Written response to the planning inspector – from Compton Village Association (CVA).

AQMA and Traffic

We support the submissions made by **Compton Parish Council and Save the Hog's Back.**

In addition we wish to raise concerns about the impact of development on the village of Compton and the B3000 with particular reference to the potential development at Blackwell Farm.

The government's draft revision to the NPPF instructs council planners to ensure that the air quality impact of new developments is considered. The NPPF also allows for the refusal of development where its impact will have a severe detrimental effect. To ensure compliance with the NPPF we ask that issues effecting the AQMA and traffic volume in Compton village are given priority as the cumulative impact on traffic will have a severe detrimental impact on Compton Village.

Background Information

Compton lies south of Guildford and the B3000 connects the A3 and the two southerly connections to and from Guildford (A3100 and A281, which are interconnected). Essentially the B3000 acts as the 'south circular' to Guildford. It is a narrow B road and at the populated end, is winding with houses on either side. Compton village does not feature greatly in the local plan as it has two conservation areas (with many listed buildings), is in AONB and remains in Green Belt. The proposed Blackwell Farm development is however in part, within the Parish of Compton and ANY increase in traffic on this road (whether it be from Blackwell Farm or other development) will have an adverse effect on the safety of residents and on air quality. The area is already subject to a recently implemented AQMA.

An independent survey carried out by G John Surveys Ltd. commissioned by Compton Parish Council demonstrated daily traffic volumes on the B3000 of 16,000 vehicles mid-week and peak hour traffic of 1,500 per hour for 5-6 hours per day and 800-900 vehicles per hour at other times. (see Appendix 1). This equates to a car passing every two and half seconds, which essentially prevents residents from crossing the road (pedestrian crossings or similar are not permissible due to poor sight lines) or leaving their homes by car, as they are unable to get out of their own drives. Average speeds are 38 MPH in one direction and 33 MPH in the other (it is a 30 MPH zone) but in reality, large numbers of vehicles travel at much higher speeds while congestion at the A3 end is now a regular occurrence.

Key points

The A3 end of Compton village sees the highest NO_2 readings in a residential area in Guildford.

Traffic modelling to date does not show the impact of development on the B3000 of development at Blackwell Farm.

The AMEC report produced as part of the evidence base omits to include impact from any development. It reports hypothetical reductions in NO_2 if effective solutions are put into place but does not weigh these up against increased traffic volume or whether the solutions suggested are achievable.

The AMEC report includes traffic data but excludes the impact of congestion as the day on which the data was collected was in fact free of congestion. The report concludes that '*there was no queuing traffic during the 24-hour survey on 12 September 2017 therefore queuing traffic is unlikely to be contributing to pollutant concentrations and has not been included in the model*'. Proposed solutions

then work on reducing stop-start movement and resulting congestion at this end of the village rather than reducing traffic volume, which directly conflicts with its own findings.

The AQMA area is limited to the houses directly affected by annual mean NO_2 readings exceeding 40 $\mu g/m^3$ with exceedances as high as 67 $\mu g/m^3$. This report acknowledges that lower readings at a neighbouring cottage were 'not suitable' and likewise excludes data from cottages near the roundabout due to lack of traffic data (presumably to and from Down Lane – AMEC report - Table C1 page 43). These omissions are not corrected but are then excluded from the AQMA as there is no breach of regulations. Readings were taken at house level and no account is taken for people using their gardens or walking or waiting at bus stops (ie street level), all of which has the potential to increase the area affected.

The possible reduction in NO_2 achieved assumes a 'street canyon' effect, with high buildings and dense tree coverage. This however is not the case in the affected area. Houses are normal height, separated and tree coverage is not dense. The street is in a dip but so are the surrounds.

The Compton Village Association supports actions that would reduce NO_2. It is noted that modelling indicates a reduction of 25% with the implementation of a 20MPH zone. This would be welcomed although we also have concerns over assumptions made within the modelling (as previously stated) and as traffic is the key component, must raise concerns that the reduction is based on current traffic flow and does not take account of future increases.

Comprehensive modelling has either not been carried out to measure impact from development on the B3000 or the time frames are such that they exclude future impact as advice received from an independent traffic consultant informs us that modelling that has been carried out (for the roundabout at Egerton) does not go beyond 2024. This therefore excludes all but a tiny proportion of traffic that would emanate from Blackwell Farm. Highways informed the Parish Council at the time of the 2016 consultation that the B3000 would be affected if Dunsfold went ahead (as traffic would seek alternative routes when the A281 became congested) and that this would be more prominent if the A3 widening went ahead. This site has now been approved.

The limited traffic modelling that has taken place (for Surrey County Council) to reflect impact should the A3 be widened (deemed a necessity for the Blackwell Farm development to go ahead) shows that the 16% increase in traffic volume on the B3000 following the Blackwell Farm and other proposed developments (identified by the Strategic Highway Assessment report, June 2016, Table 4.5) would severely impact the B3000 in terms of congestion. This has not however been factored into the AQMA modelling which reflects on the here and now.

The solutions put forward by AMEC have been subject to consultation and rejected by Guildford Borough Council (including re-signing on the A3 to encourage HGVs to take the A3 to Godalming rather than the B3000. This suggestion was made some years ago and was supported as being in keeping with the highways network hierarchy but was rejected by Surrey County Council because of an AQMA in Godalming). The only solution still on the table is the implementation of a 20MPH zone. This however was rejected in 2010 when it was suggested as part of a village safety scheme on the grounds that it did not meet with criteria. As far as we are aware, the criteria and the reasons for refusal remain unchanged, which would make the 20MPH suggestion unviable in practice. [The average speed through the village was and still is, too high. The police do not have sufficient resource to implement 30MPH let alone 20MPH and requests for camera technology have so far also been refused. The route is classified as a strategic route and hence there is little will to make changes that might have a detrimental impact elsewhere.

An air quality expert has informed us that 'any development that will result in more traffic (including construction traffic) through an AQMA will need to give full consideration to the effects on air quality that will result from the development'.

The issues and high NO_2 readings were known in 2014 yet the evidence base up to the regulation 19 consultation concluded that there were no air quality issues in Guildford. The issues were only acknowledged after the declaration of the AQMA, some 5 years after monitoring began.

Conclusion

We believe that there are a number of serious issues relating to the Blackwell Farm site, not least being the increase in traffic that the site will generate and the impact this will have on the B3000.

There are currently no viable solutions to the problem of amenity effects of traffic and resulting issues with air quality in Compton and as such, any increase in traffic is likely to exacerbate the air quality problem. Any solutions must therefore be closely monitored over a period of time to ensure that the net results of any mitigating solutions work in reality. Methodology supporting improvements to the traffic and air quality issues must be open and transparent and include all assumptions made and where possible, examples of comparable scenarios where they have worked.

Clarification as to perceived weaknesses and flaws in the wider evidence base (many of which are not apparent without independent scrutiny) have been sought, sometimes via FOI as this is often the only route to ensure a response. Despite the fact that local organisations and Parish Councils in particular are expected to be able to offer guidance and information, many responses have been most unhelpful. For example, when asked for information about traffic modelling, (27.07.17) Donald Yell at GBC responded '*We do not propose to enter into correspondence by responding to the comments and questions in your email at this time. We do not consider that this would represent the best use of the Council's resources'*.

The air quality problem in Compton is important because it demonstrates what can result when growth outweighs capacity and that changes that might benefit towns (Guildford and Godalming in particular) have consequences elsewhere. Air quality criteria generally applies to towns so seeing a problem in a small village should be a warning sign. There are many reasons why the Blackwell Farm proposal should not be pursued one of which is to prevent existing traffic and air quality issues in Compton from worsening.