

MATTER 11: SITE ALLOCATIONS – A22 LAND NORTH OF KEENS LANE, GUILDFORD

Q11.4 What traffic and access issues arise in respect of the site and what measures are proposed in relation to them?

1. Worplesdon Parish Council is concerned by the prospect of traffic generated from site A22. We consider that the volume of traffic is likely to be damaging to the amenity of the area, particularly in view of the relatively narrow country lanes leading to the site from all directions:
 - Keens Lane, approached from A322 Worplesdon Road to the east;
 - Gravetts Lane, approached from A323 Aldershot Road to the south west; and
 - Tangley Lane, approached from A322 Worplesdon Road to the north.
2. A study commissioned by the Parish Council from a firm of transport planning consultants identified that there was sufficient road capacity for the anticipated traffic generation from the allocation. The principal development would be 150 dwellings, which would generate approximately 105 vehicle movements in each of the morning and evening peak hours (and 975 movements across 16 hours). Amenity will be impaired if not capacity.
3. From the existing pattern of traffic movements there is some scope to estimate likely future movement patterns from the proposed allocation site. Just over half the vehicles would enter or leave the area from the A322 (mostly via Keens Lane) and just under half via the A323. This distribution could vary according to the position of the entrance to the allocation site along Keens Lane. For example, an entrance at the south east corner of the site could be expected to prioritise access via the junction of Keens Lane with Worplesdon Road. A south-east entrance point would minimise passage of vehicles past existing dwellings and also minimise use of the local lanes. The proposed 60-bed care home would also be accessed from the south east corner of the allocation site, generating substantial traffic (not included in the data above) which could have a detrimental impact on amenity on Keens Lane. If the site is allocated, an access near the south east corner should be specified as a requirement.

Q11.5 How is it intended to deal with proximity to the SPA?

4. Worplesdon Parish Council considers that Allocation A22 of land north of Keens Lane Guildford is unsound because it is not justified, for the reasons explained below.
5. Whitmoor Common Special Protection Area lies immediately on the opposite of the A322 from the allocation site, and part of the allocation is within 400m of it. The Council proposes a care home at the eastern end of the allocation site, within 400m of the SPA, on the basis that the residents will not generate pedestrians or dog walking within the SPA from that type of development. That is a reasonable assumption. What is not a reasonable assumption is that there will be no pressure on the SPA, including from dogs disturbing ground-nesting birds, from the residents of and visitors to the other 150 houses proposed a little further west on the allocation site. The reverse is likely. Whitmoor Common would be readily accessible across the A322 (a few minutes' walk on a bridleway from the allocation site which leads to it), and this would be a major recreational resource on the doorstep of

the proposed development. Whitmoor Common to the north east is likely to be a major magnet for residents of this proposed urban edge location, particularly as there are no footpaths in the entire western half of the compass from the allocation site. In our view the Council has focused on the letter of the policy to protect the SPA, not the reality of pedestrian movements onto the SPA which the development would be likely to generate.

6. In its response to the June 2017 Regulation 19 consultation on the Submission Plan, Natural England stated of the 150 dwellings: *“It must be ensured that these units are located outside of the 400m exclusion zone and must provide an appropriate suite of mitigation to ensure that impacts upon the SPA are avoided. The site allocation is in very close proximity to the Whitmoor Common SSSI. Any direct or indirect impacts on this site should also be avoided or mitigated.”* The Council has proposed no means of avoiding impacts on the SPA from the proposed future residents, and in our view is most unlikely to be able to do so. The Parish Council considers that the 150 dwellings will have direct and inevitable adverse consequences for the Whitmoor Common SPA. We do not consider that the criteria proposed by Natural England can be met, and therefore that the allocation should not be made.

7. The Habitats Regulations Assessment (2017 Update) accompanying the Plan states that Keens Lane is an allocation site where, provided the allocation adheres *“to the Avoidance Strategy as detailed within Local Plan Policy P5: Thames Basin Heaths Special Protected Area, then the impact of the new recreational activities resulting from new residential development can be screened out.”* Furthermore, the Council’s own Thames Basin Heaths SPA Avoidance Strategy SPD (2017) explains at paragraph 3.5 *“SANGs provide an attractive natural or semi-natural environment and visitor experience equivalent to the SPA and in doing so prevent new dwellings bringing an increase in recreational pressure on the SPA by “soaking up” potential SPA visitors”*. The Parish Council considers that the mitigation required by Policy P5 will not be adhered-to and that the SANG proposed does not come close to meeting the intention of the SPD as an ‘equivalent experience’ to Whitmoor Common. The screening out of the allocation from the HRA is therefore brought into doubt and the allocation of site A22 should not be made.

8. For developments close to the SPA but beyond the 400m exclusion zone, there is an obligation to provide Suitable Alternative Natural Greenspace (SANG) to encourage recreation to take place there instead of on the SPA. The SANG for Allocation Site A22 is at Russell Place Farm. This is more than 3km distant in a direct line and much more on rights of way. There is no footpath link to this SANG. Residents of the allocation site would only be able to reach it by car and in doing so would pass the recreational opportunities of either Broadstreet Common or Littlefield Common en-route. Russell Place Farm is in any event a destination of far lower quality than Whitmoor Common, so residents from the allocation site north of Keens Lane are unlikely to use it. The SANG for Allocation Site 22 does not meet the definition in paragraph 4.3.57 of the Submission Plan as *“land that can be used for recreation as an alternative to visiting the SPA”*: it is not a realistic alternative in this case. The Parish Council therefore considers that Site A22 should not be allocated for this reason unless a far superior new SANG can be established.

9. Natural England has issued *Guidelines for the creation of Suitable Alternative Natural Greenspace (SANG)* (Appendix 4 of the SPD). This includes 'Guidelines for the Quality of SANG'. So far as 'Paths, Roads and Tracks' are concerned, it advises: "*The findings suggest that SANG should aim to supply a choice of routes of around 2.5km in length with both shorter and longer routes of at least 5km as part of the choice, where space permits. The fact that a considerable proportion of visitors were walking up to 5km and beyond suggests the provision of longer routes should be regarded as a standard, either on-site or through the connection of sites along green corridors.*" Whether this length of route can be provided at Russell Place Farm remains to be seen. What is clear, though, is that the future residents of the proposed A22 allocation site who wish to take this typical length of circular walk, of 2.5km or more, will have little choice but to venture onto Whitmoor Common. The only other local circular walk available, south of Keens Lane (clockwise via Chitty's Common, Holly Farm and Liddington Hall Farm), would be less than 2.5km. This reinforces the significance for future residents of using Whitmoor Common for such 'standard' lengths of walk as 2.5-5km, and the difficulty of replacing that option elsewhere in a SANG.

10. Policy A22 identifies two 'opportunities' from the allocation site. One of these is 'appropriate green infrastructure enhancements, ensuring that these do not increase accessibility to the Thames Basin Heaths SPA'. The principal green infrastructure on the allocation site at present is the hedgerow between Pitch Place Farm and Keens Lane, which runs almost the full length of this lane. This is an important green corridor which should be retained if the site is found to meet the standards for being allocated. It is part of a sequence of extensive green infrastructure linking Whitmoor Common to the Hog's Back through Pitch Place, Chitty's Common, Rydes Hill Common, Littlefield Common, Broad Street Common, Backside Common and Blackwell Farm.

Q11.5 What are the exceptional circumstances at the local level that justify the removal of this site from the Green Belt?

11. The Council has set out its justification for removing allocation site A22 from the Green Belt in paragraphs 8.77-78 of its response to the Inspector's Initial Questions. We consider it striking that the Submission Plan merely asserted 'exceptional circumstances' for releasing this (or any other) site from the Green Belt without attempting to demonstrate this (paragraph 4.3.16). The Council has instead generally relied on an Environmental Capacity Analysis of all non-urban land parcels in the Borough. That analysis, by Pegasus in their Green Belt and Countryside Study Vol II, is a straight-forward planning analysis of the merits of each parcel which might encourage or discourage release for housing. Green Belt plays only a very minor role in the recommendations for whether sites might be released ('Potential Development Areas') or not. This falls far short of providing rigorous justification for 'exceptional circumstances'. Worplesdon Parish Council therefore considers that Allocation A22 Land north of Keens Lane Guildford is unsound because it is not justified.

MATTER 11: SITE ALLOCATIONS – A26 BLACKWELL FARM

Q11.17 How would the wider landscape impacts of this development be mitigated, including impacts on views from the AONB?

12. The Programme Officer advised that we refer in this Statement to our original issues which have, surprisingly, not been chosen for Questions. We agree that these issues could helpfully be included in the Agenda for the Blackwell Farm hearing.

Surface water flooding on Blackwell Farm

13. In July 2017 in response to the second Regulation 19 consultation the University of Surrey submitted a 'Vision and development concept' for 'Blackwell Park'. This mentioned flood risk and drainage (page 7). The Parish Council does not dispute that the Blackwell Farm site could be developed, and we would expect any development to respond to the risks of surface water flooding. The report's Figure 4 shows that flood risk is a significant issue across large areas of the allocation site. This is not surprising: the land dips generally from south to north, taking runoff from the Hog's Back as well as rainfall on the site. Surface (and subsurface) water runoff is a significant issue after periods of rainfall across the Blackwell Farm site. Substantial measures would be needed to store water on the site and to prevent flooding, with the design sufficient to cope with peak flood periods. A significant area would have to be set aside for water storage: there is no indication in the concept statement where these would be located.

Surface water flooding below Blackwell Farm

14. The much more significant issue than water management on the allocation site itself is the need for management of the water leaving the site. This has been explained by Worplesdon Parish Council to the Council throughout the Local Plan preparation process, but to no effect. There are already significant flood events in the area north of Blackwell Farm. This has caused much upset in the Parish over many years. The built-up areas of Wood Street Village and Fairlands are particularly at risk. Without intervention (and the Submission Plan proposes none) the effect of development on water quantity would be primarily to increase peak rates of runoff to the north. Hard surfaces on this large development site would inhibit percolation into the soil, making runoff much 'flashier'. That simply means more flooding. There are already low margins in the amounts of water that water courses can accommodate before flooding occurs. Without intervention, flooding could be expected to become very significantly worse north of the railway line after development on Blackwell Farm. Sustainable Urban Drainage Systems on the allocation site would help, but the inherently slow rate at which water drains into the local soil inevitably means that this could not provide the full solution in periods of prolonged or heavier rainfall.

15. Worplesdon Parish Council has endeavoured to identify the steps which need to be taken to avoid the flood regime north of the railway line deteriorating if the Blackwell Farm development is built. A Surface Flood Risk Assessment was commissioned from specialists

JBA Consulting and submitted with our response to the June 2017 Regulation 19 consultation. Its key points were:

- a flood risk model was devised to simulate the pre- and post-development scenarios: this appeared reliable as it correlated well with previously observed flood events;
- under a post-development scenario, the area of high surface water flood risk would increase significantly on both the western flow path (through Wood Street Village) and the eastern flow path (affecting the edge of Guildford and Fairlands);
- the flooding hotspot areas of Wood Street Village and Fairlands would experience exacerbated problems and a wider residential area would be put at high risk (1 in 30 year risk of surface water flooding): details were provided;
- the Council’s proposed plans for Blackwell Farm do not take account of existing off-site watercourses: plans should be revised to do so;
- it is critical that surface water generated by the Blackwell Farm site is managed within the site;
- if flow was controlled at the railway embankment and prevented from continuing downstream, the existing and potential flood risk could be managed;
- overall, Worplesdon Parish Council have due concern that the development of Blackwell Farm could cause detriment to the community of Worplesdon.

16. At present, Requirement 13 of Policy A26 in the Submission Plan is simply to “*reduce surface water flood risk through appropriate mitigation*”. This is worded too vaguely: does it mean ‘reduce flood risk from what it might otherwise have been’ or ‘reduce flood risk compared with the pre-existing risk’? Reduce to what extent? The infrastructure proposal FRR2 refers to “*Minimising surface water flood risk at the strategic site at Blackwell Farm, to ensure that run-off after development does not exceed run-off rates from the site before development. Measures to include on-site Sustainable Urban Drainage System (SUD), including balancing pond(s), to provide for flooding water storage on the development site.*” Rather than simply this ‘do minimum’ option of controlling run-off not to exceed pre-development rates, we would expect the Plan to use the opportunity to resolve the existing flood problems north of the railway. In particular, the proposal falls short of policy in the NPPF paragraph 100 that “*Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:....*

- *using opportunities offered by new development to reduce the causes and impacts of flooding;....”*.

This makes the Plan unsound by not being consistent with national policy. The Submission Local Plan does not address this issue.

17. A more extensive and sophisticated water management regime would be needed than that proposed in the Submission Plan. Worplesdon Parish Council considers that the measures proposed to achieve the stated objectives will be insufficient. In this respect Policy A26 Blackwell Farm is unsound because it would not be effective. Furthermore, because the Plan sets an aspiration only to meet the minimum standards required of new development, we consider the Policy unsound because it is not justified as the most appropriate strategy when the reasonable alternative exists to use the opportunity to tackle pre-existing surface water flood risk.

18. Another important aspect of water management is that the quantity of water flowing north from the allocation site needs to be reasonably constant, with seasonal variation. This is because the watercourse from the north-east corner of the allocation site, its lowest point, flows into Whitmoor Common SPA, which has a requirement for a semi-natural rate of flow which keeps it wet with a high water table. Water from Blackwell Farm may flood over Whitmoor Common. This means there is a need for careful management to avoid water supply being either too little (so that Whitmoor Common begins to dry out, damaging its ecological status) or too great (which causes flooding between Blackwell Farm and Whitmoor Common). The Submission Plan has not addressed this and in our view is therefore unsound because it is not justified.

Maintaining water quality at Whitmoor Common SPA

19. Not only the quantity of water entering Whitmoor Common should be regulated to maximise the benefit to this internationally important habitat but also the quality of that water. The scarce habitats and the species they support depend (in part) on high water quality. As water from the Blackwell Farm site may well flood the SPA in winter, it is important that it is free from the oils, dirt and man-made compounds which urban development inevitably generates in its runoff.

20. Polluted water from an urban area will not only run off the surface but also be carried into the subsurface zone and percolate through and out of the site. An essential feature of water quality management will therefore be to intercept all water leaving Blackwell Farm south of the railway line, deriving from both the surface and below. From here it can be diverted for on-site storage and treatment, before pure water is discharged in a suitable regime into the northbound watercourses. We have seen no evidence whatever that a treatment regime for Blackwell Farm water will be required. To that extent the Submission Plan is unsound because it is not justified.

Conclusions

21. We consider that, if the Blackwell Farm development were to proceed, then the 'Requirements' in Policy A26, and FRR2, would need to be amended to:
- (i) reduce the quantity of water flowing north from Blackwell Farm at peak flow periods in order to avoid downstream flooding so far as practicable;
 - (ii) provide additional water storage on the Blackwell Farm site (above that otherwise required at present) to allow for the effects of climate change;
 - (iii) manage the flow of water off Blackwell Farm to maintain reasonably even flows of water, adjusted seasonally, to sustain the water regime needed at Whitmoor Common (including its flooding) for ecological purposes;
 - (iv) ensure that all pollutants introduced by the urban development at Blackwell Farm are intercepted and removed so that high quality water flows into Whitmoor Common;
 - (v) guarantee a funding mechanism for the maintenance in perpetuity of the water management regime identified above.

22. The University of Surrey's 'Vision and development concept' for 'Blackwell Park' appears to be superior to the Submission Plan in its proposals for handling surface water flood risk off the allocation site. It commits that *"to ensure conformity with national and local planning requirements, the runoff from the site will be limited to the existing greenfield runoff rates with a 30% allowance for climate change"*. It proposes a drainage strategy *"designed to lower the flow rate from the site and increase the water storage capacity"* (emphasis added). The intention is that *"any increased run-off and flood risk effects can be effectively designed out or mitigated"*. The Parish Council particularly welcomes the commitment to accommodate 30% extra water in response to climate change (item (ii) above), which is missing from the Submission Plan. If the University's proposal to 'lower the flow rate from the site' is intended in terms of absolute quantities, to tackle the downstream flood threat, this would be highly commendable and help address item (i). However, the intention to deal with 'increased run-off' could be interpreted to avoid only a worse position post-development. Measures to tackle items (iii), (iv) and (v) above still need attention. Until all the five objectives above are met, Worplesdon Parish Council considers that the Plan is unsound because it is not justified.

23. Worplesdon Parish Council has attempted to resolve these matters in advance of the Examination. A meeting was proposed this May and appropriate personnel invited from all the main interested parties, but Guildford Borough Council invitees have refused to attend. The background paper and proposed agenda are attached as Appendix 1.

Infrastructure provision

24. The Submission Plan gives inadequate attention to the strategic infrastructure requirements needed to enable the Blackwell Farm development to proceed. Worplesdon Parish Council is especially concerned about the investment required in:

(i) Water management on Blackwell Farm (as described above). There is a requirement for a sophisticated system of water collection, storage, treatment and discharge, all on the allocation site, the need for and costs of which have not been properly addressed.

(ii) Wastewater collection and treatment. The Infrastructure Delivery Plan (December 2017) accompanying the Submission Plan is clear at paragraph 3.13 that Blackwell Farm is one of the sites where Thames Water is likely to require an upgrade to wastewater infrastructure. Thames Water's response here to the second Regulation 19 consultation in June 2017 stated *"Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development.... It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years."* The need for this infrastructure is entirely in accordance with local experience, where the inadequacy of the existing sewerage network is reflected in blocked sewers in the area and sewage backing up into people's homes. The infrastructure schedule accompanying the Submission Plan requires under item WCT3 that wastewater

infrastructure is upgraded to serve Blackwell Farm, and that the cost will be borne by the developer and Thames Water. However, the cost of this investment and the share to be borne by the University of Surrey as landowner/developer are both unclear. There is even a lack of clarity about whether Hockford sewage works or Slyfield sewage works would be upgraded to accommodate the Blackwell Farm development. Until these matters are much clearer and costed there can be no certainty that the costs will be acceptable.

25. There is a risk that water-related investments, with other major infrastructure costs, may result in the Blackwell Farm development not being viable. We need to know this now, before an allocation is made. At present Worplesdon Parish Council is unclear whether the water-related infrastructure requirements at Blackwell Farm can be afforded. Whether the scheme is therefore viable and deliverable is not clear. On this basis the Plan is unsound on the basis that it cannot be shown to be effective.

APPENDIX 1

Background Paper and Agenda
for a meeting to discuss the proposed strategic site at Blackwell Farm



**Request for a meeting with the University of Surrey, Surrey County Council,
Guildford Borough Council, Thames Water, the Environment Agency and
the (Campaign to Protect Rural England) CPRE
to discuss SuDs (Sustainable Urban Drainage System) and the capacity of the local sewerage system in
light of the proposed Strategic Site at Blackwell Farm**

Background paper and agenda

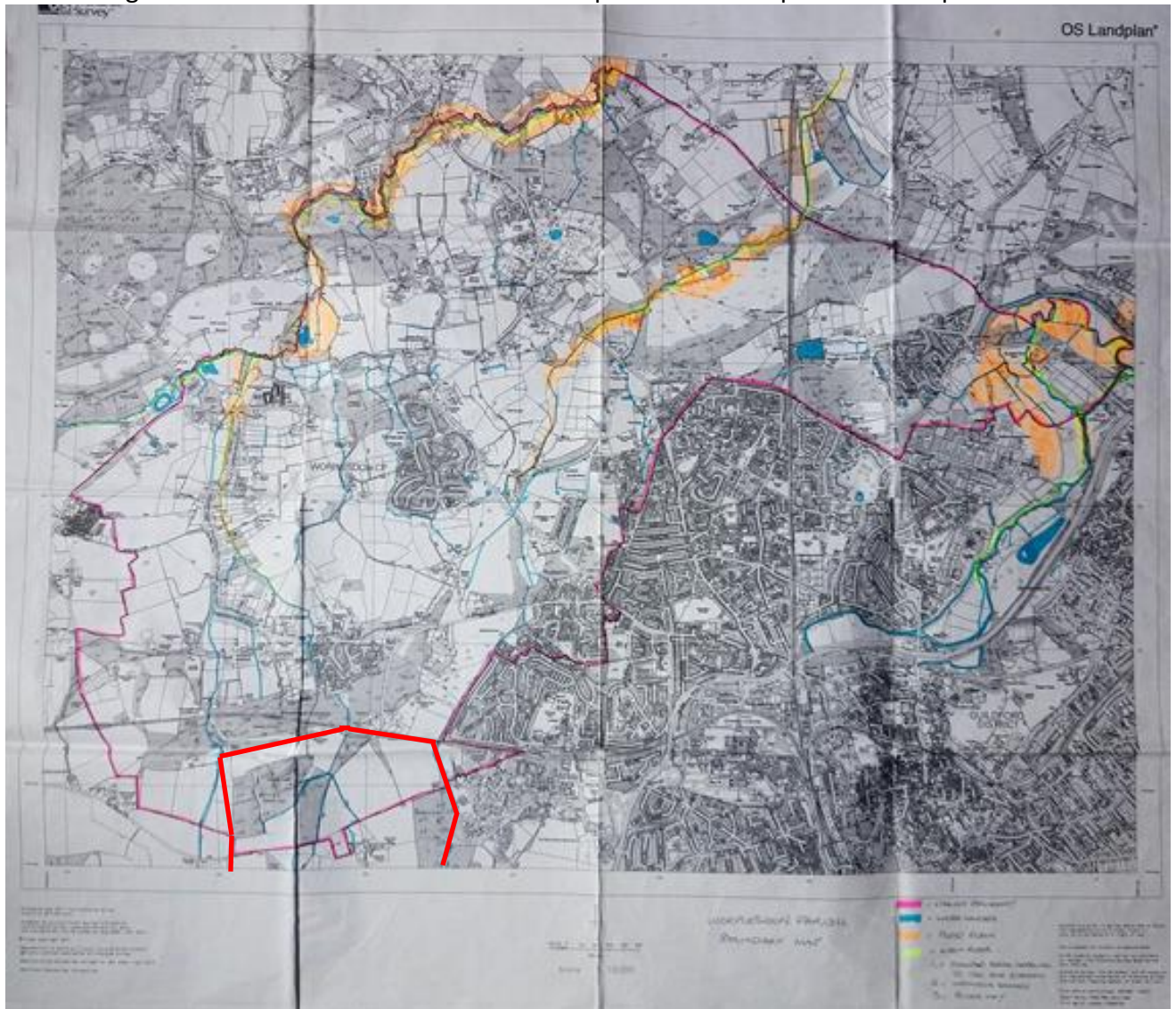
Author: Worplesdon Parish Council

20 April 2018

Guildford Borough Council: Submission Local Plan - Strategic Site Blackwell Farm - Policy A26

Background:

The Strategic Site of Blackwell Farm sits within the parishes of Compton and Worplesdon.



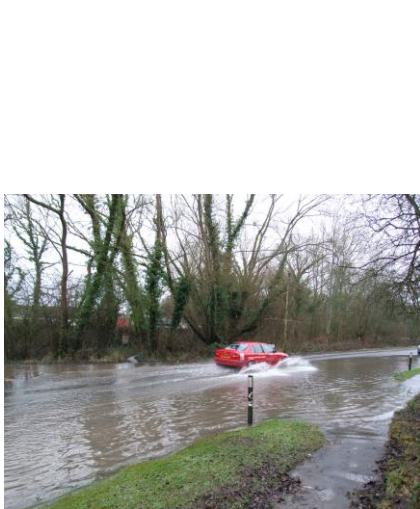
Worplesdon Parish Boundary Map – Parish boundary highlighted in pink

Historically, the Parish of Worplesdon has suffered from pluvial and fluvial flooding. Pluvial flooding (surface water run-off from the Hogs Back) creates particular problems in the villages of Wood Street and Fairlands, as recognised within the [County Council's Flood Risk Strategy](#) (Wetspots). This is due to the local topography.

There are four main watercourses which originate from the Hogs Back, and subsequently travel through the Parish. The three watercourses to the west of Blackwell Farm run through Wood Street Village (where it becomes classed as a main river) and Fairlands to the Stanford Brook and then onto the Hoe Stream. The other, to the east of Blackwell Farm, runs alongside the Surrey Research Park, down the back of Applegarth Avenue, then via Broad Street Common, behind Gravetts Lane where it becomes classed as a main river, through Whitmoor Common - Special Protection Area (SPA)/Site of Special Scientific Interest (SSSI)/Local Nature Reserve (LNR) onto the Hoe Stream. It is critical that the watercourse to the east of Blackwell Farm is maintained for the hydrology of the SPA/SSSI/LNR.

In response to surface water run-off issues within the Parish, the Worplesdon Flood Forum was established in 2005. Since that time considerable work has been undertaken by Surrey County Council, Guildford Borough Council, Worplesdon Parish Council, Thames Water, the Environment Agency and local land owners to reduce the risk of surface water flooding. The impact on property and infrastructure from surface water flooding in Wood Street Village and Fairlands can be seen in the photographs below.

The aim of the Parish Council, in conjunction with the Flood Forum, is to ensure that if the Blackwell Farm development does take place, the opportunity is taken to implement appropriate mitigation measures to avoid adverse hydrological effects from the development on Whitmoor Common SPA/SSSI/LNR, and to resolve the existing flooding problems immediately downstream of the site in Wood Street Village and Fairlands.



Pinks Hill/Oak Hill, Wood Street Vill.



Pound Hill, WSV



Fairlands Doctors' Surgery

The National Planning Policy Framework (NPPF) (paragraphs 99-104) and National Planning Policy Guidance place a strong emphasis on planning for climate change; appropriate development should only be considered where flood risk is not increased elsewhere, and only in areas at risk of flooding where informed by a site-specific flood risk assessment.

Climate change is likely to create further surface water flood risk over the lifetime of this proposed development, and drainage should therefore be designed to accommodate this. The Surface Water Drainage Statement required for the site should include, but will not be limited to:

- Detailed calculations of run-off and storage volumes;
- Designs showing how the increased volume of surface water will be stored;
- Where it will be discharged;
- How pollution will be removed;
- How the drainage system will be maintained;
- What arrangements are in place in case of exceedance of the system capacity.

As part of its Regulation S19 submission in July 2017 Worplesdon Parish Council commissioned JBA Consulting to carry out a site-specific [Risk of Surface Water Run-off Risk Assessment](#) for Blackwell Farm.

Given that Blackwell Farm has been put forward to the Planning Inspectorate within the Submission Local Plan in readiness for the Examination in Public in June 2018, Worplesdon Parish Council/the Worplesdon Flood Forum wish to request a meeting to discuss with the developers (University of Surrey - UoS) and the relevant principal authorities, how UoS will seek to implement the requisite upgrade to the local sewerage system and how Sustainable Urban Drainage System (SuDS) will be implemented. The Parish Council's local knowledge of this site and the surrounding area and, in particular, the various constraints are something that should be taken into account at the master planning stage.

It is critical that pollution is not permitted to enter the watercourse leading to Whitmoor Common SPA/SSSI/LNR, during all stages of the development, as it provides an important environment for a plethora of wildlife, including a number of rare and notable European Protected species, such as water shrew, nightjar, Dartford warbler, sundews, silver studded blue butterflies and the window winged caddis fly; this list is not exhaustive.

Aims and Objectives

Worplesdon Parish Council's aims

The Blackwell Farm development is a once-in-a-generation opportunity to resolve the underlying problem of flooding in the Parish. The Parish Council's aim is to eliminate flood risk in Wood Street Village and Fairlands deriving from the Blackwell Farm direction, whilst maintaining the hydrology of Whitmoor Common SPA/SSSI/LNR.

Our detailed objectives

- To provide sufficient water retention and an effective sustainable urban drainage system on the development site to ensure that reduced quantities of water leaving the Blackwell Farm site at the western side eliminate the risk of flooding in Wood Street Village and Fairlands;
- To maintain a sufficient quantity of flow from the eastern side of Blackwell Farm to sustain the hydrology of Whitmoor Common SPA;
- To ensure that surface- and ground-water flows north from the Blackwell Farm site are of high quality, unpolluted, and suitable to maintain the biodiversity of Whitmoor Common SPA;
<https://www.susdrain.org/delivering-suds/using-suds/suds-components/source-control/pervious-surfaces/pervious-surface-types/water-quality-performance.html>
- To ensure that run-off from the Blackwell Farm development is intercepted, collected and treated, because it will be more polluted than the present run-off from farmland;
<https://www.susdrain.org/delivering-suds/using-suds/suds-principles/pollution-prevention.html>);
- To build into the fabric of the development a substantial buffer for handling the water arising from the Blackwell Farm site in recognition of wetter conditions likely in the years ahead due to climate change;

- To build a financial structure into the development to ensure funding for necessary maintenance and upgrading of surface water management and the sewerage system.

Agreements required

(a) University of Surrey

- To build structures at Blackwell Farm with sufficient capacity not only to eliminate flooding in Wood Street Village and Fairlands but also to resolve the existing flooding problems (there can be a separate discussion about contributory payments for providing capacity greater than needed so that water flows do not exceed their previous amounts);
- To include sufficient surplus capacity in the water control system to handle substantially more water in the decades ahead, in recognition of climate change;
- To implement a high-quality SuDS and water retention system on the site;
- To establish that run-off from the Blackwell Farm development is to be intercepted, collected and treated prior to discharge from the site;
- To establish from the outset a funding mechanism to ensure maintenance of the SuDS and of the surface water run-off control system;
- To take full account of the existing watercourses leaving the site, in line with the JBA Consulting recommendation (July 2017);
- To commission the necessary hydrological studies to demonstrate how the above will be guaranteed and, for openness and transparency, to share the results of those findings with all the parties present at this meeting;
- To implement an Environmental Plan and a Construction Management Plan throughout the works.

(b) Environment Agency

- To specify the water quality standards that must be met by water leaving the Blackwell Farm site by ground- or surface-water flows likely to enter Whitmoor Common SPA/SSSI/LNR, and how these are expected to be achieved;
- To establish that run-off from the Blackwell Farm development is to be intercepted, collected and treated prior to discharge from the site;
- To identify the surface flood protection measures required on the northern boundary of Blackwell Farm and elsewhere to eliminate the risk of flooding in Wood Street Village and Fairlands now and in the future;
- To validate the developer's proposals for water retention, SuDS and interception of surface run-off to meet these requirements;
- To ensure that the proposals for Blackwell Farm will be resilient to climate change in the decades ahead;

- To identify the type/nature and scale of measures needed to eliminate any increase in water flow off the Blackwell Farm site arising from the proposed development, and to distinguish this from the scale of measures needed to eliminate flood risk in Wood Street Village and Fairlands (both when the Blackwell Farm scheme has been developed and in future decades);
- To identify how the risk of pollution will be eliminated.

(c) Guildford Borough Council

Policy A26 states that surface water flood risk is a ‘key consideration’ and that an infrastructure requirement is to “reduce surface water flood risk through appropriate mitigation”. Policy A26 should be amended to be clearer, in line with the objectives set out by Worplesdon Parish Council above. To achieve these objectives and the infrastructure delivery policy FRR2 in Appendix C of the Local Plan, we would expect the Council:

- In discussion with others, to identify the costs of measures to ensure that flood risk at Wood Street Village and Fairlands is:

(a) no greater after development at Blackwell Farm is completed than it is now (including the long term to allow for climate change);

(b) largely eliminated after development is completed;

- To ensure that the development meets the entire cost of (a) above and that the additional cost to meet (b) above is guaranteed by a suitable funding mechanism;
- “To commit to using Community Infrastructure Levy to mitigate flooding, which in Worplesdon is precisely in line with the approach taken in the Council’s *Guildford Borough Infrastructure Delivery Plan*, December 2017 at paragraph 1.38 that:

“CIL can be used to increase the capacity of existing infrastructure, or to repair failing existing infrastructure, provided it is necessary to support development. For example, surface water flood mitigation to resolve an existing flooding problem that would be made worse by new development.””

- To establish in the Local Plan that these objectives must be satisfied to go beyond simply “ensuring that run-off after development does not exceed run-off rates from the site before development”: this will involve changes to the infrastructure requirement FRR2
http://www2.guildford.gov.uk/councilmeetings/documents/s4879/EAB%20Draft%20-%20GBC%20Proposed%20Submission%20Local%20Plan%20-%20Report%20and%20Appendix%20A-G%20-%201%20of%202_Red.pdf by means of a Modification to extend the expectation to eliminate flood risk in Wood Street Village and Fairlands;

- To insist on the identification and specification of the wastewater infrastructure required before a decision is taken in principle to allocate the site: without knowledge of what is required, and therefore its cost, there can be no certainty that sufficient funds will be forthcoming from the Blackwell Farm development to meet all its obligations. If, for example, wastewater treatment costs proved more expensive than anticipated, but obviously essential, then there could be pressure to sacrifice other commitments made by the developers, such as the proportion of affordable housing. WPC therefore considers that Guildford Borough Council should amend the details of FRR2 to reflect this, deleting the current wording: “Details of scale and form of upgrades to wastewater infrastructure

will be included once development areas are confirmed and developers have produced detailed drainage strategies”.

- To provide assurances that the risk of pollution will be eliminated.

(d) Thames Water

There is insufficient sewerage capacity at present in Worplesdon, including in the area north of Blackwell Farm, where sewers back up and cause foul water flooding at times of greatest pressure. Capacity improvements are needed irrespective of the Blackwell Farm development, and we hope that the upgrade to Hockford sewage works will ameliorate and ideally eliminate the problem. It is inevitable that the assessment required in infrastructure project WCT3¹ will show the need for extra capacity. WCT3 should be amended to reflect this. The requirements are as follows:

- To identify the increased waste water capacity needed, with a sufficient margin of error, to enable Blackwell Farm to proceed;
- To identify where the sewage treatment capacity will be provided;
- To cost this additional capacity (both to and at the sewage treatment works);
- To apportion the costs between the developer and Thames Water.

(e) Surrey County Council

- To ensure that the proposals for surface water run-off comply with the requirements of the Surrey Local Flood Risk Management Strategy 2017 – 2032.
- To offer assurances that the SuDS proposals will fully comply with national and regional planning policy and will protect the communities of Wood Street Village and Fairlands as per the Surrey Local Flood Risk Management Strategy 2017 – 2032.
- To maintain a sufficient quantity of flow from the eastern side of Blackwell Farm to sustain the hydrology of Whitmoor Common SPA.

1. (“Upgrade to wastewater infrastructure if assessment (at developer’s cost) shows that additional capacity is needed to provide for Blackwell Farm strategic site”)

AGENDA

1. There are opportunities and constraints for this site, i.e. geology, hydrology, historic environment, landscape/townscape character and nature conservation. How will the developer use them to avoid harm to the Blackwell Farm site and wider area including the adjacent AONB?
2. What is the likely mix of impermeable and permeable surfaces? Anything over 5% is likely to increase the risk of surface-water run-off pollution. (<https://www.susdrain.org/delivering-suds/using-suds/suds-principles/pollution-prevention.html>)
3. Land use will create pollution of the run-off and will therefore influence treatment requirements for SuDS. How will the treatment, long-term maintenance, inspections and management of SuDS be ensured?
4. What is the local planning authority seeking from the site, i.e. are there policy requirements? [Wokingham Borough Council has an excellent SuDS Strategy](#) which we believe is something that should be emulated in Guildford given the extent of the flooding issues faced by the borough at large. Is this something to which Guildford Borough Council would give consideration? Worplesdon Parish Council would like [Guildford Borough Council](#) to state site-specific SuDS objectives for every site in the Submission Draft Local Plan.
5. Do the developers plan to use public open space for attenuation basins?
6. How will SuDS enhance biodiversity both on- and off- site? As stated in our background document the hydrology of Whitmoor Common SPA/SSSI/LNR depends on surface water run-off from the Hogs Back.
7. How is the University planning to improve the quality of the surface water run-off from this site, particularly in light of the potential impact on Whitmoor Common SPA/SSSI/LNR?
8. What assurances can be provided that the current green-field run-off rate will not be exceeded and will not therefore increase the risk of flooding in Wood Street Village and Fairlands?
9. Climate change is highly likely to create further surface water flood risk over the lifetime of this development, and drainage should be designed to accommodate this. What assurances can you give that climate change has been/will be factored into the SuDS for this site?
10. Do the Thames Water treatment works at Hockford and Slyfield have sufficient capacity to deal with the sewage from this and the other proposed development in Guildford Borough? If not, will Thames Water request a Grampian Agreement to ensure that development at Blackwell Farm cannot commence until off-site works at the Hockford Sewage Works/Slyfield Sewage Works have been completed?