

# Compton PC Local Plan Sub Committee Report (July 18, 2017)

## Local Plan timeframe

The consultation on the revised draft Local Plan (2017) is currently underway (with responses accepted before noon, 24 July), and GBC anticipates sending the results to the Planning Inspector in December 2017. The Public Examination of the Local Plan is expected to take place in early 2018.

## Consultation documentation

Since Compton PC meeting on May 17, 2017, the following documents have been commissioned/published relating to GBC Local Plan:

- *Review of GL Hearn's Guildford Addendum to the West Surrey SHMA*, June 2017, by NMS, an independent expert company dealing with housing and demographics. This was commissioned by the Guildford Residents Association and parish councils. It concluded that the Objectively Assessed Need (OAN) figure should be revised down from 560 homes per annum to 400 homes per annum.
- *A Surface Water Flood Risk Assessment of Blackwell Farm* has been carried out by JBA Consulting on behalf of Worplesdon Parish Council. This document is not yet in the public domain.
- *Technical Note re Guildford's Proposed Submission Local Plan: Strategy and Sites 2017 – Transport and Highway Review*, June, 2017 (Addendum to Technical Note re Guildford Local Plan 2016 Transport Review) by Traffic Consultant RGP on behalf of Compton and Worplesdon parish councils (attached). This concludes that there is concern about the deliverability and viability of the Blackwell Farm allocation for the following reasons:
  - Transport infrastructure requirements of around £60m are needed to make the site viable, and this sum is considered to be excessive and disproportionate to the scale of the development proposals.
  - There are operational concerns regarding how the through vehicle link from the A31 to Gill Avenue will be controlled and how the enforcement will be carried out, by whom and whether it can effectively remove potential for 'rat-running' between the A31 and the A3.
  - The deliverability of the scheme requires third-party land to access Gill Avenue and it has not been demonstrated that this is possible to acquire.
  - The vehicular impact resulting from a six-form entry secondary school on Blackwell Farm (whereby two thirds of the children would travel in from outside the site) and from a new station at Park Barn has not been included in the strategic traffic model.
- *Guildford Borough Proposed Submission Local Plan: Strategy And Sites Regulation 19 Consultation, July 2017 Response* by Green Balance and funded by Compton PC.

The Green Balance report, which the Local Plan Sub Committee considers to be a very thorough and professional piece of work, focuses on the unresolved problems relating to access and egress, and in particular how this adversely impacts on the wider network, including the B3000 through Compton Village. It draws on research that has been funded by Compton PC, and also on earlier research funded by the CPRE (Surrey) and Save Hogs Back. **The Local Plan Sub-Committee therefore recommends that the submission from Green Balance is submitted by all three organisations, and forms an addendum to the previous submission from Green Balance to the 2016 draft Local Plan.** Different contributions will be reflected in the title of this addendum.

Compton PC has also been approached by Artington Parish Council, which has expressed its wish to “support” the Green Balance response. Whilst Artington has not seen this draft response, Cllr Richard Bennett felt it was likely that Artington PC would wish to include it within its own response (perhaps as an Annex). He was of the opinion that it would be useful for the Inspector to see this document more than once.

Cllr Bennett added that Artington PC did not want Compton PC to be viewed as a “lone voice” and wanted to reflect widespread opposition to this site allocation. He proposed approaching other parish councils that would be adversely impacted by the Blackwell Farm development for their support of the document also. He was confident that this would be forthcoming from Shalford PC and is prepared to approach Shalford on Compton’s behalf. Cllr Bennett said that, if Compton agreed to Artington’s support of its document, he would ask Artington to consider contributing a token sum towards Green Balance’s fees.

**The Local Plan Sub Committee therefore recommends that, in order to add weight to Compton PC’s response to the Local Plan, Artington is allowed to add its support to the response document and that further support is sought from the other parish councils that will be similarly affected by greater traffic flows.**

The Green Balance draft submission document is in draft form and will be circulated before the meeting on the 18th July for your detailed review. The key arguments related to traffic are summarised below:

### **Impact of Local Plan on Compton - traffic**

The Blackwell Farm development depends on the delivery of two substantial infrastructure schemes, both of which will have an adverse impact on Compton:

1. Widening of the A3 from the A31 junction to the Stoke Roundabout.
  2. A new “controlled” link road from the A31 to Gill Avenue/Egerton Road.
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1. Widening of the A3 – Any increased capacity on the A3 will attract more traffic (from the villages of Godalming, Farncombe and Shalford etc) northbound on the B3000 in order to join the A3 at the Compton/Godalming junction. Guildford Borough Council’s (GBC’s) Strategic Highway Assessment (SHAR) indicates an increase of 16%

northbound through Compton if the widening goes ahead. Although it is not included in GBC's analysis, there would presumably also be an uplift in traffic travelling to the A3 along the parallel Charterhouse/Hurtmore/Priorsfield roads.

2. New "controlled" western link road – this will be accessed by a new signalised junction on the A31 (Hog's Back) at Down Place. Installing a junction at this point would almost certainly add to the existing peak-hour queues every weekday morning on the A31. Although this traffic is not fully modelled within the SHAR (it doesn't take into account stationary traffic or traffic beyond the A3 slip road), it is known that hold-ups on the A31 result in Guildford-bound traffic from the west diverting through Puttenham, Compton (southbound on the B3000) and Artington.

The result of these two infrastructure schemes will therefore be an increase in traffic through Compton both southbound and northbound during the morning peak. This is particular problem at the north end of the B3000 where levels of nitrogen oxides above EU legal limits have consistently been recorded. The Air Quality Review accompanying the Local Plan states that this location "was not declared as an AQMA [Air Quality Management Area] as the assessment noted that emissions from traffic were expected to decrease into the future. - a statement would appear to gloss over serious problem with associated health risks.

### Waverley Borough Council Local Plan Inquiry

The Waverley BC Local Plan Inquiry took place in June. Among the housing allocations examined was one for 35 homes at New Pond Road (adjacent to the junction with Binscombe Lane). Green Balance also represented a Binscombe resident opposed to this scheme. We have not yet received the Inspector's report.

The Local Plan Sub-Committee members were unable to attend the Waverley Inquiry. However we have received a report on it via Tim Harrold (CPRE Guildford Chairman) and the key points are summarised below:

- During the Inquiry, Neil McDonald (consultant at NMSS) was given time to present his case regarding the objectively assessed housing number. The Inspector agreed that the proposed figure for Waverley should come down from 490 to 396 as a result of his argument. However, the Inspector then stated that the lower figure for Waverley was "untenable" and added that "a market affordability uplift" of 20-25% would be required, presumably on the revised figure negotiated by Neil McDonald.
- The Inspector said that he was not interested in environmental constraints.
- He also stated that the Woking Local Plan had an unmet need of 166 houses, which according to the rules governing the whole Housing Market Area involving Guildford, Waverley and Woking would have to be met by Guildford and Waverley (ie 83 houses more each). Waverley BC argued that it would only be fair if Woking took one third of the uplift, but this was not accepted by the Inspector. He expressed his lack of interest in discussing lower figures and wanted discussion on how an employment increase could be made possible in Waverley through more affordable housing.

## Funding for Green Balance

To bring the PC up to date re payment arrangements for Green Balance: the consultancy has spent 10 days on researching and drafting this latest Compton PC submission, and so the next invoice will be for £6,000 (excluding VAT).

It is likely that the balance of the £10,000 set aside by Compton (for Green Balance) will not be sufficient to fully pay for representation from Green Balance through to the Examination, given the scale of the project and the number of issues it is tackling.

Procedurally, Green Balance will be invited to respond to 'Matters' raised by the Inspector (3,000-5,000 words, plus appendices per Matter) prior to the Examination. Then there is a need for its consultant to read everything that other parties have submitted, as statements are 'taken as read'. There is already a lot to read from last year, plus the new material. Then there is the need to decide what points to make at the Examination. The Examination will take at least a day (discussing Blackwell Farm alone). There will be other sessions on Green Belt, AONB, transport etc, though it might not be financially realistic to fund Green Balance's attendance at them all.

To give an indication of time requirements, Green Balance's work for New Pond Road site from after the submission of a Regulation 19 Consultation response (which is where we will be after July 24) took nearly 7 days. That was on one Matter, one very small site, limited issues for debate, and one client. So if we want Green Balance to do what is necessary to make the best possible case for Compton, it would be realistic to budget for at least 12 days further work (ie a further £7,200). This would represent a total of £13,200 against the total sum of £20,000 set aside for representing the parishes interests in the Local Plan.

**The Local Plan Sub-Committee considers that Green Balance is in the best position to support Compton with its grasp of the issues facing the Parish and its knowledge of planning issues and we recommend that it continues to represent Compton at the Examination.**

The Local Plan Sub-Committee will, of course, do as much as possible to support Green Balance in its research in order to minimise costs to the Parish. We also hope that contributions from other Parishes will ensure that the total expenditure remains comfortably within the amounts already set aside.

Karen Stevens  
Chairman, Local Plan Sub-Committee