EXAMINATION OF THE GUILDFORD BOROUGH LOCAL PLAN: STRATEGY AND SITES

EXAMINATION STATEMENT ON BEHALF OF BEWLEY HOMES PLC

APPENDICES

Matter 9 – Spatial Strategy, Green Belt and Countryside Protection Matter 11 – Policy A29 – Land South and East of Ash and Tongham

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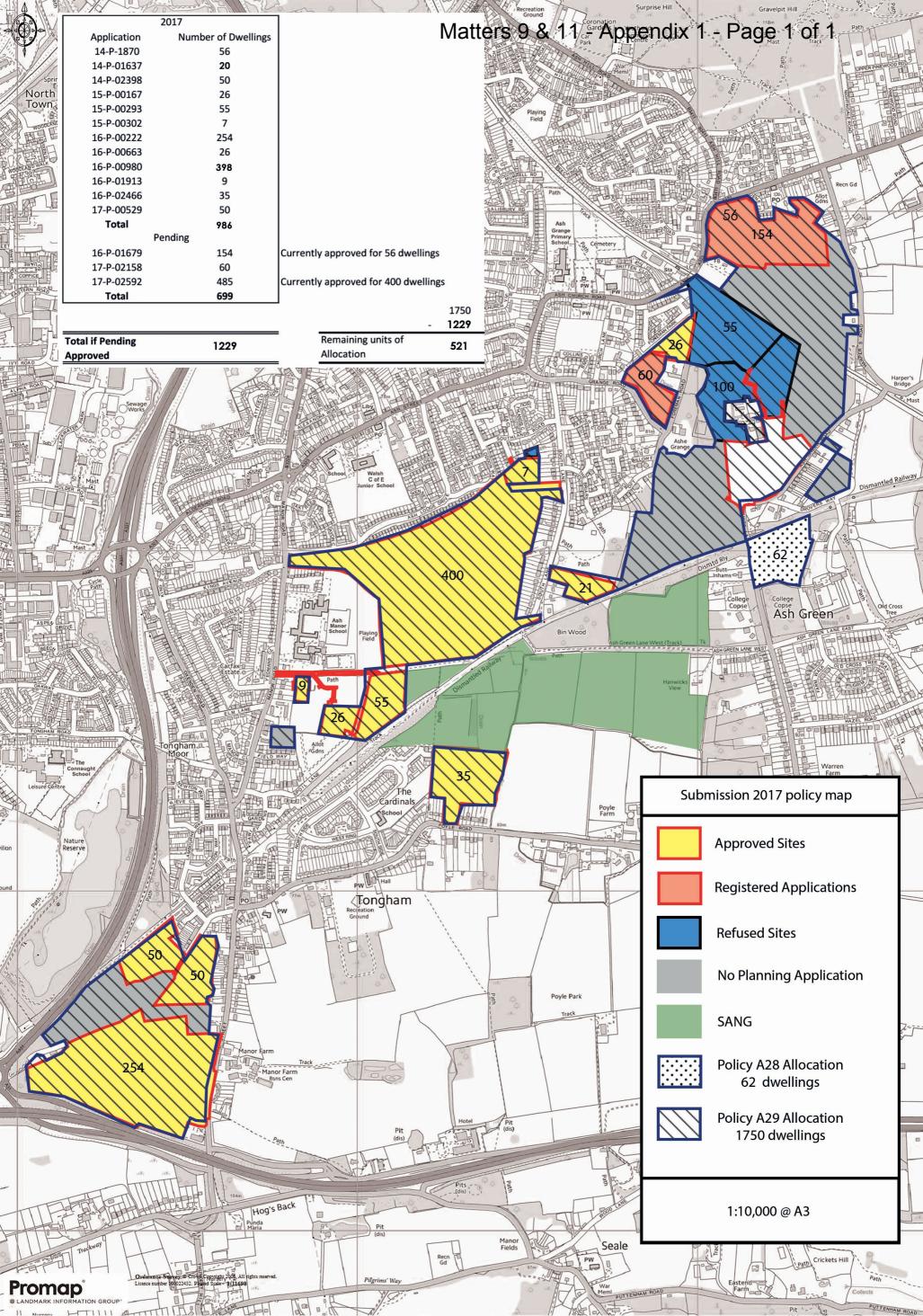
Matter 9 – Spatial Strategy, Green Belt and Countryside Protection Matter 11 – Policy A29 – Land South and East of Ash and Tongham

10 May 2018

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Appendix 1 Plan detailing the extent of sites consented, subject to applications and, the land remaining within the Ash and Tongham Allocation (Policy A29)

Appendix 2 Report on highway matters prepared by i-Transport – May 2018



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ASH LEVEL CROSSING

Project No: ITB12606

Project Title: Land South and East of Ash and Tongham

Title: Question 11.20 How would road traffic be handled from

these sites, especially having regard to the railway line and

the narrow lanes and streets?

Ref: JCB/ITB12606-010A TN

Date: 4 May 2018

SECTION 1 INTRODUCTION

1.1 For A29, Land South and East of Ash and Tongham, the Inspector has asked the following question:

"11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?"

1.2 This note sets out i-Transport's response to this query, which has been prepared on behalf of Bewley Homes and A2 Dominion.

SECTION 2 ASH LEVEL CROSSING

2.1 Evidence Base

- 2.1.1 As this stage, the Council has not presented any technical evidence that cumulative impacts of development are so significant that it is necessary for the Ash level crossing to be replaced by a new bridge.
- 2.1.2 i-Transport has assessed this matter in detail as part of the transport assessment for the current Land South of Ash Lodge Drive planning application. The south of Ash Lodge Drive site forms part of the proposed allocation for 1,750 new homes in *Policy* A29: Land South and East of Ash and Tongham in the Proposed Submission Local Plan.

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2.2 Ash Lodge Drive Transport Assessment

Developments Allowed for in Cumulative Impact Analyses

- 2.2.1 The Transport Assessment (TA) that accompanies the planning application for 485 new homes at Land South of Ash Lodge Drive (application ref: 17/P/02592) assesses the impact of 499 dwellings on the site (as a worst case). It is important to note that the site already benefits from planning permission for 400 dwellings.
- 2.2.2 The scope and parameters used in the traffic impact analyses have been discussed and agreed with Surrey County Council (SCC) as local highway authority. The analyses includes an assessment of the impact of the development proposal cumulative with committed development and 'potential' schemes.
- 2.2.3 The PPG defines 'committed development' as "development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years" (ref: PPG paragraph 014 Reference ID: 42-014-20140306). The assessment within the TA therefore goes beyond this by assessing schemes that were in the planning system at the time of drafting the TA but were not permitted.
- 2.2.4 It is acknowledged that matters have moved on since the assessment in the TA was undertaken. However, the number of dwellings now permitted or pending is now less than it was at the time of drafting the TA, i.e. the TA provides a worst-case assessment.
- 2.2.5 This assessment in the TA allows for the cumulative traffic impacts of the following:

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Table 2.1: Developments allowed for in Ash Lodge Drive TA

Scheme	Number of Homes
Committed Development	
12/P/01973 – the permitted scheme at Ash Lodge Drive	400
14/P/01870 – land south and east of Dene Close, Ash	56
12/P/01514 – land north of Poyle Road, Tongham	35*
15/P/00293 - Minley Nursery, Spoil Lane, Tongham	55
14/P/02398 – Grange Farm, Grange Road, Tongham	50
12/P/01534 – land south of Foreman Park and west of Foreman Road, Ash	26
15/P/00167 – land at Ash Green Lane West	26
16/P/00120 – land at Warren Farm, White Lane	58
13/P/01061 - land at Ash Green Lane West	60
Sub-total Sub-total	766
Potential Development	
16/P/00222 – Grange Farm	254**
17/P/00529 – land north of Grange Road	50**
17/P/00513 – Ash Manor	95
16/P/01679 – Land south and east of Dene Close Ash (additional to those already consented via 14/P/01870)	98
17/P/01315 – land at Poyle Road	150
17/P/00507 – Shortland Farm	300
17/P/01592 – Ash Manor (Phase 2)	100
Sub-total Sub-total	1,047
Proposed Development	
17/P/02592 – additional development at Ash Lodge Drive	99***
Sub-total Sub-total	99
Total	1,912

Note:

Key:

Schemes within proposed A29 allocation
Schemes outside of the proposed A29 allocation

- 2.2.6 A plan showing the location of these sites is included as Figure 2.1.
- 2.2.7 On this basis, the Ash Lodge Drive TA assesses the cumulative impact of 1,704 dwellings within the proposed allocation area (and 1,912 dwellings overall).

Level Crossing Impacts

2.2.8 In pre-application discussions, SCC stated the following:

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^{* 26} dwellings now approved but 35 assessed

^{**} These schemes have subsequently been permitted

^{*** 85} additional dwellings proposed but 99 assessed

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Question 11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?

"The site could result in an increase of traffic using Foreman Road/A323/Ash Level Crossing, within the Draft Local Plan there is a scheme to provide a bridge at this location to replace the level crossing, this scheme would look to remove congestion at this location and reduce queuing. We could seek contributions from the developer to part fund the implementation of the bridge as part of the overall mitigation package unless it is demonstrated that the proposal will not have a significant impact on this junction." (ref: SCC pre-application advice note dated 5 September 2017)

- 2.2.9 An assessment of cumulative traffic impacts on the Ash Level Crossing is set out in Section 8.9 of the Ash Lodge Drive TA. That assessment allows for the recent changes in the timetabling that results in more trains using the level crossing. The analysis in the TA demonstrates that:
 - Any queuing traffic will continue to disperse during the next period when the barriers is raised;
 - The level crossing will operate well within its theoretical capacity in the future;
 - This will remain the case even with increased barrier closure times due to an increase in rail services; and
 - Incidences of blocking of nearby junctions will not be increased by the addition of development traffic.
- 2.2.10 SCC has scrutinised this TA and has no objection to the development proposal subject to securing a financial contribution towards the following (ref: SCC email dated 22 February 2018):
 - Bus stop infrastructure improvements;
 - Enhanced bus service provision; and
 - Road safety and capacity improvement schemes at the A323/B3206, A331/A322 and A331/A31 junctions.
- 2.2.11 That contribution level has yet to be agreed, with discussions currently ongoing to seek to ensure that the value and schemes meet the relevant tests set out in paragraph 204 of the NPPF. It is however clear that:

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Question 11.20 How would road traffic be handled from these sites, especially having regard to the railway line and the narrow lanes and streets?

- An assessment has been undertaken of the impacts of 1,704 dwellings within the allocation area (and 1,912 overall);
- SCC would have sought a contribution towards a bridge to replace the level crossing if they considered that individually or cumulatively the impact to be significant;
- SCC have scrutinised the TA and have not requested such a contribution.
- 2.2.12 On this basis, the cumulative impact of 1,704 dwellings within the allocation area (and 1,912 overall) is less than significant and should therefore acceptable without the bridge.

2.3 Narrow Lanes

2.3.1 The Council is also yet to provide technical evidence regarding the impact of the proposed allocation on the 'narrow lanes' (assumed to be Ash Green Lane, Harper's Road and Wyke Lane to the south-east of Ash). There is therefore no technical justification for mitigation measures, e.g. a bridge to replace the level crossing.

2.3.2 The following is noted:

- A review of the safety record (ref: CrashMap) for the most recently available five-year period does not suggest a particular safety problem with the 'narrow lanes'; and
- The route via Ash Green Road, Harper's Road and Wyke Lane the most likely route to avoid the Ash Level Crossing is wide enough for two-way traffic (noting the continuous centre line along the route) and is therefore not especially 'narrow'.
- 2.3.3 At this stage, there is no empirical evidence that the impact on the alleged 'narrow lanes' brings about the need for a rail bridge to replace the level crossing.

2.4 Costs

2.4.1 The bridge is estimated to cost £15 million (ref: LRN21 of the Guildford Borough Infrastructure Delivery Plan - December 2017). The IDP identifies that SCC will deliver the bridge using funding from development and Network Rail.

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- 2.4.2 It is understood that GBC has secured the following funding sources for the bridge:
 - £10 million from central Government (ref: Housing Infrastructure Fund Successful Marginal Viability Fund projects – 1 February 2018); and
 - £2.5 million from Network Rail.
- 2.4.3 This leaves a shortfall of £2.5 million to be wholly funded by the development within the allocation. This is a significant financial burden that will fall of the remaining 761 dwellings that have not yet been permitted. This would equate to a contribution of over £3,000 per dwelling, whereas the average transport contribution in the local area is closer to £1,000 per dwelling.
- 2.4.4 A transport contribution at this level is likely to reduce the amount of funding available for other transport items, such as: junction improvements; pedestrian and cycling works; and/or improvements to local buses.

SECTION 3 SUMMARY AND CONCLUSION

- 3.1 The Council has not presented technical justification for the new rail bridge that is required by the emerging Policy A29.
- 3.2 The traffic impact work undertaken for the recent land south of Ash Lodge Drive planning application has been agreed with SCC. This assessment allows for the cumulative impact of 1,701 dwellings within the allocation, and 1,912 dwellings overall in the local area. SCC is satisfied with the cumulative traffic impacts of that level of development and is not requesting financial contributions towards a new rail bridge, and/or measures to deal with the alleged 'narrow lanes' in the area.
- 3.3 Notwithstanding these two matters, local concern regarding the operation of the Ash level crossing is acknowledged it is perhaps desirable for it to be replaced by a bridge and the current shortfall in funding could be made up by contributions from development in the local area. In that case:
 - Replacing the level crossing with a bridge should unlock a constraint to the operation of the local highway network, and additional development above the 1,750 dwellings currently proposed by the policy will be appropriate; and

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1-Transport

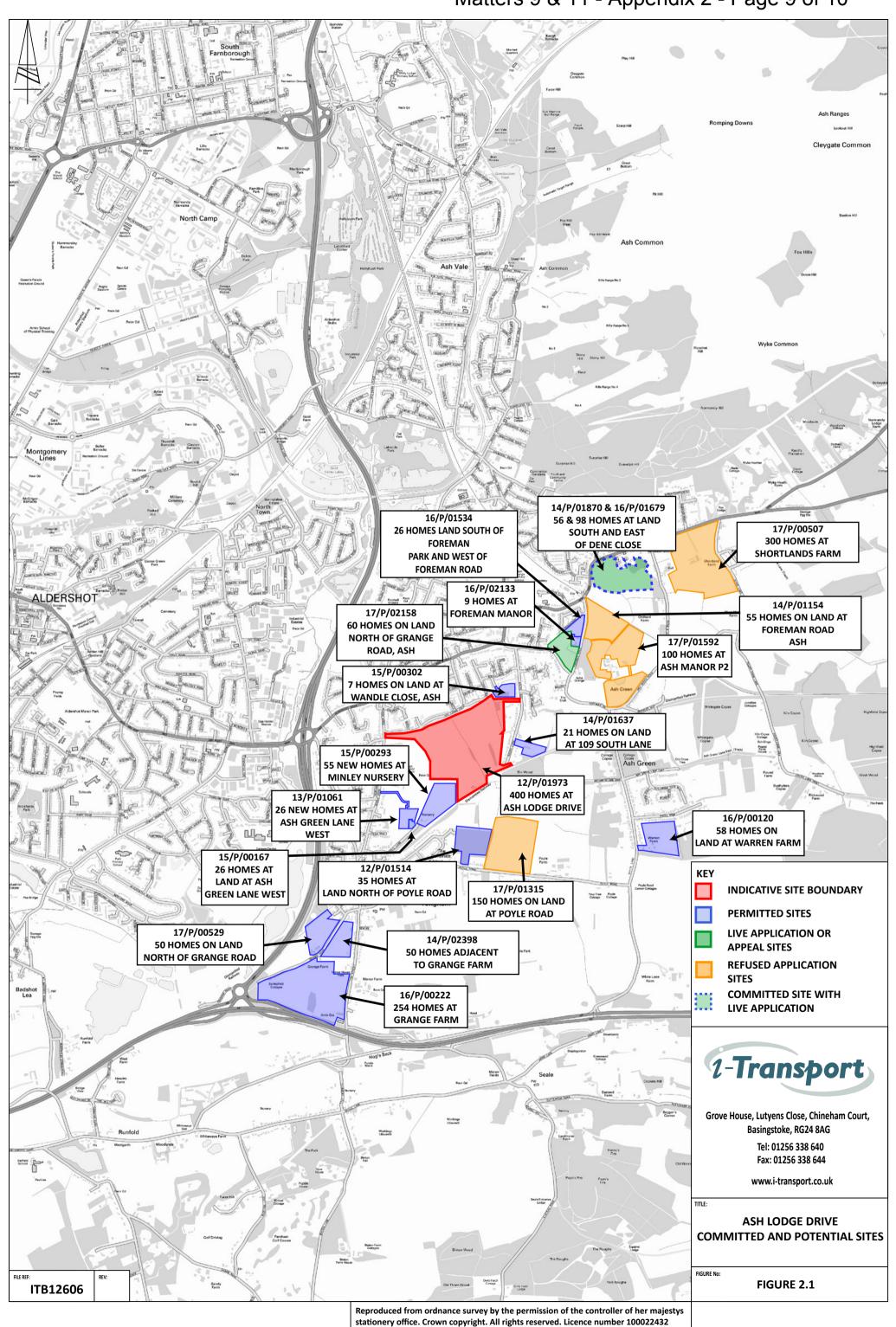
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 Increasing the number of dwellings allocated in the area will reduce the financial burden per dwelling, thereby enabling a greater level of funding for other transport schemes, e.g. junction improvements and measures to encourage the use of sustainable modes.

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FIGURE



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