

**GUILDFORD BOROUGH PROPOSED SUBMISSION LOCAL PLAN: STRATEGY AND SITES**  
**Regulation 19 Consultation, June 2017**

**Response by Compton Parish Council and Save Hogs Back supported by  
Campaign to Protect Rural England (Surrey) and Worplesdon and Artington Parish Councils**

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**July 2017**

**Policy A26: Blackwell Farm**

1. The Save Hogs Back response to the June 2016 Pre-Submission Consultation (Regulation 19) provided a comprehensive set of reasons why the Blackwell Farm strategic development allocation was so unacceptable that the Council should not proceed with it. Apart from the serious environmental damage it would do, we questioned whether it was practicable. The June 2017 Consultation indicates both the determination of the Council to press ahead with this extraordinarily inappropriate scheme and also that it is trying to deny the implausibility of the development proceeding, if at all, without appalling consequences. Modest amendments have been made to various policies in the Plan, but collectively they demonstrate that after another 12 months of searching the Council has still found no solutions to the problems we identified.

2. The unresolved problems centre on access and egress. Although pitched as an urban extension to Guildford (in the Spatial Vision, in Policy A26 and in paragraphs 4.1.8 and 4.6.24), Blackwell Farm has proved impractical to integrate into the town despite its physical proximity. There are many facets to this, the main ones being:

- the Blackwell Farm development cannot proceed without the capacity of the A3 trunk road being increased to bolster the strategic route in and out of Guildford, and the possibility of this happening is unknown;
- movement between the development area and Guildford, which is already extremely congested, would be substantially more impeded by the development;
- alternative means of access to the development area would have both significant practical problems and significant adverse consequences for the highway network;
- the ‘Sustainable Movement Corridor’ to tackle that congestion is most unlikely to be effective on the scale necessary to resolve access issues and will fail in its key role of reducing congestion;
- the combined effect of the Blackwell Farm development and the A3 widening through Guildford (itself needed in part because of Blackwell Farm) would be to raise substantially the Nitrogen Dioxide levels in Compton on the B3000 still further above legal limits at the most polluted point in the Borough.

In each case the Proposed Submission Local Plan has wholly failed to show that the Blackwell Farm development is practicable. We examine these in more detail below, after showing that the pressure on the road network in the vicinity of Blackwell Farm will be discernibly greater than forecast only one year ago.

## Traffic generation in relation to road capacity

3. Mouchel have pointed out, in advice submitted by Highways England in response to the Proposed Local Plan 2016, that there are significant limitations in the evidence presented in the *Strategic Highways Assessment Report (SHAR)* accompanying the Proposed Submission Plan in June 2016 which affect Blackwell Farm:

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.

4. The SHAR indicated that the total vehicle generation anticipated by the whole Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

5. The Local Plan 2016 identified that a “Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue”. The word ‘preferably’ is instructive because it indicates that it was unclear in June 2016 how Blackwell Farm would be connected into Guildford. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. On the assumption that a means of direct access would be found, the SHAR identified distribution of Blackwell Farm traffic to the network of 342 trips eastbound towards Guildford and 375 trips southbound to the A31 in the morning weekday peak hour.

6. Figure 4.3 of the SHAR estimates traffic on the principal arms of the local network with Blackwell Farm development in place including the link to the A31. This Figure shows that 1,803 vehicles would attempt to enter the Egerton Road/Gill Avenue crossroads by the Hospital in the peak morning weekday hour (one every two seconds). The 342 eastbound vehicles generated by the Blackwell Farm development would account for 19% of the post-scheme traffic on the junction (23% growth on pre-scheme traffic), neglecting the impact of any rat-running traffic. Users of the road would consider this scale of traffic growth implausible and unacceptable given the high level of congestion there at present. The SHAR

confirms that the level of congestion on Egerton Road in the morning peak will be substantially worse than at present and will exceed its capacity with the development and its access roads in place (Scenario 3). Table 4.4 (Row 25) shows that Egerton Road eastbound will have a ratio of flow to capacity (RFC) of 0.92 resulting in a level of service with 'unstable flow operating at capacity'. Table 4.12 (Row 8) shows that Egerton Road westbound will have a RFC of 1.21 (compared with about 1.04 now) resulting in the worst possible level of service with 'forced or breakdown of flow'. In other words, it simply won't work. The figures already smooth the morning peak hour figures over a three hour average, as Mouchel noted, so actual congestion in the peak would be worse than these indicators, even assuming zero rat-running traffic.

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.

8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

- the proposed link with the A31 has been downgraded from its 'primary' status and by default the link with Guildford is now presented as of equal significance (Policy A26 Infrastructure Requirements item 1); there are various reasons for this, explored below, but fundamentally the Council has been unable to find a way of making the link with the A31 work as it wanted;
- a major new secondary school with six form entry must now be provided on the Blackwell Farm site, which was previously sited elsewhere (Policy A26 Allocation item 9): a school of this size (circa 900 students comprising 180 students in each year group for five school years) would generate a very substantial amount of additional traffic, bringing in about 600 students daily from outside Blackwell Farm, much of it attracted from Guildford, but there have been no changes at all to the proposed capacity of the road network to accommodate this, which can only mean still worse congestion on Egerton Road and the surrounding network than inevitable anyway;
- proposals in principle are now included for limiting the road users on the new route linking to the A31 (Policy A26 Infrastructure Requirements item 3), but these are deliberately left vague as the Council has been unable to find a way of achieving this despite trying to do so for the last year;

- the developer of Blackwell Farm (ultimately University of Surrey) must contribute to funding improvements to the local road network necessitated by the scheme, but this must now have “regard to the Sustainable Movement Corridor Supplementary Planning Document”: as this SPD has not yet been published even in draft, the policy change demonstrates a remarkable lack of clarity about the role of the SMC in relation to Blackwell Farm (where it will go, how it will be built, who pays for it and how it links into the wider network) and creates an open-ended commitment which could affect the viability and deliverability of Blackwell Farm;
- the new Policy A59 has given a clearer specification of the need for a new railway station at Park Barn near the northern end of Blackwell Farm, with access from both the north and south sides: the access from the south will generate additional traffic affecting the roads to Blackwell Farm, especially in peak periods, which has been neglected in the calculation of traffic generation and the modelling of its distribution to the road network, again placing additional stress on already massively overloaded roads in peak periods.

These changes are additional to the increased traffic on Egerton Road and the surrounding network arising in any event from development planned or under construction at Manor Park and at the existing Research Park.

### Traffic on the A3

9. Guildford Borough Council has adopted conflicting positions regarding its intentions for traffic on the A3 through Guildford.

10. The Council has endorsed a study commissioned in 2014 from Arup *Guildford Town and Approaches Movement Study*, a vision statement on transport in Guildford to 2050. This is the basis for the Sustainable Movement Corridor now promoted through the Local Plan by the Council (see paragraphs 51-53 below). However, the Arup study was clear that the purpose of the A3 should be to concentrate through-Guildford movements on this road, assisted by inhibiting its use for local movements. The study recommended:

“Interventions in this strategy that reduce roadscape in the town centre should serve to deter through traffic in the town; they should also reduce short journeys on the A3 within the town (for example, trips from the Surrey Research Park to the town centre via the A3) that will free up capacity for longer distance trips on the A3 trunk road”.

11. The Arup study was clear that there should be no capacity increase on the A3 trunk road through the town:

“In the appraisal of interventions undertaken for this study, all potential interventions that increased road capacity, including A3 interventions (widening, northern bypass, tunnel) and additional road links in the town centre, resulted in increased traffic levels in the long term over and above business-as-usual changes (i.e. in 2031 compared to the 2031 Business-As-Usual). Vehicle mileage increased by up to 2% across the borough and highway delay increased by up to 16%, with associated deterioration in air quality, noise impacts, land use impacts and

severance. These interventions are therefore not included in the strategy as they do not strongly support the multi-faceted headline vision for sustainable mobility in the town of Guildford identified to guide the development of the strategy.”

12. However, this study is increasingly being compromised. Arup’s limitation on using the A3 is wholly at odds with the approach which Guildford BC is taking in practice. The Council has decided that the Blackwell Farm development cannot proceed without substantially increased capacity on the A3. The last sentence of the 2017 Local Plan’s ‘Spatial Vision’ states: “The delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford”. This is due to existing major peak hour congestion on the A3 (Local Plan paragraph 2.14a). The June 2016 Strategic Highway Assessment Report concluded that “the results of this assessment indicate that should the [DfT’s] Road Investment Strategy schemes [which include major A3 capacity increases through Guildford] not be forthcoming then the residual cumulative impact of the Proposed Submission Local Plan on the highway network could be considered severe.... To avoid this occurring in such circumstances of the RIS schemes not being forthcoming, then the quantum and location of development as proposed may have to be amended” (page 63, emphasis added). This was confirmed in the 2017 Addendum for the revised Proposed Submission Local Plan (Conclusion, page 2).

13. The Local Plan therefore aspires to a very substantial increase in the capacity of the A3, not least to facilitate car-borne travel to and from the major developments planned at Blackwell Farm (and Gosden Hill Farm). The Spatial Vision states:

“The Department for Transport’s Road Investment Strategy includes schemes for the A3 Guildford and the M25 Junction 10/A3 Wisley interchange. Early, targeted improvement schemes to deliver road safety and some congestion relief on the A3 in Guildford will be delivered within the plan period.”

Paragraph 4.6.14 specifically explains the intention of Policy ID2 ‘Supporting the DfT’s “Road Investment Strategy”’ as including the identified:

“Scheme with construction anticipated to commence in Road Period 2 (2020/21 to 2024/25):

- A3 Guildford – improving the A3 in Guildford from the A320 to the Hogs Back junction with the A31, with associated safety improvements.”

14. In the last twelve months, the likelihood of any of this happening has been slipping away. The Local Plan has now been altered with the deletion from paragraph 4.6.18 of the option of a tunnel under Guildford, so that a road widening scheme is now the most likely option (even if a tunnel remains the Borough Council’s preferred option – see *Topic Paper: Transport* paragraph 5.101). Exactly what is intended is still hugely unclear: the Infrastructure Schedule for this project in Appendix 3 shows that what is proposed is so vague that it may cost anything between £100m and £250m (project SRN5). Only a brief examination of the A3 through Guildford will in any event show just how difficult, costly and enormously environmentally damaging would be any attempt to add significant extra capacity in each direction to the A3.

15. Also deleted is paragraph 4.6.17 which had stated “Guildford Borough Council and Highways England are in the process of agreeing a Statement of Common Ground which sets

out assumptions regarding both the performance and safety outcomes that the RIS schemes can be expected to realise". This is said to be because an SoCG is likely to be agreed closer to the Examination (*Topic Paper: Transport* paragraph 5.14), but we would not be surprised if Highways England is unable to make the commitment the Borough Council seeks.

16. Highways England itself is doubtful about how much can be achieved on the A3 and by when. Its response to the Proposed Submission LP on 18 July 2016 stated: "There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period." A Technical Note supporting that submission, prepared by Mouchel, was more precise:

"It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals."

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

18. Guildford BC found this response hugely inconvenient and persuaded Highways England to withdraw this statement after a meeting on 1 September 2016. Highways England's letter on 5 October 2016 doing this stated instead (with our emphasis added):

"You will be aware that Highways England is currently developing options for a potential scheme on the A3 in Guildford, capable of being delivered in the next roads period (2020-2025), subject to the normal value for money being applied. The scheme proposes widening the existing carriageway to provide additional capacity and safety improvements between the A31 Farnham Road and the A3/A320 Stoke Road. The design of such a scheme is complex and needs to consider a number of potential options, a process which takes time to complete. We will continue close working with Guildford Borough Council and Surrey County Council to progress the development of the potential scheme.

We note that the delivery of housing in the later stages of the plan period is dependent upon a major improvement to the A3 through Guildford. It is essential that the Local Plan provides the planning policy framework to ensure development does not come forward in advance of critical infrastructure. As a result of clarification received at our recent meeting, it is now understood how the Local Plan intends to do this. Therefore we wish to formally withdraw our representation to this policy."

19. While Highways England is urging caution, Guildford's Local Plan continues to make highly questionable assumptions. On timing, Appendix C claims that the A3 capacity increase will be 'delivered' between 2023 and 2027. This conflicts with paragraph 4.6.14 of

the Plan (above) which expects construction to begin three years earlier. Delivery in 2023-27 is itself barely consistent with the Council's own *Topic Paper: Transport* at paragraph 5.88, which reports that "Highways England has advised that, if a scheme is approved with funding agreed, construction is unlikely to be start[ed] until 2024 at the earliest, with construction taking 2½ years." This would mean that the capacity would only become available in 2027 at the earliest, in effect postponing by some years the Plan's aspiration for A3 widening.

20. On funding, there is no clarity where the money for A3 widening would come from, even if it did surprisingly pass the value-for-money test. The proposed submission Local Plan has been amended from one year ago in the Infrastructure Schedule in Appendix C to give the impression that developers are now expected to foot more of the bill, further adversely affecting the viability and deliverability of Blackwell Farm. The change states the funding source will be 'Highways England and developer funded' instead of 'Highways England and developer contributions'.

21. Finally, the exorbitantly expensive, damaging and disruptive widening of the A3 cannot be expected to achieve its objective of alleviating traffic flows sufficiently to accommodate effectively traffic from Blackwell Farm. Congestion will, remarkably, be worse with the A3 widened than without it. The SHAR reports in paragraphs 4.8.4-6:

"4.8.4 Table 4.1b shows in the PM peak that while the network performs better in Scenario 5 [i.e. with the A3 widening in place] compared with Scenario 3, it is still worse than in Scenario 1 with vehicle hours higher and vehicle speeds lower by 12% and 2% respectively.

4.8.5 As noted above in Section 4.5, the capacity increases on the M25 and A3 result in some high flow increases as trips re-route to make use of the improvements. In turn, this affects roads approaching the A3, such as the A320, A31, A25 and B3000. These also see high flow increases with some, such as the A320, experiencing a significant deterioration in the Level of Service.

4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion."

22. The Borough Council's own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the 'do nothing' option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:

- if a suitable widening scheme can be designed and if so how much it would cost;
- whether the scheme would meet 'value for money' tests;
- whether the money for it could be found;

- whether the A3 capacity could be increased in time to assist the development of Blackwell Farm during the Plan period, as the earliest provision date would be 2027 (and probably later).

Finally, even if built, the widening of the A3 would generate congestion in Guildford rather than relieve it and would itself be even more over-capacity than it is now. The Borough Council's reliance on the A3 capacity improvement is foolhardy in the extreme. Not proceeding with the Blackwell Farm development would be a far superior option.

24. The Council recognises that the Blackwell Farm development cannot proceed until the A3 has been widened, but realises that this cannot be achieved until, at best, near the end of the Plan period. As a result of the lack of progress in agreeing A3 capacity increases, the rate of provision of houses in Policy S2, which was back-end loaded in the 2016 Proposed Submission, is now in the 2017 Proposed Submission still more heavily skewed towards the end of the plan period. The 2019-20 provision has been dropped from 500 to 450, while the annual provision in the last three years of the Plan has been raised from 790 to 850. There is insufficient evidence to show that 850 dwellings per annum could be constructed and sold in the Borough in those last three years: the numbers reflect not how the housing market works, but the contortions which the Council has gone through to square its housing provision numbers with the aspirational timetable for the widening of the A3. A far superior option in both housing and transport terms would be to abandon both the Blackwell Farm development and the A3 widening (which in part is justified by Blackwell Farm as well as facilitating it).

#### Access from the A31 Hogs Back

##### *Junction with the A31*

25. The principle of a new signalised junction on the A31 to facilitate access to Blackwell Farm is project LRN3 in the Infrastructure Schedule. The Plan accompanying Policy A26 Blackwell Farm is unchanged from June 2016. It continues to show a road access at a widened junction of Down Place with the A31, passing over the A31 slip road onto the A3 northbound. Our response to the June 2016 Consultation demonstrated, in a commissioned report from transport specialists, that the proposed signalised junction at Down Place with the A31 would be most unlikely to function effectively. Furthermore, Surrey County Council's *Strategic Highway Assessment Report* June 2016 shows that the new junction would cause all users on average a 35 second delay compared with no junction (Table 4.11). In the last twelve months the Borough Council has been forced by a Freedom of Information request to release a sketch map provided by the University of Surrey showing the latest proposals for this access. This involves a junction slightly west of the site originally intended but shows no distance measurements. It shows too an extra westbound lane for traffic on the A3 over-bridge but no bridge widening. Further proposals exist for this junction but have been denied to Save Hogs Back on weak excuses. Also, there appears to be no proposal to co-ordinate this junction with improvements to the Down Lane junction on the opposite side of the A31 slightly to the east, even though the creation of the Down Place access could ordinarily be expected to generate significant additional use of Down Lane.



26. The lack of transparency by the Council is significant: unless demonstrated otherwise, we consider that the proposed access at Down Place is likely to remain impractical for the following reasons.

- There does not appear to be sufficient road width for the proposed junction.
- A signalled junction is likely to be over-capacity at peak periods.
- Travellers leaving Blackwell Farm this way in the morning peak will suffer major tailbacks due to the overloaded A31 eastbound inhibiting left turns (the peak flow direction).
- Widening of the A3 over-bridge may well still be necessary at vast cost.
- Only a very environmentally damaging roundabout in the AONB on the top of the Hog's Back (previously opposed by Borough Councillors) could be sure of accommodating likely flows.

#### *Access road between the A31 and Blackwell Farm*

27. Project LRN4 in the Infrastructure Schedule is an access road at Blackwell Farm with a through link to Egerton Road. The Plan continues to give the misleading impression that “The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV” (Infrastructure Requirements item 2). A significant road connecting to the A31 could not possibly be achieved by an ‘improved Down Place access road’, the route of which is narrow, lined by mature trees on both sides, and includes a significant sharp bend, while any alternative could not possibly be sympathetic to the AONB and AGLV. The construction of an access road through an AONB to a new urban extension would be major development in its own right. This could only be justified in AONB policy terms if there were exceptional circumstances. There are none of these and none are claimed or demonstrated.

28. The principal difficulty which has arisen in the last year regarding the new link road is that the Council has been unable to find a workable solution for the local road network. The Council wants residents of Blackwell Farm and employees at the Research Park and its proposed extension to be able to enter and leave either in the Guildford direction or the A31 direction, but it does not want most other drivers to use the same roads if they don't really need to be there. There appear to be two intentions: to constrain drivers who are just passing through – so as to avoid rat-running (especially necessary if a direct through route can be found south of Manor Copse) – and to avoid attracting drivers who currently use Egerton Road. In both cases the intention is to avoid causing adverse network effects if drivers divert onto the new link, e.g. rat-runners overloading Egerton Road still further, or the new access prompting more traffic on the A31.

29. Policy A26 in the June 2017 Proposed Submission Local Plan sets out its solution: to provide a new route “between the A31 Farnham Road and Egerton Road” for “employees and emergency vehicles” (only) to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital. We address in this section the practicability of selecting users for the public highway. However, the matter is also linked to the separate issue of how to link Blackwell Farm into Egerton Road, the main road into Guildford (see paragraphs 47-50).

30. We have tried for the last year to obtain from Guildford BC and the County Highways Authority an understanding of exactly how users of the proposed new road network would be restricted to those people deemed suitable, with everyone else barred. No credible explanation has been provided. The matter is completely ignored in the Borough Council's *Topic Paper: Transport* (June 2017) and *Strategic Highway Assessment Report Addendum* (June 2017), and is restated but not explained in *Guildford Borough Transport Strategy 2017* (June 2017). This is an issue which cannot be brushed under the carpet because it lies at the heart of the credibility of the link to the A31.

31. The local authorities have been thinking about the issues raised but failed to find an answer after another year of investigating. Surrey County Council has indicated that its preferred option is the use of Automatic Number Plate Recognition (ANPR) coupled with a permit system. However, there is a general right of public access on the public highway without the State snooping on who uses it by means of cameras, so the legality and practicality of any control system remains to be resolved. For this method to function, therefore, we anticipate that cameras would have to monitor passage on private roads, raising the prospect that Blackwell Farm might not be fully accessible on the public road network. It remains unclear what would happen to drivers whose number plates were not 'authorised' to use the road, or how they could be discouraged from arriving in the first place. If there was a system of fines for unauthorised use of the road link, this would require the co-operation of public authorities in perpetuity (which would need to have ongoing funding from the development). With private roads, control of the network would be lost to a private interest whose priorities might not always be the same as those of a public authority. Rights of access to the private roads could at any time be changed by the landowner by reference to which vehicles were allowed passage, when, at what cost, or in other ways. We would expect an urban extension to Guildford reliant on access and egress by private roads to be fundamentally unacceptable.

32. It is unclear whether Guildford BC appreciates the impracticability of the proposed differentiation between acceptable and banned users of the road. There will be thousands of 'legitimate' drivers resident in the Blackwell Farm housing development. There will be many hundreds of employees in the Research Park and its proposed extension. There will be hundreds of staff on the Manor Park campus and at the Hospital. Identifying these individuals and, specifically, the cars they will be driving would be a nightmare, made worse by staff turnover and churn in the occupancy of the housing development. Legitimate individuals may have good cause to use alternative cars. The newly introduced secondary school would be largely (two thirds) for the benefit of non-residents of the Blackwell Farm development, so large numbers of drivers can be expected to arrive from elsewhere using the link road, and would need to be registered. Many others will claim legitimate cause for registration on the ANPR system, such as staff at the Nuffield Hospital as well as the County Hospital, employees of shops and services in the area, taxi drivers and so on. The system of registration would become very large and unwieldy, requiring continual (and rapid) update, at real cost. A reliable and effective appeal system would be needed, but the frustrations of both registered and especially non-registered users of the road are still entirely foreseeable.

33. As the transport consultant to Compton and Worplesdon Parish Councils notes, the inevitable complexity of an ANPR process raises a series of questions related to site deliverability such as:

- i) Will the developer provide for the financial enforcement costs of the link road restrictions in perpetuity? Is this included within the £20million cost for LRN4?
- ii) Will Surrey Police provide the enforcement of the ANPR in perpetuity?
- iii) How will all of the people who will be granted access to use the road be differentiated from through traffic?

34. Answers to these questions and resolving other practical concerns are fundamental to the successful deliverability of the vehicular link road and the urban extension as a whole. The road must not attract unwanted road users, but must still achieve the aim of serving all of the desired users. So far the Council has offered no commentary at all on how these awkward issues might be resolved, or on how the use of private roadspace to achieve a public purpose can be made to function without unacceptable risks of unilateral action by the landowner.

35. The outcome seems to us clearly inevitable if a link road is built. It will not be workable. Instead of a costly system of registration, fines, appeals, etc., the greater likelihood is that the foreseeable cacophony of opposition to a system which appears indiscriminate, unfair and ineffective will cause the system of ANPR and registration to be abandoned in a short order of time. All the disadvantages of the link road to the wider network would then be realised.

#### *Impact of the link road on air quality in Compton*

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear *2016 Air Quality Annual Status Report*, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO<sub>2</sub>) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO<sub>2</sub> pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of

achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than  $40\text{g}/\mu\text{m}^3$ ) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

38. The vehicle count through Compton will rise alarmingly if the Blackwell Farm development and the associated A3 widening are built, inevitably necessitating an AQMA and with little or no prospect of an AQAP being effective. For vehicle impacts, the SHAR treats development of Blackwell Farm and accesses to it as a two-stage process: 'Scenario 3' involves the construction of key highway schemes providing access to large development sites (incl. Blackwell Farm) and local highway schemes, while 'Scenario 5' involves the widening of the A3 at Guildford (A320 Stoke interchange junction to A31 Hog's Back junction). The traffic consequences of each are modelled separately. In practice, as established in paragraph 12 above, there is common ground between the Borough Council, County Council and Highways England that the Blackwell Farm development cannot proceed until the A3 has been widened, so in practice the highways impacts of the site access road and A3 widening are additional if Blackwell Farm is to proceed.

39. The SHAR shows in Figure 4.3 for the morning peak hour that 275 vehicles will leave the A31 at Down Place (for Blackwell Farm, the Surrey Research Park and County Hospital). Paragraph 4.7.5 suggests that these are trips which primarily have their origin in the west, (though the likelihood is that many of them will have actually their origin in the south: traffic from Godalming and Farncombe, for example, could access the A31 at the Puttenham junction and then head for the Research Park or Hospital while avoiding Guildford.) In short, a proportion of the 275 vehicles using the Down Place junction under Scenario 3 will have passed through Compton. Unfortunately, the network effects diagram shown in Figure 4.3 does not extend southwards to Compton to identify an indicative number.

40. The SHAR then indicates the impact of Scenario 5 compared with Scenario 3. This is reported for Compton in Table 4.5, showing that the B3000 through Compton will have one of the highest absolute increases in flow arising from the widening of the A3, with an additional 145 vehicles per hour in the morning peak, representing a further 16% increase in traffic through Compton. The Table notes that both under Scenario 3 (even without the A3 widening) and under Scenario 5 the Level Of Service on the road would be category E: 'Unstable flow operating at capacity'. The outcome could be even worse: the SHAR notes at paragraph 4.7.5 that potentially the number of drivers attracted to use the new Down Place to Blackwell Farm link could be somewhat higher as the model cannot accurately reflect the queuing that occurs on the nearside lane of the A31 as it approaches the merge with the A3. If so, the numbers passing through Compton could be expected to increase proportionately.

41. The evidence is clear that the combined effect of the Local Plan's proposals for the Down Place link road to Blackwell Farm and the A3 will greatly increase traffic through Compton which in turn will have an inevitable and appalling impact on air quality (which already exceeds legal limits at one location). Despite this, the Council is in denial about the air quality impacts of its Proposed Submission Local Plan 2017. Aecom have prepared for the Borough Council an *Air Quality Review of Guildford Borough proposed Submission Local*

*Plan: Strategy and Sites "June 2017"*, but this completely fails to appreciate the relationship between the Blackwell Farm development, the proposed road infrastructure developments and air quality at Compton. It provides a series of unwise statements:

(i) "it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally" (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) "The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO<sub>2</sub> concentrations measured in the area" (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

(iii) A review of Policy A26 Blackwell Farm (section 5.2.2.1) recognises that "A large development such as this is likely to have an impact on local air quality as there are likely to be large changes to traffic flows on nearby roads and thus impacts on pollutant concentrations", but failed to realise the consequences for Compton, even though this is nearby and clearly the place with the worst NO<sub>2</sub> pollution recording in the Borough (which should obviously be one of the first places to examine for air quality consequences).

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: "There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality."

(v) Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with 'through the planning application process'. Once allocations of land are made for development, strategic reasons for resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

42. Aecom's recommendations in section 5.4 recognise that "The increase in traffic flows associated with the implementation of the Draft Local Plan are predicted to be in the region

of 12,500-17,000 vehicles per day on the Guildford Bypass [A3]”, but seem to assume – extraordinarily – that no extra vehicles will pass through Compton (despite the evidence in the SHAR). In our view, the Aecom report and its recommendations represent a significant failure to respond to clear evidence of the air quality damage that the Blackwell Farm development as a whole and the associated A3 widening would inflict upon Compton, about which little could then be done in the short term. We wholly disagree with its approach, which could threaten life-expectancy in Compton.

43. It is hardly surprising that air quality is barely mentioned in the Sustainability Appraisal and treated as a minor issue, as Aecom also prepared this for the Borough Council: paragraph 10.7.1 final indent merely recommends that ‘detailed modelling’ is undertaken close to where very large increases in traffic flows are expected. Paragraph 10.7.7 concludes “Proposed changes to the spatial strategy have little or no implications for health, whilst proposed changes to site specific policy (particularly regarding air quality; see discussion above), responding to the Air Quality Review (2017), are supportive of good health.” Again key decisions are to be left until too late until the planning application stage, with both the SA (at paragraph 10.7.1) and the Air Quality Review (at page 5) recommending that ‘potential air quality issues’ should be added to the list of ‘key considerations’ at the end of the main urban development allocation policies, including Policy A26 Blackwell Farm. This has been taken up by the Borough Council. However, the SA fails to address the key issue that needs resolution now: how to stop additional traffic being attracted through Compton or reduce it.

### Connection to Guildford

#### *Linking the Research Park Extension to the road network*

44. The expansion of the Surrey Research Park and the creation of the Blackwell Farm estate are treated as part of the same development in Policy A26. In access terms it is more sensible to consider them separately. The Research Park proposal is for an Extension of 10-11ha, which would be to the north-west of the current Research Park. Access would be straight-forward from Guildford: via Egerton Road and Gill Avenue, via the roundabout serving the Research Park by the Occam Road/Priestley Road loop, and by making an extension to Stephenson Way. A road serving the Extension could be taken through the mature hedgerow separating the existing Research Park from Blackwell Farm at a point close to and parallel to the railway line. Stephenson Way has been constructed to allow further extension of the roadway in this location (also giving access to some of the last remaining large vacant sites on the current Research Park). Proposals for the Sustainable Movement Corridor in the June 2016 ‘Progress update’ as part of the evidence base for the Proposed Submission Local Plan at that time were consistent with this. They showed in Figure 5 a schematic route for the SMC. This is reproduced on page 16 of the Guildford Borough Transport Strategy 2017. At its western end this turns north from Gill Avenue, apparently to follow Occam Road and Priestley Road, before making a westward thrust into the Research Park extension area (though whether north or south of Surrey Satellite Technology is difficult to say from the scale of the plan provided). So far as the Research Park Extension is concerned, that would seem to be an understandable direction in which to take the Sustainable Movement Corridor.

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the *Sustainable Movement Corridor – Update* 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.

46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

#### *Linking Blackwell Farm to Egerton Road and the Tesco roundabout*

47. How the Borough Council and the County Highways Authority propose to link the Blackwell Farm development into Egerton Road preferably via Gill Avenue, in accordance with the Proposed Submission Local Plan 2017 Policy A26, remains unclear. It is important to appreciate that, after another year of investigation, the Council is no closer to finding a workable means of channelling traffic out of Blackwell Farm towards Guildford or back into it, let alone linking this access with the proposed new access to the A31. One option has recently been lost by the construction of the substantial School of Veterinary Medicine on the line of one possible access road. We consider the Proposed Submission Local Plan to be derelict in its duty to demonstrate how such a major urban development on the edge of Guildford can in reality be linked into the fabric of the town. The Borough Council is plainly having great difficulty finding a suitable access route. We strongly recommend that the Local Plan should not be submitted for Examination unless this route can be clearly identified first.

#### *Impact of Blackwell Farm and the Research Park development on the local road network*

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these

destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.

49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The *Strategic Highway Assessment Report* June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

50. In addition to this, in the last twelve months, the Proposed Submission Local Plan 2017 has upgraded the importance of Egerton Road to the purpose of providing access to Blackwell Farm, compared with the 2016 Plan, in that the alternative proposed access to Blackwell Farm via the A31 is no longer designated as the ‘primary’ access and Egerton Road is no longer designated the ‘secondary’ access. They now have equal status. Whereas this properly reflects the implausibility of an acceptable link to the A31, no change whatever has been proposed to Egerton Road to accommodate such extra traffic as may now be expected to take this route (which is unspecified). In our view, the additional traffic congestion impacts on an already overloaded local network are so foreseeably dire that we strongly recommend the Blackwell Farm development should not be taken forward.

#### *Sustainable Movement Corridor*

51. Back in 2014 Arup prepared a report *Guildford Town and Approaches Movement Study* for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a



corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be 'largely on existing roads'. 'Route sections' were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a *Progress Update on the Sustainable Movement Corridor scheme* (GBC, June 2016). This showed a revised figurative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was "to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period." Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).

53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report *Sustainable Movement Corridor – Update* published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie's Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

54. The Sustainable Movement Corridor will measure its effectiveness by a substantial degree of modal shift away from cars and towards sustainable transport modes. The starting point for analysis is that the Strategic Highway Assessment Report 2016 assumes no modal shift to sustainable modes, and so is a 'worst case' in respect of cars (paragraph 4.1.8). Paragraph 4.6.28 of the Proposed Submission Local Plan 2017 now states that "the site allocations and proposals in this Plan – including the significant programme of schemes to provide and improve opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034". However, the Council has accepted that this is unlikely to be enormously effective: the same sentence continues "we forecast that there will also be an absolute increase in overall traffic volumes." Instead the paragraph proposes to 'increase highway capacity'. This is a downgrading from the intentions just a year ago, when paragraph 4.1.8 of the SHAR stated "The impact of these sustainable transport schemes is expected to be significant". What, therefore, is the Council's objective?

55. The key section of the SMC for Blackwell Farm is the western section. At the key pinch-point of the A3 underpass, the Sustainable Movement Corridor can only function if the existing four lanes for vehicles are reduced to three, with one of these lanes taken up as a bus lane based on tidal flow routing. Space for other vehicles would be halved. The Proposed Submission Local Plan 2017 together with the main transport documents supporting it (the *Guildford Borough Transport Strategy 2017* and *Topic Paper: Transport*, June 2017) are silent on whether this will be implemented, but as it is a key feature of the SMC, which could not function without it, we assume that this is what is proposed. Furthermore, the Tesco roundabout diagram in the *2017 Update* document shows no roadspace at all reallocated to the Corridor west of this point.

56. The Council does not appear to have modelled the network consequences of creating the western section of the SMC (or any other section). With the Blackwell Farm development completed, the SHAR forecasts (Figure 4.3) that, in the morning peak hour, there would be 837 movements westbound and 636 movements eastbound along Egerton Road through the underpass (one vehicle about every 4 seconds and 6 seconds respectively). The underpass is highly unlikely to have the capacity to accept this level of traffic on a single lane each way. That would still be the case after modest modal shift had reduced the vehicle counts somewhat. It seems to us unrealistic to believe that all traffic inhibited by denial of road space will divert to sustainable modes. The more likely effect is that the SMC will simply add greatly to the predicted overcapacity on Egerton Road, with knock-on effects through the network. The principal effect of the SMC in the Blackwell Farm area is therefore likely to be to make traffic congestion worse rather than better if the development is built.

57. The footpath and cycleway on the north side of Egerton Road, segregated from traffic but not from each other, would be maintained under the proposals in the *2017 Sustainable Movement Corridor – Update*, though the current design is cramped and mostly unattractive. The footpath and cycleway cease east of the Tesco roundabout, so walkers and cyclists have to fend for themselves when crossing the Ashenden Road arm of the Tesco roundabout. No improvement even to this basic problem is proposed in the Plan. The Plan

needs to be clearer about what if anything it is actually proposing in order to encourage walking and cycling to and from the Blackwell Farm development.

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the Council's heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable and we recommend that the proposed allocation in Policy A26 is withdrawn.

60. The purpose of the SMC can only be achieved by upsetting car drivers. However, the Plan strongly emphasises accommodating traffic generation from proposed development with figures apparently incorporating: no modal shift at all; a sustained aspiration for a major increase in capacity on the A3; and continued investment in local road capacity improvements. We conclude that the Sustainable Movement Corridor has already been compromised, will fail to make discernible impacts on existing congestion, and will therefore not have anything like enough impact on travel patterns to accommodate the people and goods movements arising from 1,800 houses at Blackwell Farm. We recommend that the Local Plan should not be submitted for Examination without deletion of the Blackwell Farm proposal in Policy A26.

#### Funding the transport infrastructure necessary for Blackwell Farm

61. We pointed out in our submission a year ago that the scale of financial support expected from the developers of the Blackwell Farm site for the delivery of road infrastructure alone was far above the amounts normally expected. In the last year the obligations upon them have increased. The Proposed Submission Local Plan has now been amended in the Infrastructure Schedule in Appendix C. Proposals affecting the A3 were noted in paragraph 20 above, to which Blackwell Farm developers will be a party. Other new financial commitments specific to Blackwell Farm are:

- Project BT6 'Significant bus network serving the Blackwell Farm site and key destinations including the existing western suburbs of Guildford and the town centre to be provided' is a new requirement in 2017, which must be entirely funded and

- delivered by the developer, at a price which is still to be confirmed, and therefore an open-ended commitment at present;
- Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which must be entirely funded by the developer, has seen its cost increase from £5m to £10m;
  - The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN3 ‘New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
  - The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN4 ‘Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)’, which is likely to increase financial obligations on the developer;
  - The developer rather than Surrey County Council will now be responsible for the delivery of Project LRN5 ‘Interventions to address potential highway performance issues resulting from development at Blackwell Farm site’, which is likely to increase financial obligations on the developer;
  - A “Necessary and proportionate contribution to delivering Guildford West (Park Barn) railway station” towards the estimated £10m cost of Project NR2 will still be required from the Blackwell Farm developer (the only named developer required to contribute) in accordance with Policy A26 Infrastructure Requirement (7): this assumes greater importance now that the station merits its own Policy A59 (see paragraphs 63-64 below);
  - The funding arrangements for SMC1 Sustainable Movement Corridor: West have been amended slightly. The change states the funding source will be ‘Developer funded and Local Growth Fund’ instead of ‘Developer contributions and Local Growth Fund’, suggesting that the developers will have to fund somewhat more than previously expected. The Blackwell Farm development will be the principal contributor to this section of the SMC.

62. Transport consultants advising Compton and Worplesdon Parish Councils calculate that the transport infrastructure alone for the Blackwell Farm development will cost about £60million, most of it up-front. This is around £35,000 per dwelling. There will be other major costs which the developer will be required to fund, including new primary and secondary schools and affordable housing (none of which were included in our previous costings), all of which can be very expensive, and numerous other mitigation costs from such a major development. There is, therefore, a real risk that the proposed development will not be viable and deliverable. If still included, the Local Plan would need to ensure that the Blackwell Farm development complies with paragraph 173 of the NPPF on this point. In reality, in the absence of other funding sources to provide money which the developers may be unable or unwilling to provide, the Blackwell Farm scheme would have to fail and be deleted from the Plan.

**Policy A59: New Rail Station at Guildford West (Park Barn)**

63. Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the

Local Plan period will be limited, probably not being operational until at least 2029. The *Topic Paper: Transport* explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

64. The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

#### **Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value**

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:
- constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
  - major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;

- taking land for major development which ought to be included within the AONB and has a real prospect of being so included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016.

69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

### **Unsoundness**

70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

- (1) The Plan is not consistent with national policy, in the following respect:
  - Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO<sub>2</sub> pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to.... unacceptable levels of.... air.... pollution”.
- (2) The Plan will not be effective, in the following respects:
  - Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.
  - Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
  - Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
  - Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.

- Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.
- Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

- Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.
- Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

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