

Guildford Local Plan: Strategy and Sites

Id-3 Matters and Issues for Examination

Statement on behalf of the University of Surrey

May 2018

Terence O'Rourke

MATTERS 1-3

No comment.

MATTER 4. Housing Trajectory

Generally speaking it is agreed that the low start and rising delivery in later years is a sound basis for meeting housing need.

Indeed there are opportunities for exceeding GBCs assumptions on delivery in the middle period of the plan (years 6-10) at Blackwell Farm.

This is because the delivery of local infrastructure improvements, local conditions and the characteristics of the development at the site support more delivery than GBC have assumed in these years.

There is potential for improved access from the local road network to provide relief to and mitigate the impact upon the A3. The Blackwell Farm allocation includes provision for a new managed access from the A31 Farnham Road which would serve both the new allocation site, as well as existing land uses in western Guildford (principally the Surrey Research Park and the Royal Surrey County Hospital). The provision of a new managed access to these existing land uses would help relieve the A3. This is acknowledged in the Guildford Borough Transport Strategy.

The construction of a new local access at Blackwell is a form of mitigation that provides an opportunity to accelerate the delivery of housing earlier in the Plan period. This delivery would be without reliance upon the delivery of the major improvement to the A3, under RIS2.

The Blackwell Park development is a sustainable location close to more than 10,000 local jobs and connected by cycle and bus services to Guildford station (3.5km) and Guildford town centre (approx. 4 km). The allocation would deliver a new local centre, a primary school, a secondary school (serving both the site and north-west Guildford) and a range of types of housing (private, key worker/affordable and a CCRC). This mixture of on-site and nearby land uses will reduce the need to travel.

Planned and funded investment on the local highway network includes a Sustainable Movement Corridor and improvements to the A3 northbound off-slip. Document GBC-LPSS-SD-040-RevB identifies the benefit of this investment including allowance for some initial delivery at Blackwell Farm. A business case for a new railway station in west of Guildford has been prepared.

Congestion and delay in the peak hours on the local road network is largely a result of the heavy tidal flows of traffic movements (primarily to local jobs in the AM and returning home in the PM). The early phases of Blackwell development would be served from the existing highway network based upon four mitigating factors:

1. the travel demand by car would be counter directional to the main existing traffic patterns locally;
2. the early phase proposals would include a Continuing Care Retirement Community (CCRC) which would have very limited peak hour travel demand;
3. an element of key worker housing for the University and/or Hospital would be provided; and
4. the Sustainable Movement Corridor and A3 slip road improvements will help manage traffic patterns locally and facilitate early housing delivery.

Beyond the early phase, it is accepted that the scale of new homes would require more significant mitigation. The policy requires the provision of a new local access from the A31 Farnham Road, alongside a managed vehicular route to provide alternative access to western Guildford. As acknowledged in the policy wording this new access from the local highway will provide benefit, although the Council has not attempted to quantify this.

The relief to the A3 provided by an additional managed access for the west of Guildford has been quantified by multiplying the proportion of vehicles that commute from the west and south of Guildford into the area by the overall number of cars. The proportion of cars is understood from analysis of 2011 census journey to work data which identifies that 29% of vehicles travelling to the west of Guildford could use the new A31 access and managed access. The number of vehicles that travel to the Research Park and Hospital is understood from recent surveys which show circa 1,350 vehicles arriving in the AM peak hour and circa 1,100 vehicles leaving in the PM peak hour.

The scale of existing traffic anticipated to use a new managed access is therefore circa 400 vehicles in the AM peak hour ($1,350 \times 29\%$) and 300 vehicles in the PM peak hour ($1,100 \times 29\%$). The local access from the A31 would relieve the A3 of these trips. Further details are shown in Appendix A.

The full allocation for Blackwell Farm is for 1,800 homes. Such a scale of housing would be anticipated to generate around 700 two-way vehicle trips in the AM peak hour and 650 two-way trips in the PM peak hour. The 2011 census journey to work patterns can establish the proportion of these trips that would be expected to use the A3. The analysis shows that a third of trips (32%) would be anticipated to travel on the A3, equating to around 250 two-way vehicles. Further detail is shown in Appendix B.

The provision of a new access to western Guildford from the local road network would mitigate the impact of new housing on the A3 and enable an accelerated delivery of the housing at Blackwell Farm. GBC has set out a trajectory for housing at Blackwell Farm that delivers 650 dwellings in the first two thirds of the Local Plan period. With the early phase of housing accessed from the existing local highway, followed by the provision of a new managed local access to western Guildford from the A31, the allocation could deliver at a higher rate sooner in the Plan period, like other allocations (for example Wisley is shown as delivering 1,000 homes over a similar period). The employment element of the Blackwell Farm allocation would be expected to be delivered in

association with wider improvements to the A3, the delivery of the new railway station, and/or other mitigation.

MATTER 5.

No comment.

MATTER 6. Homes for All

6.5 The provision of student accommodation.

The University considers that, in general, the plan's policies are sound and effective in delivering homes for all, and does not wish to comment regarding issues 6.1 to 6.4 and 6.6 onwards.

However, the University has concerns regarding the soundness of the policy wording in relation to issue 6.5, the provision of student accommodation.

The key concern is the expression in the policy of an expectation that about 60% of the full time Guildford based (FTGB) University of Surrey students are to be provided with accommodation on campus.

Whilst expressed in the policy wording as an expectation, there is a danger that this might become viewed as an obligation, and that this is an obligation that it may not be possible to meet. This is both in terms of the proportion (about 60% of FTGB students) and the location (on campus).

The number of FTGB students fluctuates over time in response to changes in academic priorities and recruitment policies at both the University and national government levels. It is also influenced by changes in the international higher education context and other factors such as changes in immigration policies. It changes in response to types of courses and modes of delivery of them, and to changes in funding. Any suggestion of an obligation to deliver bedspaces on campus for 60% of the FTGB number is therefore inappropriate given that the amount of beds and the land and finance available to deliver them is very difficult to predict in this dynamic environment.

We welcome the Council's positive comments in GBC-LPSS-001 about the University's performance and investment in the provision of student accommodation. We also welcome that the Council considers a higher expected percentage (than 60%) to be unrealistic and potentially unviable.

We note that the Council considers that build out of the outline permission at Manor Park will see the percentage of FTGB students accommodated on campus trending towards or in line with their stated expectation.

We welcome that the Council considers that requiring additional PBSA to accompany further higher education provision is not required to meet needs and would place an unjustifiable burden on institutions. The Council also believes that it might also

discourage growth of facilities for higher education, with a negative impact on academic opportunities available. We agree strongly with these important points.

Given the above, the University understands that the Council has not expressed the policy as an obligation, and also that the Council considers that its stated expectation of 'about 60%' is simply a reflection of previous statements by the University. The Council has said that it is not intended as a requirement or a control on the University.

It should therefore be removed from the policy as the wording adds nothing to encourage the provision of student accommodation, and could be wrongly interpreted as requiring a level of control that is not intended.

Regarding the origin of the expectation, the Council refers in GBC-LPSS-001 to the change to the green belt boundary in the 2003 local plan to take Manor Park out of green belt, and that this was on the understanding that there was a need to increase student residences with the aim of returning the amount provided on campus to about 60%.

It is unusual that evidence from the 2001 local plan inquiry should be used today to justify policy wording in the 2018 local plan review. In 2001 the aim for 60% was expressed by the University, based on growth plans and a higher education context that were in place at that time. It was not an expectation or target or requirement imposed by others.

The University today in the current context does not believe that an aim of 60% of FTGB students in accommodation on campus as being achievable and does not consider it appropriate that the local plan review should include an expectation based on an out of date aim.

Today the University aims to accommodate as many of its Full Time Guildford Based students in purpose built accommodation (owned by itself or others), on campus, close to campus or within commutable distance (on public transport) as possible. The University already provides more on campus accommodation than virtually all UK Universities.

It should be noted that the SHMA is based on an assumption of 55% of the anticipated growth in the University's FTGB student number being housed in purpose built student accommodation (PBSA). The wording in the policy that refers to an expectation of 60% of all FTGB students to be accommodated on campus is at odds with the evidence base (SHMA) on this, an inconsistency that affects soundness. This provides a further reason why it should be deleted.

If it is deemed necessary to have an 'expectation' in the plan, the University prefers that this should be based on a proportion of planned growth in FTGB students in the plan period, as in the SHMA, rather than on total numbers.

The University is working to ensure that more of its students will be accommodated in PBSA, but this will depend not just on new accommodation that is planned on campus

but also on more PBSA being built by third parties in areas in the town that are close to campus, or within neighbouring towns with good public transport links to Guildford and the campus.

The University considers that off-campus PBSA will play an increasingly important role in helping to meet its aim to be within that range. The support of the local plan in achieving this by providing encouragement for PBSA in appropriate sustainable locations and by identifying sites where possible will be valuable to this.

There is scope for off site PBSA on sites that are located close to the campus and/or with good sustainable travel links to it. Some sites for PBSA have been identified in the plan, and others might come through windfalls. There is also scope to do more in this regard through better use of town centre sites that might change from retail or other uses.

It is notable that Guildford town has far less PBSA off campus, owned and operated by third parties, than is the case in many other similar sized university towns and cities. This indicates an opportunity to encourage and grow this type of provision in the town.

There are other higher education institutions in the town that generate a need for student accommodation, accepting that these institutions are smaller and that the number of students is therefore also smaller. An approach that is more positive towards off site PBSA provision would assist the accommodation needs of these institutions as well as the University.

Identifying more sites for PBSA and to have an encouraging framework towards windfall sites for PBSA in specified locations, would help to take some of the pressure off private rentals of existing homes in established residential areas.

The University recognizes and understands the impact that students have on accommodation in the town, and provides a significant amount of PBSA on its campus and continues to provide more. It is committed to continuing to work together with the Borough Council to address student accommodation issues on an ongoing basis.

This would include joint monitoring of changing FTGB student numbers, and joint monitoring of the provision of bedspaces provided in PBSA on campus and in the town more widely. and consideration of controls that GBC can set in place on HMOs, if necessary to counteract the effects of 'studentification' in popular streets and areas.

This will allow a more informed and coordinated approach in the future, and this will in turn allow for future policy review, if required to effectively address issues that may arise.

MATTERS 7 and 8

No comment.

MATTER 9. Spatial Strategy, Green Belt and Countryside Protection

The University considers that the plan is sound regarding distribution of development, directing this to the right places, and use of urban areas as much as possible. The amount and strategic locations for growth outside urban areas are justified by plan-wide exceptional circumstances that allow the amendment of green belt boundaries. A sound approach is taken to protection of countryside generally, recognizing that all development needs cannot be met in urban areas. The University therefore has no further comment on issues 9.1 to 9.7, and does not wish to comment on issue 9.9 regarding Ash and Tongham.

Regarding issue 9.8, the University considers that it is possible that an outcome of the hearings will be to identify a need to accommodate a greater housing requirement. If this is the case then the plan should reflect the spatial strategy by enlarging the allocations at the identified strategic growth locations accordingly.

It is notable that the allocation at Blackwell Farm has been reduced in size between the draft plan and the submission plan stages. It would therefore be appropriate that if there is a greater housing requirement the allocation be increased by reinstatement of the deleted area (see plan in Appendix C), which was only removed because of a change in methodology of the green belt study.

This reinstatement of this area would increase the number of homes to be provided from about 1800 in the current allocation up to about 2400 in the extended allocation, providing an additional 600 homes.

Given that it would be a reinstatement of the previous allocation, this increase would not affect the broad spatial strategy that seeks to provide urban extensions to Guildford town to meet need that cannot be met in the urban area and allocates land at Blackwell Farm for that purpose.

Other land is also available and suitable at Blackwell Farm, west of the allocation, that would allow further enlargement of the allocation and would also fit with the spatial strategy in the same way. This land is shown on the plan in Appendix D and could deliver an additional 800 homes (approximately).

It is likely that much of the additional development would be delivered beyond 2034.

MATTER 10. Built Environment and Heritage Assets

No comment.

MATTER 11. Site allocations

A26, Blackwell Farm

11.15 Can access to this site from the south be successfully achieved from the A3 / A31 without significant detriment to the landscape?

Yes. The area around the existing A3/A31 junction is very well wooded with mature trees effectively visually absorbing the complex arrangement of roads, bridges, embankments and cuttings. The proposed junction into the site from the A31 Farnham Road would add to the amount of highway-related development in the area, but as this localised area is already highly affected by similar elements, the additional development would not result in a 'step change' in either the character or perceived appearance or experience of the area. It is therefore considered that the new junction would assimilate well with the existing context, so causing no significant detriment to the character of the local landscape.

The University has progressed concept design and assessment of the new access to the A31, which includes:

- A new signalised junction on the A31;
- A new bridge over the slip road between the A31 and A3;
- A new access road adjacent to Down Place;
- A junction across Down Place; and
- Management of the route to limit its use to local traffic destined to / from west Guildford and to avoid it being used as an alternative to the strategic roads for through traffic.

The concept design work (see Appendix E) reflects the Blackwell Farm policy wording to create an access parallel to Down Place, to minimise the impact on trees and to minimise the landscape impact. The concept design also considers local constraints, which include the topography of the land and existing access.

The University is satisfied that this form of access can be delivered. The concept design provides an access that:

- Is deliverable;
- Provides a suitable form of junction to the A31;
- Provides a suitable engineering alignment of the access road;
- Is sensitive to the landscape;
- Retains most of the trees on Down Place; and
- Accords with the policy A26 wording.

Landscape impact

The concept design shows there would be some very localised landscape impacts, such as very limited loss of some trees at the junction and also some tree losses as the new road crosses the existing lane (Down Place) to Blackwell Farm. The new road will need to cross the lane at grade and the location of the crossing has been guided by a tree survey which has identified preferred locations in relation to impact on trees. The location of the new road crossing towards the lower slopes means that in views towards the Hog's Back, any loss of trees will not be easily perceptible due to the screening effects of intervening vegetation.

There would also be limited loss of open field resulting from the road alignment and its associated earthworks. Both these impacts would be mitigated within a relatively short time scale by new woodland planting. The slight change in balance between open field and woodland would not result in any significant detriment to the character of the immediate landscape, as the locality has a particularly well-wooded character.

The proposed new woodland belts, and adjacent retained trees lining the Down Place access, would absorb the road alignment. The new woodland would strongly relate to the existing landscape pattern of woodland, assimilating both with the Down Place woodland and the concentration of woodland that currently absorbs the A3/A31 junction. Initial impacts would arise from the new road, but these impacts would rapidly reduce over time as planting matures.

Visual impact

The impacts would be very localised as existing vegetation and topography combine to limit views of this part of the site. Appendix I includes four views illustrating the relatively limited degree of visibility of the access road.

Views in the immediate locality of the junction are already influenced, even dominated by highways related features, therefore the character and nature of those views would not be significantly altered. In some views from the wider landscape, in the initial years, the new junction and road would be perceptible; but the proposed planting would rapidly absorb the road in much the same way as the existing planting absorbs the existing junction features, with no medium to long term significant detriment to views.

Policy A26 identifies a very narrow strip of land south of the site connecting to the A31. The concept design work undertaken by the University suggests that extending the allocation area to show a wider area of land would allow much needed flexibility to allow a suitable design solution to be implemented, as shown in the concept design in Appendix E.

For these reasons the University proposes that the plan should therefore include a main modification to widen the access corridor to provide scope for the design to be refined further at planning application stage (see Appendix F). Without this change it is considered that the boundary of A26 would not provide for the access as it is too narrowly defined and will lead to more tree loss than is necessary.

11.16 Where would the traffic impacts occur and how would they be mitigated?

The impact on the A3 and mitigation provided by an access to western Guildford from the local highway is discussed in Matter 4 above. Impacts on the local highway network will be assessed at planning application stage, as identified in the policy wording. The provision of a new access from the A31 will lead to some re-assignment of traffic into western Guildford which would also be considered.

The IDP includes a list of local junctions where mitigation, if required, could be provided. The local road network to the east of the Blackwell Farm has funded improvements as part of the Sustainable Movement Corridor and the benefit is reported in document GBC-LPSS-SD-040-RevB which includes for some initial delivery at Blackwell Farm. There may be mitigation beyond the funded improvements on this part of the local road network, to improve access for all modes of travel.

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

The vast majority of the Surrey Hills AONB is located south of the Hog's Back and therefore the visual studies and exploration of the effects on the character of the AONB that have been undertaken on behalf of the University have been largely restricted to that narrow edge, which is also the corridor of the A31.

Representative viewpoints of the proposed development in relation to views from and towards the AONB have previously been agreed with all major stakeholders including Natural England, the Surrey Hills AONB office and GBC. These agreed viewpoints and additional viewpoints from the wider landscape considered as part of the ongoing landscape and visual impact assessment (LVIA) process, as well as effects on landscape character, are being carefully considered in formulating the development form, including layout, density and building heights.

It is intended that the new buildings will be limited in height, the majority of new homes being between 2 and 3 storeys with scope for 3.5 storeys in appropriate locations, and a very limited area of up to 4 storeys at the local centre, subject to the results of a full LVIA at planning application stage.

The development is set on the lower parts of the site, away from the steep north facing slopes of the Hog's Back and (with the exception of the A31 access), well beyond the AONB boundary (see Appendix G for the illustrative masterplan and illustrative aerial view, and Appendix H for AONB boundary).

The effect of this location set back from the steeper slopes is that the setting of the AONB is retained uninterrupted, when seen in views from the north, looking towards the AONB.

Because virtually all of the AONB lies south of the Hog's Back, views of the site from the AONB are restricted to views from the A31 corridor along the ridge and public rights of way on the northern slopes of the Hog's Back. The enjoyment of views from these locations is currently restricted due to the close proximity of heavy traffic, and most persons experiencing these views are travelling in vehicles. The development would appear as an edge to Guildford. Retained existing vegetation and new planting would soften the effects of the development.

The southern access road is the only part of the development that lies (partially) within the AONB and this is located in a position where topography and vegetation combine to make it unobtrusive from most views. The access road would be visible in some views from the north, looking towards the Hog's Back, but the angle of descent, the curve of the road and large areas of new woodland planting would combine to absorb the road in these views within a short time scale, around 10-15 years. In these views from the north, controls on the height of the development through the masterplan approval process, and the intervening woodland lying north of the site, would largely screen the development.

There are views towards the site from the eastern part of the Hog's Back that already overlook the existing Guildford urban area, and from locations on the south western fringes of Guildford, but it is anticipated that the intervening woodland would result in only negligible changes in these views.

The development would similarly be largely screened by existing and proposed vegetation in views from the countryside to the west.

There are public views from the public rights of way crossing the site. Users of these would unavoidably experience large changes in views, as would be the case when any site is developed.

With regard to landscape features on and surrounding the site, the intention is that the development will retain most of the hedgerows, virtually all existing trees and all woodland.

The mitigation will therefore be achieved through careful master planning informed by robust landscape and visual assessment. Attention to building heights, retention of existing hedges and tree cover, and extensive new planting will all help to mitigate wider landscape impacts and impacts in views from the AONB.

Should the site be enlarged as suggested in Matter 9 to take in more land, the above would also apply to the enlarged site.

11.18 What is the evidence for the need for the proposed amount of land and floorspace specifically as an extension to Surrey Research Park?

The plan states a requirement for about 30,000 sq m of office and research and development space (use classes B1 a and B1 b) at the allocation to provide an extension to the Surrey Research Park (SRP). It is understood that the Borough Council

anticipates this amount to be delivered within the plan period, with scope for another 5,000 sq m post 2034.

The existing SRP has been a very successful enterprise that has brought significant levels of investment, economic activity and expertise to Guildford. It is an economic driver of great importance. The fact that it is now nearly complete, in terms of the amount of space it can provide, brings the question of how to continue to build on its success and sustain its important economic role.

The development of an extension of the SRP as proposed in the local plan policy will address this. It will allow further development of high quality employment accommodation that builds on the success of the existing SRP.

This will underlie future economic development for knowledge based businesses in the forthcoming era of technologies such as those influencing resource efficiency, the bio-economy, digitisation and dematerialisation, and health services. These are essential to address the social changes that are now emerging across global markets and include such changes as urbanisation, web empowerment, new business models, maturing environmental concerns, mobility (transport) and geographic dispersion enabled by technology.

The area identified for the SRP extension is about 11 hectares. Excluding areas required for strategic drainage, landscape and the main spine road, the amount of land available for development is about 9.8 ha.

The intention is that the local plan requirement of 35,000 m² of employment space (30,000 in the plan period and 5,000 beyond 2034) will therefore be located within this 9.8 ha area.

It is likely that the net developable area will be circa 70% of 9.8ha, which is approximately 7ha. This will be developed at an average density of 5000 m² per ha (NIA), providing 35,000 m² NIA in total. This is higher density than the existing SRP that has about 55,000 sq m across 28 ha (about 2,000 m² per ha), but will allow for a high quality landscape setting for the new development whilst making efficient use of the land. This can be achieved by having more 3 storey development and buildings over car park areas.

11.19 Are there local level exceptional circumstances that justify the release of this site from the Green Belt?

Yes. The University has set out its views on this in its comments on the Submission Local Plan. Essentially the amendment to the green belt boundary is needed to accommodate the urban extension at Blackwell Farm, which itself is needed as a key element of the overall development and spatial strategy of the local plan.

The strategic allocation has been subject to rigorous assessment by GBC in environmental and sustainability terms, and also in comparison with other potential locations.

This assessment of local characteristics of the site and the conclusion that it is a suitable development location taking this assessment into account justifies its identification as a strategic site, and hence provides local exceptional circumstances for the green belt boundary amendment at this location.