

**JOINT PLANNING COMMITTEE – 20 FEBRUARY 2019**  
**UPDATE SHEET**

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Correspondence received and matters arising following preparation of the agenda

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**WA/2018/1815**  
**LAND OPPOSITE MILFORD GOLF CLUB, STATION LANE, MILFORD**

Updates and amendments to the report

Page 13 – The contribution towards secondary education infrastructure is now sought towards a school with the Waverley Federation, not exclusively towards a project at Broadwater School at this time.

Page 45 – Firstly, in regard to the second paragraph the Council sought further clarification from the County Highways Authority on the matter of linking the development site with surrounding developments. The County Highway Authority has reviewed the current proposal and is satisfied that the proposed development would be satisfactory and provide a number of off site highways improvements which would benefit the local area and enhance pedestrian movement. The suggested link from the development to nearby land to the north-west will be addressed by way of an additional condition in the Committee update sheet to ensure that links to and from the development are explored in more detail prior to a Reserved Matters application being submitted. This would ensure that the applicant has explored the potential for such links and their implementation in sufficient detail to the satisfaction of officers.

The potential for improvement works to provide a better link to the railway station has been considered in the determination of the application. The Council has requested a further view from the County Highway Authority on this matter. The Highways Officer confirmed improvements to the width of the existing footway on the eastern side of Station Lane, between the southern boundary of the application site and Rake Lane would be beneficial to pedestrian movement and safety. , When the site was promoted for Local Plan Part 1, the County Council supported its inclusion as a strategic site, in part due to the benefits that this site could deliver by delivering a wider footway on the east side of Station Lane (by utilising land owned by the Golf Club).

Land Ownership consideration: The applicant is not the Golf Club; the new owner does not control the land on the east side of Station lane. The applicant has confirmed they are not able to undertake any improvements to this existing footway, as the land is owned by the Golf Club and outside of their control.

The Highways Officer is supportive of the package of works secured for Station Lane and considers that it will deliver significant improvements, both in terms of highway safety and promoting sustainable transport.

The delivery of additional improvements to provide the complete upgrade to the footpath (2m width) linking to the railway station is considered necessary to mitigate the potential impacts of the scheme. Officers believe that the complete pedestrian link can be delivered on the Golf Club land; the onus should be put back on the developer to provide this improved link. A Grampian planning condition is considered reasonable in this instance to require the applicant to demonstrate the required improvement is deliverable prior to the submission of the Reserved Matters application. If the footpath widening can not be secured then an application to remove the condition will need to be made and a satisfactory justification made at that time.

Pages 46-50 – Regarding the highways works as set out on pages 46-50 of the agenda report, the highway works on Station Lane will be delivered by the developer's contractor under a S278 agreement with the Highway Authority. The developer will have to submit detailed engineering drawings for approval by the Highway Authority. The scope of works at the Station Lane bridge will include both clearing the culvert under the bridge and improvements to surface water drainage on the carriageway.

The Highway Authority has confirmed that they are also aware of 'wet-spots' on Station Lane, particularly between the bridge and its junction with Rake Lane. This is caused by water being discharged from the golf club land on the east side of the carriageway directly onto the carriageway. The Highway Authority is in discussions with the Golf Club (separate from this planning application), to agree measures/works to stop this private surface water run-off into the highway. The Highway Authority has also confirmed that they will ensure that the scheme of S278 works on the full length of Station Lane between the bridge and Rake Lane will include improvements to existing highway drainage within the extent of the public highway i.e clearing out gullies and providing new gullies at identified 'wet-spots'.

In regard to section of Station Lane south of Springwood, to clarify, the footway widths would be as follows:

- Widening of footway south of Springwood to 2.0m for a distance of 10m up to Little Bargate's brick boundary wall;
- Existing footway width (1.0m-1.3m) retained adjacent to boundary wall for a distance of 27m (there is no highway land available to widen this stretch of footway);

- Footway widened to 2.0m between bridge and new zebra crossing located just to the north of the golf club's vehicle access;
- New 3.0m wide shared footway/cycleway provided adjacent to eastern boundary of application site between its northern and southern boundaries.

With regard to the proposed 30mph section, this will start just to the south of Rake Lake where the new zebra crossing is located, which will also form a new 30mph 'gate-way' feature.

Page 53 – The FRA Stretton Milford Report dates (May 18, 2<sup>nd</sup> addition) should refer to the 3<sup>rd</sup> addition of this report submitted in February 2019.

Page 75 – In regard to the test set out in Paragraph 55 of the Habitats regulations relating to the granting of a protected species licence. To clarify, Natural England as the relevant licencing body will apply these tests when determining a licence application. As per relevant and established case law it is not for Officers or members to carry out its own shadow assessment of this test when determining an application for planning permission. Officers have made Natural England aware of the presence of protected species on this site and have been provided with a copy of Surrey Wildlife Trust's response to this application. Natural England has not objected to this application and therefore it is considered reasonable for the Council to proceed on the basis that a licence is not unlikely to be granted if permission is approved.

An EIA screening opinion on this site has been attached at annex 1 of the update sheet.

### Responses from Consultees

#### Surrey County Council CIL Education Infrastructure

- The developer contribution requested for this development would be applied to a project at a school within The Waverley Federation to allow it to accommodate additional children in line with the forthcoming pupil demand.

#### Natural England

- Update to original response to amended a typo to state 'Thursley, Hankley and Frensham Commons SPA' instead of the 'Thames Heath Basin SPA'.
- Subject to the delivery of the SANG in line with the Management Plan (October 2018) and the addendum (11474\_R08b), and securing the conditions outlined in our response dated 24/01/2019, we agree with the conclusions of the draft Appropriate Assessment.

## Queries from Members

1. The SANG area, I estimate 20,000sqm of SANG area and Natural England are saying this is fine and then they say that they need 2.5 kilometres of Board walk which equates to a loss of seventy five per cent of the SANG area being deemed unusable. If this is the case H&S and Risk assessment of that area would deem it unsafe and cause risk to children, dogs and people, therefore the SANG would only be 5,000sqm. Please confirm.

The total site area is 13.28 ha (the application site which covers both east and west of station lane). Of this, 4.04 ha is SANG which leaves a balance of 9.24ha. The percentage split of the site is: 30.42% SANG, 69.58% development Site. Natural England are satisfied that the proposed SANG, including boardwalks is acceptable and satisfies the requirements of a SANG. The use of this area of the site, within flood zone 2 and 3 is considered to be water compatible development and acceptable in this location in regards to potential flood risk.

2. Please also confirm that none of the houses are to be built in flood zone 2

This application is for outline consent only with all matters reserved except access. As such, the layout and positioning of houses does not form part of the assessment of this application. The indicative layout, however, does not show built development falling within the defined flood zone 2 area of the site.

3. Can you please confirm that the EA have taken into consideration runoff from existing properties in this area and what they intend to do to improve the flows downstream and under roads and culverts to avoid flooding to others.

The proposed development would benefit from mitigation which would be permitted to ensure that the existing situation is not worsened. The Local Lead Flood Authority are satisfied with the proposed drainage and surface water run off schemes and are content with the proposed development subject to conditions.

4. Finally, can you please confirm that the Planning Inspector told WBC that if this piece of land was included in our Local Plan he would approve our Local Plan.

The proposed removal of the site from the Green Belt and its allocation as a strategic housing site was already in the Local Plan when we submitted it for Examination in December 2016. Therefore, it was not added at the request of the Inspector. However, in his report he did endorse the Council's approach. He said that it was a well chosen site and that its release from the Green Belt was justified by exceptional circumstances.

5. Clarification is sought regarding Condition 4 that the modelling files as well as being submitted in writing to LPA will be referred back to EA as statutory consultee?

The information required as per Condition 4 of the agenda report will require the Environment Agency to review as a statutory consultee.

## Queries from Witley Parish Council

### 1. Flood Risk Assessment

According to the Environment Agency, the Flood Risk Assessment has not yet been properly carried out or completed. The removal of their objection is heavily caveated and subject to the fulfilment of a number of technical requirements. What will happen if the full Flood Risk Assessment to be carried out at the reserved matters stage shows that there is a risk of increased flooding elsewhere? Can the Council categorically confirm that the Environment Agency will be consulted again at the reserved matters stage?

The Environment Agency is satisfied that the remaining climate change modelling can be controlled through condition to require this information to form part of a Reserved Matters application. The quantum of development is for up to 200 dwellings with layout reserved from this application, as such the Environment Agency are satisfied that, at this stage, sufficient controls are in place to ensure that the development of the site can be acceptable at a Reserved Matters stage. The layout and quantum of development in this respect can be lowered to ensure that development is located on less vulnerable parts of the site in regard to flooding. Officers are satisfied that the above concerns have been assessed by the competent authority on this matter.

### 2. Treatment of Foul Sewage

Planning permission was recently granted for 262 houses at Aaron's Hill. The WBC High Level Water Cycle Study 2016 shows that the Godalming sub-station is expecting to take another 472 dwellings. If permission is granted for 200 houses on this site will the Godalming sub-station be at capacity once Aaron's Hill and this site are completed?

Officers have raised the Parish Council's concerns with Thames Water. They have reviewed the comments and have advised they do not wish to withdraw or revise their existing comments on this application. Officers are satisfied that the above concerns have been assessed by the competent authority on this matter.

### 3. SANG

The Environment Agency have stated that in Flood Zone 3 the boardwalk will need to be raised to a height that is above the 1 in a 100 year flooding level to avoid the risk of man-made structures making any flooding more severe. How high is that? And is Natural England aware that the boardwalk will now be higher than planned, and therefore more costly to build, maintain and keep safe?

Natural England is satisfied that the proposed SANG will provide adequate mitigation in relation to Thursley, Hankley and Frensham Commons SPA. Natural England has previously raised questions with the applicant regarding the potential for flooding and the adequacy of the road crossing points during pre-application discussions. The design has been amended accordingly, and we consider that the design outlined in the SANG Management Plan (October 2018) satisfies these issues. Officers are

satisfied that the above concerns have been assessed by the competent authority on this matter.

#### 4. Traffic congestion at the Station Lane / Church Road junction

Can officers explain how the additional traffic from the large number of additional houses in the western part of the borough including Dunsfold have been taken into account in assessing the impact of this development on the Station Lane/Church Road junction and the Milford Crossroads?

The County Highways Authority have confirmed that the cumulative impact of development has been taken into account and that sufficient analysis has been carried out to ensure that the impact of this development would not generate a serve impact to the surrounding highways function or safety in line with the requirements of the NPPF.

#### 5. Education

We have noticed that a large capital contribution (£631K) has been allocated to Broadwater School but not to Rodborough School. Why is this?

Surrey County Council have now revised their response and have now advised that the contribution the Education Authority have now revised their justification to the following;

For this development, Surrey County Council would request a contribution of £630,893 towards secondary education infrastructure. The developer contribution requested for this development would be applied to a project at a school within The Waverley Federation to allow it to accommodate additional children in line with the forthcoming pupil demand.

Schools within the Waverley Federation are typically oversubscribed and therefore it is reasonable to assume that children from the development would apply for a place at these schools.

#### 6. CIL / S106

How much money would the developer have had to pay in CIL contributions, if this application had come forward after 1 March 2019?

CIL Calculation:

		1 Bed Flat	1 Bed Bungalow	2 Bed Flat	2 Bed House	3 Bed House	4 Bed House	5 Bed House
Market	No. Units	5	8	12	28	55	20	12
	CIL per unit	£18,984	£18,984	£29,606	£33,674	£42,036	£49,946	£53,788
	<b>Total CIL</b>	£94,920	£151,872	£355,272	£942,872	£2,311,980	£998,920	£645,456
Affordable	£0							
<b>Total</b>	<b>£5,501,292</b>							

### 7. Restrictive Covenant

While we understand that the issue of the restrictive covenant is not a matter for this committee, nevertheless it is a concern locally as currently we understand Mr and Mrs House are maintaining their objection to the removal of the restrictive covenant. Consequently as a Parish Council we have no idea when construction of this development will commence (and that is assuming the matter of the restrictive covenant can be resolved, which seems far from certain).

The Covenant on the land is not a material planning consideration which can be assessed as part of this application. The Covenant was taken into account as part of the Local Plan Part 1 inspection and was deemed to not prejudice the delivery of this site or the plan. As such, this can not be considered as part of this planning application.

#### Additional third party representations

CPRE have objected to this proposal on the following grounds;

- The Environment Agency has substituted its objection for conditions which is a much weaker protection for the statutory environmental concerns regarding the building on flood plains.
- This site is not required to meet the housing or employment need and Waverley should not implement the Inspectors decision to remove this site from the Green Belt.
- The site is not suitable or sustainable and there is no evidence that the site could be made sustainable.
- Station Lane is inadequate and congestion, especially over the narrow bridge, will be exacerbated, the Council or Applicant has not demonstrated what infrastructure is required and how the necessary infrastructure is ensured to be delivered.

- There is no evidence that the adjoining road system can safely accommodate the additional traffic generated by this development and how pedestrians will access the station and school safely.
- This application should be withdrawn until Local Plan Part 2 has been adopted to ensure it does not prejudice the plan making procedure and takes into consideration the need to identify further sites and assess the overall impacts of development on Milford.
- The proposed development is not required to meet the OAN housing requirement as set out in Local Plan Part 1.
- The proposed development does not accord with paragraph 17 of the NPPF taking proper account of protecting the Green Belt and the countryside.
- The development removed valued green space in Milford, the setting of a historic village and defies the principles of the Localism Act.

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

- The village can not sustain this amount of development.
- Station Lane and other surrounding roads/junctions can not handle this amount of traffic.
- There is insufficient infrastructure to support this proposal.
- The FRA report has been updated outside of the consultation period not allowing objectors, Officers of the Council or the Environment Agency adequate time to make representations to this amended information.
- Some objectors' comments have not been published on the website.

Response to additional representations:

The proposed development has been assessed against the development plan and the NPPF and complies with the principles of the Localism Act. The development is considered to provide sufficient infrastructure to mitigate potential harm which may arise from its implementation. The impacts to the locality have been thoroughly assessed and, subject to secured contributions and mitigation, would not cause detrimental harm to the area. Further comments regarding the amount of development, potential flood risks and the impact on the surrounding roads have been thoroughly addressed within the main agenda report.

The adopted Waverley Borough Local Plan has a housing requirement of 590 dwellings per annum. The removal of the Milford Golf Course site from the Green Belt and its allocation as a Strategic Housing site was included in the Waverley Borough Local Plan that was submitted for examination and endorsed by the Inspector in the examination. Given that the site has already been removed from the Green Belt and identified as a strategic housing site, there is no reason, in principle, why the development of the site should not proceed.



Reference has been made by CPRE to a potential lower housing requirement derived from the application of the latest population/household projections. If the Council were to seek to review its housing requirement, this would need to be through a review of the Local Plan itself. The approach to identifying the housing requirement in a new Local Plan would need to be in accordance with the latest (2018) NPPF and through the application of the new 'Standard Method' for identifying housing need. The Government has made it clear that it has concerns about the latest household projections. This is why it recently consulted on proposed updates to national policy and guidance. The Government proposal was that, pending a review of the Standard Method, the 2014-based projections should be used rather than the 2016-based projections as the starting point for assessing need. It was the 2014-based household projections that were used by the Local Plan Inspector in determining Waverley's Local Plan housing requirement. Therefore, for decision making purposes, the application should be determined in accordance with the development plan and only very limited weight should be afforded to the 2016 based projections.

The potential for the site to be delivered prematurely has been assessed on page 39 of the agenda report.

The impact on the nearby conservation area has been addressed on pages 58-61 of the agenda report.

The principle of development including the removal of the site from the Green Belt and allocation for housing has been set by Policy SS6 of the Local Plan Part 1 and the agenda report pages 32-40.

The amendments made to the FRA relates to para's; 3.3, 5.8-5.10, 6.13-6.14, 6.20, Table 7.1, and para 7.4. The amendments are technical in their nature and would not make material or significant amendments in relation to this application which would warrant the re-consultation of the application. Officers and the Environment Agency have considered the further information in adequate detail and are satisfied with this.

#### Changes to existing conditions

Condition 20 is updated to read:

- 1) The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:
  - a) Evidence that the proposed solution will effectively manage the 1 in 30 & 1 in 100 (+40%) allowance for climate change storm events

and 10% allowance for urban creep, during all stages of the development (Pre, Post and during), associated discharge rates and storage volumes shall be provided using a maximum discharge rate of 16.5l/s.

- b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).
- c) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.
- d) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- e) Evidence that the Station Lane culvert has been cleared to enable the free flowing of water in the River Ock.
- f) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected.

**Reason:**

To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site, in accordance with Policy CC4 of the Local Plan Part 1 (2018) and paragraph 103 of the NPPF.

Additional conditions/informatives

**Condition**

Prior to the submission of a Reserved Matters application details shall be first submitted to and approved in writing by the Local Planning Authority of a proposed scheme for a continuous pedestrian/cycle link to link the development to the surrounding land to the west of the site. The development shall be carried out in accordance with the approved details.

**Reason**

In order to deliver sustainable transport measures and accord with Policy SS6 of the Local Plan Part 1 (2018) and the NPPF.

**Condition**

Prior to the submission of a Reserved Matters application details shall be first submitted to and approved in writing by the Local Planning Authority of a proposed scheme for a continuous pedestrian/cycle link to Milford railway station along Station Lane, including the widening of the pavement along the east side of Station Lane. The development shall be carried out in accordance with the approved details.

## Reason

In order to deliver sustainable transport measures and accord with Policy SS6 of the Local Plan Part 1 (2018) and the NPPF.

### **Revised recommendation**

Recommendation A is amended to the following, recommendations B and C remain as set out in the Committee report:

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 affordable housing mix, education infrastructure, SuDS management/maintenance, public open space and play space provision and maintenance, highways improvements, environmental improvements contribution, travel plan, car club, leisure and green space areas, environmental enhancements, waste and recycling facilities, and provision and maintenance of an on-site SANG; **and subject to conditions 1-44 (with the amendment to condition 20) the two additional conditions noted in the update sheet and informatives 1-15, outline permission be GRANTED.**

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# ANNEXE 1

## Request for Screening Opinion under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Proposal: Screening Opinion

<b>Date of initial request:</b>	N/A
<b>Further information received:</b>	N/A
<b>Request acknowledged:</b>	N/A
<b>Deadline for response:</b>	19/02/2019

### Recommendation & Key Reasons

The proposed scheme is an outline application for residential development of up to 200 dwellings. The proposed development does exceed the relevant thresholds stated in Schedule 2 of the EIA Regulations. These areas have been addressed in line with the EIA Regulations and Government guidance and it has been concluded that likely significant effects would not occur. It is therefore recommended that the proposed scheme does not constitute EIA development.

The proposal is considered to fall within EIA Regulations, Schedule 2 paragraph 10 (b) (ii) and (iii).

The proposed scheme exceeds the relevant thresholds given in Schedule 2 of the EIA Regulations for urban development as the development exceeds 150 dwellings and the overall area of the development exceeds 5 hectares.

The proposed scheme does exceed relevant threshold (i – site area exceeds 5 hectares) for urban development projects set out in the indicative screening thresholds given in the official guidance on EIA (NPPG) in the Government's Environmental Impact Assessment Annex. However, the scheme would not exceed relevant thresholds: (ii) it does not provide more than 10,000m<sup>2</sup> of commercial floorspace, and (iii) it would not have significant urbanising effects in a previously non-urbanised area (e.g. it does not comprise a new development of more than 1,000 dwellings).

<b>Principal party to be notified:</b>	Satplan Ltd
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Description of the proposal

### Physical development

The proposed scheme is an outline application for residential development of up to 200 dwellings.

### Location of proposal

The site covers 13.28ha. The application site is an irregular shape which has a developable area measuring approximately 10.92 hectares. It is located on the eastern fringe of the defined settlement of Milford, to the west of Station Road and formally part of Milford Golf Course. The site is bounded to the north and west by a row of thick vegetation and a small river. Station Road runs down the eastern boundary and mature trees bound the site to the south.

The rural settlement of Milford is located to the north and east of the proposed development site, with residential dwellings set back from the site boundaries south of church Road and east of Petworth Road. There are no public rights of way across the site; however there is a public footpath along Station Road.

### Considerations against Schedule 1 and Schedule 2 of the EIA Regulations

Is the proposal listed in Schedule 1?

The scheme would not involve a form of development listed in Schedule 1.

Is the proposal listed in Schedule 2?

With reference to the National Planning Policy Guidance (NPPG) 2014 the proposal is considered to fall within EIA Regulations, Schedule 2 paragraph 10(b) urban development project.

Does the proposal exceed the relevant thresholds given in the EIA regulations?

The proposed scheme exceeds the relevant thresholds given in Schedule 2 of the EIA Regulations for urban development projects (10b), as the proposal would exceed 5 hectares and would provide for more than 150 dwellings.

Does the proposal exceed the relevant thresholds given in the official guidance on EIA (NPPG)?

The proposal would exceed the relevant threshold (i) of a site area greater than 5 hectares.

The proposal would not provide a total of more than 10,000m<sup>2</sup> of new commercial floorspace, so would not exceed threshold (ii).

The proposal would not comprise development which would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings), so would not exceed threshold (iii).

Is the proposal in or adjacent to a sensitive area as defined in Schedule 2 of the EIA Regulations?

The application site does not fall within a sensitive area. However, it does fall within the 5km Buffer Zone of the Wealden Heaths I SPA and within the 2km Buffer Zone of the Wealden Heaths I SAC.

Is the proposal in or within 2.5km of a site designated under the Birds Directive (SPA) the Habitats Directive (SAC) or the Ramsar Convention?

The site is located approximately 1km from the Thursley, Hankley and Frensham Common (Wealden Heaths I SPA). The site is also located approximately 1km from the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC). The Thursley and Ockley Bogs RAMSAR is located 3.1km to the west of the site.

In light of the distances, it is considered that an Appropriate Assessment under the Habitats Regulations is required.

Is the proposal in or adjacent to other potentially sensitive areas, such as local designations, protected species, contaminated land, etc.?

An area of the site (to the north) is classed as Potentially Contaminated Land.

The Rodborough Nature Reserve is approximately 1km to the west of the site.

At its closest point, a Site of Nature Conservation Importance lies approximately 125m to the south of the site.

#### Screening Checklist for Schedule 2 Projects (from EIA Regulations Schedule 3)

##### Characteristics of the proposed scheme

Screening Criteria	Would the size of the proposed scheme be in keeping with the context in which it would be located
Scheme characteristics	
The development site is located on an area of land adjacent to the developed area of Milford, the site has been allocated for development, removed from the Green Belt but remains within AGLV (a locally designated area of great landscape value) and identified as part of the settlement of Milford. The development will be focused to the	

area of the site currently used as a golf course and the SANG located to the wooded areas to the north and west of the site. The existing landscaping buffers to the edges of the site will remain, the site is not within an AONB.

The character of the existing land will alter due to the introduction of built form. However, in the context of the site adjacent to the developed area of Milford, the proposal is not considered to be significant when viewed in context.

**Characteristics of potential impacts**

No significant impacts in EIA terms are anticipated.

Screening Criteria	Would the proposed scheme cumulate with other development?
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**Scheme characteristics**

The following permission relates to a site which exceeds 5 hectares, and would therefore comprise schedule 2 development:

WA/2012/1592 – Milford Hospital, Tuesley Lane, Godalming Outline application for demolition of existing buildings and redevelopment of land to provide 104 new (Class C3) residential units, works to 12 existing residential units (The Crescent), works to Allison House and staff cottages to provide 4 (Class C3) residential units, access and diversion of Public Footpath 161, Busbridge.

\* This scheme was built out subsequent to reserved matters approval under

The following permission relates to a site which exceeds 5 hectares, and would therefore comprise schedule 2 development:

WA/2018/1239 - 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 including informal and formal open space, internal road network, landscape enhancement and access; following demolition of existing buildings (as amended by plans received 02/11/18) at Ockford Wood Farm, No.19 and No.21 Aarons Hill.

\*The application was approved by members at a joint planning committee on the 9<sup>th</sup> January 2019. A screening opinion was carried out on this development and an EIA not required.

There are other major development proposals within close proximity of the application site which, whilst they are in themselves not Schedule 2 development, should nevertheless be considered:

CR/2018/0007 - Westbrook Mills, Borough Road, Godalming Prior Notification Application G.P.D.O. Part 3, Class O - Change of use from Use Class B1a (office) to Use Class C3 (residential) use to provide 128 dwellings

\* This follows previous prior notification applications and an appeal decision, all for less than 100 units.

WA/2014/0932 – Land at Ockford Ridge, Godalming Hybrid Planning Application

under Regulation 3 of the Town and Country Planning General Regulations 1992 for the erection of 99 dwellings following demolition of 65 dwellings and associated works comprising a Full Planning Application for Phase 1 (Site D) for 16 dwellings and Outline Planning Permission for Phase 2 (Sites A, B and C) for 83 dwellings with appearance, landscaping, layout and scale matters reserved for future consideration (as amended by plans received 09/07/2014).

None of the abovementioned development proposals comprise significant extensions to the developed area; they are all seen within the context of surrounding built form which would not be seen to result in the context of this particular site. There would not be an accumulation of developments given the spatial disparity and cumulative impact of the abovementioned development proposals in relation to the current scheme.

It is also noted that a high level EIA has been undertaken as part of Local Plan Part 1 which allocated this site as a strategic housing allocation.

**Characteristics of potential impacts**

No significant impacts in EIA terms are anticipated

Screening Criteria	Would the proposed scheme involve the use of natural resources?
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**Scheme characteristics**

It is considered that the proposal would not result in the loss of soil, land, water or biodiversity.

**Characteristics of potential impacts**

No significant impacts in EIA terms are anticipated

Screening Criteria	Would the proposed scheme produce large volumes of hazardous types of wastes?
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**Scheme characteristics**

It is considered that the proposal would not produce large volumes of hazardous waste.

**Characteristics of potential impacts**

No significant impacts in EIA terms are anticipated

Screening Criteria	Would the proposed scheme have the capacity to give rise to pollution or nuisance?
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**Scheme characteristics**

It is not anticipated that the development would have the capacity to give rise to pollution or nuisance in the long term. There would be likely short term impacts during the construction and operational phases of the development; however, these would be transient and not of a significant scale. Further, such impacts would be controlled by a Construction Environmental Management Plan.

**Characteristics of potential impacts**

No significant impacts in EIA terms are anticipated



Screening Criteria	Would the proposed scheme present risks of accidents?
Scheme Characteristics	
The proposal would not involve any dealings with hazardous material or substances. Further, effective site management should deal with any risks during the construction process.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

#### Sensitivity of proposed location

Screening Criteria	Would the proposed scheme be compatible with existing land use at the intended site and adjacent areas?
Scheme characteristics	
The existing site comprises an existing golf course which has altered the landscape of the site from its original state. The proposal would introduce residential development into this area and, as such, there would be an inherent material change of use of the land. However, the site is adjacent to existing residential built form and would be conducive to the pattern of development from Milford Village area. It is considered that the proposed scheme would therefore be compatible with the surrounding land uses.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the relative abundance, quality & regenerative capacity of the area's natural resources?
Scheme characteristics	
The scheme would introduce residential development into the area and would include the removal of the existing golf course paraphernalia and associated man made landscaping. It is anticipated that the scheme would not result in any material impact on the abundance, quality and regenerative capacity of the area's natural resources.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any wetlands?
Scheme characteristics	
No	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any woodland areas?
Scheme characteristics	
The site is not within close proximity to adjacent to Ancient Woodland. The nearest Ancient Woodland is in excess of 400 metres away and any proposed development is unlikely to cause material harm.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any nature reserves or parks?
Scheme characteristics	
No	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposal scheme have implications for the integrity of any Site of Special Scientific Interest (SSSI)?
Scheme characteristics	
At its closest point, the site is located approximately 0.9km from Thursley, Hankley and Frensham Common SSSI the and 1km from the Charterhouse to Eashing SSSI. There are additional SSSIs located at greater distances from the site. Given this distance, it is considered that the scheme would not have any material impact on the integrity of the SSSI.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any Special Protection Area (SPA) &/or Ramsar site?
Scheme characteristics	
At its closest point, the site is located approximately 0.3km from the Charterhouse to Eashing SSSI. There are additional SSSIs located at greater distances from the site. Given this distance, it is considered that the scheme would not have any material impact on the integrity of the SSSI.	
The site is located approximately 973m from the Thursley, Hankley and Frensham Common (Wealden Heaths Phase I SPA). The Thursley and Ockley Bogs Ramsar is located 3.1km to the south west of the site.	
Any likely harm to these areas would need to be avoided or mitigated.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any Special Area of Conservation (SAC)?
Scheme characteristics	
The site is also located approximately 973m from the Thursley, Ash Pirbright and	

Chobham Special Area of Conservation (SAC).
Any likely harm to this area would need to be avoided or mitigated.
Characteristics of potential impacts
No significant impacts in EIA terms are anticipated

Screening Criteria	Would the proposed scheme have implications for any areas where environmental quality standards are already exceeded?
Scheme characteristics	
No	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for any densely populated areas?
Scheme characteristics	
The proposed development is located adjacent to the village of Milford. It is considered that the proposed scheme would not result in any material implications for the populated area.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Screening Criteria	Would the proposed scheme have implications for the integrity of any landscapes of historical, cultural or archaeological significance?
Scheme characteristics	
The site is located to the south of the Milford Conservation Area. The site is sufficiently separated from this to ensure that there would be no significant effects on the integrity of this heritage assets. The development would not have a significant impact to the landscape of historical, cultural or archaeological area of significance.	
Characteristics of potential impacts	
No significant impacts in EIA terms are anticipated	

Considerations of possible impacts on the environment & human population

Issue	Comments	Significance of risks
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Risks to the environment
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Air quality	Low/High significance
The site is not located within an AQMA. Notwithstanding this, any likely impact on air quality would be transient and short term during the construction process. Any likely impact could be controlled by a Construction Environmental Management Plan.	

Archaeology & historic environment	Low/High significance
Previous investigative work was undertaken in relation to this site which identified no significant aetiological significance. It is not anticipated that the scheme would result in any material effect on archaeological remains or the historic environment.	

Climate change	Low/High significance
Having regard to the location of the site, adjacent to existing residential built form, it is considered that there would be no material effects with regard to climate change.	

Ecology	Low/High significance
Relevant ecological surveys would be required to be undertaken, having regard to the open nature of the site at present and the demolition of a small number of existing buildings. Any likely impact could be controlled by agreed working practices, mitigation and enhancement measures.	

Geology & soils	Low/High significance
It is considered that any impact to ground levels and hydrology of the site would be likely contained to the site and there would be no resultant wider material impact.	

Hydrology & hydrogeology	Low/High significance
Given that the proposed development site located adjacent to the developed area of Milford, and due to the residential context of the wider site, there is likely to be no undue harm to the urban environment.	

Landscape	Low/High significance
Whilst the site falls within the AGLV, the site falls outside of the AONB and has been removed from the Green Belt through Local Plan Part 1 (2018). It is anticipated that the scheme would not result in any materially harmful impacts on the wider landscape.	

Urban Environment	Low/High significance
Given that the proposed development site located adjacent to the developed area of Milford, and due to the residential context of the wider site, there is likely to be no undue harm to the urban environment.	

Risks to the human population

Traffic	Low/High significance
Owing to the nature of the proposed scheme, there would be an increase in traffic levels within the vicinity. However, it is not anticipated that the scale of this increase	

would be so significant as to result in a material risk to the human population.

RECOMMENDATION: An EIA is not required in relation to this site.

## ANNEXE 2

### Surrey County Council's Response to Motion's Review of the Transport Assessment for Proposed Development at Milford Golf Club

1. Baseline Traffic Surveys - Motion have undertaken their own traffic counts on Station Lane and Portsmouth Road. The flows recorded by Motion identify that traffic flows through the junctions may be between 2% and 8% higher than the flows used for the applicant's transport consultant. This level of increase is within typical day-to-day variation and Motion conclude that this would not create significant impact on the baseline traffic modelling analysis. The baseline traffic survey data presented in the applicant's transport assessment is therefore robust.

2. Proposed Development Trip Generation – Motion have reviewed the vehicle trip rates in the applicant's Transport Assessment. Motion's report concludes that the vehicle trip rates used by the applicant are in line with the expected rates for typical residential development.

3. Queue Length Surveys – The Highway Authority has received and assessed queue length data provided by the applicant, which have been compared to the mean maximum queues presented in the Transport Assessment. The Highway Authority is satisfied that the predicted queues in the baseline models are generally in line with the observed queues. The baseline traffic models are therefore fit for purpose in terms of assessing the impact of development generated traffic and background traffic growth (including committed development).

4. Visibility Splays – The Highway Authority's assessment has included a site visit to check that the 2.4m x 120m visibility splays at the proposed site access can be achieved. The Highway Authority is satisfied that the visibility splays can be provided and thereafter permanently maintained.

5. Impact of Dunsfold Park Development Traffic – The Highway Authority advise that the applicant's transport model includes a 2024 future year assessment, which accounts for traffic growth from committed development, including at Dunsfold Park. The model for this scenario shows that the Station Lane priority junction with Church Road and the Portsmouth Road mini-roundabout junction is approaching theoretical capacity. The Highway Authority have therefore secured the following junction capacity improvements:

- Enhancements to the eastern and western carriageway lane widths at the Portsmouth Road mini-roundabout junction, to increase stacking space for vehicles turning left and right.
- On the Station Lane approach to the Church Road junction the carriageway has been widened to provide extended left and right hand turning lanes, between the give-way road marking going back to the entrance to the car park.

These improvements have been included in the future year (2024) traffic model, and demonstrate a small reduction in delay due to the formation of the longer dedicated

left and right turning lanes, resulting in a material improvement to the flow of traffic through each junction. 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. 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 evidence from the traffic modelling shows that the improvements at the Station Lane/Church Road junction and the Portsmouth Road mini-roundabout would cost effectively mitigate the impact of development generated traffic, therefore the Highway Authority does not consider that the residual cumulative impacts from this development on the road network would be severe.

6. Construction Traffic – The Highway Authority have recommend a condition requiring a Construction Transport Management Plan to be submitted prior to commencement of the development. This document will secure traffic management measures to ensure construction traffic, particularly HGVs, do not detriment highway safety. The strategy will also secure an approved route to the site for all construction traffic and restrict the movement of construction traffic to outside of the AM and PM peak hours.

7. Priority Give-Way Scheme over Station Lane Bridge – These proposals have been subject to an independent Road Safety Audit, which has not identified any highway safety problems with this scheme. Vehicles travelling north will have to give-way to traffic coming south from Church Road. The proposals do not reduce the width of the carriageway on either side of the bridge. The Highway Authority is satisfied that the proposal will not have any material impact on traffic flow on Station Lane or increase queuing and delay on Station Lane during peak periods.

8. HGV movements – The Highway Authority's own traffic count data shows that the average number of weekday two-way HGV movements on Station Lane within the vicinity of the proposed site access is 69. The average number of weekday two-way movements for all vehicles is 5,248. The proportion of HGV traffic on Station Lane is therefore very small at 1.3%. The proposed development will not result in any material increase in HGV traffic on Station Lane.

9. Road Safety Audit – The Highway Authority has assessed the Personal Injury Accident (PIA) records on the highway network within the vicinity of the site for the last 5 years (2014-2018). Two slight accidents have occurred on Station Lane within the last 5 years, both resulting from driver error. There is no history of accidents on Station Lane involving HGVs or school children. There is a small cluster of PIAs classified as 'slight' on Church Road and Portsmouth Road. These accidents resulted from vehicles coming into conflict with pedestrians crossing these roads. The Highway Authority have therefore secured improvements to pedestrian crossing provision on Portsmouth Road and Church Road, to provide safer crossing provision.

10. Pedestrian Access – The Highway Authority agree with Motion that there is regular pedestrian activity on Station Lane. The proposed development would increase walking and cycling trips on Station lane, both to the south towards the railway station and to the north towards the centre of Milford. It is recognised that the existing environment for pedestrians and cyclist is sub-standard, therefore the following extensive package of infrastructure improvements would be provided. The Highway Authority is satisfied that this package of works will both improve safety on Station Lane and maximise opportunities for people to travel by sustainable modes of transport;



- A new shuttle working traffic arrangement over the Station Lane Bridge, allowing the existing footway on the eastern side of the carriageway to be widened to 2.0m.
- Widening of the existing footway to 2.0m on the eastern side of Station Lane between the road bridge and the golf club access.
- Two new pedestrian crossings on Station Lane between the road bridge and the existing golf club access, connecting to a new 3.0m wide shared footpath for pedestrians and cyclists on the eastern boundary of the site, parallel with Station Lane.
- New crossing with pedestrian refuge on Station Lane adjacent to the south-eastern corner of the site, providing a connection between the site and the existing footway on the eastern side of Station Lane.
- Zebra crossing on Station Lane adjacent to Rake Lane.
- Traffic calming measures, in the form of speed cushions and road tables, at regular intervals on Station lane, to reduce vehicle speeds and enable the reduction of the speed limit from 40mph to 30mph.

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