

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.