

18/06215/FUL

Consultations and Notification Responses

Ward Councillor Preliminary Comments

Councillor Richard Scott

Initial Comments: Given the substantial public interest in this application, I should like the application to be taken to the full planning committee at Wycombe Council for a decision, rather than it be decided by delegated decision.

Further Comments: I have noted the further objections to this application and its recent amendments, together with the response from Marlow Rugby Club, particularly with respect to their Cotswold Transport Planning reply to BCC Highways.

Before commenting further, I should like to see the BCC response to the Cotswold Transport Planning report as it does not appear to address all the issues raised in the BCC report dated 9 July 2018.

I am in regular contact with the Planning Officer at Wycombe District Council and remind all those who have commented on this application that I have requested that it be referred to the full planning committee of the Council for a decision, should Officers be minded to recommend its approval.

Final Comments: I note that BCC have now formally submitted their comments on this application. Its objections relate to three areas; namely safe pedestrian crossing of Gossmore Lane, provision of lighting to footways and inadequate travel plan. I am however concerned that there has been no objection to the use of the local highway network, which was the main concern of residents.

Given the BCC comments and the substantial number of objections from residents, I repeat my earlier request, that if Officers are minded to approve this application, it should be referred to the full planning committee for a decision.

Parish/Town Council Comments/Internal and External Consultees

Marlow Town Council

Initial Comments: No objection in principle subject to Highways assessment on the impact of traffic on residential roads.

Additional Comments: No objection - subject to Highways approval

Control of Pollution Environmental Health

Comments: I have no objection to this application.

Rights of Way and Access

Final Comments: With reference to Drawing SK04 (Rev E), into which I was copied by email on 10th October 2019 from Mike Fuller, Cotswold Transport Planning, I can confirm the amendments now address all my previous concerns regarding the application. I am content there will be no negative impacts on walkers using the public footpath through the site.

The Ramblers Association

Comments: No comments received

Buckinghamshire County Council (Non Major SuDS)

Initial Comments: Holding objection due to lack of supporting evidence.

Further Comments: LLFA has no objection to the proposed development subject to conditions.

The applicant is proposing to utilise permeable paving; in the form of gravel within the parking bays to manage the surface water generated by the impermeable surfaces for the access road. We would

like to make the LPA aware that the site is at risk of flooding from fluvial, groundwater, and surface water sources. However, due to the nature of the proposed development, the flooding will reduce the usability of the car park. It should be noted that car parks are not included within the flood risk vulnerability classification within the National Planning Policy Framework, furthering the LLFA's opinion that the risk of flooding to this car park is not of great concern.

Currently the site consists of impermeable asphalt and made ground with no positive drainage system. The LLFA are of the opinion that the proposed system will provide betterment to the existing development and lack of formal surface water drainage system.

Environment Agency (south-east)

Comments: We have reviewed the information submitted and we have no objections to the proposal on flood risk grounds. We consider that planning permission could be granted to the proposed development submitted subject to a condition that it be carried out in accordance with the Flood Risk Assessment provided.

Town Planning Team Network Rail

Comments: No objections in principle subject to conditions related to asset protection due to the proposal being next to Network Rail land.

County Highway Authority

Initial Comments (dated 09.07.18): The site gains access onto Gossmore Lane adjacent to the junction with Riverwoods Drive. Gossmore Lane is an unclassified predominantly residential road, with no parking or waiting restrictions in place. The road benefits from a pedestrian footway to one side of the carriageway, but does not benefit from street lighting.

The application proposes the change of use of the land used as an ancillary car park for Marlow Rugby Club to allow employees of the Globe Business Park to use the car park between Monday to Friday 8am – 6pm retaining sole use of the car park for club members outside of these hours. New cycle parking is also proposed as a part of the application, and the car park is to be resurfaced and formalised.

The applicant has previously engaged in a scoping discussion with the Highway Authority, and has submitted to me comments given by my colleague, Melanie Radley. The applicant has not provided information suggesting that a full pre-application response was requested or issued, and the Highway Authority has no record of a pre-application response having been issued.

In the submitted Planning Statement and Transport Statement, the applicant has given a figure of two hundred and forty existing parking spaces and a proposal of one hundred and thirty three parking spaces. However the area annotated as provision for five coaches covers twenty nine regular parking spaces that are currently demonstrated, therefore parking provision will be reduced to one hundred and four spaces if the proposed coach area is occupied.

The Highway Authority does not accept double counted parking spaces and, given the likelihood of the use of coaches, would consider the parking provision to be one hundred and four spaces with five coach spaces. The current proposals are therefore considered to constitute a significant reduction in parking provision within the site, to which the Highway Authority objects.

This applicant could attempt to overcome the objection by way of parking beat surveys of the site and the highway network within eight hundred metres of the site during peak hours of usage, these peak times should first be agreed with the Highway Authority. Parking beat surveys would have to be carried out to determine the current level of parking requirement of the site at these times and therefore whether a reduced level of parking provision could continue to serve the site without displacing parking spaces onto the highway.

The parking beat surveys should also extend over the footway crossing of the railway and must include supporting site photos for all areas surveyed. I note that should the parking beat surveys

demonstrate that the proposed development will displace parking onto the local highway network, the Highway Authority would likely maintain the above objection.

The subsequent comments are provided on the basis of what further information would be required should the objection on displaced parking be overcome by way of the requested additional information.

Whilst an outline area for coach parking has been demonstrated upon the plans, the Highway Authority requires each space to be demonstrated to exact dimensions of 15 x 5 metres. Further, the access to the proposed coach area is restricted. I request that the applicant provide scale plans with swept path analysis demonstrating access to each coach parking space and the required manoeuvring space for the coaches to both access and egress the site in a forward gear.

Whilst the applicant has stated that the vehicular trips are currently already on the network their position is that there would be no impact resulting from rerouting the vehicular trips, the Highway Authority considers the rerouting of the vehicles and trips to have a material impact upon both the previous and the new routes involved. The Highway Authority considers the rerouting of vehicles to require assessment due to the material impacts upon the free flow, capacity, and potentially highway safety of the parts of the highway network that have increased vehicular movements.

I note that should the applicant be required to provide a higher number of parking spaces than currently proposed in order to prevent parking being displaced onto the publically maintained highway, further analysis of the highway network could be required. Specifically, analysis would include junction analysis of the Station Road, Glade Road, and Lock Road junction and the Little Marlow Road (A4155) and Glade Road junction both at AM and PM peaks.

I further note that Lock Road, Glade Road, Dedmere Road, and Little Marlow Road (A4155) do not appear to have been assessed by the applicant in Section Two of the Transport Statement on the site location and Local Highway Network. All of these roads are likely to be affected to some degree by the proposed development, with Lock Road being one of the most likely roads to experience impacts resulting from the proposed application.

The applicant has stated that individuals who are both club members and employees at Globe Business Park already utilise parking at this site during weekdays. The applicant has submitted that between eighty to ninety individuals, stated to be mostly associated with Whistl, currently use the car park on weekdays during work hours. Having carried out a site visit and observed the parking on-site during weekdays, I concur that there is weekday parking existing on site, though as to whether the situation is considered to be permitted in line with the current use of the site is a matter to be determined by the Local Planning Authority.

Should this use of the car park be considered permitted, more exact figures should be provided in order to accurately assess the impact of the proposed development with regards to the additional vehicular movements generated and the number of parking spaces that the site would provide to accommodate spaces proposed to be removed from the publically maintained highway.

The Highway Authority agrees that the applicant should also create a detailed parking management plan to be secured by way of condition in order to manage the parking within the site curtilage should the other highway issues be overcome by the applicant. The applicant has currently proposed no restriction on club member parking, and should the number of club members parking on-site during working hours increase, less spaces will be available for paying customers from the Globe Business Park. This could result in a lack of capacity on-site, and the associated issues of vehicles accessing and egressing the site when they cannot find spaces, resulting in searching for a parking space upon the local highway network.

The Highway Authority maintains the requirement for a Travel Plan for the proposed development as the club is stated to be reducing the parking provision on site for its existing use, therefore substantially rearranged provision for various modes of transport. Whilst Marlow Rugby Club cannot

impose travel plans upon the Globe Business Park site, a Travel Plan should cover the use of the rugby club's car park. The Travel Plan should include measures to ensure that low occupancy private vehicle travel is not made disproportionately more convenient when compared to other more sustainable modes of transport as this would have the effect of encouraging additional low occupancy private vehicle usage.

One possible measure would be to include appropriate pricing of parking spaces with potential to provide discounts for vehicles carrying multiple occupants in order to promote ride sharing and higher occupancy rates for private vehicles.

Given the above, should the other issues be overcome, a travel plan is required by the proposed development with appropriate measures to promote the most sustainable travel possible. This is considered to be an important component for managing the impact of, and promoting the most sustainable uses of the proposed development.

No measures for ensuring sustainable development are included within the application's submissions besides the case for economic sustainability through providing additional parking for Globe Business Park. However the current existing parking reduces the potential benefit of the development as between eighty to ninety of the proposed spaces are already occupied and only between forty to fifty spaces would be created as a result of this planning application.

Reference is made to the reduced likelihood of employees of Globe Business Park using their vehicles for short trips during the day, but is a factor considered to apply by virtue of the position of the site rather than as an active measure proposed to be adopted by the applicant.

Point 3.12 of the Transport Statement appears to provide insufficient information on rail links between Maidenhead and Marlow. Having accessed the National Rail website I have found that for Tuesday 3rd July 2018, morning trains are available approximately every half hour between Maidenhead and Marlow, reducing to an hourly service after 0831. The trip between Maidenhead and Marlow occasionally involves one change, but the morning service takes either twenty two or twenty three minutes. Included within this trip time is the time taken between Bourne End and Marlow, which is approximately seven minutes.

Given the trip times to Maidenhead and half hourly service at peak times, it would appear to be a viable mode of transport from at least Maidenhead, rather than Bourne End. Further travel is potentially possible, I note that at peak AM times on weekdays, the service from Slough station to Marlow station, whilst requiring two changes, is given a travel time of between thirty five and forty two minutes.

There is no right of way over the rail tracks between Gossmore Lane and Fieldhouse Lane. Given this lack of a public right of way, and in light of recent closures of pedestrian level crossings across Buckinghamshire, the Highway Authority cannot consider this to be a guaranteed pedestrian route. Due to the lack of a public right of way, despite their current stated position, Network Rail could close this pedestrian rail crossing at any time. This however does not present a highway safety issue, rather the issue would be a lack of adequate pedestrian access between the site and Globe Business Park.

Until such a time as the pedestrian crossing is closed, the likely pedestrian route to access Globe Business Park from the application site is via the pedestrian rail crossing. This route also includes crossing Gossmore Lane at a point of limited forward visibility adjacent to the pedestrian rail crossing. This has the potential to create an unsafe situation upon the highway including collisions between highway vehicles and between highway vehicles and pedestrians. Mindful of this, a Highway Safety Audit should be carried out to determine whether measures will be required to accommodate the increased pedestrian traffic at this potentially dangerous pedestrian crossing point.

The applicant has offered financial contributions for Traffic Regulation Order measures to ensure that areas of inappropriate on-street parking will not fill up again once existing demand in these areas

shifts to Marlow Rugby Club's car park. The applicant has not confirmed the extent of these proposals and I request clarification of such matters.

In addition, the development in itself is considered likely to impact the highway within the vicinity of its site entrance. The highway is required to be free of obstructions such as on street parking in order to maintain operation of the highway should any issues arise. For example an issue obstructing the site gates, as the highway terminates at Marlow Rugby Club and Riverwoods Drive highway vehicles would be required to turn upon the highway and travel back along Gossmore Lane in order to prevent stacking upon the highway.

Given the likely impact of the development, double yellow lines on both sides of the carriageway between the site entrance and a point ten metres past the corner on Gossmore Lane, adjacent to the railway pedestrian crossing, should be provided by the applicant. Proposals should take into account the extent of double yellow lines currently planned by Transport for Buckinghamshire around the corner of Gossmore Lane adjacent to the railway pedestrian crossing. This Traffic Regulation Order by Transport for Buckinghamshire will likely be put in place before the commencement of development for this proposed application.

Given the lack of on-street lighting along Gossmore Lane between the site entrance and the pedestrian crossing of the railway, the applicant would need to propose on-street lighting to ensure that the full highway route is lit. During the winter, the proposed operating hours will fall within hours of darkness. The Highway Authority would therefore require any such proposed pedestrian route to be served by street lighting for reasons of highway safety and security.

Mindful of the above comments, whilst the Highway Authority objects to the stated reduced parking provision within the site curtilage, I do not believe that there is sufficient information for me to provide a substantive response to this application at this time. I therefore reserve my final comments until such a time as the applicant has provided the requested additional information.

Further Comments (dated 02.05.19): Thank you for your letter dated 5th December 2019 regarding the proposed development at the above location.

The site gains access onto Gossmore Lane adjacent to the junction with Riverwoods Drive. Gossmore Lane is an unclassified predominantly residential road, with no parking or waiting restrictions in place. The road benefits from a pedestrian footway to one side of the carriageway, but does not benefit from street lighting.

The Highway Authority has previously responded to this application requesting additional information as it was considered that insufficient information had been provided for the Highway Authority to provide a substantive response to the proposals.

Additional information was requested in the form of proposals of additional double yellow line parking and waiting restrictions along the corner of Gossmore Lane adjacent to the railway crossing, assessment of the pedestrian route between the application site and Globe Business Park, and a proposal of street lighting along Gossmore Lane between the railway crossing and the site. Subsequent comments by the Highway Authority also requested creation of a travel plan, and of a parking management plan, and a swept path analysis of the bus parking spaces which should be set out to 5 x 15 metre dimensions.

I note that the applicant has stated that the existing scheme for parking and waiting restrictions along Gossmore Lane adjacent to the railway crossing is sufficient to mitigate the impact of the proposed development. However these parking and waiting restrictions were put in place by the Highway Authority, Transport for Buckinghamshire.

These alterations to the public highway cannot be considered to mitigate the increase in pedestrian traffic along and crossing Gossmore Lane as they are unrelated to the applicant, the application site,

and the application proposals, and therefore cannot be attributed to this planning application for the purposes of mitigation.

Mindful of the recommendations of the safety audit, I would not request further parking and waiting restrictions be implemented within the vicinity of the application site.

Local Highway Pedestrian Access

To accommodate the increased pedestrian traffic resulting from the application, measures attributable to the application are required to provide a safe route to and from Globe Business Park for pedestrians. The submitted safety audit has identified specific highway safety risks. To mitigate the impact of the development, and ensure that it will not result in a detrimental impact to highway safety, measures to address these issues must be proposed.

No detailed submissions have been made to formalise a pedestrian crossing on Gossmore Lane, such as dropped kerbs, which were recommended by the safety audit. Proposals of this nature would require amendment of the site's red line and plans to be submitted for assessment prior to the approval of the application in order to ensure that the increase in pedestrians crossing the highway at this point can be safely accommodated.

The Highway Authority previously stated that the proposal of street lighting along Gossmore Lane between the railway crossing and the rugby club would be required to ensure that the proposals do not result in a detrimental impact upon the safety of the public highway. The safety audit has also stated that street lighting would be required to safely accommodate the pedestrian route along Gossmore Lane.

It should be noted that street lighting is particularly necessary at the pedestrian crossing point of Gossmore Lane. Requiring pedestrians to cross at this point when the highway is unlit would result in a significant detrimental impact to highway resulting from limited visibility of vulnerable road users.

The applicant has not proposed street lighting along Gossmore Lane or at the required pedestrian crossing point. Mindful of both the Highway Authority requesting and the safety audit recommending the street lighting, and the detrimental impact upon highway safety of an unlit pedestrian route in such a situation, I object to the proposals due to the lack of proposed street lighting.

Travel Plan

I note that statements have been submitted that the application is flawed, raising other methods of providing parking provision for and promoting modal shift in forms of transport related to Globe Business Park. However, I note that these measures are not within the power of the applicant to implement as they relate to Globe Business Park rather than Marlow Rugby Club. Therefore I do not consider these proposals to fall within the scope of this planning application. I do not believe that matters regarding the internal management of Globe Business Park car parks or the travel arrangements of individual companies are within my remit to comment on as a part of this planning application.

As such, my comments address only the matters falling within the scope of this planning application, and which are within the power of the applicant to implement.

I do not consider the Travel Plan to have adequately addressed the context of the application and site as a car park. The measure regarding active travel is a measure that I would expect from a typical residential, office, or industrial unit travel plan, and applies well to rugby club users who live sufficiently close enough for active travel to be a viable mode of transport, however I do not consider it sufficient to address the proposed use of the car park by Globe Business Park.

Given the nature of the proposed expanded use of the car park by employees of Globe Business Park, I would consider the measures required by a travel plan to be focussed around promoting more

efficient and sustainable forms of long distance vehicular travel. For instance measures promoting ride sharing and the use of electric vehicles.

Having assessed the submitted documents, I do not consider the travel plan to address the specific matters related to the proposed use of a car park. The travel plan should be amended to address the nature of the proposed development.

Objection

Mindful of the above, the Highway Authority raises three objections to the proposals due to the submitted additional and amended information not addressing the requests of the Highway Authority and the recommendations of the safety audit. Specifically, the proposals would result in an unsafe highway situation resulting from the proposed application, and the travel plan is not considered to materially address and promote sustainability with regards to the nature of the proposed expanded use of the car park.

I refer below to matters within the additional information provided that the Highway Authority does not object to.

Local Highway Network Congestion Impact

Whilst the principle of the development of a new car park in this location would be contrary to good urban transport design in terms of location comparative to the strategic highway network, and residential areas of Marlow, I note that this is not a newly proposed car park. The proposals utilise an existing car park that serves the rugby club, and events hosted at the application site. The proposals are to diversify the site to further utilise the existing parking facilities, which is supported by the Buckinghamshire Countywide Parking Guidance policy document to promote the shared use of parking facilities to utilise under-utilised car parking capacity.

I note that Lock Road, Glade Road, Dedmere Road, and Little Marlow Road (A4155) have not been assessed by the applicant in Section Two of the Transport Statement on the site location and Local Highway Network as previously requested by the Highway Authority. The previous response of the Highway Authority noted that the lack of assessment of the local highway network required to access Marlow Rugby Club contributed to the inability to provide a substantive response to the application proposals. However, a letter of objection has been submitted by a transport consultant assessing the local highway network.

The occurrence of vehicles travelling along the public highway having to stop and allow others to pass due to restricted effective carriageway width is a common existing situation within Marlow, including the local highway network that will be subject to redistributed of vehicular trips. I also note that the reduction in carriageway widths is a situation resulting from on-street parking that the application seeks to address. The reduction of on-street parking resulting from the proposed development will result in less reduction of effective carriageway widths on the local highway network.

When taking into account the associated reduction in on-street parking, the expected increase in vehicular trip rates associated with the application site, whilst material, is not expected to impact primary routes such as the A4155. Nor to generate significant enough trip rates along unclassified roads to the degree that a severe impact upon highway congestion could be demonstrated.

With regards to speeding and driving of vehicles upon pedestrian footways, I note that these are enforcement rather than planning matters, as these actions are illegal under the Highways Act (1980) and the Road Traffic Act 1991. Nor has sufficient information been submitted to demonstrate that these offences occur as a result of severe congestion.

With regards to Station Road, I would not expect a significant increase in the number of vehicles accessing parking along Station Road as I would only expect the vehicles accessing Globe Business

Park along Parkway to reroute. Commuters from the west and south of the application site are likely to utilise the same route as previously.

Mindful of the impact on highway congestion and safety of reducing on-street parking, and the limited impact of reassignment of car trips upon strategic routes and wider highway network, I do not believe that an objection based upon a severe impact to highway congestion could be upheld at an appeal scenario. I note that the National Planning Policy Framework states that applications should only be refused on the grounds of capacity and congestion where the impact upon these matters would be severe.

Parking Arrangement

Having assessed the revised parking arrangement, including the swept path analysis of the coaches, I consider this additional information to have addressed these concerns of the Highway Authority. I therefore consider the site to have demonstrated sufficient manoeuvring space for these vehicles to both access and egress the site in a forward gear.

The applicant has also provided additional information clarifying that on days that coaches will be in use, the overflow parking will be available, which is not to be made available for the employees at Globe Business Park. I therefore have no objection to the proposed parking arrangement with regards to the existing rugby club use of the application site.

Parking Management Plan

I note that it was previously agreed that a detailed parking management plan should be created, to be secured by way of condition in order to manage the parking within the site curtilage. This should include a restriction on club member parking during the use by Globe Business Park, to prevent less spaces being available for parking by employees of Globe Business Park.

This would result in a lack of capacity on-site, and the associated issues of vehicles leaving the site when they cannot find spaces, resulting in searching for a parking space upon the local highway network. A future parking management plan should address this matter but can be secured by way of condition should the objections of the Highway Authority be sufficiently addressed.

Recommendation

Mindful of the above comments, I object to the unsafe pedestrian crossing on Gossmore Lane, and pedestrian access between the application site and Globe Business Park. I also note that additional measures are required for the travel plan to adequately address the nature of the proposed development. I therefore object to the application for the following reasons

Final Comments (Received 10.09.19): I note that the Highway Authority has previously commented upon this application in letters dated 9th July 2019 and 2nd May 2019. This letter should be read in conjunction with these previous comments.

I note that since the last set of comments were provided by the Highway Authority, concerns have been raised again with regards to the matter of congestion. I note that the impacts of the development would not approach a severe residual cumulative impact upon the public highway, as detailed in the previous response of the Highway Authority. Therefore the Highway Authority would not be in a position to object on the grounds of such an impact.

The impact that would result from the proposed development is considered to be a highway amenity impact, which does not fall within the remit of the Highway Authority to comment upon.

The Highway Authority previously raised a highway safety concern at the informal crossing of Gossmore Lane along the desire line between the application site and Globe Business Park. This is

the only point where the concern was raised as this point is where an intensification of pedestrian movements will occur as a result of the proposed development.

With regards to speeding vehicles, I note that there is a speed restriction of 30mph in place within the vicinity of the site. This concern is therefore an enforcement matter and is not a material consideration in the assessment of this application.

The matters of highway safety, capacity and congestion have been addressed, and the matters that merited objection were objected to by the Highway Authority. The previously raised objections regarded the lack of demonstration and provision of a safe pedestrian route between Marlow Rugby Club and Globe Business Park due to a lack of a demonstrated crossing point proposal and street lighting, and for insufficient measures with regards to the travel plan.

Gossmore Lane Crossing Point

I note that no measure to secure the use of minibuses has been proposed or would be secured. Furthermore, given the distances involved, and an approximate walking time of between five and ten minutes to sites within Globe Business Park, minibus transport is not considered appropriate for this development and the Highway Authority would not seek to secure such a measure.

For the avoidance of doubt, the proposed development has been assessed on the basis of an increase of one hundred and thirty six pedestrian trips, or two hundred and seventy two movements, between Marlow Rugby Club and Globe Business Park per day, assuming full utilisation of the car park. I note that these numbers would also be increased by ride sharing increasing occupants of vehicles.

The applicant has submitted a plan for works proposed to be carried out upon the public highway at Gossmore Lane adjacent to the railway pedestrian crossing. These proposals include the creation of a dropped kerb with tactile paving informal highway crossing. The proposed informal crossing point is considered capable of safely accommodating the likely increase in pedestrian movements between the application site and Globe Business Park.

At an informal crossing point, with no formal or controlled crossing, a pedestrian should wait for an appropriate time to cross the carriageway. Visibility splays for pedestrians of 0.8 x 24 metres have been demonstrated measured from points 0.8 metres back along both side edges of the proposed informal pedestrian crossing tactile paving.

I would consider this sufficient visibility to allow a pedestrian to judge when it is safe to cross the highway carriageway. The realignment of the carriageway edge, street lighting of the crossing point, and dropping of the kerb with tactile paving would sufficiently mitigate the intensification of use of this informal pedestrian crossing of Gossmore Lane.

Mindful of the above, I believe that sufficient mitigation has been proposed to ensure that the development will not detrimentally impact highway safety at the informal crossing.

Gossmore Lane Street Lighting

The requirement for street lighting is combined with the previous matter of the pedestrian crossing. A pedestrian crossing required to serve this increase in pedestrian movements, especially during hours of darkness, is not considered to be safe without street lighting. The route between the car park and Globe Business Park, as the stated destination, is required to be lit to ensure an appropriate pedestrian route.

This was raised previously by the Highway Authority in correspondence with the applicant, subsequent to the previous objections being raised. The applicant has not demonstrated outline street lighting provision in the amended plans, however I note that the applicant has proposed that the measure of street lighting be addressed at a later detailed design stage.

The applicant has suggested that street lighting proposals be secured by way of condition and provided at a detailed design stage. The safety audit submitted has also raised the matter of street lighting, however it also references predicted numbers of pedestrian movements which have not been submitted and do not form a part of this application.

The Highway Authority would maintain a strong objection to the proposed development should street lighting not be provided. I therefore recommend that the detailed design stage of the off-site works be included as a pre-commencement of works requirement, whilst actual implementation of the off-site works be secured as prior to the operation for the permitted use.

Amended Travel Plan

The applicant has proposed to provide an amended travel plan at a later stage. I believe that this could be secured by way of condition should the Local Planning Authority be minded to approve this application.

I note that the Highway Authority requires further measures to promote the most sustainable utilisation of the car park that can be achieved. This should therefore include, but not be limited to, measures associated with the use of private cars such as ride sharing and provision of infrastructure for electric vehicles.

Recommendation

Mindful of the above, I believe that the previous objections have been addressed by the applicant, and have either been mitigated for, or mitigation can be suitably secured by way of condition.

Representations

Parish Cllr Simon Hammond

Comment: I support the car park proposal as the income gained will ensure that the rugby club will have funds to carry on providing sports activities for the local community across a range of age groups and genders for a number of years. With funding of the NHS in constant decline, keeping fit will be a key factor for good health and thereby reducing the burden upon the nation's resources.

Marlow Rugby Club has a good track record of bringing youngsters into sports at an early age and influencing the positive sporting habits of a lifetime and the associated benefits.

27 comments have been received supporting the proposal:

Summarise comments:

- Marlow Rugby Club has taken a bold and a considered approach to both support the wider community and also the future of sport and rugby in Marlow.
- Children's sport is necessary if not essential but one that requires regular funding. In this proposal Marlow Rugby Club has ensured that this can continue in Marlow for this and future generations.
- Lived long enough in Marlow to know that the Marlow Rugby Club would not submit this application without careful consideration.
- The submitted car park plan will put in place a structure to allow sensible and safe car parking along with a determined route for them to take.
- The application benefits the wider community and the children of Marlow who play sport at the rugby club.
- Will improve access to Globe Park and Marlow in general

123 comments have been received objecting to the proposal as originally submitted:

Summary of comments:

- Contrary to Green Belt policy

- increased traffic on already congested roads
- additional risk to pedestrians and other road users
- other solutions not fully investigated
- Carpark is already in use by Globe Park workers who seem to think Lock Road, Gossmore Lane & Riverpark Drive is ok to use as a race track.
- Increased danger for pedestrians using the footpath to the side of the club car park
- Whilst this application is being presented as a solution to the ongoing parking problem on Globe Business Park, it is extremely likely to create further problems which will affect a large number of local residents.
- Proposal would divert in excess of 500 plus journeys through local streets and junctions not designed for the purpose.
- Existing infrastructure is unsuitable, and this represents unnecessary further aggravation for the residents and visitors of the Riverpark / Riverwoods area of Marlow.
- Congestion in the surrounding residential areas by the station, Station Road, Glade Road, Lock Road, Riverpark Drive and Gossmore Lane has steadily increased in recent years and in particular over the last year or so due to parking needs overflowing from the estate and no doubt in part to the parking of some vehicles on the club site already.
- Increased traffic would increase problems at major pinch points and therefore significant traffic disruption to the residents of the area.
- Will increase dangerous parking too close to junctions
- Verges being destroyed
- ALL traffic would have to traverse the Station Road/Glade Road/Lock Road intersection, which is well known as complex junction caused by poor sight lines and parked car obstructions close by, that whilst few accidents occur this is more by luck and significant caution by drivers.
- Proposal is ADDING to the traffic in the town as it is taking cars from Globe Park, where they exit the A404 and bringing them on an extra journey - through a quiet and safe residential area where children play - to the rugby club
- Lock road is effectively a single track road
- Will add to the existing gridlock in Glade Road and Lock Road
- The high volume on the roads are also leading to a lot of frustration with the drivers which then leads to higher speeds.
- Concerned about risk to life from this additional traffic.
- How can anybody think sending 136 cars and coaches on a daily basis, morning and evening, through an already congested bottleneck, into a dead end residential area, going the opposite way against local traffic, a good idea?
- Ridiculous to include a bus service as its quicker to walk into Globe Park
- There is surely a much better alternative being proposed at the Sports Ground on the Bourne End Road which will have no impact to any local residents and provide an even greater number of parking spaces.
- Some support for demolishing vacant building within the GBP and at the Marlow end of the Fieldhouse Industrial Park near the station to provide additional parking to alleviate both Marlow's and GBPs.
- A proposal for Globe Park to build a multi-storey car park on the industrial estate thereby avoiding heavy traffic through quiet residential streets frequented by many pedestrians including children would seem a much more sensible and safer option for all.
- If the Rugby Club wishes to proceed with commercialising their car park they should be required to work with British Rail and create a single lane level crossing at the bottom of Fieldhouse Lane to connect with Gossmore Lane where there is already a pedestrian crossing. Any costs associated with this should be saved by the reduction in bus journeys.
- Increased pollution, noise, disturbance, and general disruption during peak hours for local residents.
- Inconsistencies in and between Transport Report and Design and Access Statement
- Significant concerns for child and elderly pedestrian safety around the area of Glade Road, Lock Road and Station Road

- The green park area directly along Riverpark Drive used by the local children play after school. Should this proposal, be approved it will make it unsafe for children to use this area.
- The residents of Gossmore Lane & Lock Road will suffer unbearable traffic hindrance
- Why should existing residents be penalised because Globe Park doesn't have enough parking?

109 Further comments on amendments received December 2018:

- Transport report ignores impact on residential roads listed in CHA response and is therefore inadequate
- No traffic impact study has been carried out.
- There are glaring omissions
- A serious lack of substantive evidence
- There are mistakes in the analysis and many misleading 'facts' presented
- The Transport Statement and Planning Statement are full of conjecture and conclusions that are weak and cannot be drawn from the facts
- There are a number of duplicitous and disingenuous statements
- The contravened local and national planning policies
- the addition of double yellow lines has not changed the overall situation
- The application continues to state 8am to 9am and 5pm and 6pm when the time period in the morning starts before 8am and extends to 10am and beyond. In the afternoon cars start to leave from 4pm. Can the application be amended to mirror what is actually happening?
- A recent representation has stated that 192 cars are parked at the club. This is a substantial increase in the initial application of 136.
- More information required on taxi service and coach movements
- Cycle parking should be provided at business premises not at the rugby club
- Proposal too reliant on level crossing which is not a public right of way and could be closed at any time.
- a multi-storey car park in Globe Park is the only solution
- There is going to be more housing built on the old station yard so even more traffic at the crossroads of Glade Road, Station Road and Lock Road.
- The Industrial Park should not be allowed to spoil the residential areas but be self-contained.
- Painting yellow lines on 15m at each junction will not help this grid locking
- Plan to add double yellow lines along the bend of Gossmore Lane will simply serve to transfer further along the road the parking issues
- Residents should shoulder the burden of Marlow's parking problems, which do not benefit us in any way.
- When is there going to be a proper Traffic Impact Study?
- Parking marked for disabled resident ignored causing access problems for the resident
- Will endanger users of the Thames Path.
- Some support for a town wide solution to parking

31 Further comments following amendments in July 2019, raising the following new issues:

- Recent amendments do not take into account the comments/concerns of neighbours
- Concern that no action has been taken to stop existing parking taking place
- None of the supporters of this proposal are actually neighbours
- Local streets are already overloaded with traffic which the newly built Travelodge is already
- Residents of Glade Road, Lock Road, Riverpark Drive, Hyde Green, Gossmore Lane and Riverwoods Drive paid for a study to be prepared and it clearly demonstrates that the additional traffic is already having a big impact on the residential areas. Please use this study (uploaded on January 24th) as part of your decision making.

2 further comments following amendments in September 2019 raising the following new issue:

- Account should be taken of the impact of the development on air quality