

# Agenda Item 9.

Contact: Sarah Nicholson DDI No. 01494 421514

App No : 18/06215/FUL App Type : FUL

Application for : Change of use of land used as an ancillary car park for Marlow Rugby Club to allow the car park to be used by Globe Business Park Monday to Friday (8am-6pm) and solely by Club Members outside of these times with new cycle parking for Marlow Rugby Club

At Marlow Rugby Club, Riverwoods Drive, Marlow, Buckinghamshire SL7 1QU

Date Received : 11/05/18 Applicant : Marlow Rugby Club

Target date for decision: 06/07/18



## 1. Summary

- 1.1. Permission is sought for the change of use of the car park of Marlow Rugby Club (MRC) to allow the car park to be used by Globe Business Park. The use sought is for Monday to Friday (8am-6pm) with the car park being solely for the use of MRC Members outside of these times. New cycle parking is also proposed for the MRC.
- 1.2. The car park is a triangular area of land located to the west of the club house and south of the Marlow branch line. It currently comprises an area partly tarmacked and partly gravel/unbound surface. Operational works include a reduction in the area that is tarmacked, a new entrance gate and enhancements to footpath Marlow 19 which runs along the northern edge of the car park. The site would remain as a car park, albeit that the proposal would involve an intensification in the use of the car park.
- 1.3. The application site is located in the Green Belt, a Green Infrastructure Area and the floodplain (Flood Zone 2/3 – High /Low –Medium Risk), is part of the area known as the Marlow Gravel Pits and is in non-residential parking Zone 2.
- 1.4. On balance, the proposal is considered to accord with Green Belt policy and the intensification in use would not be considered to have a significant impact on openness, as the site is relatively visually self-contained. It would also accord with development plan policies aimed at resolving the parking issues at Globe Business Park (GBP), potentially making the park more attractive to potential occupiers, with the economic and social benefits this would bring. It would not frustrate proposals to establish a Country Park on the former Marlow Gravel Pits and would help to support MRC outreach programme, notably the junior programme of activities.
- 1.5. Subject to conditions the proposal raises no issues with regards to:
  - Green Belt
  - SuDS and flooding
  - Highway safety
  - Highway capacity
  - Ecological
  - Landscape
  - Establishment of a new country park at Marlow Gravel pits
- 1.6. However, the proposal would concentrate additional traffic on the limited number of largely residential roads that can provide access to Marlow Rugby Club. This concentration would lead to an unacceptable loss of amenity for local residents and other users of the highway, by means of increased inconvenience and disruption caused by additional noise, fumes and congestion. The proposal is considered to be contrary to policies CP9 (Sense of Place), DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality) of the

- 1.7. This loss of amenity is, on balance, considered to outweigh the planning benefits of the development and the application is therefore, recommend for refusal.

## **2. The Application**

- 2.1. Permission is sought for the change of use of the car park of Marlow Rugby Club (MRC) to allow the car park to be used by Globe Business Park. The use sought is for Monday to Friday (8am-6pm) with the car park being solely for the use of MRC Members outside of these times. New cycle parking is also proposed for the MRC.
- 2.2. The car park is a triangular area of land located to the west of the club house and south of the Marlow branch line. It currently comprises an area partly tarmaced and partly gravel/unbound surface. The land is generally level with a very gentle slope to the south. MRC is separated from Globe Business Park (GBP) by the railway line, although there is a pedestrian level crossing at the end of Grossmore Lane which leads into Fieldhouse Lane.
- 2.3. The proposal is to refurbish the existing surfacing and mark out the spaces to provide a total of 136, including 11 disabled spaces in rows which run from north to south across the site. Along the northern side of the spaces a 2m wide footway would be delineated with white lines. A barrier with keycode/fob access panel is proposed at the entrance. Parking for 32 cycles is shown to be located at the north east corner of the car park.
- 2.4. The application site is located in the Green Belt, a Green Infrastructure Area and the floodplain (Flood Zone 2/3 – High /Low –Medium Risk), is part of the area known as the Marlow Gravel Pits and is in non-residential parking Zone 2.
- 2.5. The application is accompanied by:
- a) Planning Design and Access Statement
  - b) Transport Assessment
  - c) Flood Risk Assessment
  - d) Covering Letter
- 2.6. The application has been amended a number of times in response to comments made by statutory consultees including the Buckinghamshire County Highway Authority (CHA), the County Rights of Way Officer and the Local Lead Flood Authority (LLFA).

## **3. Working with the applicant/agent**

In accordance with paragraph 38 of the NPPF (2019) Wycombe District Council (WDC) approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments. WDC work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application. In this instance the applicant/agent was updated of issues after the initial site visit and was provided the opportunity to submit amendments to the scheme/address issues. The application was considered by the Planning Committee.

## **4. Relevant Planning History**

- 4.1. The MRC site has a long history of temporary permissions for the siting of residential caravans and extensions to the club house dating from the 1990's and before. More recent applications relate to lighting of the pitches and adverts. None are relevant to this current application part from:
- 4.2. 14/07360/FUL - Change of use of ancillary storage building from Class B8 (storage and distribution) to be used as taxi booking office (sui-generis) and provision of 2 x parking spaces. Permitted and implemented
- 4.3. The following permissions granted and implemented on neighbouring sites are so of relevance:

- 4.4. 17/06833/FUL - Creation of car park providing 200 spaces with associated lighting, landscaping and access for a temporary period of 5 years at Land between A404 and Clubhouse Water Sports Club, Fieldhouse Lane, Marlow. (Permission granted until 31<sup>st</sup> January 2023). An extension was sought to this car park under application No. 19/06567/FUL but was withdrawn before determination.
- 4.5. 16/08396/FUL - Change of use of land to a car park providing 102 spaces with 8 x 6m high single lighting columns and 9 x 6m high twin lighting columns, associated drainage and alterations to access at site of Former Chelton Building, Thames Industrial Estate, Fieldhouse Lane, Marlow.
- 4.6. 17/07956/FUL - Change of use of land to car park and the erection of single decked car park and associated alteration to access at site of Former Chelton Building, Thames Industrial Estate, Fieldhouse Lane, Marlow.

## 5. Issues and Policy considerations

### Principle and Location of Development

Wycombe District Local Plan (August 2019): CP1 (Sustainable Development), CP3 (Settlement Strategy), Policy MR7 (Globe Business Park), DM33 (Managing Carbon Emissions, Transport and Energy Generation), DM42 (Managing Development in the Green Belt)

DSA: DM1 (Presumption in favour of sustainable development), DM6 (Mixed-use development)

### Development Plan Framework

- 5.1. For the purposes of considering this application the relevant parts of the Development Plan are the Wycombe District Local Plan (August 2019) and the Delivery and Site Allocations Plan (July 2013).

#### Green Belt

- 5.2. The NPPF (National Planning Policy Framework) indicates at paragraph 133 the great importance attached to the Green Belt, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. Development is inappropriate the exceptions to inappropriate development are set out in paragraphs 145 and 146 of the NPPF. This reflected in the policy DM42 (Managing Development in the Green Belt) regard there is a degree of inconsistency between the development plan and the NPPF.
- 5.3. The proposal relates to the use of the land and therefore paragraph 146 is applicable. The applicant's planning statement indicates that land already operates as a car park and that it will continue to do so under this application. The difference, as proposed through this application, relates to how the car park will be used and to deliver a more formalised parking arrangement which can allow the car park to be used both to serve the needs of the Rugby Club and to provide commercial parking (Monday - Friday, 8am-6pm) for Globe Park employees.
- 5.4. A change of use of land is no longer one of the exceptions within Green Belt policy. However, given that the land already functions as a car park it is questionable whether or not the use of the land is changing per se as it will remain a car park albeit one which is used in a different manner.
- 5.5. Alternatively, the planning statement suggests that the proposal could be considered as a local transport infrastructure which can demonstrate a requirement for a Green Belt location. As such it would be not inappropriate in the Green Belt provided it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- 5.6. What might constitute "local transport infrastructure" in paragraph 145 is not defined in the NFFP or the PPG. Neither is it defined in any Development Plan policies.

- 5.7. The main purpose of the car park is to provide an income stream for the Rugby Club and to provide parking to address some of the significant parking problems in GBP. Wycombe District Council helped established a Business Improvement District (BID) for GBP in 2015. The BID Board of Directors is made up of senior management from the Business Park and associated Stakeholders. Their remit is to develop schemes to improve and add value to GBP and the local area. Poor access and lack of parking are key issues identified as making the Business Park less attractive to potential occupiers and investors. This has been reflected in Policy MR7 (Globe Business Park) which seeks to support opportunities to improve access and provide new car parking both on and off-site.
- 5.8. The BID Board commissioned the Globe Business Park Parking Survey (April 2017) which concluded that there was a shortfall of around 350 parking spaces for the then current level of occupancy. At that point there was a 37% vacancy rate of floor space within GBP and future parking requirements based on full occupancy would require a further 600 spaces giving rise to an overall requirement of 950 spaces.
- 5.9. While the permission granted on the Former Chelton Building and Land between A404 and Clubhouse Water Sports Club, both in Fieldhouse Lane between them provide some 375 spaces. There remains a shortfall of parking to serve the needs of GBP.
- 5.10. It is understood that this current proposal has evolved through discussions with BID as a way of assisting in alleviating traffic congestion on surrounding residential roads whilst delivering a car park that is within short walking distance, or by shuttle bus to GBP, managed through a Parking Strategy between the BID and MRC.
- 5.11. Based on this assessment, the parking will only be available to businesses which have a long term agreement with BID and/or the landowner and therefore provides only a localised parking facility. As such, there are no wider public benefits arising from this car parking facility and cannot be considered as local transport infrastructure. Furthermore to meet the requirements of a local transport infrastructure it would need to demonstrate a requirement for a Green Belt location. The evidence presented does not demonstrate that the site has to be in the Green Belt but merely that the site benefits from being already used as a car park, has capacity on weekdays to accommodate more parking and is in a convenient location adjacent to GBP albeit on the other side of the railway line and somewhat remote from businesses located within the Business Park.

#### Effect on Openness and the purposes of including land within the GB

- 5.12. Openness of the Green Belt can generally be described as an absence of built form, and having both a spatial and visual aspect. The land is currently used as a car park with an informal hard surface and has some street furniture, such as lighting columns, which are proposed to be retained. Surface finishes would be refurbished and parking spaces better defined, given the site more formality. This will not impact openness and in any event the owners could resurface the car park, without permission being required, providing they replace like for like.
- 5.13. In terms of the visual aspect, the site is visible from the entrance gate and from the railway line, it is largely open with trees and vegetation to the south. Existing vegetation will be unaffected. A new entrance barrier is proposed but as the site is already gated this will have no impact on openness. On this basis it is considered that the proposal 'tidies up' the site which will otherwise remain as existing.
- 5.14. Taking these factors together officers consider the car park will not reduce the openness of the Green Belt.
- 5.15. In conclusion, the development does not constitute an exception to inappropriate development within paragraph 146 of the NPPF. It therefore falls to be considered as "inappropriate development" which, by definition, is harmful to the Green Belt and should not be approved except in very special circumstances. These will be considered at the end of the report. However, it is noted here that the proposal is not considered



to erode the openness of the Green Belt.

### **Transport matters and parking**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), MR7 (Globe Business Park), DM33 (Managing Carbon Emissions, Transport and Energy Generation)

DSA: DM2 (Transport requirements of development sites)

Buckinghamshire Countywide Parking Guidance.

- 5.16. Adopted policy is generally supportive of proposals aimed at supporting or serving existing developments. The supporting text of Policy MR7 recognises that GBP is currently not fulfilling its full potential and that the shortage of parking may be a contributory factor. It therefore supports the principle of the provision of new car parking on and off the business park to serve the needs of the park.
- 5.17. The site accesses 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. It is a road that benefits from a pedestrian footway to one side of the carriageway, but does not benefit from street lighting.
- 5.18. Gossmore Lane is essentially a cul-de-sac with the MRC and Riverswood Drive at the end on the east side the bridge which carries the A404. In order to gain access to Gossmore Lane from the A4155, the main arterial route though Marlow, vehicles would have to travel through what is largely a residential area. The most direct routes being via Glade Road/Lock Road/River Park Drive or via the High Street/Station Road/Mill Road or Lock Road into Gossmore Lane.
- 5.19. The County Highway Authority was consulted on the application and initially raised a number of concerns and objections, concluding that while a number of these could be overcome, it ultimately had insufficient information on which to be able to fully judge the highway implications of the proposals. In particular the application lacked information on the impact of re-routing traffic originally detained for GBP on the wider network within the town.
- 5.20. The applicant responded by providing additional information which the CHA duly assessed. This second assessment concluded that the proposal raised no issues of highway capacity. The only highway safety concern was the suitability of the informal pedestrian crossing of Gossmore Lane along the desire line between the application site and GBP to safely accommodate the additional pedestrian activity generated by the development. The applicant subsequently discussed improvements to this crossing, including dropping the kerb and providing lighting.
- 5.21. In commenting on congestion the CHA has concluded that the impacts of the development would not approach a severe residual cumulative impact upon the public highway. Consequently, an objection based on this could not be reasonably sustained on the basis of highway safety or capacity. The impact that would result from the proposed development is considered to be a highway amenity impact, a matter that falls outside the remit of the CHA, but does have to be considered by the Local Planning Authority. This is discussed below.
- 5.22. The access to MRC is considered to be able to function safely and in accordance with national guidance on sight stopping distances.
- 5.23. The parking spaces proposed within the site meet the size requirements of the Buckinghamshire Countywide Parking Guidance.

### **Raising the quality of place making and design**

Wycombe District Local Plan (August 2019): CP9 (Sense of place), DM34 (Delivering Green Infrastructure and Biodiversity in Development), DM35 (Placemaking and Design Quality)

DSA: DM11 (Green networks and infrastructure),

- 5.24. Policies CP9 and DM35 of the Adopted Local Plan seek high standards of design and

- layout to be achieved through the creation of positive, attractive and safe public and private environments, with locally distinctive qualities of place to be reinforced by enhancing landscape and built characteristics of the site and wider context.
- 5.25. The proposed layout of the car parking is regimented and a more organic layout with additional landscaping would be desirable. However, introducing this could actually lead to a reduction in the number of spaces available on a site and cannot be insisted upon, when the site has been used for parking for a period in excess of 30 years.
  - 5.26. The nature of the car park is that of an open area, with areas of tarmac and gravel in various states of repair. The proposal would reduce the amount of tarmac limiting this to the circulation areas in the northern section of the car park. The remainder of the site would be finished in unbounded gravel. This surfacing will have a softer impact than a more traditional hard surfacing material.
  - 5.27. All existing vegetation and boundary treatments are to be retained with a new car park barrier provided at the entrance.
  - 5.28. As the alterations amount to little more than upgrading the existing car park, the impact of the proposal is considered acceptable.

### **Amenity issues**

Wycombe District Local Plan (August 2019): CP9 (Sense of Place), DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality),

- 5.29. Policy CP9 recognises that the district is very varied and seeks to achieve a high quality of design, improving the character and quality of an area and the way it functions. Developments should optimise the density of development to make best use of land whilst respecting the distinctive character of the area.
- 5.30. Policy DM33 seeks to provide safe, direct and convenient access for all modes that meets the needs of the development; provide for parking sufficient to meet the needs of future occupants and to ensure there is no significant adverse impact from overspill parking, whilst ensuring that any material adverse impacts on existing and forecast traffic conditions are mitigated.
- 5.31. Policy DM35 requires all development to improve the character of the area and the way it functions. Developments are expected to respond positively to their surroundings, through an understanding of the functions, qualities and character of the of the developments natural and built context. Opportunities for improvements and enhancements should be maximised and significant adverse impacts on the amenities of neighbouring land and property should be prevented.
- 5.32. The site is too far from neighbouring residential properties for the parking to have any impact in terms of loss of privacy, light or outlook.
- 5.33. The impact will instead stem from the additional traffic which will be re-routed throughout streets which are largely residential, causing additional noise, fumes and congestion.
- 5.34. With the more intensive use of the car park there will be a general increase in activity and, with so few access routes available to MRC, traffic will be channelled through streets, some of which, at least anecdotally, already suffer from a degree of congestion that causes distress and inconvenience to residents. This distress would be increased by the development and have an impact on people's quality of life; whether that be difficulty in accessing or parking near their house; or highway safety fears caused by more traffic travelling at times above the speed limit. It would be a retrograde step to encourage traffic, that currently either by-passes the town or only passes through on the main road, onto some of the towns most congested streets, with the implications this would have for the quality of life of local residents and other road users who already use these streets.
- 5.35. These streets are often heavily parked, whether that be by residents, those who work

in the area, or visitors. The recently added yellow lines around key junctions provide some additional control, but do nothing to alleviate the volume of traffic that the development would generate, or the resulting increased congestion.

- 5.36. The proposal is thus considered to be contrary to adopted policies CP9 (Sense of Place), DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality).

### **Environmental issues**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth), DM20 (Matters to be determined in accordance with the NPPF)

- 5.37. The traffic generated by the development would increase noise and add to air pollution. Given that we are in an urban area, a certain amount of traffic noise is to be expected, however in residential streets which lead to a cul-de-sac noise levels would be expected to be low. While the additional traffic resulting from the proposed development may not constitute a statutory noise nuisance under environmental legislation, that does not mean to say that local residents will not experience increase traffic noise which may cause them annoyance, concern or distress.
- 5.38. It is recognised that parts of Marlow experience high levels of air pollution. However the Council's Control of Pollution unit have raised no objection to the proposal in terms of noise or air quality.
- 5.39. The proposal is thus considered to accord with development plan policies in these regards.

### **Flooding and drainage**

Wycombe District Local Plan (August 2019): DM39 (Managing Flood Risk and Sustainable Drainage Systems)

- 5.40. The site is mainly in Flood Zone 3 with only the northern edge in Flood Zone 2. The site is subject to fluvial flooding. The ground water levels are high however groundwater flooding is only likely to occur when the site is already at risk of fluvial flooding.

#### **Sequential Test**

- 5.41. A sequential test is normally required when a site is within flood zones 2 and 3. However, in this instance there is no change in the overall use of the site which is and will remain a car park, so a sequential test is not required. In any event as the proposal is seeking use to use the car park to serve the Business Park, so it needs to be located close to or within the business park. Therefore any search area would need to be in the immediate locality.
- 5.42. In the NPPF Technical Guidance car parks are not identified within a particular vulnerable category and are considered as Less Vulnerable. Therefore subject to the sequential test where relevant, this type of development is appropriate within these flood zones and there is no exceptions test required.
- 5.43. It is not proposed to change the levels on the site which will remain as existing. The northern section of the car park is currently tarmacked and while it is proposed to retain this on circulation routes, this will be removed and replaced by gravel/unbound surfacing to match the remainder of the car park.
- 5.44. The site is considered to be at a higher risk of groundwater and fluvial flooding. Due to the permeable nature of the soils in the area, groundwater flooding incidents are likely to be closely linked to fluvial flood events. The site is not considered to be at risk from any other sources of flooding.
- 5.45. The geology of the site a chalk bedrock with superficial deposits of sand and gravel, allows for the utilisation of infiltration drainage techniques on the site. The infiltration techniques proposed are intended to provide storage for the 1 in 100 +40% climate change storm event. As such, flood risk will not increase either on-site or elsewhere



as a result of the development.

- 5.46. A Flood Risk Assessment (FRA) has been provided with the application and the Environment Agency is satisfied that the development will not increase flood risk, subject to a condition requiring the development to be completed in accordance with the FRA which would include agreeing a floor warning system and floor evacuation plan in times of flood.
- 5.47. In terms of surface and groundwater flooding the Local Lead Flood Authority (LLFA) have considered the drainage strategy. They have requested amendments to ensure that they are satisfied with the strategy proposed and have removed their objection subject to conditions.
- 5.48. The proposal is considered to comply with the requirements of the Flood Risk Management policy.

### **Landscape Issues**

Wycombe District Local Plan (August 2019): RUR4 (Little Marlow Lakes Country Park), DM34 (Delivering Green Infrastructure and Biodiversity in Development)  
DSA: DM11 (Green networks and infrastructure), DM12 (Green space), DM13 (Conservation and enhancements of sites, habitats and species of biodiversity and geodiversity importance), DM15 (Protection and enhancement of river and stream corridors)

- 5.49. The Little Marlow Gravel Pits (SPG) considered the landscape character of the larger area. It is defined as falling within the Valley Floodplain. There is considerable variation in landscape quality due to the extraction of gravel and urban influences. This particular site is designed as an informally surface car park sandwiched between the business park/rail line to the north and development in River Drive to the south and the flyover of the A404 to the west and the rugby club house to the east. The site is relatively visually self-contained and separated from the wider landscape by the structures and buildings described above and the trees and scrubland which sweep around the lower part of the site. The SPG identifies the site as a car park.
- 5.50. The proposals for the car park represent a soft touch and are limited to rationalising surfacing as described above in para. 5.39 and the updating of the entrance gate and street furniture on the route of the public footpath, to improve access at the eastern end of the carpark where the footpath starts to cross the pitches. Lighting is to remain as existing.
- 5.51. Parking is potentially a type of development (depending on the scale) that could fit into the site and have more limited impact on landscape character. The proposed layout like the existing is very car dominant with no structural planting. While a softer appearance could be achieved through the introduction of soft landscaping this would be at the expense of the space efficient layout the car park currently provides and could lead to an increase in the displaced parking that a number of local residents have complained about on match day.
- 5.52. Given that the site is relatively visually enclosed it is considered that an intensification in its use proposed by in this application will not result in significant harm to the character and appearance of the area.

### **Ecology**

Wycombe District Local Plan (August 2019): RUR4 (Little Marlow Lakes Country Park), DM34 (Delivering Green Infrastructure and Biodiversity in Development)  
DSA: DM13 (Conservation and enhancement of sites, habitats and species of biodiversity and geodiversity importance), DM14 (Biodiversity in development)

- 5.53. No ecological information has been provided with the application, but given the established use of the site as a car park, it is likely to be of limited interest. Because the site is a Biological Notification Site and to ensure compliance with policies DM14 and RUR4, ecological improvements should be sought.



- 5.54. Should permission be forthcoming a condition is recommended which will require an ecological management plan to be submitted and approved for the wider MRC site.

### **Recreation and Community facilities**

Wycombe District Local Plan (August 2019): RUR4 (Little Marlow Gravel Lakes Country Park), DM29 (Community Facilities)

Little Marlow Gravel Pits SPG

Community facilities SPD

- 5.55. The site lies within the Little Marlow Gravel Lakes Country Park area allocated by Policy RUR4 of the newly Adopted Local Plan. RUR4 proposes the creation of a new country park in the Green Belt between Marlow and Bourne End along the Thames. The detailed background and justification for this is set out in the supporting text to RUR4 and the associated SPG.
- 5.56. RUR4.1 states that the land is allocated for outdoor recreation, with RUR4.4 specifying that development should not frustrate the objective of establishing a country park and RUR4.5 states that any development is required to provide safe, convenient and direct access to Marlow and Bourne End.
- 5.57. The SPG sets out a detailed vision and masterplan for the Country Park. This site is identified as an existing car park with no further designations or proposals suggested.
- 5.58. The use of the club car park for parking by business users during weekday is unlikely to have a negative impact on the recreational uses of the rugby club which are focused at the weekends and evenings. The club runs a youth programme encouraging young people to participate in physical activity and have indicated that the income generated from allowing businesses to use the car park will help fund these activities. This will help improve the health and wellbeing of the participants.
- 5.59. In the planning balance, this counts as a benefit, and would not frustrate the aims of establishing the proposed country park.

### **Infrastructure and Developer Contributions**

Wycombe District Local Plan (August 2019): CP7 (Delivering the infrastructure to support growth)

DSA: DM19 (Infrastructure and delivery)

BCSNP: Policy 13 (Connecting the Parish)

- 5.60. The development is not the type of development where CIL would be chargeable. The proposed off site highway improvements can be secured by a Grampian condition should permission be forthcoming.

### **Weighing and balancing of issues – overall assessment**

- 5.61. This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.
- 5.62. In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
- a) Provision of the development plan insofar as they are material
  - b) Any local finance considerations, so far as they are material to the application (in this case, CIL)
  - c) Any other material considerations
- 5.63. As set out above it is considered that the proposed development would provide the following benefits in the planning balance:

- Help to relieve parking issues in GBP, making it potentially more attractive to potential occupiers with the economic and social benefits that that this would generate. Such proposals are supported by policy MR7
- Help to support MRC outreach programme, notably the junior programme of activities. Such proposals are supported by policies RUR4 and DM29

This can be given considerable weight in the planning balance.

5.64. The following issues are considered to have a neutral impact in the planning balance:

- Green Belt
- SuDS and flooding
- highway safety
- highway capacity
- Ecological
- Landscape
- Establishment of a new country park at Marlow Gravel pits

5.65. As set out above it is considered that the proposed development would provide the following disbenefits in the planning balance:

- Encourage additional traffic into a limited number of residential streets causing increased inconvenience, annoyance and stress to residents who fear for the health and wellbeing of local residents and other road users.

This can be given great weight in the planning balance.

5.66. In weighing and balancing the pros and cons of the development it is considered, on balance, that the negative impact of the development on the amenities of local residents and users of the streets leading to MRC outweighs the benefits of providing increased parking for GBP and maintaining/enhancing the community benefit provided by MRC.

5.67. The proposal is thus recommended for refusal.

### **Recommendation: Application Refused**

- 1 The proposal will concentrate additional traffic on the limited number of largely residential roads that can provide access to Marlow Rugby Club. This concentration will lead to an unacceptable loss of amenity for local residents and other users of the highway by means of increased inconvenience and disruption caused by additional noise, fumes and congestion. The proposal is considered to be contrary to policies CP9 (Sense of Place), DM33 (Managing Carbon Emissions: Transport and Energy Generation) and DM35 (Placemaking and Design Quality) of the Adopted Wycombe District Local Plan (Adopted August 2019).

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.

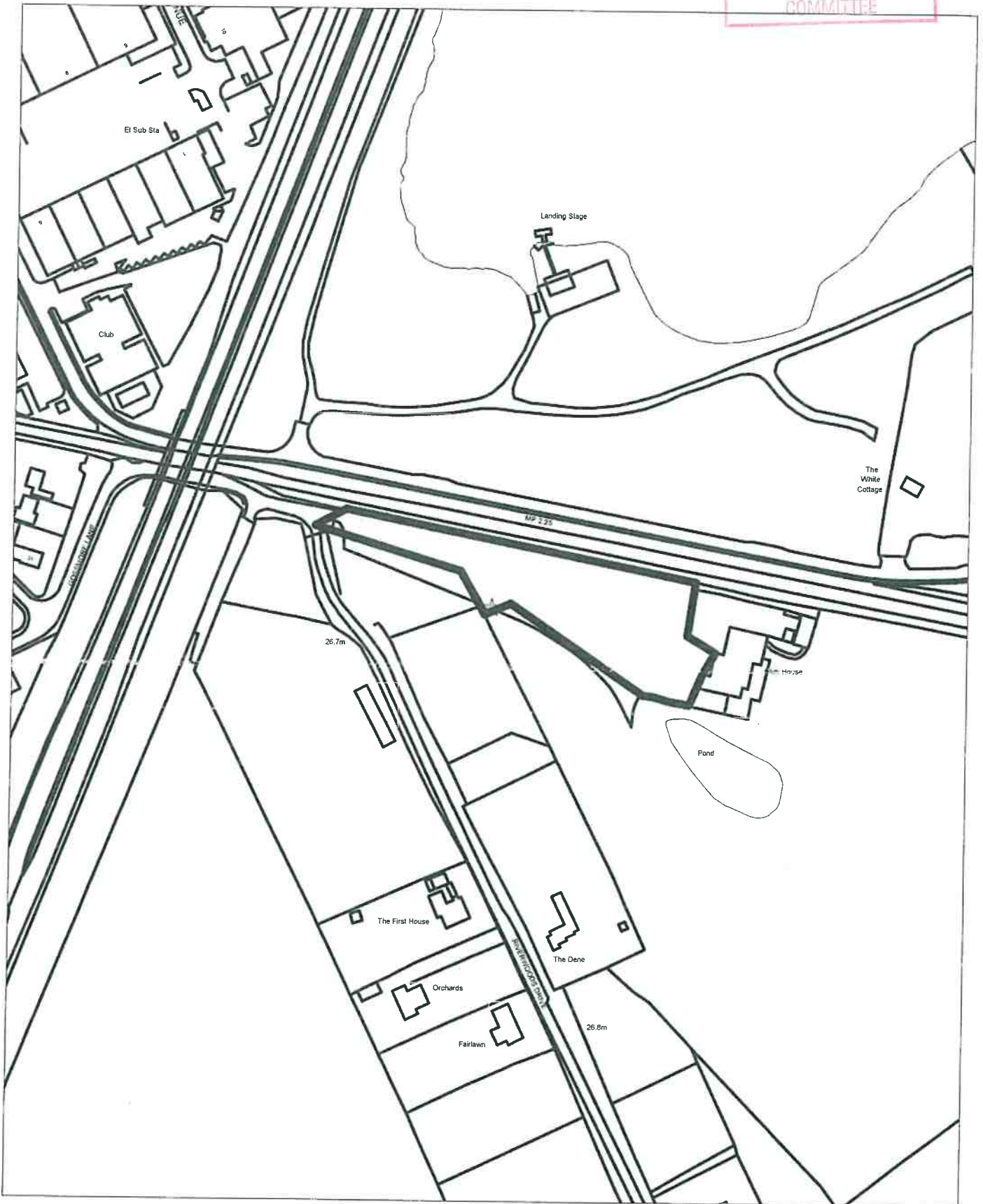
2 further comments following amendments in September 2019 raising the following new issue:

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

18/06215/FUL

Scale 1/2500

PLANNING APPLICATIONS  
13 NOV 2019  
COMMITTEE

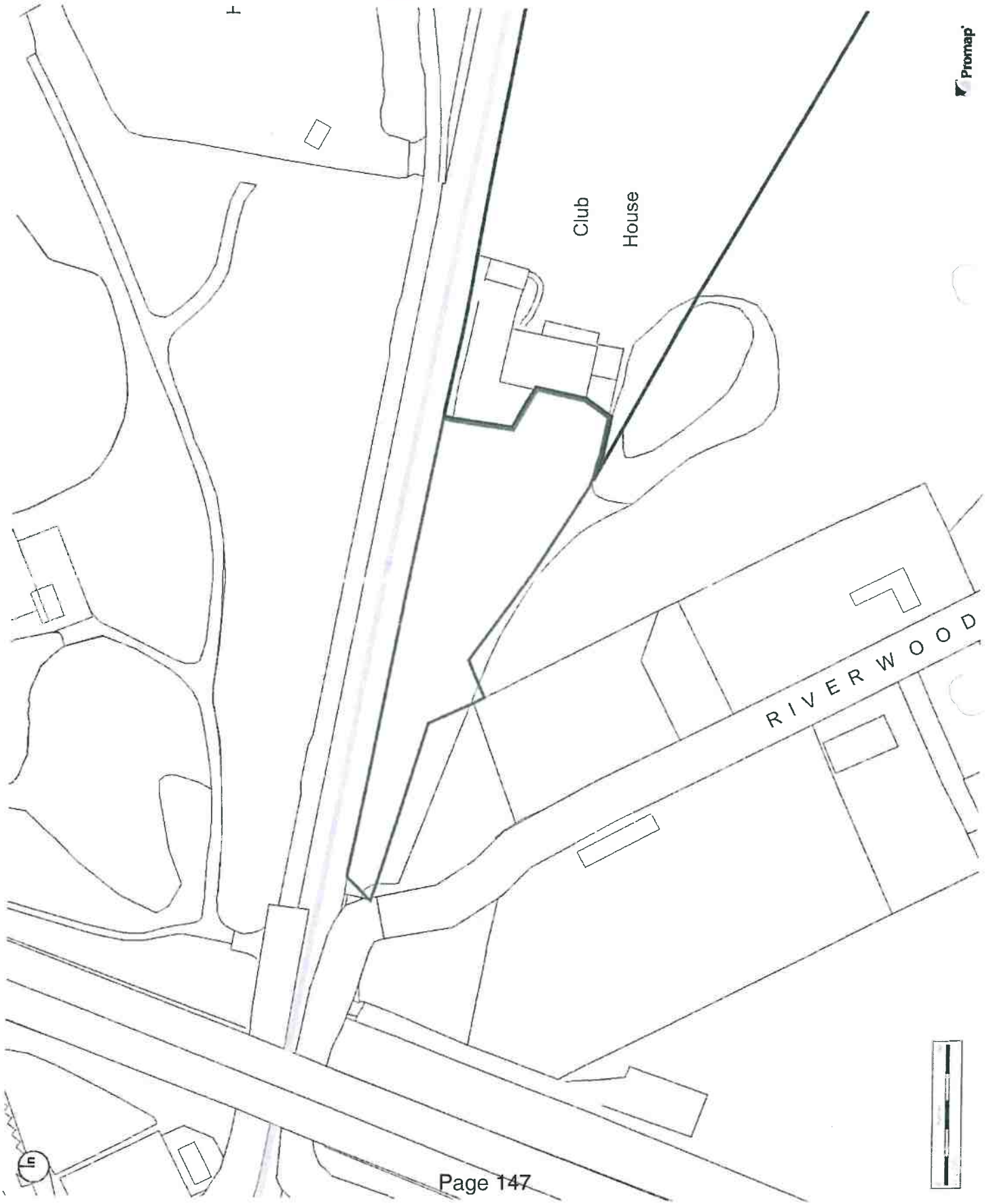




Planning Applications  
13 NOV 2019

PLANNING APPLICATIONS  
13 NOV 2019  
COMMITTEE

Planning Applications  
13 NOV 2019



Turley



Existing access road

Proposed car park barrier with keypad/job access panel. Details to be confirmed.

Proposed 5.5m access

2m footway delineated with white lining

6m access between rows of parking bays

Existing lighting column to be retained.

Existing electricity mast to be retained

Proposed storage for 32no. bicycles

Existing electricity mast to be retained

6m access between rows of parking bays

Existing electricity mast to be retained

Existing lighting column to be retained.

5.5m access to parking bays closest to rugby club entrance

**Legend**

Surfacing to be as existing. Tarmac areas to be retained.

Proposed gravel surfacing. Where existing, graveled area to be made good.

Area of car parking to be set aside for coach parking/access on match days. (Parking for 5no. coaches possible).

'Keep Clear' white lining to prevent parking

Existing vegetation to be retained

**Notes:**

1. Do not scale from this drawing.
2. Drawing is preliminary and as such is subject to change.
3. Total car parking spaces is 136 including 11 disabled.
4. Parking bay dimensions in accordance with tables 9 and 13 of Buckinghamshire Countywide Parking Guidance, published in September 2015.

PLANNING APPLICATIONS  
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COMMITTEE



**COTSWOLD  
TRANSPORT  
PLANNING**

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Cheltenham  
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GL50 1NW  
Tel: 01242 370283  
chellenham@cotswoldtp.co.uk  
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Drawing Title:  
Proposed Car Park Layout

Client:  
Marlow Rugby Club

Project:  
Marlow Rugby Club

Drawing No:  
SK01

Revision:  
F

Date Drawn:  
15.02.17

Issue Date:  
05.02.18

Drawn by:  
LG

Checked by:  
MF

Project Code:  
CTP-16-414

Scale at A3:  
not to scale

Drawing Status:  
INFORMATION

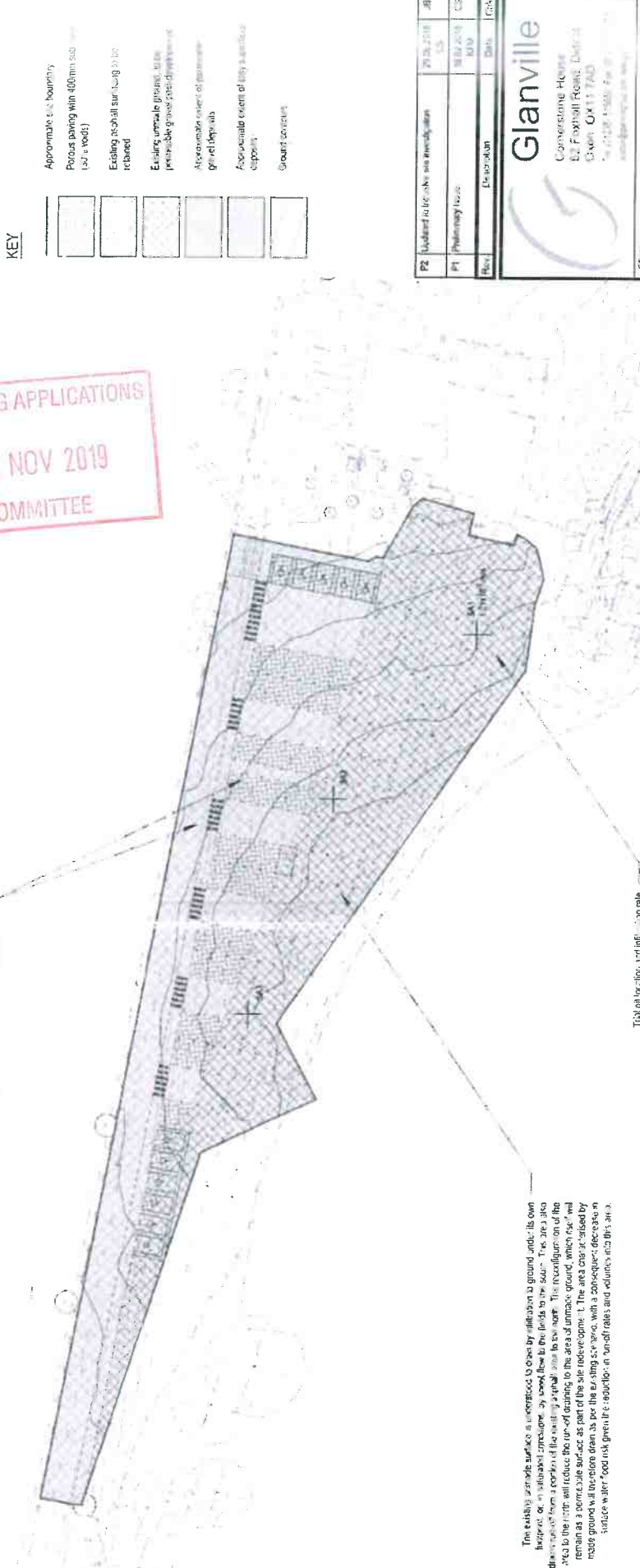


**NOTES**

1. Dimensions not to be scaled.
2. This drawing is indicative and not intended for construction.
3. Site layout from Cotswold Transport Planning Study No. CTP-15-14 SHU Rev F
4. Topographic survey from Gournthorpe Ltd. Drawing No. 1.3290-1-C.
5. Refer to the Flood Risk Assessment of the site for a drainage strategy.

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Runoff from roofs, paved areas and other drained to permeable ground (perforating spaces), where feasible, will be directed to the soakaway twin storage for all events up to and including the 1 in 100 year ARI, cumulative change storm, prior to discharge by infiltration to ground.



The existing site surface is intended to be by infiltration to ground under its own weight, or, in alternative circumstances, by flow to the soakaway. The area also drains to the soakaway from a parking area to the north. The reconfiguration of the area to the north will reduce the runoff draining to the area of permeable ground, which will remain as a permeable surface as part of the site redevelopment. The area also drains to the soakaway from the existing car park, with a consequent decrease in surface water flood risk greater reduction in runoff rates and volumes into the area.

Total infiltration and infiltration rate

**KEY**



- Approximate boundary
- Permeable paving with 400mm SUD (soak a void)
- Existing soakaway (surrounding to be retained)
- Existing permeable ground, with permeable ground paved (perforating)
- Approximate extent of permeable ground (soakaways)
- Approximate extent of fully permeable surface
- Ground contours

P2	Updated to reflect site investigation	27.05.2018	JB
P1	Preliminary Issue	18.02.2018	CS
Rev	Description	Date	Drawn

**Glanville**  
 Cotswold Homes  
 52 Foxhill Road, Litchfield  
 Glos, GL13 7AD  
 Tel: 01297 250000  
 www.cotswoldhomes.co.uk

Client: Marlow Rugby Union Football Club

Project: Marlow Rugby Club New Car Park

Title: Indicative Surface Water Drainage Strategy

Project Engineer: K. Allen     Scale: 1:150 @ A3  
 Project Director: J. Birch     Date: 18 January 2018

PRELIMINARY

Drawing No. CV8170307/SK02     Rev: P2





PLANNING APPLICATIONS  
 13 NOV 2018  
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Notes:

- 1. Do not scale from this drawing.

KIP  
 ADDITIONAL PLANS



COTSWOLD  
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Drawing Title  
 Existing Car Park Surface Finishes

Client  
 Marlow Rugby Club

Project  
 Marlow Rugby Club

Drawing No  
 SK03

Date Drawn  
 06.06.18

Drawn by  
 MF

Project Code  
 CTP-15-414

Revision

Issue Date  
 06.06.18

Checked by  
 MF

Scale at A3  
 1:750

Drawing Status

INFORMATION

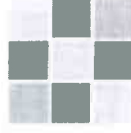
**Legend**

- Existing Tarmac Surface
- Existing Gravel/Grass Surface

Notes:

1. Do not scale from this drawing.
2. Drawing is preliminary and as such is subject to change.
3. Total car parking spaces is 136 including 11 disabled within the red line application boundary.
4. Parking bay dimensions in accordance with tables 9 and 13 of Buckinghamshire Countywide Parking Guidance, published in September 2015.

PLANNING APPLICATIONS  
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COMMITTEE



**COTSWOLD  
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Drawing Title:

Proposed Car Park Finishes

Client:

Marlow Rugby Club

Project:

Marlow Rugby Club

Drawing No:

SK04

Revision:

E

Date Drawn:

07.06.18

Issue Date:

09.09.19

Drawn by:

LG/MF

Checked by:

MF

Project Code:

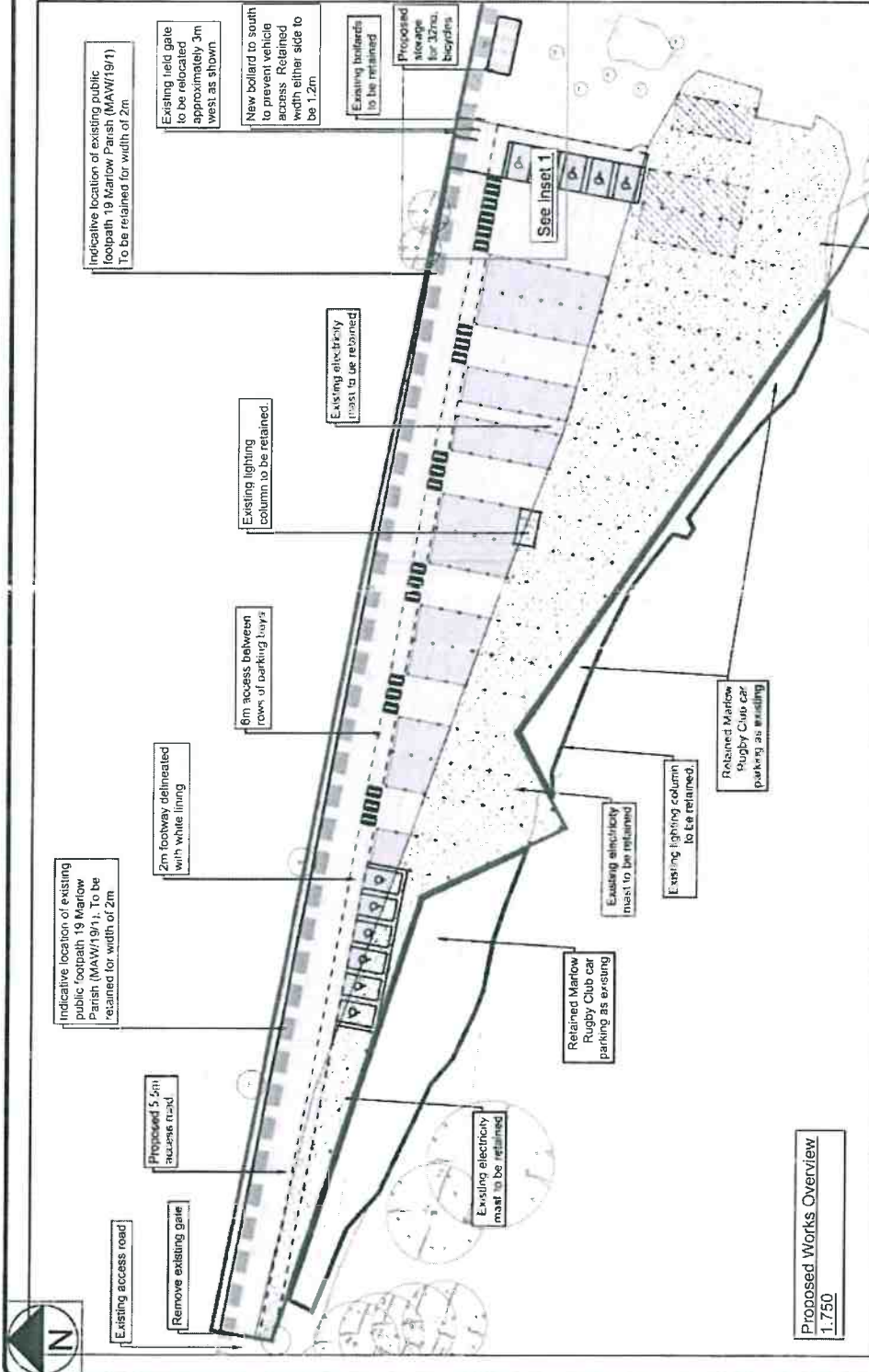
CTP-16-414

Scale at A3:

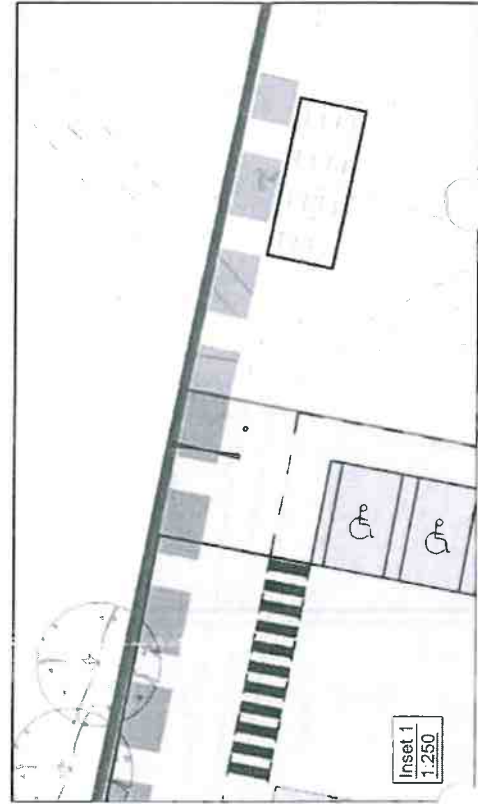
1:750

Drawing Status:

INFORMATION



Proposed Works Overview  
1:750



Inset 1  
1:250

Legend

- Existing tarmac surface
- Existing gravel/unbound surface
- Existing tarmac surface to be excavated and replaced with gravel/unbound surface
- Existing gravel/unbound surface to be excavated and replaced with tarmac surface
- Area of car parking to be set aside for coach parking/access on match days.
- Existing vegetation to be retained.
- Indicative location of existing public footpath 19 Marlow Parish (MAW/19/1). To be retained for width of 2m.



Proposed tactile crossing point

Proposed 14m corner radius

Proposed Arrangements (1:200)

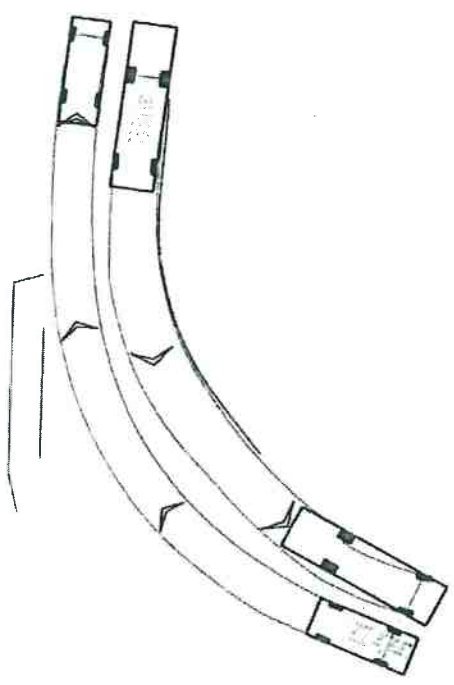
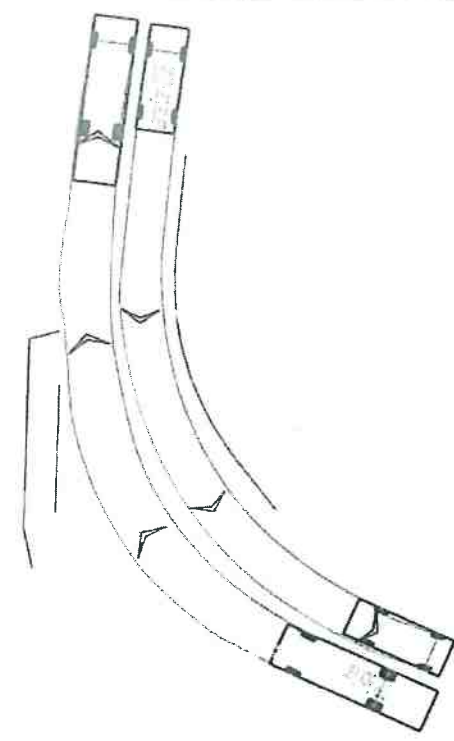
PLANNING APPLICATIONS  
 13 NOV 2019  
 COMMITTEE

24m pedestrian visibility splay to a 1m offset from the rear side channel line from the back of the proposed tactile in accordance with Manual for Streets, Guidance for 20mph speeds

24m pedestrian visibility splay to the centreline from the back of the proposed tactile in accordance with Manual for Streets Guidance for 20mph speeds

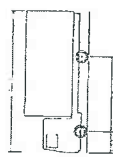
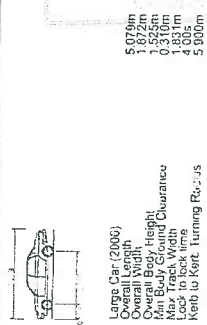
Box Van (Eastbound) / Large Car (1:250)

Box Van (Westbound) / Large Car (1:250)



Notes:

Highway Boundary Data



Large Car (2000)  
 Overall Length 5.079m  
 Overall Width 1.872m  
 Overall Height 1.370m  
 Min Body Ground Clearance 1.881m  
 Max Track Width 1.915m  
 Kerb to Kerb Turning Radius 5.900m

7.5t Box Van  
 Overall Length 6.010m  
 Overall Width 2.490m  
 Overall Height 2.351m  
 Min Body Ground Clearance 2.064m  
 Kerb to Kerb Turning Radius 7.490m



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Drawing Title: Proposed Pedestrian Crossing Point	
Client Marlow Rugby Club	
Project: Marlow Rugby Club	
Drawing No: SK05	Revision:
Date Drawn: 05.06.19	Issue Date: 05.06.19
Drawn by: TG	Checked by: MF
Project Code: CTP-16-414	Scale at A3: As Shown
Drawing Status: INFORMATION	



