



GUILDFORD BOROUGH COUNCIL

LOCAL PLAN EXAMINATION

HEARING STATEMENT

ISSUE 9 – SPATIAL STRATEGY, GREEN BELT & COUNTRYSIDE PROTECTION

This statement has been prepared on behalf of Crimson Project Management, the owners of land at Rokers, Aldershot Road, Fairlands, Worplesdon

THE ISSUE

Having regard to the need for housing does the Plan direct it strategically to the right places? Relevant aspects are;

- **The spatial distribution of existing and future need for housing**
- **Movement patterns**
- **Green Belt and landscape impact**
- **Infrastructure provision and constraints**

9.2

1. The Plan accepts that there is a need for a significantly increased level of housing delivery in the Borough during the Plan period. Whilst it is not the purpose of this statement to assess in detail the extent of this need and what the precise housing requirement of the Plan should be there are two obvious concerns that immediately arise in relation to the strategy that the Plan proposes for meeting the need.

2. Firstly, considerable reliance in meeting housing need is placed upon a number of strategic allocations which it is hoped will deliver the required number of homes over the Plan period. Secondly, such reliance does little to meet existing housing needs in the first five years of the Plan.
3. The problem that often arises with strategic allocations, other than where the identified constraints are limited and easily and quickly resolvable, is the uncertainty that the allocation will either come forward at all or within the projected time frame.
4. In the circumstances, the Local Plan needs an appropriate 'insurance policy' strategy which covers this position. Such a strategy should involve a larger number of smaller allocations than is currently proposed in order to provide the certainty of delivery. The Plan is deficient in not proposing sustainable urban extensions to existing settlements where these are relatively unconstrained and sustainable.
5. Paragraphs 2.14 – 2.14b paint a grim picture regarding the transport network, traffic congestion on the principal roads in the Borough and the impact that this has on public transport. As a matter of strategy, the Plan should have sought to minimise additional demand on the A3, A31 and the roads within Guildford Town Centre and to look to allocate new development in areas where there is good public transport connectivity into the Town Centre and thence onwards to London and other movement attractors by public transport.
6. Given what is said in paragraphs 2.14 – 2.14b and what is known regarding the movement patterns in the Borough, it would seem wholly inappropriate to propose up to 1,800 homes, new retail and commercial development, a new secondary school, new primary school and other movement generators on a site which would discharge, in effect, almost directly onto the A31/A3 junction.
7. Whilst expert technical concerns will, no doubt, be identified by others relating to the impact on movement corridors from the proposed allocations, Crimson Project Management Limited has itself commissioned Transport Consultants to provide an overview and their assessment in the form of a Technical Note is attached to this statement.

8. The strategy of the Plan in terms of proposed Green Belt releases relies extensively on the Green Belt and Countryside Study. As the Council's response to the Inspector's initial questions explains, it is a key piece of evidence and it is also, indeed, a very voluminous piece of work. As the Council's response further explains, whilst the sensitivity of the Green Belt was a factor in identifying site allocations, other sustainability factors were also part of the site selection process.

9. Inevitably, there must be the exercise of judgement in such a process. For example, the Regulation 18 Draft Local Plan proposed a residential safeguarding allocation on land to the west of Fairlands. Fairlands has a good public transport rating of 4 within GBC Settlement Hierarchy and ranked 6th in terms of the sustainability assessments in the GBC Settlement Hierarchy. The draft allocation was proposed even though the land to the west of Fairlands (land parcel H8) was regarded in the Green Belt and Countryside Study as having a high sensitivity. In the Regulation 19 submission draft the proposed safeguarding allocation was removed. By the time of Volume 3, Section 11 of the Green Belt and Countryside Study an 'on balance' view had been taken that the visual exposure of the land and potential settlement coalescence with Wood Street Village should mean its removal. This was a view that was further repeated in Volume 5, Section 21. The relevant extract of Volume 5 is attached to this statement.

10. Interestingly, the Green Belt and Countryside Study does not assess land parcel J4 which is the now redundant Rokers nine hole golf course. The study simply ascribes this land as having a high sensitivity in the sensitivity map without seemingly any exercise being done weighing this against other relevant sustainability factors.



1. The point to be made, therefore, is that there is a balance. The Blackwell Farm allocation, for example, proposes a major access road not only through an area of high sensitivity Green Belt but also land that forms part of the AONB and an Area of Great Landscape Value. The proposed allocation on land parcel H2, where development is proposed, is categorised as medium sensitivity in the Green Belt and Countryside Study even though it is not readily apparent what different characteristics it has from parcel J4. The strategy of the plan, therefore, does not adequately explain the balancing exercise between Green Belt and landscape impacts and other relevant considerations, principally sustainability and transport impacts.
12. In relation to the strategy of the Plan concerning infrastructure provision, and in relation to Policy ID1 and accompanying schedule, it appears as if there has been no consistent approach that has been taken to meeting infrastructure needs, not just to service the housing allocations but also the wider infrastructure requirement of the Borough. Thus, for example, the Regulation 18 draft Plan proposed a new five form entry secondary school on land at Salt Box Road to the north of Guildford. Objections were lodged to this draft allocation, which did not enjoy the support of Surrey County Council, on the grounds that there were more appropriate locations including nearby at the now redundant Rokers Golf Course where an educational campus could be formed with Merrist Wood College.
13. In the first Regulation 19 submission draft in 2016, the Salt Box Road secondary school allocation was dropped in favour of a new secondary school on Green Belt land at Normandy/Flexford as part of a strategic housing allocation. In the revised Regulation 19 submission draft, Normandy/Flexford was omitted and the new school is now proposed as part of the Blackwell Farm allocation.
14. It is not disputed in any evidence base that a five form entry secondary school (or larger) is required to be delivered over the next few years. The Council is now onto its third site for such a school to the north/west of Guildford.

5. The site for the new school as part of the Blackwell Farm allocation is wholly unsustainable in transport and accessibility terms for the reasons identified in the Technical Note. It does seem odd that this should be the Council's preferred location for such infrastructure, which is acknowledged to be needed, where there is a reasonable alternative site available at Rokers which has no highway objections, is well served by public transport, is in the right location to serve the needs of secondary school children in north and west Guildford and has a delivery partner ready to undertake the project. If Blackwell Farm fails to deliver for any reason, or even if it is delayed, the secondary school children of Guildford will be left without the necessary infrastructure. Surrey County Council has confirmed the suitability of the Rokers site for the new school but, as must be the case, defers to the draft Local Plan (no doubt with rather a lot of finger crossing!).

9.4

16. It is submitted that the Plan fails to strike an appropriate balance for the reasons identified above. A greater reliance on sustainable urban extensions and extensions to settlements that have good sustainability credentials would provide a more certain future for meeting housing need in Guildford during the Plan period. It would also provide for a more certain future for educational infrastructure provision. A larger number of more modest extensions, whilst potentially not reducing the overall impact on the amount of Green Belt land that will be necessary, will have a significantly lesser overall impact on the integrity and the purposes of the Green Belt in the Borough.

9.5

17. It is not argued that the overall amount of land that is proposed to be released is not justified. There are exceptional circumstances relating to the need for more housing, It is submitted, however, that the draft Plan adopts the wrong strategy/approach to such release and proposes such releases in the wrong locations.

Project: Site A26: Blackwell Farm. Transport Matters
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1.0 Introduction

- 1.1 Motion is instructed by Crimson Project Management Ltd to prepare representations in respect of the Guildford Borough Local Plan: strategy and sites. This report considers transport aspects of the proposed Policy A26 to allocate Blackwell Farm, Hog's Back, for a mixed-use development comprising:
- ▶ Approximately 1,800 homes
 - ▶ Six Gypsy and Traveller pitches
 - ▶ Approximately 30,000sqm of employment
 - ▶ A new Local Centre including approximately 500sqm of comparison retail, 660sqm of convenience retail, 550sqm of services and 500sqm of community uses
 - ▶ A two-form entry primary school
 - ▶ A secondary school of up to six forms entry, two of which would serve the new housing on site
- 1.2 Vehicular access to the site would be taken from (i) a signal-controlled junction on the A31 Farnham Road at or near Down Place, and (ii) Egerton Road, preferably via Gill Avenue. Both are approximately three kilometres from Guildford town centre.
- 1.3 The Submission Local Plan envisages a "through vehicular link which will be controlled...to provide a new route for employees and emergency services to the Surrey Research Park, the University of Surrey's Manor Park campus and the Royal Surrey County Hospital, as well as a choice of vehicular access for the new residents/occupiers." This link is intended to reduce impact on the A31/A3 junction in advance of the delivery of Highways England's A3 Guildford scheme, although the Submission Local Plan is unclear on how or precisely for what purposes it will be 'controlled'.
- 1.4 The developer is to provide the western section of the Sustainable Movement Corridor and proportionate contributions to the Local Road Network (LRN) and Strategic Road Network (SRN), together with a bus network to serve the site and key destinations including existing western suburbs and the town centre. It is also expected that a contribution will be made toward the proposed Guildford West (Park Barn) railway station.

2.0 Existing Conditions

- 2.1 The Guildford Borough Transport Strategy (GBTS) 2017 acknowledges that significant and recurrent traffic congestion is experienced during peak hours within the town of Guildford, particularly on the A3 and on the gyratory and its approaches. This has severe impacts on the local community, including in relation to road safety, severance, noise, air quality and public transport patronage, whilst also discouraging walking and cycling.

A31 Farnham Road

- 2.2 The GBTS 2017 also recognises, on page 13 (under the heading 'Weaknesses') that the A31 Hog's Back suffers recurrent peak period congestion where it meets the A3 northbound carriageway. Queues frequently extend back to the main carriageway of the A31, where it splits into the A3 slip road and Farnham Road into the town centre, at which point late lane changing often leads to road safety risks and driver frustration. Driver uncertainty is compounded by U-turning manoeuvres from eastbound to westbound carriageways. According to the online road collision mapping tool Crashmap (www.crashmap.co.uk), four collisions resulting in personal injury occurred at this location within the last five years.
- 2.3 Farnham Road is a single carriageway subject to a 50mph speed limit, with no lighting west of Down Lane. Its horizontal and vertical alignments along this section are unsuitable for speeds of 50mph. A narrow footway runs along the north side, eastwards from Down Place, a gated private road providing access to Blackwell Farm located 400 metres east of the A3 northbound on slip road. Immediately east of Down Place is the A3 overbridge, whilst Down Place itself crosses the A3 northbound on slip road via an asymmetrical overbridge. Although Down Place is a private Road, the bridge is maintained by Surrey County Council, as evidenced by the signs on each side warning of its weakness (Figure 1).



Figure 1 – Down Place at A3 northbound on-slip overbridge

- 2.4 Down Lane provides access to the A3 southbound carriageway, some 170 metres east of Down Place. Although this marks the westernmost limit of the existing built-up area, Farnham Road retains a rural character because residential properties back onto it with hedges or fences. This character continues to Friar's Gate, some 2.6km east of the A3 northbound on slip road.
- 2.5 According to Crashmap, nine collisions leading to personal injury (including two serious) occurred along the 1.28km length of Farnham Road between the A3 northbound on slip road and High View Road (excluding the four referred to above at the A31/A3 slip road junction itself).

- 2.6 The annual average daily traffic flow along Farnham Road, according to data published by the DfT ('Road Traffic Estimates Great Britain: 2016'), is 15,137. This is 12% higher than the national average of 13,500 for all A class roads and 30% higher than the average for rural A roads. Typically, again based on the DfT's national statistics, traffic flows along Farnham Road will be in the order of 1,000 per hour during the morning peak period and 1,150 during the evening peak, with similar flows maintained over a three-hour period due to 'peak spreading'. These traffic flows are close to the carriageway's practical link capacity.
- 2.7 Farnham Road traffic flows are highly tidal, i.e. predominantly eastbound into the town centre in the morning and westbound away from the town in the evening. In the morning this causes lengthy queues to form into the town centre, frequently past Friar's Gate and often as far as The Drive, a distance of 1.28km (equivalent to over 200 vehicles).
- 2.8 The only public transport service in the area is the 65 Guildford to Alton bus route, which calls at stops 100 metres east of Down Place. It runs from 7am to 7pm on weekdays and Saturdays at a frequency of about once per hour. Guildford railway station is approximately 3km from the site and hence too far to be considered convenient on foot. No cycle facilities exist along Farnham Road, which falls steeply toward the town centre and is uninviting by that mode.

Gill Avenue/Egerton Road

- 2.9 Gill Avenue is a single carriageway with widening at various locations to accommodate pedestrian refuge islands, right turn lanes and to provide additional capacity at its signal-controlled junction with Egerton Road/Richard Meyjes Road. It is the sole means of access to the Surrey Research Park and the University's Manor Park campus; and it serves most of the traffic attracted by the Royal Surrey County Hospital, including patient parking and the Accident and Emergency unit, as well as ambulances.
- 2.10 Manor Park continues to expand around the recently constructed School of Veterinary Medicine, predominantly in the provision of students' accommodation.
- 2.11 Egerton Road provides the only connection to Park Barn from the south, which is otherwise severed by the Reading railway line. Richard Meyjes Road provides access to the University-owned Surrey Sports Park, together with the Onslow Park & Ride facility. Richard Meyjes Road and Gill Avenue are connected within University land by Francis Crick Road, but only buses may complete the circuit due to an automatic rising bollard (forming a 'bus gate'). Effectively, therefore, both Gill Avenue and Richard Meyjes Road are culs-de-sac.
- 2.12 The Gill Avenue/Egerton Road/Richard Meyjes Road signal junction experiences severe weekday peak period congestion, resulting in traffic queues forming to the east through the Tesco Roundabout and onto the A3 main carriageway; and to the west past the Royal Surrey County Hospital accesses and into the Surrey Research Park. Queues also form to the north along Egerton Road, from Park Barn.
- 2.13 A number of bus services stop at the Hospital and this, along with the car park pricing structure and limited capacity, contributes toward some reduction in hospital-related car trips. However, these buses do not reach the Research Park, parts of which are in excess of 600 metres away. The student-based bus services stopping on Rosalind Franklin Close are a little more convenient for some, but still 500 metres from many others and often perceived as being 'not for me'. Parking is widely available to employees and the Research Park remains a car-dominated environment.
- 2.14 A shared foot/cycleway runs along the north side of Egerton Road, from the Research Park to the University's main campus on the east side of the A3, but provision is poor in places, particularly at the Tesco Roundabout and the A3 underpass. The Sustainable Movement Corridor aims to improve this provision.

Overview

- 2.15 It is clear from the above that Blackwell Farm is poorly located in respect of existing sustainable transport infrastructure. Western parts of the site are some four kilometres from the town centre and railway station, whilst bus services and cycling/walking infrastructure are limited, particularly along Farnham Road.

- 2.16 Severe traffic congestion occurs frequently along both corridors connecting Blackwell Farm to the town centre. Furthermore, as acknowledged by Highways England, Surrey County Council and Guildford Borough Council, the A3 through Guildford suffers significant and recurrent traffic congestion. Consequently, collisions are commonplace and, with the SRN and LRN both already operating at capacity, they lead to regular area-wide 'gridlock'.
- 2.17 Furthermore, congestion on the A3 is not confined to the weekday peak hours; queues and slow-moving traffic may be observed seven days per week.

3.0 Proposed Blackwell Farm Allocation

Residential

- 3.1 The TRICS database has been interrogated to estimate potential traffic volumes associated with the proposed 1,800 dwellings. The TRICS category '03 Residential: M - Mixed Private/Affordable Housing' has been used for sites within England (excluding Greater London), outside of town centre and edge of town centre locations. Table 3.1 below summarises the calculated trip rates and trips.

	Morning Peak Hour (08:00 – 09:00)		Evening Peak Hour (17:00 – 18:00)		Daily	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Total Person Trip Rates	0.178	0.800	0.524	0.252	3.453	3.615
Total Person Trips	320	1,440	943	454	6,215	6,507
Vehicular Trip Rates	0.121	0.360	0.304	0.413	1.969	2.039
Vehicular Trips	218	648	547	257	3,544	3,670

Table 3.1 – Blackwell Farm, Residential Trips

- 3.2 Table 3.1 indicates that the Blackwell Farm residential development could generate 1,760 two-way total person trips in the weekday morning peak hour, of which 866 could be vehicular. In the weekday evening peak hour, 1,397 two-way total person trips could be generated of which 804 could be vehicular. Across a typical weekday, 12,722 two-way total person trips could be generated, of which 7,214 could be vehicular.
- 3.3 Typical travel modes of the resident population of the Guildford 005 and 017 mid-layer super output areas (MSOAs) have been established with reference to Census data for 'Method of Travel to Work' for the resident population (2011 output).
- 3.4 The Census modal split of travel is summarised in Table 3.2 below. The total person trips identified in Table 3.1 for both the weekday morning and evening peak hour have been assigned based on the Census modal split percentage and are also summarised in Table 3.2 below.

Mode of Travel	Census Model Split	Weekday AM Peak		Weekday PM Peak		Weekday Daily Movements	
		Arr	Dep	Arr	Dep	Arr	Dep
Car Driver	69%	221	994	651	313	4,288	4,490
Train	11%	35	158	104	50	684	716
Bus	3%	10	43	28	14	186	195
On Foot	7%	22	101	66	32	435	455
Car Passenger	4%	13	58	38	18	249	260
Bicycle	2%	6	29	19	9	124	130
Motorcycle	1%	3	14	9	5	62	65
Other	1%	3	14	9	5	62	65
TOTAL	100%	320	1,440	943	454	6,215	6,507

Table 3.2 – Blackwell Farm, Residential Total Person Trips

- 3.5 Using the Census data for the Guildford 005 and 017 MSOAs provides an indication of the likely travel patterns that residents would use to travel to work. The car driver modal split is 69% and results in an increase to 1,215 two-way vehicular trips in the weekday morning peak hour and 964 two-way vehicular trips during the weekday evening peak hour. Across a typical weekday, the Census modal split results in 8,778 two-way vehicular trips.
- 3.6 Taking the highly optimistic view that the proposed sustainable travel measures intended to accompany the development might achieve a 10% reduction in single-occupancy car trips, it might be expected that these trip numbers could fall to 7,900 per day or between 868 and 1,093 per peak hour.

Employment

- 3.7 The proposed allocation includes 30,000sqm of B1 employment floorspace. Office floorspace provides the most onerous assessment of a B1 employment use, hence this assessment utilises office trip rates to identify the maximum potential trip generation. The TRICS database has once again been utilised, using the category '01 Employment: A – Office' for sites located within England (excluding Greater London) and excluding sites within a town centre and edge of town centre location. Table 3.3 summarises the assumed peak hour trip rates and trips, based on a 30,000sqm floorspace.

	Morning Peak Hour (08:00 – 09:00)		Evening Peak Hour (17:00 – 18:00)		Daily	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Total Person Trip Rates	1.906	0.129	0.085	1.714	5.885	5.888
Total Person Trips	572	39	26	514	1,766	1,766
Vehicular Trip Rates	1.496	0.148	0.088	1.328	4.272	4.309
Vehicular Trips	449	44	26	398	1,273	1,293

Table 3.3 – Blackwell Farm, Employment Trips

- 3.8 Table 3.3 indicates that the Blackwell Farm employment development could generate 611 two-way total person trips in the weekday morning peak hour, of which 493 could be vehicular. In the weekday evening peak hour, 540 two-way total person trips could be generated of which 424 could be vehicular. Across a typical weekday, 3,532 two-way total person trips could be generated of which 2,566 could be vehicular.

- 3.9 Typical travel modes of the workplace population of the Guildford 005 and 017 mid-layer super output areas (MSOAs) have been established with reference to Census data for 'Method of Travel to Work' for the workplace population (2011 output).
- 3.10 The Census modal split of travel is summarised in Table 3.4 below. The total person trips identified in Table 3.2 for both the weekday morning and evening peak hour have been assigned based on the Census modal split percentage and are also summarised in Table 3.4 below.

Mode of Travel	Census Model Split	Weekday AM Peak		Weekday PM Peak		Weekday Daily Movements	
		Arr	Dep	Arr	Dep	Arr	Dep
Car Driver	81%	463	32	21	416	1,430	1,430
Train	3%	17	1	1	15	53	53
Bus	2%	11	1	1	10	35	35
On Foot	5%	29	2	1	26	88	88
Car Passenger	5%	29	2	1	26	88	88
Bicycle	3%	17	1	1	15	53	53
Motorcycle	2%	11	1	1	10	35	35
TOTAL	100%	572	39	26	514	1,766	1,766

Table 3.4 – Blackwell Farm, Commercial Total Person Trips

- 3.11 Using the Census data for the Guildford 005 and 017 MSOAs provides an indication of the likely travel patterns that residents would use to travel to work. The car driver modal split is 81% and results in an increase to 495 two-way vehicular trips in the weekday morning peak hour and 437 two-way vehicular trips during the weekday evening peak hour. Across a typical weekday, the Census modal split results in 2,860 two-way vehicular trips.

Retail and Community Uses

- 3.12 The District and Local Centres will cater primarily for new residents and, although the community use could attract trips into the site, they are likely to be outside the peak periods. It is considered that the primary school within the allocation will also cater primarily for new residents and therefore would generate minimal traffic on the surrounding highway network.

Secondary School Allocation

- 3.13 Assessing a secondary school using the TRICS database is difficult, as only four sites are available across the UK since 2010. Within England, only one site has been surveyed since 2010 and is located in Scunthorpe. As such, it is not considered appropriate to assess the secondary school allocation based on a survey of this site alone.
- 3.14 A planning application (reference 16/P/01397) was refused in 2016 for a residential development with school at the nearby Rokers site, off Aldershot Road, Guildford, which assessed the impacts of a secondary school at the site. This assessment made use of travel plan monitoring data for three schools within Surrey as follows:
- ▶ Rydens School, Hersham;
 - ▶ St John the Baptist School, Woking; and
 - ▶ Heathside School, Weybridge.
- 3.15 The Rokers assessment was agreed with Highway Officers of Surrey County Council and it is therefore reasonable to rely on it to identify the likely traffic impacts of a secondary school at the Blackwell Farm site. The agreed modal split of travel is provided in Table 3.5.

Mode of Travel	St John the Baptist	Heathside	Rydens School		Average Modal Split	
			Arr	Dep	Arr	Dep
Car Share/ Passenger	26.0%	2.4%	32.0%	21.0%	20.1%	16.5%
Car/Van (single student)	1.0%	25.3%	0.0%	0.0%	8.8%	8.8%
Cycle	3.0%	14.6%	8.0%	8.0%	8.5%	8.5%
Bus	24.0%	2.2%	14.0%	14.0%	13.4%	13.4%
Other	0.0%	0.9%	2.0%	1.0%	1.0%	0.6%
Taxi	0.0%	0.2%	0.0%	0.0%	0.1%	0.1%
Train	3.0%	15.7%	1.0%	1.0%	6.6%	6.6%
Walk	21.0%	38.7%	44.0%	56.0%	34.6%	38.6%
Park & Stride	20.0%	0.0%	0.0%	0.0%	6.7%	6.7%
TOTAL	98.0%	100.0%	101.0%	101.0%	99.7%	99.7%

Table 3.5 – Surrey School Travel Plan Modal Split

- 3.16 The Blackwell Farm allocation includes a six form entry secondary school, two of which would accommodate the needs of Blackwell Farm residents. Based on 30 students per form, the school is likely to cater for 180 students per year and 900 students overall. Of the 900 students, 600 are considered to attend the school from existing parts of west Guildford and beyond.
- 3.17 The modal splits anticipated for the 600 students travelling in from the wider area are identified in Table 3.6. It is assumed that each car share would be occupied by two students for the purposes of calculating the number of vehicles associated with the school pick up/drop off activity.

	Arrivals		Departures	
	Student Modal Split	Number of Students	Student Modal Split	Number of Students
Car (Multiple Students)	20.1%	121 (61 vehicles)	16.5%	99 (50 vehicles)
Car (Single Student)	8.8%	53	8.8%	53
TOTAL	28.9%	174	25.3%	152

Table 3.6 – Student Vehicular Modal Split and Trips

- 3.18 Table 3.6 indicates that the 600 students attending the school from the wider area could generate 114 arrivals to the school in the morning and 103 departures in the afternoon. Most students would be dropped off during the weekday morning peak hour, accounting for 228 two-way vehicular trips as students are dropped off and the parent/carer subsequently departs the site. It is considered likely that most students will have departed the site prior to the weekday evening peak hour.
- 3.19 School staff are likely to arrive and depart the school site within the weekday peak hours and therefore need to be factored into the traffic impact calculations associated with the development. A review of the TRICS database indicates that the only recent England survey has a ratio of 0.186 staff per pupil. This is similar to the 0.184 ratio assessed within the recent Rokers planning application. Applying a 0.186 ratio to the 900 students at the school would result in 167 staff working at the school. Applying the workplace modal split, identified in Table 3.4, provides the likely travel patterns for staff and is provided in Table 3.7 below.

Mode of Travel	Census Model Split	Weekday AM Peak		Weekday PM Peak		Weekday Daily Movements	
		Arr	Dep	Arr	Dep	Arr	Dep
Car Driver	81%	135	0	0	135	135	135
Train	3%	5	0	0	5	5	5
Bus	2%	3	0	0	3	3	3
On Foot	5%	8	0	0	8	8	8
Car Passenger	5%	8	0	0	8	8	8
Bicycle	3%	5	0	0	5	5	5
Motorcycle	2%	3	0	0	3	3	3
TOTAL	100%	167	0	0	167	167	167

Table 3.7 – Blackwell Farm, School Staff Trips

Total Site Development Traffic

- 3.20 Based on the above analysis, Table 3.8 below provides a summary of the vehicular trip generation associated with all aspects of the Blackwell Farm development. This is based on the identified peak hour vehicular trips for the residential (Table 3.2), commercial (Table 3.4) and school (Tables 3.6 and 3.7).

	Morning Peak Hour (08:00 – 09:00)		Evening Peak Hour (17:00 – 18:00)		Daily	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Residential	221	994	651	313	4,288	4,490
Commercial	463	32	21	416	1,430	1,430
School – Students	114	114	0	0	217	217
School - Staff	135	0	0	135	135	135
TOTAL	933	1,140	672	864	6,070	6,272

Table 3.8 – Blackwell Farm, Total Vehicular Trips

- 3.21 Table 3.8 indicates that the Blackwell Farm development is likely to generate over 2,000 two-way vehicular trips in the weekday morning peak hour and over 1,500 two-way vehicular trips in the weekday evening peak hour. Across a typical weekday, it would generate in excess of 12,300 two-way vehicular trips.

Potential Traffic Impacts

- 3.22 No detail is provided by the Submission Local Plan in respect of the Gill Avenue access, but a priority (give way) junction onto the western side of Priestly Road seems likely. A signal-controlled junction is envisaged at the Farnham Road access.
- 3.23 It has been established above and is widely known that Gill Avenue suffers severe peak period congestion, since it is the sole point of access to the Research Park, Manor Park Campus and most parts of the Royal Surrey County Hospital. Queues extend onto the A3 northbound main carriageway in the morning peak period and into the heart of the Research Park during the evening peak period.

- 3.24 If it is assumed, optimistically, that Blackwell Farm development trips split evenly between the two proposed accesses, traffic on Gill Avenue would increase by approximately 6,000 vehicles, of which between 750 and 1,000 would be during the peak hours. This level of uplift would be very difficult indeed to accommodate, given that the already high-capacity signal-controlled junction at Egerton Road struggles to cope with existing traffic levels. The suggested signalisation improvement to the Tesco Roundabout is unlikely to mitigate this increase and it therefore seems likely that queues would continue to form onto the A3 main carriageway and into the Research Park. It is far from certain that the tidal nature of residential development flows would complement the opposite tidal flow of existing and new employment related traffic flows to/from the Research Park/Manor Park/Hospital.
- 3.25 Similarly, Farnham Road is clearly very busy during both peak periods, with long queues forming from the town centre in the morning. In the evening peak, traffic leaving the town centre (beyond the Guildford Park Road mini-roundabout) is presently unencumbered by junctions requiring Farnham Road westbound traffic to give way, but under the Blackwell Farm proposals this would no longer be the case.
- 3.26 Given that Farnham Road is already operating at or close to its link capacity, the introduction of any form of junction interrupting traffic flows will inevitably have adverse consequences. It is not difficult to imagine eastbound queues forming back onto the A31 Hog's Back main carriageway under existing morning peak period traffic demands. The addition of half of all traffic generated by the Blackwell Farm development would increase these demands by 750 to 1,000 in the critical peak hours, requiring a traffic signal junction with substantial stop line capacity.
- 3.27 The addition of morning peak period queues in lane 2 of the eastbound A31 Hog's Back, alongside those already seen in lane 1 (for the A3 northbound on-slip), will increase the risk of personal injury accidents at this location. Despite the 50mph speed limit, or in some cases because of it, lane changing and hard braking as vehicles approach the back of traffic queues often leads to side or rear impact type collisions.
- 3.28 Furthermore, outside of the morning peak period, the proposal to introduce a signal-controlled junction on a high-speed road with a rural character is considered unsafe and hence unlikely to satisfy a Stage 1 Road Safety Audit. The kind of mitigation measures necessary to reduce approach speeds (eastbound in particular) would urbanise this section of Farnham Road and, since they would be out of character, drivers may not interpret road conditions correctly, leading to collisions due to hesitation, unexpected braking or swerving.
- 3.29 The existing bridge carrying Down Place over the A3 northbound on-slip road appears structurally unable to serve the Blackwell Farm development. Whilst a new bridge could be constructed, it would represent a very significant engineering project and require (perhaps lengthy) closures of the slip road, leading to traffic disruption.
- 3.30 Blackwell Farm lies below Farnham Road and a new bridge would be visible from the south. The signal junction would have to be of substantial proportions; it too would be a significant piece of engineering infrastructure. Trees would need to be removed and it would be surprising if the signal heads were not visible from some southern viewing points.

4.0 Proposed Transport Improvements

- 4.1 Highways England's A3 Guildford proposals continue to be developed. The Surrey County Council Strategic Highway Assessment Report (June 2016) refers to "widening the A3 to dual three lanes between the A31 and A320, together with improvements to the Tesco and Cathedral junctions." In March 2017 the Government committed funding for two targeted improvement schemes:
- ▶ SRN7 – A3 northbound off-slip lane widening to Tesco Roundabout
 - ▶ SRN8 – A3 southbound off-slip road widening to A320 Stoke Interchange improvement scheme
- 4.2 Two further targeted improvement schemes are in development by Highways England but do not yet have committed funding:
- ▶ A3 Guildford average speed camera/road safety scheme

- ▶ Beechcroft Drive new access road/road safety scheme
- 4.3 Whilst these improvements are expected to ease congestion and improve safety on the A3 main carriageway (these are the benefits indicated by Highways England), they will not address traffic impacts arising from Blackwell Farm on the local highway network.
- 4.4 Proposed improvements to the LRN focus heavily on sustainable modes of transport, which is to be welcomed in broad terms. These include:
 - ▶ A new Park and Ride scheme at Gosden Hill Farm (east Guildford)
 - ▶ Sustainable Movement Corridor, linking Guildford town centre and rail station with Ladymead Retail Park, the Royal Surrey County Hospital, the University's Stag Hill and Manor Farm campuses, the Surrey Research Park, Slyfield Industrial Estate, existing urban communities in seven wards, the new Guildford West (Park Barn) and Guildford East (Morrow) rail stations, Park and Ride at Onslow and Gosden Farm and the new communities at Blackwell Farm and Gosden Hill Farm
 - ▶ Various bus improvement schemes (in addition to the those planned under the Sustainable Movement Corridor)
 - ▶ Active Mode schemes such as pedestrian and cycling improvements and wayfinding signage
- 4.5 These schemes will certainly encourage mode change among existing and new residents, but it is highly unlikely that they will be so successful as to mitigate all traffic impacts arising from the proposed residential allocations within the town of Guildford. Surrey County Council has acknowledged that, without Highways England's RIS schemes, the impact of planned developments could be considered severe. The Borough Council notes at paragraph 6.91 of the Transport Topic Paper that these schemes are complicated, but appears to believe that the potential for mode shift encouraged by the sustainable transport improvements proposed (above) will mitigate these impacts to a large extent. However, the Council fails to produce a convincing case that the overall net effects will be either neutral or positive.
- 4.6 Fundamentally, the quantum of development proposed will inevitably generate a large number of new motor vehicle-based trips on an already highly congested local road network. The proposed sustainable and traffic-based improvements cannot hope to satisfactorily mitigate the impacts.

5.0 Summary and Conclusions

- 5.1 This report considers transport aspects of the proposed Policy A26 to allocate Blackwell Farm, Hog's Back, for a mixed-use development comprising approximately 1,800 homes, six Gypsy and Traveller pitches, approximately 30,000sqm of employment, primary and secondary schools, and new Local Centre with comparison retail, convenience retail, services and community uses.
- 5.2 Vehicular access to the site would be taken from a signal-controlled junction onto the A31 at or near Down Place and Egerton Road, preferably via Gill Avenue. Both are approximately three kilometres from Guildford town centre.
- 5.3 The town suffers significant and recurrent traffic congestion during peak hours, particularly on the A3 and on the gyratory and its approaches. This has severe environmental, safety and amenity impacts on the local community, whilst disincentivising sustainable modes of travel.
- 5.4 Blackwell Farm is poorly located in respect of existing sustainable transport infrastructure and the severe existing traffic congestion experienced on the corridors connecting it with the town centre and on the A3.
- 5.5 The Blackwell Farm development is likely to generate over 2,000 two-way vehicular trips in the weekday morning peak hour and over 1,500 two-way vehicular trips in the weekday evening peak hour. Across a typical weekday, it would generate in excess of 12,300 two-way vehicular trips.

- 5.6 The transport infrastructure schemes proposed within the Submission Local Plan, including those directly associated with Blackwell Farm, will encourage a degree of mode change among existing and new residents, but it is highly unlikely that they will be able to adequately mitigate all traffic impacts arising from the proposed residential allocations. The Blackwell Farm allocation, in particular, will inevitably generate a large number of new motor vehicle-based trips on an already highly congested local road network.

Conclusion

- 5.7 It is not sufficient to say that the town of Guildford is the most sustainable location for new development in the Borough and use that as justification to focus a substantial proportion of the required new development there, without giving proper consideration to the unavoidable traffic impacts that this approach will create. The proposed sustainable travel improvements are of course welcomed, but to rely on them to absorb the travel demands associated with 1,800 new dwellings and other forms of development at Blackwell Farm, together with the numerous and sizeable developments elsewhere in the town, is optimistic in the extreme.
- 5.8 A more balanced approach would be to distribute new development more widely across the Borough, albeit in locations that are themselves sustainable and could be made more so by providing local facilities such as shops and schools, together with improved inter-urban sustainable transport choices, supporting travel to work in particular.

Fairlands – Major Village Expansion

Stage 1: *Based upon the land take requirement, does the environmental capacity allow for a major expansion of the village that would enable a 'critical mass' population of at least 4,000 being achieved, which is considered to be required to achieve Garden City principles as referred to in the NPPF?*

Fairlands has a current population of 1,412 and therefore would require an additional population growth target of 2588 to reach the settlement 'critical mass' of 4,000 (or 1,078 dwellings based upon 2.4 persons per household). This equates to an overall landtake requirement of 71.8 hectares (ha) with 35.9ha (50%) required for residential development, 28.72ha (40%) required for open space, and 7.18 ha (10%) required for infrastructure and new facilities.

A PMDA with a landtake area of 72.6 hectares has been identified within land parcel H8-A between Littlefield Common to the north, Envis Way to the north east, Hook Farm and Broadstreet Common to the east, Oak Hill at Wood Street Village to the south, Littlefield Manor and rising ground at Round Hill and Angers Hill to the west of the PMDA. The PMDA H8-A land take of 72.6ha is approximately comparable to the target landtake of 71.8ha therefore the PMDA at H8-A has been further considered within the Stage 2 assessment.

The PMDA at H8-A is relatively unconstrained in environmental capacity terms, however, would need to take account of environmental designations including Littlefield Common Registered Common Land and the SNCI to the north, Rydeshill Registered Common Land and SNCI to the east, together with rising topography at Anger's Hill and Round Hill to the west of the PMDA between Fairlands and Wood Street Village. A designated Conservation Area is located to the south west of PMDA H8-A within Wood Street Village as shown on the Stage 1 mapping.

The PMDA identified at H8-A has a total area of 72.6 hectares therefore exhibits the following mixed use land take requirements:

- 72.6ha total landtake within land parcel H8-A (100%);
- 36.3ha of estimated residential capacity (50%) which equates to 1089 dwellings and 2,614 potential population growth;
- 29.04ha of open space capacity (40%) including environmental constraints such as the woodland, treebelts, hedgerows between Littlefield Manor, Hook Farm and Wood Street Village; and
- 7.26ha of village expansion infrastructure and additional facilities (10%).

The total landtake of 72.6ha would allow for a population increase of approximately 2,614 (4,026 total population) to the south west of Fairlands.

Stage 2: *If capacity is demonstrated in Stage 1, does the Potential Major Development Area (PMDA) achieve at least two of the three sustainable development considerations below?*

Will the village expansion provide opportunities for good public transport connections to the wider settlements within Guildford Borough and beyond?

Fairlands has a good public transport rating of 4 within GBCs Settlement Hierarchy. Bus routes 17, 20 and 520 all pass within close proximity to land parcel H8 on the A323 Aldershot Road and on Fairlands Avenue within the village. These bus routes could potentially be extended into the PMDA if

a major expansion was brought forward at H8-A between Fairlands and Wood Street Village.

Will the village expansion result in a village with a mix of uses, including residential, employment, community and retail?

A population expansion of 2,614 at PMDA H8-A would provide a total population of 4,026 at Fairlands and this could realistically be expected to provide the following facilities as encouraged by best practice for new and expanded settlements:

- A local centre and village shop
- Employment provision
- Accessible natural and semi-natural greenspace
- Amenity open space
- Junior School and Nursery
- Healthcare facility
- Community Hall

It is, however, recognised that many of these facilities already exist within the surroundings of Fairlands and there may be limited opportunities to provide entirely new facilities as part of a major population expansion. GBC may wish to pursue contributions to expand these existing facilities if appropriate, rather than require entirely new facilities to support the population growth. This would be dependent on the existing and projected capacity levels of the existing facilities. The following existing facilities may require contributions rather than the provision of entirely new facilities, subject to existing and potential community requirements:

- Worplesdon Primary School – nearest primary school
- Fairlands Medical Centre – nearest healthcare facility
- Littlefield Common to the north and Broadstreet Common to the east – nearest accessible natural and semi natural green space
- Playing fields at Fairlands Community Centre – nearest public open space
- Fairlands Community Hall – nearest community hall

The PMDA at H8-A to the south west of Fairlands with a potential population expansion of approximately 2,614 (4,026 total village population) would allow for a mix of uses, including the provision of a local centre, employment, residential and public open space provision.

Will the village expansion provide the opportunity for new facilities within the particular settlement, thereby enhancing the existing sustainability credentials of the settlement?

The number of entirely new facilities that could be brought forward within PMDA H8-A would be limited by the existing range of facilities already located within the surroundings of Fairlands. If a major expansion was brought forward at H8-A it is more likely that improvement would be required to existing facilities.

The PMDA at H8-A at Fairlands achieves only two of the three sustainable development considerations within the Stage 2 assessment. It is unlikely that a major expansion at Fairlands would provide opportunities for a range of entirely new facilities as many facilities are already present within the surroundings of Fairlands. Fairlands scored highly (score 12) in terms of the total community facilities and was ranked 6th in terms of the sustainability assessments within the GBC Settlement Hierarchy.

Stage 3: If capacity is demonstrated within Stages 1 and 2 – does the Potential Major Development Area (PMDA) exhibit defensible boundaries that would allow for the inseting of the village expansion in accordance with the NPPF? What impact would development of the PMDA have upon the purposes and openness of the Green Belt across the borough?

A PMDA has been identified within land parcel H8-A between Littlefield Common to the north, Envis Way to the north east, Hook Farm and Broadstreet Common to the east, Oak Hill at Wood Street Village to the south, Littlefield Manor and rising ground at Round Hill and Angers Hill to the west of the village as shown on Stage 1 mapping.

The defensible boundaries within the surroundings of PMDA H8-A includes:

1. Woodland at Littlefield Common
2. Treebelt at Flexford Community Centre
3. Hedgerows to west of Quaker's Way and Gumbrell's Close
4. Treebelt to south of Envis Way
5. Treebelt to south of Worplesdon Primary School
6. Woodland at Rydeshill and Broadstreet Common
7. Hedgerows surrounding Hook Farm
8. Woodland and access road near Dunmore Farm
9. Hedgerow to north residential properties on Oak Hill
10. Woodland and treebelts at Graylands Farm
11. Hedgerows and rising topography near Anger's Hill and Round Hill
12. Woodland within the surroundings of Littlefield Manor

However, land parcel H8 is considered to be of high sensitivity (scores 3) in the Green Belt purposes assessment in the Volume II Addendum. In terms of Green Belt purposes 2 and 4, a PMDA at H8-A to the south west of Fairlands would potentially result in settlement coalescence with Wood Street Village (Purpose 2) although would not likely affect the setting of Wood Street Village Conservation Area (Purpose 4).

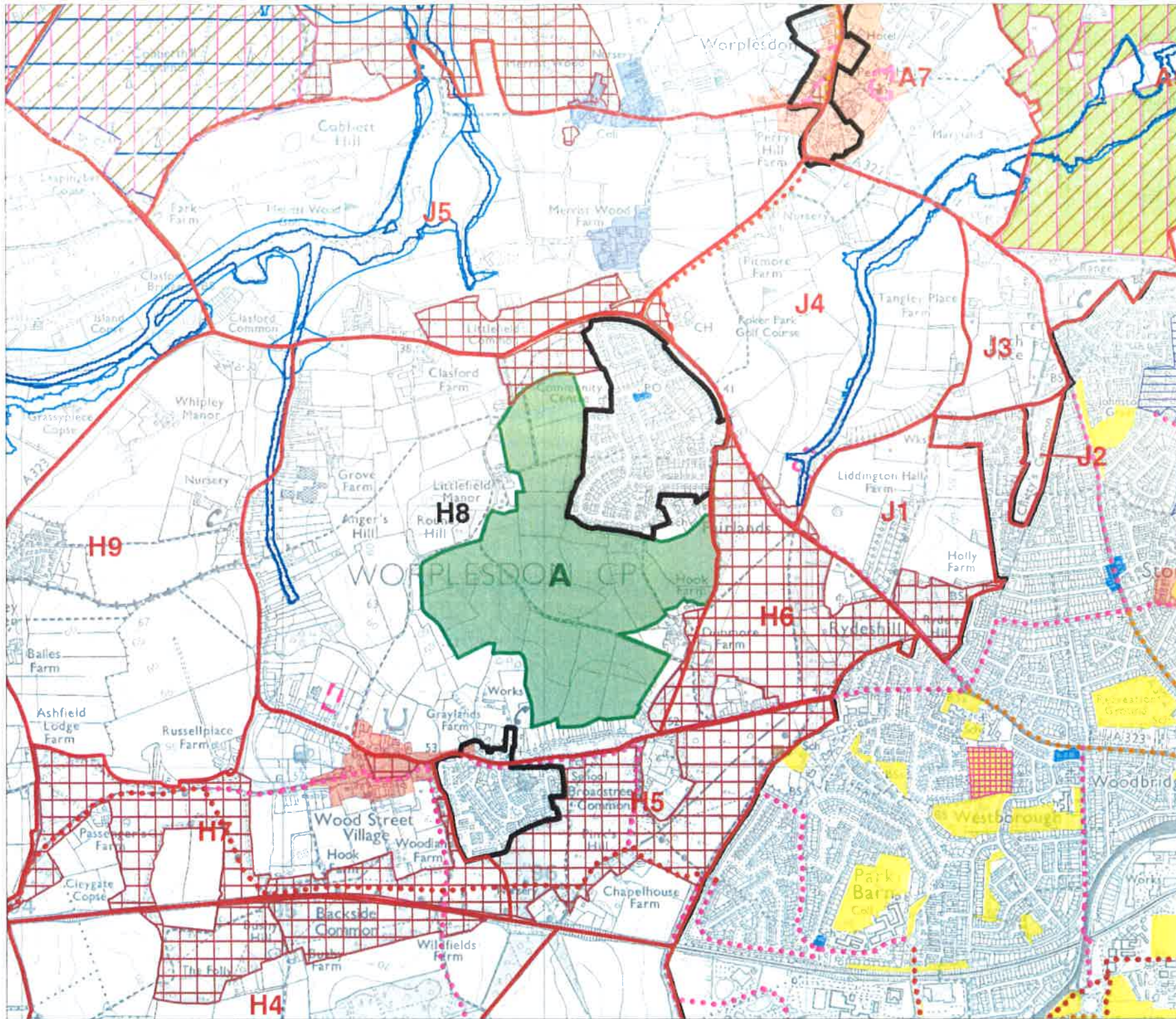
The development of the PMDA at H8-A would significantly affect the openness of the Green Belt between Fairlands and Wood Street Village. The PMDA at H8-A is partly located on rising ground near Round Hill, Graylands Farm, and Littlefield Manor which is visually exposed from a number of locations within the wider Green Belt.

Stage 4: In summary, would it be appropriate to recommend a major expansion within the

surroundings of the particular village given the guidance on large scale development and the Green Belt within the NPPF?

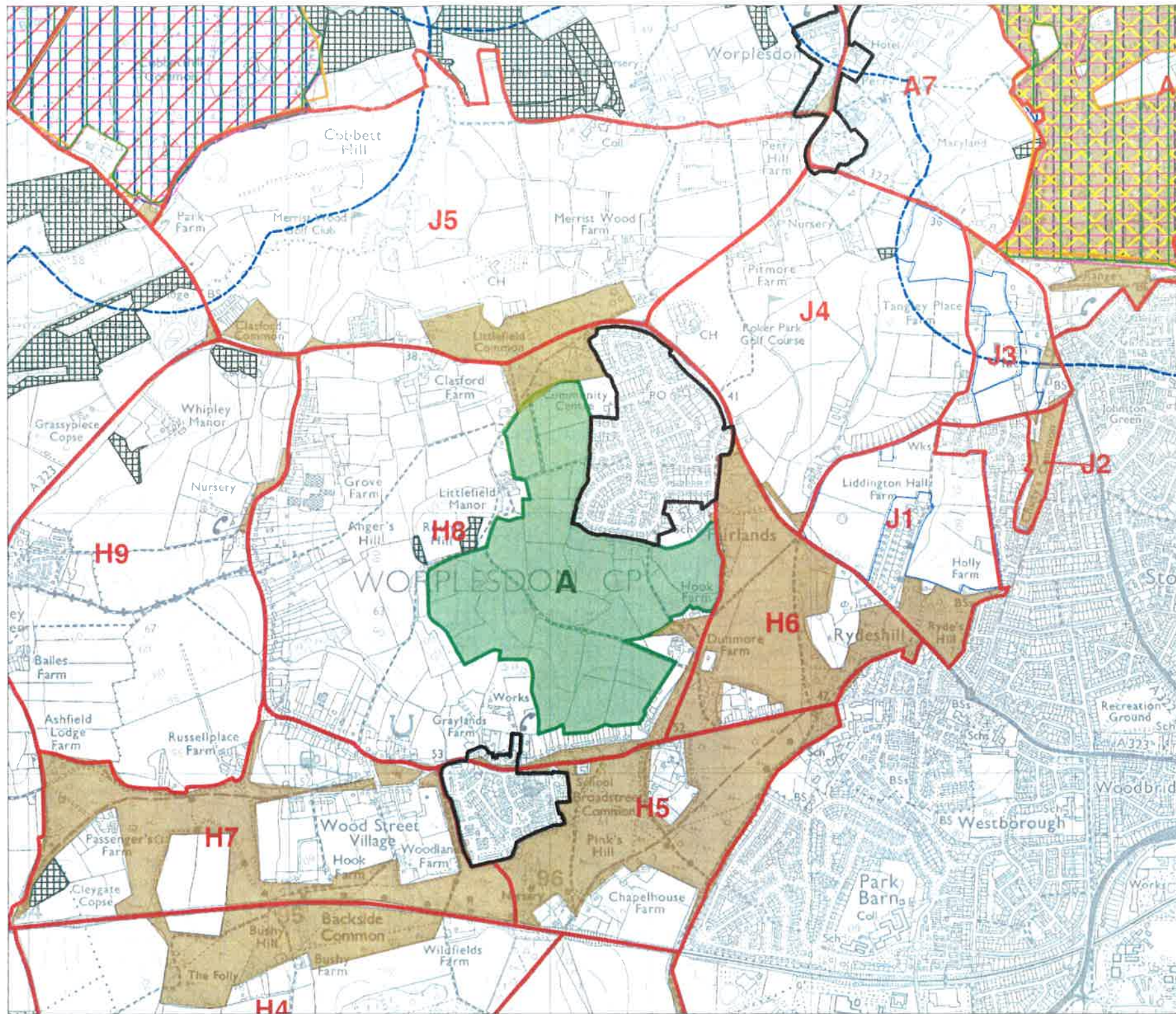
On balance, it is considered that a Potential Major Development Area (PMDA) to the south west of Fairlands would not be appropriate due to the adverse impact on the purposes and openness of the Green Belt identified within Stage 3, outweighing the sustainability enhancements referred to in Stage 2. Fairlands has a good public transport rating of 4 within GBCs Settlement Hierarchy and is already supported by a number of facilities, therefore a major expansion provides limited opportunities to provide entirely new facilities and sustainability enhancements. The location of PMDA H8-A to the south west of Fairlands is visually exposed within the surroundings of Round Hill, Graylands Farm and Littlefield Manor and a major expansion would potentially cause settlement coalescence with Wood Street Village located to the south of Fairlands.

Potential major expansion of those villages within Guildford Borough ranked highest in GBC's Settlement Hierarchy



Scale 1:15,000@A3

Stage 1
Fairlands Major Expansion
Local Plan Policies



Potential major expansion of those villages within Guildford Borough ranked highest in GBC's Settlement Hierarchy

Scale 1:15,000@A3

Stage 1
Fairlands Major Expansion
Environmental Designations