7) Aarons Hill Green.

8) How will the impact on potential future occupants of the site arising from noise, smells and CCTV of the nearby Caper and Berry premises be dealt with?

Officers would advise that the matters of noise and smells would fall to be enforced under separate Environmental Legislation if found to comprise a statutory nuisance. The matter of CCTV would not comprise a material planning consideration and if filming of private space occurred, it would be a matter to be potentially raised with Surrey Police.

9) What is the walking distance between the application site and the proposed off-site SANG?

The walking distance between the application site and the proposed off-site SANG is approximately 1.9km. This distance is based on the proposed walking route between the application site and the off-site SANG (see plan below), as set out within the submitted 'Access and Transport Note' which forms part of the formal submission to Guildford Borough Council under application ref 18/P/01958.



10) Are there intended S278 improvements to the pathway along Eashing Lane?

No improvements to the pathway along Eashing Lane, adjacent to land falling within Guildford Borough, are proposed as part of the S278 works associated with the current proposal as they are not required by the proposal. However, the County Highway Authority has confirmed to Officers that improvements to this effect may be required at a future stage in the event that a scheme within Guildford Borough is forthcoming.

11) Has the Appropriate Assessment undertaken by the Local Planning Authority been published? – concern was expressed that there has been a delay in this taking place

An Appropriate Assessment which has been undertaken by Officers has been published on the Council’s website. This has been amended and subsequently published following verification of how to secure delivery of the intended SANG by Counsel. Notably, Officers would advise that the use of the Section 106 Agreement as verified by Counsel reflects a robust approach.

Amendment to conditions/informatives

- Pre commencement conditions

The following conditions are pre-commencement conditions:
2, 4, 5, 7, 8, 9, 15, 17, 21, 24, 25, 26, 27, 30, 31, 32, 33, 34, 36

It is recommended that the following sentence is added to the reason for imposing conditions 2, 4, 5, 7, 8, 17, 24, 26, 27, 30, 31, 32, 33, 34, 36:
“This is a pre-commencement condition as it goes to the heart of the permission.”

It is recommended that the following sentence is added to the reason for imposing conditions 9, 15, 21, 25:
“This is a pre-commencement condition as it relates to the construction process.”

- Amendment to conditions

It is recommended that the following reason is added for the imposition of Condition 16:

Reason
In order that the development should not prejudice highway safety nor cause inconvenience to other highway users in accordance with Policy ST1 of the Local Plan 2018 (Part 1) and the NPPF.

Additional conditions/informatives

- Additional conditions

The following additional conditions are recommended to be imposed on any grant of planning permission:

- 50. Condition
No properties shall be occupied until confirmation has been provided by the Applicant to the Local Planning Authority that either:-
a) all water network upgrades required to accommodate the additional flows from the development have been completed; or

b) a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied.

Where a housing and infrastructure phasing plan is agreed, no occupation of the properties shall take place other than in accordance with the agreed housing and infrastructure plan.

Reason

The development may lead to no/low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand from the new development. This is required to accord with Policy CC4 of the Local Plan 2018 (Part 1).

51. Condition

Prior to the commencement of development, full details of the proposed foul water drainage scheme for the development shall be submitted to and approved in writing by the Local Planning Authority. No dwelling shall thereafter be occupied until the approved foul water drainage scheme has first been carried out and is operational, in strict accordance with the approved details.

Reason

To ensure that the development is satisfactorily drained and in the interest of the amenities of the area in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002. This is a pre commencement condition as the matter goes to the heart of the permission.

52. Condition

The development shall be carried out in strict accordance with recommendations of Table 1 set out within the Bat Aerial Tree Assessment Report, undertaken by Darwin Ecology, dated October 2018.

Reason

To safeguard the ecological interests of the site in accordance with Policy NE1 of the Local Plan 2018 (Part 1).

53. Condition

Prior to the commencement of development, full details of the emergency access point to be provided within the site and the associated method of controlling this means of access shall be submitted to and approved in writing by the Local Planning Authority. The emergency access shall be provided in strict accordance with the approved details prior to first occupation of the dwellings hereby approved.

Reason

To ensure that an appropriate emergency access point to serve the site is provided, having regard to Policies ST1 and TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002. This is a pre commencement condition as it relates to the construction process.

54. Condition

Prior to the commencement of development, full details of any electricity substations to be provided within the site shall be submitted to and approved in writing by the Local Planning Authority. The details shall include location, dimension and design of the substations. The substations shall be provided on site in strict accordance with the approved details.

Reason

In the interests of the character and visual amenities of the area, in accordance with Policy TD1 of the Local Plan 2018 (Part 1) and retained Policies D1 and D4 of the Local Plan 2002. This is a pre commencement condition as it relates to the construction process.

Revised Recommendation (including additional Recommendation C)

Recommendation A

That, subject to the applicant entering into an appropriate legal agreement within 6 months of the date of the committee resolution to grant planning permission, to secure the provision of/contributions towards: 30% affordable housing and ~~market~~ **affordable** housing mix, education infrastructure, SuDS management/maintenance, off site GP capacity, public open space and play space provision and maintenance, public access, off site highways improvements, travel plan, car club, leisure and green space areas, environmental enhancements, recycling facilities, Surrey Police recruitment and equipment, self build plots and provision and maintenance of the SANG (as identified in the Appropriate Assessment), subject to conditions and informatives, permission be GRANTED.

The conditions referred to are Conditions 1 – 49 as set out on pages 129 – 148 of the Agenda Report and additional Conditions 50 – 54 as set out on the update sheet.

Recommendation B

This is recommended to remain as set out on pages 153 and 154 of the report.

Recommendation C

That, if formal planning decision in respect of recommendation A is issued on 01/03/2019 or thereafter, then the Head of Planning be authorised to charge CIL in accordance with the Council's approved CIL Charging Schedule and revised Section 106 Infrastructure payments.

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Transport Development Planning
County Hall
Penryhn Road
Kingston upon Thames
Surrey
KT1 2DY

7 January 2019

Dear Rebecca,

WA/2018/1239 – Land Between New Way and Aarons Hill, Surrey - Erection of 262 dwellings (use class C3) including 78 affordable dwellings together with a 131sqm building for community use (use class D1) and associated works

Further to the Highway Authority's formal consultation response on the above application, I have prepared additional comments that respond to the key highway and transport objections/concerns raised by local residents.

Access Strategy For All Modes

The access strategy for vehicles and non-car modes has been reviewed in the TA. This includes the site access onto Aarons Hill, the emergency access onto Halfway Lane, and the route to the railway station/town centre via New Way. The Highway Authority have undertaken numerous site visits to assess these routes, including a review of Personal Injury Accident records over the last 5 years.

The Developer's TA (Section 4) has described the existing highway network between the site and Godalming Town Centre and has reviewed the Personal Injury Accident (PIA) data for these routes. There is no pattern of accidents involving pedestrians and cyclists on roads surrounding the site. Further from the site, it is noted that a cluster of accidents, including a fatality in 2013 has occurred at the A3100/Holloway Hill junction. The Highway Authority has already made improvements to pedestrian safety at this junction by installing dedicated pedestrian crossing phases on all arms of the junction.

The proposal provides infrastructure improvements between the site and the railway station/town centre via New Way (Public Bridleway No.6). This will provide a lightly trafficked and convenient link for pedestrians and cyclists to access the railway station and services/amenities in the town centre. The objections regarding the steepness of Eashing Lane and New Way/Public Bridleway No. 6 are noted; the Highway Authority has secured improvements for all non-car modes within the context of the geography of the site. In addition to walking/cycling improvements, the Highway Authority has secured a S106 contribution to improve the frequency of bus service No. 71/72 which serves Aaron's Hill and Ockford Ridge. The Highway Authority is satisfied that the proposed development accords with the NPPF requirement to maximise sustainable transport opportunities.

It should be noted that distances to facilities and services have been measured along the routes that will be used and not as the crow flies.

Trip Generation

The objection note suggests that 'neighbourhood centre' and free standing' sites within TRICS should have been utilised in the trip generation assessment. The Highway Authority has undertaken a sensitivity test using these parameters, and the results show a lower trip rate than has been used in the TA – the Highway Authority are satisfied that the trip rate methodology is robust and the resulting trip generation estimation is fit for purpose. The use of the TRICS database is the standard methodology used in the UK.

Additional Train Patronage

The estimated additional demand will be circa 50 peak hour train trips. Whilst rail infrastructure provision is not the Highway Authority's responsibility, in transport sustainability terms it would not accord with planning policy to prevent development that is well located to rail services which will be taken up by new residents.

The proposal will deliver significant improvements to the route to the rail station and the town centre via New Way, a predominately traffic free route, and will thereby promote walking and cycling trips between the site and local services/amenities.

Concerns over narrow width of the Western end of Eashing Lane (between A283 and Lower Eashing)

A review of injury accident data over the last 5 years shows one accident has occurred – as a result of a passenger have a medical episode which caused the driver to lose control. There is no pattern of accidents involving two vehicles colliding due to the width of the road. It is considered that widening the road would result in greater vehicle speeds, which it is considered would detriment highway safety.

Concerns over improvements at the Eashing Lane/A283 junction

The proposed improvements to this junction have been subject to an independent safety audit. It is considered this scheme will reduce queuing on the Eashing Lane arm of the junction, whilst also improving safety for pedestrians crossing Eashing Lane and the A283.

Concerns over traffic routing via The Hollow and Lower Eashing

In response to concerns raised about increase in traffic routing via Lower Eashing/The Hollow, the Highway Authority have secured a scheme to introduce gateways at each end of the village, with the installation of 'Access Only' Signage to discourage rat-running.

The Highway Authority advises that the Eashing road bridge has a load bearing capacity of 40 tonnes, in line with EU Directive EU/2015/71. The structural integrity of the bridge is therefore sufficient to safely accommodate any additional development related traffic using this route.

Concerns over Eastern End of Eashing Lane

The Highway Authority has secured a scheme to rationalise on-street parking, to remove parking on the north side of the carriageway close to the junction with Portsmouth Road. The TA includes a parking survey which demonstrates that the proposed parking bays will accommodate existing residents' demands. Removal of the parking on the junction will help improve traffic flow during peak times.

Impact of development on Westbrook Road

Most of Westbrook Road is private, but is classified as a Public Footpath (No. 44). The first 180m of Westbrook Road from its junction with New Way is classified as public highway. The development is not promoting the use of the private section of Westbrook Road as a route for pedestrians and cyclists. Neither will the proposed development result in an increase in vehicle movements on Westbrook Road. Improvements have been secured to promote/improve the route between the site and the town centre via New Way (Public Bridleway No. 6), and it is not therefore considered that the development would result in an intensification in use of Footpath No. 44. There have been two severe PIAs on the private section of Westbrook Road, both involving cyclists. Whilst any accident is regrettable, this section of Westbrook Road is only highway up to footpath status; the route is therefore not suitable for cycling. It is considered that the scheme of improvements to New Way (Bridleway No. 6) will make this the most attractive route for cyclists, therefore reducing the likelihood of cycling related accidents on Footpath No. 44. Improvements to signage and lighting are proposed on either side of the Westbrook Road railway bridge, to improve cyclist safety.

Construction Traffic Routing The Highway Authority will require that all HGV construction traffic to the site will route from the A3, via Portsmouth Road and then left into Eashing Lane. No heavy goods movements will be permitted on the western section of Eashing Lane or on The Hollow/Lower Eashing.

Godalming Community Traffic Survey

The Highway Authority has assessed the traffic survey data provided by the Godalming Community. The Highway Authority note that when the survey was carried out between 12th and 14th November 2018, roadworks were being carried out on the A3100 to the south of the Eashing Lane junction, at the junction with Wood Farm Lane. The Highway Authority considers these roadworks will have resulted in vehicles diverting to other routes to access the town centre, and it is therefore not considered that the traffic count data represents neutral traffic conditions. Notwithstanding this, the Highway Authority have scrutinised the traffic count data and has the following comments:

Shackstead Lane Roundabout - The developer's TA has recorded a higher number of vehicles using this junction in both the AM and PM peak hours.

Eashing Lane junction with A3100 – During the AM peak hour (when the junction is busiest) the impact of the roadworks on the A3100 have resulted in changes to traffic flows at this junction, with lower flows on the A3100 and higher flows on the Eashing Lane arm. The Highway Authority consider this scenario has occurred as a result of vehicles routing via Milford and Eashing Lane to avoid the road works on the A3100. It is important to note that the traffic flows recorded by both the Godalming Community (765 vehicles) and the Developer (722 vehicles) for vehicles heading towards Godalming Town Centre are very similar. It is therefore considered that the traffic data used by the developer to inform their traffic impact assessment is fit for purpose.

The Hollow/Eashing Lane – During the AM peak hour (when the junction is busiest), both the Godalming Community (107 vehicles) and the Developer (106 vehicles) have recorded almost identical traffic flows egressing The Hollow onto Eashing Lane. On Eashing Lane itself, the Godalming Community Survey has recorded 229 vehicles travelling northbound on Eashing Lane, compared to 183 vehicles recorded by the Developer. The Highway Authority considers this difference is likely due to the impact of the roadworks on the A3100, resulting in an increase in traffic routing to Godalming Town Centre via Eashing Lane. It should also

be noted that this junction experiences minimal queuing and delay during both the AM and PM peak hour, and the Highway Authority is therefore satisfied that the impact of development generated traffic at this junction would not be severe.

Traffic Impact on Local Highway Network

Section 9, Paragraph 109, of the National Planning Policy Framework states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. However, neither the National Planning Framework nor the National Planning Practice Guidance contain a definition of severe.

The reason for this is that it is up to the Highway Authority and Local Planning Authority to define 'severe' on a site specific basis. Congestion alone does not imply a severe impact as there are many junctions that experience congestion during periods of the day or at certain times of the year and this will continue to be the case in the future and is likely to get worse, particularly if the economy grows.

The Highway Authority does not consider that the residual cumulative impacts from this development on the road network would be severe. This conclusion has been reached by assessing a number of factors. As an example, details have been provided for how the Eashing Lane/A3100 junction and the Shackstead Lane Roundabout junction have been assessed:-

Eashing Lane/A3100 – AM Peak

- The number of additional traffic movements compared to the existing situation – it is estimated that the development will add 64 vehicle movements to this junction. This compares to 1,139 vehicles travelling through this junction across the AM peak.
- Average delay compared to the existing situation – The traffic model estimates an average increase of 10 seconds delay per vehicle in the busiest 15 minute period for the Eashing Lane arm of the junction (this includes both the Aaron's Hill development and other committed development).
- Queuing at this junction (in normal traffic conditions) clears relatively quickly after 09:00 and the junction continues to operate without queuing and delay for the rest of the day, with minimal queuing and delay at the junction during the PM peak period.

Shackstead Lane Roundabout – AM Peak

- The number of additional traffic movements compared to the existing situation – it is estimated that the development will add 57 vehicle movements to this junction. This compares to 1,331 vehicles travelling through this junction across the AM peak.
- Average delay compared to the existing situation – The traffic model estimates an average increase of 12 seconds delay per vehicle in the busiest 15 minute period on the Portsmouth Road arm of the junction. (this includes both the Aaron's Hill development and other committed development).
- During the busiest 15 minute period traffic associated with both Aaron's Hill and other committed development results in average queue length increasing by 8 vehicles on the Portsmouth Road arm of the junction.
- The junction clears relatively quickly after the AM peak and then operates in free flow conditions during the inter-peak period.

This assessment process has been undertaken for every junction within the traffic model, for both the AM and PM peak periods.

The evidence demonstrates that development generated traffic will have an impact on the local road network, and during the busiest AM peak period this will result in small increases to the delay and queuing experienced by drivers. However the Highway Authority does not consider that this level of impact could reasonably be considered a 'severe' impact, as defined by the NPPF.

The NPPF requires that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The Highway Authority has secured a comprehensive package of measures that aims to promote greater use of non-car modes of transport for future residents (and the existing community), but also deliver improvements at junctions that suffer congestion during peak periods. This includes upgrading of signalised junctions on the A3100 to improve journey time reliability and to increase capacity/improve safety at the Eashing Lane junction with the A283. The Highway Authority is satisfied that these improvements will cost effectively mitigate the impact of development generated traffic to an acceptable degree.

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