

## Examination into the soundness of the Guildford Borough Local Plan: strategy and sites

### HEARING STATEMENT

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1. This statement focuses primarily on the transport infrastructure aspects of two of the Matters and Issues, namely *4 Housing Trajectory* and *9 Spatial Strategy, Green Belt and Countryside Protection*. Specific sites (*11 Site Allocations*) are also briefly addressed where the Inspector has asked about infrastructure. Traffic congestion in peak periods is a major issue today in the borough<sup>1</sup> and it will continue to be so in the plan period. Commuter rail services are also under stress.

#### Matter 4 - Housing Trajectory

2. The proposed improvement of the A3 between the A31 and the A320 (SRN2) is crucial for the plan. Highways England has advised that it is prudent to assume 2027/28 for completion of the scheme. The A3 is already overloaded in peak periods each weekday. Increasing the numbers of houses at the strategic sites adjacent to the A3 (A24, A25, A26 and A35) in the first five years of the plan would make a poor situation worse on the A3 through Guildford and on connecting roads. It is surely essential that highway infrastructure provision meets the needs of new developments from their inception, as Policy ID1 is designed to ensure. Highways England expressed this view in their consultation responses in relation to the SRN2 scheme.
3. The delivery of the two new railway stations included in the plan, NR2 and NR3, is not expected until the second five-year period of the plan. And an increase in Portsmouth main line capacity is unlikely before the end of the plan period.
4. There are already potential problems in the plan in terms of the phasing of development where site development is scheduled in advance of related highway schemes. For example SRN9 and 10, Burnt Common slips, may not be open before 2027 while development is planned at Gosden Hill Farm, Wisley Airfield and Garlick's Arch in prior years. This will cause problems on the B2215 through Ripley. The proposals currently being developed by Highways England for M25 J10, the Ockham Roundabout and Wisley Lane could add to that pressure. The delivery of housing is assumed to start at Blackwell Farm in 2022/23, five years before SRN2 is due to be completed.
5. The report on A3 junctions in 2024, prepared by Mott McDonald for GBC<sup>2</sup> shows that the development in the plan to 2024 is likely to have a minimal effect on queues at the junctions studied. This is to be expected given the scale and location of the housing and employment sites involved. It should be noted that the new GBC Corporate Plan includes a target for the delivery of housing at site A24, Slyfield, from 2021<sup>3</sup>. This would have traffic implications for the A320 (and potentially for Stoke interchange), for example.
6. In summary, GBC is right to regard the capacity of the A3 as a constraint on the pace of growth

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<sup>1</sup> See GBC Corporate Plan 2018-2023, April 2018, page 12

<sup>2</sup> Ref GBC-LPSS-SD-040-RevB and Rev Ba

<sup>3</sup> Ibid, Appendix 1.

## Matter 9 - Spatial Strategy, Green Belt and Countryside Protection

7. The road network in the borough is fairly described in the evidence base and current traffic conditions have been summarised in the plan<sup>4</sup>, the Infrastructure Development Plan and elsewhere. The preamble to Policy S2 would be improved by including reference to infrastructure constraints as well as environmental constraints in para. 4.1.5. A lower level of allocation of housing to Green Belt sites and an increase in existing urban areas has the potential to lead to a more sustainable transport position.
8. GBC relies on the Strategic Highway Assessment Report 2016 (SHAR) for evidence on the traffic position, as set out in para 5.1.6 : *“The results show that for Scenario 5, which represents the quantum and distribution of development proposed in the PSLP together with key highways schemes , there will not be a severe impact on the local and strategic highway network, when compared against the Do-Minimum Scenario 1”*. Traffic conditions in the Do-Minimum scenario are important because they are the closest to the current situation, and also because they are the basis for comparison with the other scenarios. The information on the Do-Minimum available in the SHAR indicates that the model understates the extent of congestion. Peak period congestion is an issue today, for example on the A3, but this is not evident in the model output. According to the DfT , the observed speed on the A3 in 2015 was 25.6 mph<sup>5</sup>, or 41 kph, whereas in the 2031 modelled Do-Minimum it is shown as 76.7 kph. This suggests that the Do-Something results require interpretation, allowing for a higher level of demand. The Appendix to this Statement gives more detail.
9. The recent decision of the Secretary of State approving the development of Dunsfold Park has implications for traffic in the borough, particularly the A281. The development was not included in the 2016 analysis.
10. Highways England is carrying out studies looking at the M25 South West Quadrant in the longer term. The first stage of the work concluded that the capacity of the M25 (J10-16) will not be increased beyond the current schemes for smart motorway and J10. Other ways of meeting growth are being considered, including developing orbital routes. One such route could be from the A3 to M3 using the A31/A331, which would have obvious implications in the borough.
11. If the town centre were to be allocated more housing, for which there is scope, then a new road crossing of the railway in the town should be part of the long term plan. It would add resilience to the network and provide the opportunity to improve the environment and safety of pedestrians and cyclists. A good quality bus station is essential and should be in the Infrastructure Development Plan, complementing the Sustainable Movement Corridor.

### Site Allocations

12. We do not have the benefit of transport analysis for individual sites. In assessing highway infrastructure implications, the traffic modelling output available in the SHAR is a general guide, being derived from a strategic model. The comments below relate to major sites only.

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<sup>4</sup> As in SLP paras 2.14a, 2.14b and 2.15

<sup>5</sup> See GBC-LPSS-SD-038, Transport Strategy, page 27

13. A24 SARP

This development will add to the pressure on the A320 and also Clay Lane. The mitigating schemes included in the SHA work in 2016 were restricted to junction improvements – notably signalisation of the junctions on the A320. This is unlikely to be sufficient, given that Table 4.5 in the SHAR shows the A320 over-capacity.

14. A25 Gosden Hill Farm

The infrastructure requirements include a park and ride facility and this is included in the Infrastructure Schedule (P&R1). The phrase '*potential opportunity to provide an all movements junction of the A3 trunk road with the A3100 London Road, the B2215 London Road and the A247 Clandon Road*' is confusing. If and when the Burnt Common slips (SRN9 and 10) are introduced, then there will be on and off slips connecting the A3 with the A247. An extra connecting road would be required for traffic from the Gosden Hill development to gain access to the B2215. It is not evident that LRN6 includes such a road, given that the sum associated with it is £5-10m. The traffic consequences for Burpham will probably be severe even with mitigation. As with the other strategic sites located along the A3, the phasing of development should take into account the timing of SRN2.

15. A26 Blackwell Farm

In terms of analysis, at this stage there is only the SHAR to indicate where traffic impacts would occur. There are significant implications for the A3 and the A31, and for the roads used to access the Surrey Research Park, RSCH, the University, Compton, Park Barn and Guildford Park. The A3 is forecast to be over capacity in peak periods. The scale of the proposed development makes mitigation difficult. A detailed study is required.

16. A29 Land South and East of Ash and Tongham

These roads are poorly suited to coping with the likely level of demand in peak periods. The SHAR gives evidence of the issue, in Figure 4.9, and Tables 4.4 (item 23) and 4.5 (items 19 and 20). There is mention in the SHAR (para 4.13.9) of cross boundary impacts in the Ash/Ash Vale area.

17. A35 Wisley Airfield

The highway issues relating to this site were of course extensively discussed at the Public Inquiry. There is a core issue involving the provision of new slip roads at Burnt Common, and whether an additional lane will be required in each direction on the A3. The Highways England scheme being developed for J10, including the plans for Old Lane, Elm Lane, Wisley lane, and Ockham Roundabout will affect the access plans. If development is permitted in advance of the Burnt Common slips, it will probably add to traffic through Ripley.

18. A43, A43a and A58 Garlick's Arch and Burnt Common

Re the question posed in 11.37, there is insufficient information in the SHAR to assess what the effect of the Burnt Common slips in combination with the housing and employment allocations in the immediate area. It is undoubtedly the case that there will be an impact on Send Road traffic, and this issue requires further investigation.