

MATTER 9: SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION

Q9.2 Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- **Green Belt and landscape impact**

Green Belt

1. Our views on the Plan's failure to apply Green Belt policy properly were partially set out in section 4 of Save Hog's Back's response to the June 2016 Regulation 19 consultation. We also support Save Hog's Back's Statement on Qs 9.2 and 11.19.

2. Our arguments on strategic issues in summary were as follows, to which a few additional points are now added. Each issue contributes to the Plan being unsound because it is not justified.

(i) The current Local Plan, adopted in 2003, included the release of 63.3ha of land from the Green Belt in a single area: University of Surrey land in this area, of which 59.6ha was at Manor Farm (Local Plan paragraph 16.18). The expectation at the Local Plan Inquiry was that 40ha would be developed and the remainder have open uses such as sports fields. The Inspector agreed this substantial release was proposed to avoid "*a succession of bites at the Green Belt*" (paragraph 16.4.3). Nonetheless, a further major release of Green Belt is now proposed in exactly the same area. This undermines the intentions of the last Inspector and is in direct breach of the NPPF policy that when Green Belt boundaries are reviewed in Local Plans "*authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*" (NPPF paragraph 83).

(ii) Further expansion into the Green Belt on this west side of Guildford is not to assist the University of Surrey's academic purposes directly. It is to meet the Borough's housing and employment needs which the University, like any other landowner, finds convenient for financial reasons.

(iii) The Government continues to reiterate its policy commitment to protecting the Green Belt.

(iv) The Council's consultants proposed 'Potential Development Areas' (PDAs) to be released from the Green Belt on land parcels specifically on the urban edge. The consultants accepted that these bore no necessary relationship to the assessed 'Green Belt sensitivity' of the parcels around the Borough (the number of Green Belt purposes each served) (Volume II Addendum paragraph 4.4). Much the same distribution of PDAs might have arisen if the Green Belt had not existed at all. Green Belt releases should not be planned that way.

(v) The consultants made a dubious interpretation of NPPF paragraph 80, which is clear that the second purpose of Green Belt is "*to prevent neighbouring towns merging into one another*". Rather than restrict the assessment of Green Belt purposes on land parcels to

'towns' merging, they applied it to far smaller settlements. For example the very first parcel, A1, prevents Jacobs Well and north Guildford from merging, but Jacobs Well is a village rather than a town. Without achieving Purpose 2, parcel A1 would have been rated as only 'medium' rather than 'high' sensitivity. Across the Borough the pattern of sensitivities would have been rather different from that in Vol II Addendum Appendix 2, with fewer high sensitivity parcels and more scope for accommodating development.

(vi) The fifth purpose of Green Belt is *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"* (NPPF paragraph 80). The Council's consultants took the view *"By restricting development in the surrounding countryside, all land in the countryside contributes to the fifth purpose above and therefore applies equally to all Green Belt areas. As the purpose is common to all land parcels, each land parcel has therefore been assessed against the four remaining Green Belt purposes"* (Green Belt and Countryside Study Volume II, paragraph 7.8). The Plan accepted this. In our view the assumption is incorrect as different sites have different abilities to promote land recycling. For example, one effect of stopping development on Blackwell Farm would be to oblige the University to pay more attention to the more efficient use of its other land, particularly regarding land for research businesses. At present the University takes a relaxed approach to land supply, with large areas devoted to car parks and the Surrey Research Park advertised as a 'low density rural location' (providing just 65,000m² of office space across 28.33 hectares).

(vii) Blackwell Farm is becoming progressively less able to fulfil the 'strategic' role identified for it because its capacity to accommodate dwellings has been overstated. The Council anticipates 1,800 dwellings on the allocation site A26. This site is the former 'H2' land parcel identified by consultants for the *Green Belt and Countryside Study*, but with an additional plot in the north-west corner capable of taking 200 houses (response to Inspector's initial questions paragraph 8.67). We anticipate substantially fewer dwellings being practicable within an appropriate urban design. This would significantly affect the charge per dwelling needed to meet the large infrastructure costs associated with the scheme and therefore the viability of the whole scheme. The following issues arise:

- (a) *The assumed dwelling capacity was high in the first place.* The Council's consultants in 2012 estimated the dwelling capacity of H2 (without the NW plot) at 1,196 (with residential areas at 40 dwellings per hectare) (Vol II, schedule after page 25), 400 fewer than the Council assume.
- (b) *More space is required for non-housing purposes than assumed in the June 2016 Regulation 19 consultation (or earlier).* In 2017 the Council included land for a six form entry secondary school in the requirements but did not adjust the dwelling capacity. Also, no allowance was apparently made by the consultants or the Council for the unusually large space needed for water storage within Blackwell Farm, to control flooding both on and off the site. Furthermore, Requirement 23 of Policy A26 expects *"Sensitive design at site boundaries that has significant regard to the transition from urban to greenfield"*, which is likely to affect dwelling density around the site margins but does not appear to have been planned-for.
- (c) *Land required for the purposes of the strategic site is already being proposed outside its boundaries.* Fitting all necessary development into the area proposed for the urban extension in the Submission Plan has already failed. The Council announced in

its response to the Inspector's initial questions that "*The playing fields [for the secondary school] are proposed to be located outside the site within the Green Belt but will remain easily accessible to the secondary school*" (paragraph 8.68). This is on environmentally sensitive land to the south of the allocation, within the Area of Great Landscape Value and within the area into which our Landscape Consultants have advised the AONB ought to be extended. This should be kept free of urbanisation. Requirement 11 of Policy A26 refers to the school's playing fields, with the reference to them being 'off-site' only appearing between the second Regulation 19 consultation in June 2017 and the Submission Plan in December 2017. These fields are likely to be flood-lit in this sensitive area, especially as they must be 'dual-use'. This would be contrary to Green Belt objectives.

(viii) The extent to which a parcel of land fulfils each Green Belt purpose, and how to use that information, is more nuanced than either the Council or its consultants have acknowledged. The main aspects of this are:

(a) The sensitivity assessment assumes that each land parcel either does or does not perform each purpose. They are scored either 1 or 0 on each purpose and then these purposes are added up. Some parcels perform a purpose 'somewhat' rather than fully or not at all, either because part of the parcel performs it or because the whole parcel makes a limited contribution to it. This is well illustrated by Blackwell Farm, which makes a contribution to the fourth Green Belt objective "*to preserve the setting and special character of historic towns*". There is intervisibility between key vantage points within the city (notably the Cathedral and The Mount) and parts (but not all) of Blackwell Farm which emphasise Guildford's setting: for example see Figure 1. These fields and the remnants of Manor Farm provide rare views where the Cathedral rises from a fully rural setting. Furthermore, significantly, much of Blackwell Farm can be seen in the same view as the Cathedral from the Hog's Back: development of site A26 would damage the setting of the city when both are appreciated together: for example see Figures 2 and 3. Despite these qualities, Blackwell Farm was scored '0' in the Green Belt assessment on this purpose.

(b) All purposes are scored equally in the *Green Belt and Countryside Study* and added together on that basis. No scope is given to the possibility of one purpose being of such outstanding importance that, irrespective of whether other purposes are performed too, that single vital purpose is held to be sufficient by itself to take priority over development. In the case of Blackwell Farm, we would have expected the third Green Belt purpose, "*to assist in safeguarding the countryside from encroachment*", to be appreciated as of outstanding significance in this case. The Hog's Back is an internationally known iconic landscape and development of the allocation site would directly interfere with its enjoyment. The site is partly within the Surrey Hills Area of Outstanding Natural Beauty and the rest of it is in its setting; most of it should, on the advice of our Landscape Consultants, be placed within the AONB when the AONB boundary is reviewed in the near future.

Landscape impact

3. Save Hogs Back welcomes Policy P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value and the many statements and aspirations in the Plan

Figure 1:

Guildford Cathedral from the site of the proposed Surrey Research Park extension, Blackwell Farm



Figure 2:
Blackwell Farm proposed allocation site from the Hog's Back, in the setting of the cathedral city of Guildford

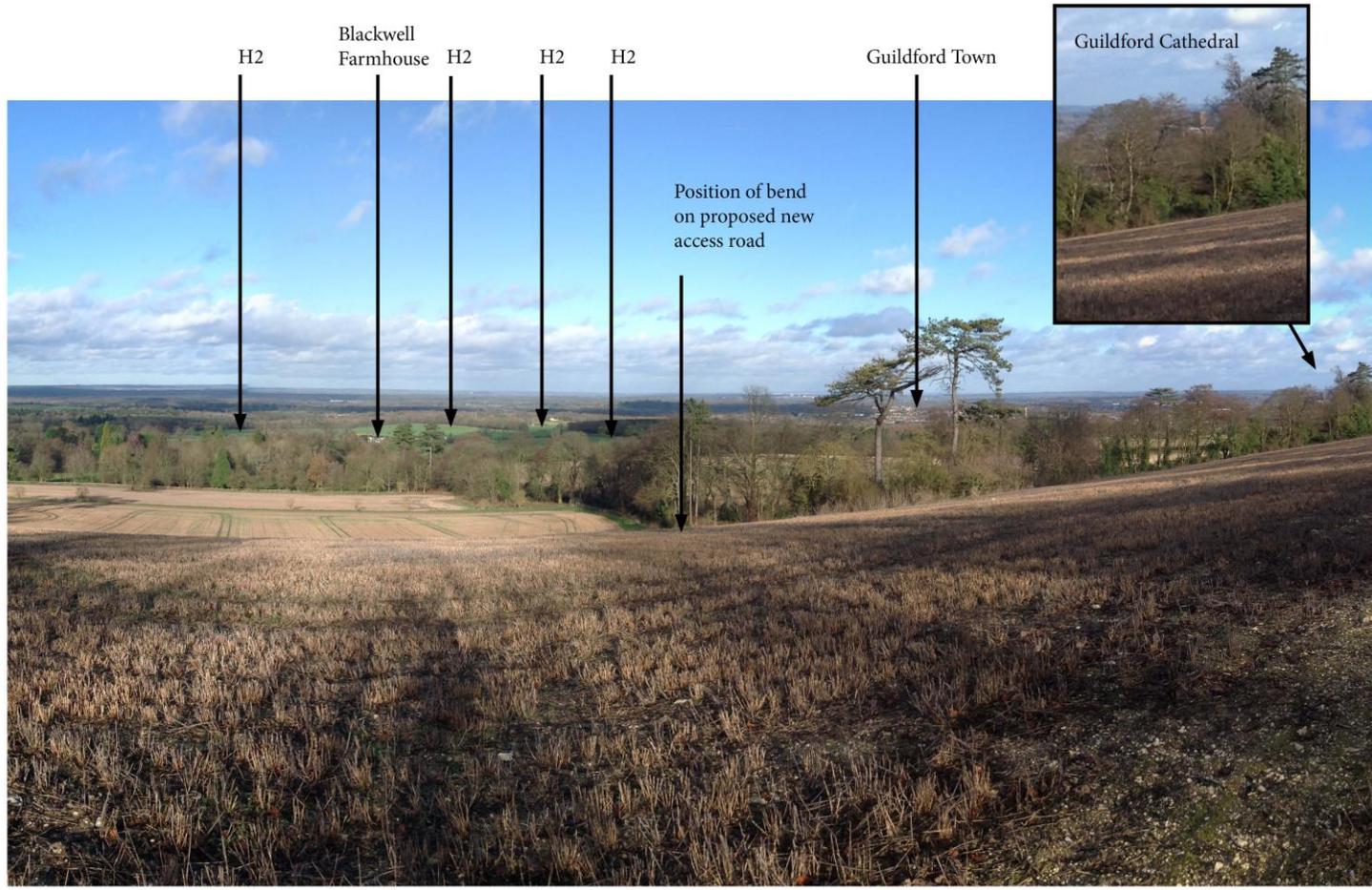


Figure 3:

In the setting of Guildford and its Cathedral: panorama from the Hog's Back with the Blackwell Farm proposed allocation site



supportive of the AONB (e.g. the Council Leader's Foreword, paragraphs 2.23, 4.1.4, 4.3.1-10) and the Spatial Vision that "*Areas of high environmental value such as the Area of Outstanding Natural Beauty and Sites of Special Scientific Interest will be retained and afforded great protection.*" The problem is that the Submission Plan has failed to apply the policy and these principles in the case of Blackwell Farm. We consider it is unsound because it is not consistent with national policy, having failed to implement correctly NPPF paragraph 116 (on major development in AONBs), that the new access road through the AONB is not justified and the urban development in the setting of the AONB should not be allocated. Policy A26 is the only significant development in the Plan affecting the AONB and its deletion should be a top priority for making the Plan sound.

4. Reasons for requesting the deletion of Policy A26 on landscape grounds were set out by Save Hog's Back responses to the Regulation 19 consultations in June 2016 (paragraphs 3.1-20) and June 2017 (paragraphs 65-69). In addition to these points, since then, Artington, Compton, Wanborough and Worplesdon Parish Councils have commissioned Land Management Services to prepare a Landscape and Visual Appraisal of the proposed alignment for the access road to the proposed Blackwell Farm development site from the A31 Hog's Back (January 2018) and is provided separately as Appendix 1. We support the Save Hog's Back analysis in its response to Q11.15 which draws on their findings. Our comments on the impact of the Plan on the AONB are set out in response to Q11.17: there are strategic considerations there but the points are best expressed in one place.

Q9.5 Having regard to 9.2-9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?

5. The Submission Plan merely asserted 'exceptional circumstances' for releasing sites from the Green Belt without attempting to demonstrate this (paragraph 4.3.16). Only when invited to remedy this (Inspector's Initial Q8) did the Council offer an explanation. Even so, the Council has failed to carry out any assessment of the importance of Green Belt in the Borough and simply assumed that an OAN for housing – whatever it is – justifies releasing sufficient Green Belt land to supply it. There has been no assessment against the NPPF paragraph 14. There has been no acknowledgement of the 'permanence' of Green Belt as a structuring feature in strategic planning. If allowed to prevail, the effect would be to enable urbanisation in a corridor along the A3 from Blackwell Farm to Ripley. This would be the urban sprawl which the Green Belt was established to avoid. The Plan is unsound in this respect because it is not consistent with national policy.

6. If the Green Belt assessment had been carried out more satisfactorily and applied more carefully by the Council at the strategic level, then:

- more sites would have been available from which to select suitable development areas (see paragraph 2(v) above);
- the particular contribution of removing the Blackwell Farm allocation to encouraging urban land recycling would have been identified, enabling the site to score more strongly against Green Belt purposes and making it much less likely to be selected (paragraph 2(vi) above);

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- Blackwell Farm would have scored more highly for its contribution to protecting the setting of the historic cathedral city of Guildford, and so have been much less likely to be chosen for development (paragraph 2(viii)(a) above);
- the strategic benefits claimed of Blackwell Farm would have been identified as distinctly fewer (paragraph 2(vii) above);
- the outstanding contribution of Blackwell Farm to the countryside in this part of the Borough, in the AONB and its setting, would have been properly identified, and reflected in not being allocated for development (paragraph 2(viii)(b) above).

In each respect the Plan is unsound because it is not justified.

MATTER 11: SITE ALLOCATIONS – A26 BLACKWELL FARM

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

7. Compton Parish Council wholly supports the Save Hog's Back Statement in its responses to Qs 11.15 and 11.16. Points there are not repeated here.

Sustainable Movement Corridor

8. The Council has pinned its hopes that future traffic volumes will not be as bad as all the evidence shows on its proposal for a Sustainable Movement Corridor through Guildford. This reaches Gill Avenue at its western extremity. It is important to appreciate that this will have negligible impact on modal shift or traffic flows. The Save Hog's Back response to the June 2017 Regulation 19 consultation showed (paragraphs 10-12, 44-45 and 51-60) that laudable proposals by Arup to the Council in 2014 – to reduce roadspace for cars and reallocate it to buses, cycles and pedestrians – have been progressively abandoned in any practical sense so far as they affect Blackwell Farm. The Council has effectively given up on the original aspirations by its statement in paragraph 4.6.28 of the Submission Plan that *"Whilst 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, we forecast that there will also be an absolute increase in overall traffic volumes"* (emphasis added).

9. The Council's latest position is set out in its *Topic paper: Transport*, December 2017 accompanying the Submission Plan. The key issue for Blackwell Farm is the degree of priority given to sustainable transport modes from Gill Avenue to the A3 and into Guildford. In particular the A3 underpass is a pinch-point. This currently provides for two lanes of traffic in each direction between the Tesco and Cathedral roundabouts. Paragraph 2.10.4 of the *Sustainable Movement Corridor – Update* (20 February 2017) explains:

"Figure 5 shows two options for the [SMC] route passing under the A3 on Egerton Road. This section is a particular interest as there is an opportunity for pedestrians and cyclists to avoid the subway, which has been highlighted as a perceived safety concern by stakeholders. This means that pedestrians would walk through the existing underpass which is currently for vehicles only. Another option is to introduce a bus lane through this section, however, its level of use and the benefit it would bring to the bus route might be relatively small and could be perceived to be unnecessary. Both of these options are dependent on improvements to Gill Avenue, adjacent to the Hospital to help the flow of all vehicles through the corridor."

10. Appendix B shows plans with a bus priority lane in the underpass, but paragraph 2.10.5 cautions: *"this is for information only and will require consultation with various parties and further development and modelling before a preferred option is presented."* It is clear that the Submission Plan is making no commitments. However, 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, even somewhat reduced by modal shift, on a single lane each way. Unfortunately the Sustainable Movement Corridor will fail. It has already been compromised; extra (not reduced) vehicular capacity is proposed for Gill Avenue and Egerton Road; there will be no discernible impacts on existing congestion; and the SMC 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.

11. The Statement by Save Hog's Back shows that traffic generated by Blackwell Farm will cause massive congestion. Modal shift would be a necessary element to tackle this. However, the Submission Plan has inconsequential aspirations in this regard. The Plan is therefore unsound because it will not be effective in enabling the delivery of Blackwell Farm as a sustainable development.

The traffic impact of any modal shift

12. Our starting point is that providing a bus service to Blackwell Farm (both residential area and Research Park extension), together with pedestrian and cycle access, is not modal shift but normal. Modal shift comes from incentivising sustainable modes and discouraging cars. Requirement 5 of Policy A26, to provide a significant bus network to serve the site, does not count as modal shift, whereas reallocating road space in the A3 underpass and providing a new station at Park Barn do. There are no firm proposals to reallocate underpass road space (and its traffic consequences have not been modelled). We assume that the Park Barn station will eventually be built. Compton Parish Council supports this station, even if Blackwell Farm does not proceed. This station could have a beneficial effect on modal shift. However, our transport consultant strongly recommends that modelling the attraction of vehicle trips to the new station at Park Barn is fundamental to the acceptability of the site allocation and this crucial work should not be left until a planning application comes forward.

13. The site of the station is behind the Nuffield Hospital and RSCH. It raises the prospect that plenty of hospital staff would arrive by train, some of whom currently arrive by car. There is also the likelihood that some staff of the existing Research Park and its proposed extension would use it. The residential area of Blackwell Farm would be distinctly further away, though still walkable or cyclable. There are proposals for a 'kiss and drop' space outside the station on its south side, though vehicular access to the station would be from Egerton Road (north arm) near the railway bridge, adding to existing congestion: that would therefore achieve no net benefit on the local roads. However, the far greater adverse impact is likely to be that Blackwell Farm residents will drive to Park Barn and use the RSCH car parks (on which RSCH has expressed concern).

14. Meanwhile access to RSCH is currently poor. Alf Turner, Deputy Chief Executive RSCH, advised us that the Hospital lacks adequate car parking facilities. It is looking to develop a multi-storey car park to serve patients and staff, but "*The problem with increasing car parking provision is the A3. The Hospital would like to increase its car parking places, as would the University, but they are restricted by peak flow activity on the A3. Highways England can object to any application for more parking*". It is clear that if Hospital car parking capacity is released by any significant modal shift of existing users to Park Barn

station, the capacity would be taken up by other users whose journeys are currently frustrated by insufficiency of parking spaces. Park Barn station has merit but not to reduce traffic on the access route to Blackwell Farm. Modal shift will therefore only work with significant disincentives to travel by car, particularly reduced car parking spaces at destinations and reallocation of road space. None of that is proposed in the Submission Plan as part of the Blackwell Farm development. The Plan is therefore unsound because it will not be effective.

Viability

15. The transport infrastructure needed as a direct consequence of Blackwell Farm will be extremely expensive and should be charged to the development. In some cases costs are likely to be split with other agencies. There are in addition a range of other infrastructure costs, some of which have been substantially underestimated in the Submission Plan. The overall cost of infrastructure properly attributed to Blackwell Farm is likely comfortably to exceed any realistic amount that the University of Surrey as landowner would be prepared to spend on bringing the scheme forward.

16. Appendix 2 brings together the infrastructure requirements in principle at Blackwell Farm, mostly identified in the Submission Plan. Changes to the commitments since the first Regulation 19 Consultation Plan in June 2016 are highlighted in red. In many cases the likely costs of the infrastructure are not identified in the Submission Plan. Nor has the split of the costs been identified where these are shared between the Blackwell Farm development and other parties. Built into the development is the provision of 40% affordable housing (and land for specialist housing): this is taken as an integral rather than separate cost.

17. The proposals in the Submission Plan noted in our Appendix 2 can be compared with the viability study commissioned by the Council. Initially prepared by Peter Brett Associates in October 2016, a revised viability study by Porter Planning Economics in November 2017 is now taken as the basis for assessment. The costs of the project identified in the viability assessment work are not limited to the infrastructure costs reported in the Submission Plan. For example, about £11.5m is allowed for carbon reduction measures in response to Plan Policy D2.

18. One of the largest items in the viability assessment is an allowance of £75.5m for 'strategic site opening-up costs', explained on page 18 as for transport infrastructure. We accept that this sum is likely to be sufficient to cover highways-related costs other than those promoted by Highways England. In particular, this sum would be wholly insufficient to make any meaningful contribution to the widening of the A3, upon which Blackwell Farm is wholly dependent. Given that the A3 once widened would still be heavily overloaded on the day Blackwell Farm was completed, drivers would be little better off than they are at present, so in our view the lion's share of the cost of the A3 widening should fall to Blackwell Farm (and to a lesser extent the Slyfield development). This could be hundreds of millions of pounds.

19. The viability assessment makes provision for Suitable Alternative Natural Greenspace, which will be provided 'bespoke' on the Blackwell Farm site. £13.5m is set aside for this, which appears to cover infrastructure item SANG10 in the Submission Plan.

20. Some of the Blackwell Farm infrastructure costs are covered by two broad provisions in the viability study:

(i) £10,000 per unit for site opening-up costs (providing £18m in total). This is explained on page 18 as covering 'opening up costs not covered in the transport infrastructure costings'. We assume that this includes laying estate roads, electricity and broadband cables, pipework, etc. and perhaps Submission Plan infrastructure items like the community meeting hall (CMH1) and GP practice surgery (HSC3): there is otherwise no record of these costs being covered. If a wider range of costs is expected to be covered, this should be clarified by the Council.

(ii) £8,000 per unit for 's106/s278/AH contribution' per unit (providing £14.4m in total). (Affordable Housing appears included here in error.) Porter paragraph 4.7 cross-refers to this covering principally open space and education costs (PBA report paragraphs 5.25-29). The Submission Plan refers to the provision of serviced land at nil cost plus the construction of a primary school for £8m (PED4) and a secondary school for which Blackwell Farm would be responsible for one third of the £20m cost, i.e. £6.7m (SED3). These exceed the £14.4m budget available, though open space could probably be provided cheaply on University of Surrey land (the uncosted infrastructure item OS2 in the Submission Plan).

21. The viability assessment appears to omit a series of infrastructure costs which can be expected to be very expensive: offsite connections EG4, WS2, WCT3, (plus contributions to WCT7 and WCT8 or alternatively a major upgrade to Hockford sewage works), and onsite FRR2 and water quality controls. All items would be largely or wholly developer-funded.

22. We consider that the full infrastructure costs attributable to Blackwell Farm have not been allocated to this development in the viability study. They are all essential to enable the Blackwell Farm development to go ahead. Not proceeding with the A3 widening or with major water or wastewater upgrades or surface flooding controls are not options available if the development is to proceed. If they are not charged to Blackwell Farm, the costs would fall instead on other parties such as through tax bills, council tax bills, water bills and sewerage bills. We do not consider the enormous costs to facilitate this inappropriately located scheme should be extensively offloaded onto others.

23. Nor do we consider it an acceptable option to proceed on the current basis of not knowing the approximate costs of these major infrastructure investments. Attempting to push through a major urban extension at the allocation stage on a false prospectus and a wild assumption – that it will turn out OK in the end – is the antithesis of good planning. If the costs were properly identified at the outset, now, there is a real likelihood that they would damage the viability of the scheme to the point where it could not proceed. In that scenario, the consequence before long would be the landowner/developer (the University of Surrey) attempting to evade the more negotiable costs which ought to fall onto Blackwell Farm. In particular, from experience, we foresee an attempt in due course to reduce or eliminate the contribution to affordable housing, which is one of the pillars on which the project is currently being allocated. Without proper identification of costs now there is a

major risk of compromise to the quality of the scheme: the Council and University would have asked for one package now but delivered a different one later, with the shortfall reflected in costs borne by other parties. The allocation should not be countenanced until all infrastructure costs attributable to Blackwell Farm have been broadly agreed by the relevant parties and then shown to be within the capacity of the development to pay for them. We consider the Plan is unsound because the missing evidence base on infrastructure costs makes it not justified.

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

24. The landscape impacts of the Blackwell Farm development, particularly on the AONB, were outlined in Save Hog's Back's response to the June 2016 Regulation 19 consultation, section 3. In addition the harm which the link road to the A31 and its junction would cause to the AONB and the landscape is outlined in Save Hog's Back's Statement paragraphs 13-17, supported by an expert report supplied as Appendix 1. Further, the general impact of the development on the wider landscape was explained in connection with 'safeguarding the countryside' and 'protecting the setting of an historic town' in the context of Green Belt policy in paragraph 2(viii) above, accompanied by selected photographs. We urge the Inspector to make a site visit and would welcome the opportunity to show him around.

25. The Council's attention to the setting of the AONB has been inadequate. The legal importance of the setting of AONBs, stated in the Countryside and Rights of Way Act 2000 s85(1), has apparently been neglected. So has the Planning Practice Guidance (reference ID 8-003-20140306). NPPF paragraph 115 requires that in any decision "*great weight should be given to conserving landscape and scenic beauty*" in AONBs: this applies not only to developments proposed within an AONB but if proposed in their setting such that the AONB would be affected (applying s85). No discernible regard has been had to the Submission Plan's own Policy P1 or to the AONB Management Plan on protecting AONB settings. The advice which the Council received from its consultants for the *Green Belt and Countryside Study* was surprisingly insensitive to AONB setting. The various volumes have numerous references to development 'within' or partly within the AONB, but, contrary to policy, rarely is AONB setting mentioned or reflected in assessments. It is ignored completely in the assessment in Volume II of Blackwell Farm in conclusions on residential capacity, both for site H1 (paragraph 9.17) and site H2 (paragraphs 9.18-19). The Plan is unsound because it is not consistent with national policy.

26. No significant landscape mitigation of Blackwell Farm has been proposed in the Submission Plan. Compton Parish Council considers it highly unlikely that realistic landscape mitigation is feasible: the site is overlooked from the higher ground of the Hog's Back, so tree planting is unlikely to be effective – even decades hence once trees have matured. The reverse is the case: the proposed development would have spill-over effects into the surrounding countryside. This is especially clear with the proposed off-site playing fields (see paragraph 2(vii)(c) above). The Plan is unsound because it is not justified.

APPENDIX 1

**Proposed Blackwell Farm Access Road: Landscape and Visual Appraisal
by Land Management Services
January 2018**

for Artington, Compton, Wanborough and Worplesdon Parish Councils

(supplied as a separate document)

APPENDIX 2

Tables:

Costs of access infrastructure to the Blackwell Farm development
Non-transport infrastructure costs of the Blackwell Farm development

Costs of access infrastructure to the Blackwell Farm development

<u>Policy</u>	<u>Project</u>	<u>Delivery</u>	<u>Delivered by</u>	<u>Likely cost and funding source</u>	<u>Notes</u>
LRN2	A3/Egerton Road Tesco roundabout improvement scheme	2017-2026 2020-2026	SCC and/or Highways England	£5m, HE and developer contributions-funded	Borough Transport Strategy December 2017 identified delay
LNR3	New signalised junction from Blackwell Farm site to A31 Farnham Road (to principally serve Blackwell Farm site)	Between 2021 and 2027	SCC and/or developer	£5m >£10m Developer funded	Cost with new bridge over A3 sliproad, SCC withdrew funding offer June 2017
LNR4	Access road at Blackwell Farm site with through link to Egerton Road (to principally serve Blackwell Farm site)	Between 2021 and 2027	SCC and/or developer	£20m Developer funded	SCC withdrew funding offer June 2017
LNR5	Interventions to address potential highway performance issues resulting from development at Blackwell Farm site	Between 2021 and 2033	SCC and/or Highways England and/or developer	£5-10m Developer funded	Extra cost identified June 2017, SCC withdrew funding offer June 2017
SMC1	Sustainable Movement Corridor: West	Between 2018 and 2033	Surrey CC, Guildford BC & developer(s)	£20m Developer contributions funded and Local Growth Fund	Terminology changed June 2017*
NR2	New rail station at Guildford West (Park Barn)	Between 2018 2024 and 2029	Network Rail, SCC, RSCH, GBC & developer(s)	£10m Developer funded (mostly Blackwell Farm?)	Start date put back June 2017
A26	Interventions to address highway network performance issues which could otherwise result from the development	Not stated	Not stated	Not stated	
SRN2	A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme (E31)	Between 2023 and 2027	Highways England	£100-250m Highways England and developer contributions funded	Terminology changed June 2017. Much higher cost likely. BF by far the largest beneficiary
SRN7	A3 northbound off-slip widening to Tesco roundabout	2017-2020 2018-2019	Highways England	£2m Highways England and developer contributions DfT committed funding £1.6m	Developer contributions & price dropped June 2017, delivery period refined June 2017
BT6	Significant bus network serving Blackwell Farm	2021-22	Developer	TBC, Developer funded	(Not in June 2016 Plan)

* Policy A26 requires: "Developer to provide the western route section of the SMC on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network, both having regard to the SMC SPD".

Non-transport infrastructure costs of the Blackwell Farm development

<u>Policy</u>	<u>Project</u>	<u>Delivery</u>	<u>Delivered by</u>	<u>Likely cost and funding source</u>	<u>Notes</u>
EG4	Upgrade electricity supply infrastructure should capacity assessment conclude it necessary	Years 1-15	UKPN	Developer and UKPN funded	
WS2	Upgrade to capacity of water supply network if assessment shows it is needed	Years 1-15	Thames Water	Developer funded	See Thames Water comment**
WCT3	Upgrade to wastewater infrastructure if assessment (at developer's cost) shows that additional capacity is needed to provide for Blackwell Farm strategic site. 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.	Years 1-15	Thames Water	Developer funded	See Thames Water comment***
WCT7	Upgrading existing pumping station at Slyfield (Slyfield Area Regeneration Project (SARP) site)	Years 1-10	Thames Water	Developer and Thames Water funded	Relevant if Blackwell Farm served by Slyfield rather than Hockford
WCT8	Pipeline required between existing pumping station and the new site and potentially returning to discharge location at SARP site	Years 1-10	Thames Water	Developer and Thames Water funded	Relevant if Blackwell Farm served by Slyfield rather than Hockford
FRR2	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 (SUDS), incl. balancing pond(s), to provide for flooding water storage on the development site.	Years 1-15	Developer	Developer funded	There will also need to be major investment to avoid deterioration in water quality leaving the site (supplying Whitmoor Common SPA)
SANG 10	Bespoke Suitable Alternative Natural Greenspace (SANG)	Years 1-5	Developer	Developer funded	
PED4	A new two-form entry primary school with pre-school provision at Blackwell Farm to serve new housing on the site	Years 1-15	An academy trust	Developer to provide serviced land and build costs Construction cost = £8m	

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SED3	A 6FE secondary school at Blackwell Farm strategic development site. 2FE would be needed to serve the site itself, and the remainder will serve new housing development in the wider area. The associated off site playing fields must be dual use.	TBD	An academy trust	Developer to provide serviced land at nil cost and transfer it to SCC; £20m build costs – developer funded	If one third of the need is attributable to students from Blackwell Farm, then its capital payment would be £6.7m + land supply
OS2	Open space including park, playground, and playing fields	Years 1-15	Developer	Developer funded	
HSC3	Expansion of existing GPs Practices in Guildown Group Practice to provide additional capacity for residents of Blackwell Farm strategic site or land and a new building for a new GPs practice surgery at Blackwell Farm strategic site	1-15 years	Developer /Guildford Waverley CCG	CCG or a local GPs Practice and developer funded	
CMH1	Community meeting hall (Use Class D1)	Years 1-15	TBD	Developer funded	

** *“The water network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic water supply infrastructure upgrades are likely to be required to ensure sufficient capacity is brought forward ahead of the development”* (Thames Water, July 2017).

*** *“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”* (Thames Water, July 2017).