Examination Statement

Coordinated by Savills on behalf of Taylor Wimpey UK Limited

Guildford Borough Council Development Management Plan Examination in Public – Matter 5 Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Regulation 19 Comment ID: LPDM21B/281

October 2022



1. Introduction

- 1.1. This Examination Statement in regard to the Guildford Borough Council Development Management Policies (GBC DMP) has been prepared by Savills, Martin Higgitt Associates and WSP on behalf of Taylor Wimpey UK Limited (TW), who own land at Former Wisley Airfield (FWA). TW is broadly supportive of the Draft GBC DMP, however feel some further refinements need to be made in order to ensure that the Plan is sound.
- 1.2. A Hybrid planning application has been submitted at FWA (ref: 22/P/01175), for a residential-led mixed use development of the strategic site, allocated by Policy A35 of the Guildford Borough Local Plan ("GBLP") Strategy and Sites 2015-2034 (adopted 2019). TW, in collaboration with Hallam and CBRE, are proposing one settlement, which comprises three neighbourhoods. The full application description and application document are available on the council's website.
- 1.3. TW's representation to Guildford Borough Council (GBC) Regulation 19 DMP consultation (relevant to this matter) has been given the following reference Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network, comment ID: LPDM21B/281. TW has registered to appear at the Hearing Session in respect of Matter 5 cycling matters.
- 1.4. This Statement includes the following Appendices: **Appendix 1:** Provides a copy of the whole policy ID10 and supporting text, with TW's suggested amendments. **Appendix 2:** Provides a summary of the relevant public consultation undertaken in respect of the development proposals at FWA, specifically related to the cycling strategy.

2. Response to Inspector's Matters and Questions

Matter 5: Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network

Question: Whether Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network is positively prepared, justified, effective and consistent with both national policy and the LPSS.

- 2.1. The map supporting the policy is unjustified and ineffective based on the present evidence base (TW's justification for this is outlined in the supplemental questions).
- 2.2. The mapped routes which comprise the 'Comprehensive Guildford Borough Cycle Network' found in DMP Appendix A <u>broadly</u> reflect the routes TW are developing in consultation with Surrey County Council with input from the GBC transport adviser. However, they do not reflect the TW-proposed routes upon which TW has consulted with stakeholders (see **Appendix 2** to this Statement). In some cases the routes shown could not be delivered within the adopted highway. In some other cases the routes take a different alignment.
- 2.3. Whilst TW appreciate that additional text has been added to paragraph 6.85 of the DMP to highlight flexibility, they question why GBC would not update the map when there is more up to date evidence base available. In addition, TW wishes the actual policy text to include flexibility.
- 2.4. It is very important indeed that the Guildford Cycle route network is developed in line not only with objective assessments of the potential demand for travel between key origins and destinations, but also targeting the most deliverable routes as a priority. The routes set out in DMP Appendix A are all given exactly the same status whereas some are more difficult to deliver than others and the potential demand is not the same for all routes.
- 2.5. Emerging policy ID 10 should also reflect and not ignore the progress already made in assessing deliverable routes from Wisley Airfield to the most popular destinations. The policy should build on that work.
- 2.6. TW has sought to comply with Policy A35 of the GBLP through establishing a series of actions set out

below:-

- Engaging a specialist team of experts in the field of cycling infrastructure:-
 - Martin Higgitt Associates, a widely respected firm that has a great deal of experience in the practical planning and implementation of cycling strategies and cycle facilities across the UK;
 - Phil Jones Associates, a leading firm of specialist transport planners in the field of accessibility planning and one of the lead authors of LTN 1/20 "Cycle Infrastructure Design".
- Carrying out an objective assessment of the destinations people will want to get to most from the site on a cycle, based on the number of facilities at each local destination;
- Engaging with local interest groups such as GBUG, local parish councils and local residents to establish the
 issues likely to be encountered in planning and implementing the routes and how these might be overcome
 (see Appendix 2).
- Engaging with Surrey County Council and Guildford Borough Council officers regarding the detail of each route including carrying out Road Safety Audits of the routes proposed.
- 2.7. The process outlined above is entirely relevant, and a material influence on an up to date policy, in order to ensure that emerging policy ID10 is positively prepared, justified, effective and consistent with both national policy and the GBLP. Noting, in particular, all of the actions to develop a cycling strategy are required by existing policy (i.e. policy A35 of the GBLP).

A route along Old Lane

- 2.8. The objective assessment referred to above strongly identified that a route along Old Lane to Effingham Junction would be unlikely to serve very many journey purposes owing to the very limited range of facilities in Effingham Junction other than the railway station. The work carried out also identified that a route to Effingham Junction along Old Lane would be challenging to deliver within the constraints of the existing highway boundary without major urbanising infrastructure changes, including removal of trees and modification to drainage channels.
- 2.9. The discussions with Surrey County Council drew on the engagement with the wider community and the conclusion was jointly reached, that it would not be appropriate for a cycle route to be delivered along Old Lane at this stage given the other cycle routes that have been identified. However, it was identified as a route that should be improved for all users, including those users of the PROW network who need to cross Old Lane. Local residents were also vocal about the increasing speeds and volumes of traffic on this route

and the need to calm the traffic was considered a greater priority than cycling, given the other routes available that could be delivered. The TW team therefore designed a scheme of traffic calming that will improve conditions for all road users.

2.10. For DMP Appendix A to continue to identify Old Lane as a cycle route without appropriate caveats is to ignore the discussions held on this matter, including with GBC.

A route to East Horsley

- 2.11. A route to East Horsley, on the other hand, would serve a great many local facilities and businesses there as well as trains on the same line as Effingham Junction station. This led to the conclusion by SCC that it was highly appropriate to serve East Horsley and the station there in preference to Effingham Junction.
- 2.12. A route to East Horsley along lightly trafficked roads has been identified that can be accommodated within the highway and which would satisfy the need to be safe and convenient for the average cyclist (as stated in GBLP policy A35). However, this route is not along Ockham Road North but along Long Reach and a traffic free route along an existing PROW alongside the railway. Indicating a route along Ockham Road North (between Long Reach and East Horsley railway station) in DMP Appendix A would prejudice the ability for the route to be provided as there are similar highways constraints to those along Old Lane, including high traffic volumes and speeds.

A route to Cobham

- 2.13. The objective assessment by TW also highlighted the importance of Cobham as a destination for residents, having a wide range of facilities. Again, a route to Cobham along lightly trafficked roads has been determined as suitable for the average cyclist and this has been endorsed by SCC. However, it is omitted from emerging policy ID 10 Appendix A. It should be amended to show this important addition to the cycle route network.
- 2.14. Overall, given the length of the discussions TW has engaged in with stakeholders, it is appropriate for DMP Appendix A to be updated to reflect the most recent work carried out alongside the highway authority and GBC. This would help ensure the policy is effective and justified.

Supplementary Questions:

5.1 Are the mapped routes adequately justified and would the network be effective?

- 2.15. No, the mapped routes are not justified as they are not based on the most recent evidence and would not result in an effective network.
- 2.16. The mapped routes do not reflect the TW-proposed routes upon which TW has consulted with stakeholders. In some cases, the routes shown could not be delivered within the adopted highway. In some other cases the routes take a different alignment.
- 2.17. See TW's response in paragraphs 2.1 and 2.14 above.
- 2.18. The map in **Figure 2.1** (overleaf), based on "Policy ID10 Comprehensive Guildford Borough Cycle Network" (pg.232 of "Guildford Borough Local Plan: Development Management Policies: Submission Local Plan June 2022") shows the routes where comprehensive cycling proposals have been developed in orange, together with the routes along Old Lane and Ockham Road North that TW recommends are deleted from the map.

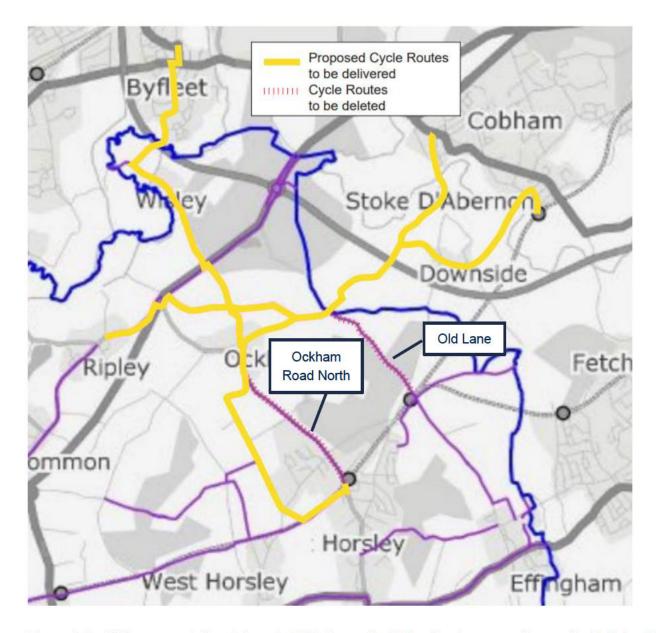


Figure 2.1 – TW's suggested revisions to DMP Appendix A Map (for incorporation on the Policies Map)

Question: Whether Policy ID10: Achieving a Comprehensive Guildford Borough Cycle Network is positively prepared, justified, effective and consistent with both national policy and the LPSS.

- 2.19. The cycle strategy and development of infrastructure proposals for the FWA have been developed with reference to Gear Change and LTN1/20 cycle guidance.
- 2.20. LTN1/20 is primarily focused on cycle design in urban areas and for publicly funded schemes. Nearly all of the infrastructure solutions espoused in LTN1/20 are specific to urban contexts and equally, some solutions that are more relevant to rural areas are not as thoroughly developed.
- 2.21. Recognising the relative dearth of information and recommendations on appropriate cycle design in rural areas, Active Travel England is understood to be looking at developing specific cycle guidance for rural areas.
- 2.22. In developing the cycling proposals for FWA, Figure 4.1 of LTN1/20, showing appropriate infrastructure typologies according to the speed and volume of traffic (reproduced in **Figure 2.2** overleaf) was taken as the basis for developing appropriate solutions in conjunction with other considerations such as heritage, landscape and engineering.

Figure 4.1: Appropriate protection from motor traffic on highways

Speed Limit ¹	Motor Traffic Flow (pcu/24 hour) ²	Protected Space for Cycling			Cycle Lane	Mixed Traffic
		Fully Kerbed Cycle Track	Stepped Cycle Track	Light Segregation	(mandatory/ advisory)	
20 mph ³	0 2000 4000 6000+					
		1 1 1				
30 mph	0 2000 4000 6000+					
40 mph	Any					
50+ mph	Any					



Provision not suitable for all people and will exclude some potential users and/or have safety concerns

Provision suitable for few people and will exclude most potential users and/or have safety concerns

Notes:

- If the 85th percentile speed is more than 10% above the speed limit the next highest speed limit should be applied
- The recommended provision assumes that the peak hour motor traffic flow is no more than 10% of the 24 hour flow
- In rural areas achieving speeds of 20mph may be difficult, and so shared routes with speeds of up to 30mph will be generally acceptable with motor vehicle flows of up to 1,000 pcu per day

Figure 2.2 – Extract from LTN1/20

- 2.23. Working with a principal author of LTN1/20, TW considered appropriate solutions that reflected the spirit of LTN1/20 and applied it to a rural setting. From this, TW developed typologies of solutions to provide good cycle infrastructure as follows:
 - on high traffic / high volume routes, the provision of fully segregated cycle tracks (e.g. Portsmouth Road for route to Ripley, Downside Bridge Road for route towards Cobham);
 - on low-trafficked rural lanes: designation of "Quiet Lanes" and traffic calming measures to restrain traffic speeds to 30mph (and to discourage rat-running) (e.g. Long Reach towards East Horsley, Wisley Lane towards Byfleet, Ockham Lane / Plough Lane towards Cobham and Stoke D'Abernon)

- on traffic-free routes, widening shared footway/cycleways or bridleways towards LTN1/20 standards
 (e.g. path parallel to railway on route towards East Horsley, Muddy Lane for route towards Byfleet);
- 2.24. In relation to emerging policy ID10 and the supporting text (the suggested changes as included in **Appendix 1**), TW therefore consider that:
 - there should be reference to Quiet Lanes (as a rural design solution similar in nature to low traffic neighbourhoods);
 - shared footways/cycleways: whilst these should be avoided in urban settings, they can be an
 appropriate solution in rural settings on routes that are only lightly used by pedestrians. For example,
 it is common for facilities such as greenways to be shared, without segregation.
 - Whilst lighting should be generally supported, the case for lighting and the type of lighting to be employed needs careful consideration on a case-by-case basis, subject to local conservation or ecological circumstances.
 - It can be very challenging to deliver 100% LTN1/20 compliant end to end schemes. FWA makes a substantive investment to start developing a cycle network that is appropriate in this locality and provides a sound basis for Surrey and Guildford to continue to develop the network over time.



