



MAY 2018

# Guildford Borough Local Plan Examination

## Hearing Statement – Matters 3, 4, 6 & 11

Iceni Projects Limited on behalf of  
Ptarmigan Land

May 2018

ICENI PROJECTS LIMITED  
ON BEHALF OF PTARMIGAN  
LAND

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**Guildford Borough Local Plan  
Examination**  
HEARING STATEMENT – MATTERS 3, 4, 6 & 11

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# 1. INTRODUCTION

- 1.1 This Statement has been prepared by Icen Projects Ltd on behalf of Ptarmigan Land in response to Matters 3, 4, 6 and 11 of the Inspector's Matters and Issues for Examination (Part 1) for the Guildford Local Plan Examination.
- 1.2 The below comments build upon our previous representations on this issue and provide further explanation of how and why we consider Policies S2, H2 and A43 will need to be amended to make them sound in this regard.

## 2. MATTER 3 – UNMET NEED IN THE HOUSING MARKET AREA

2.1 This section responds to the following question raised in relation to Matter 3:

*“Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA?  
Relevant aspects include:*

*3.1 The allowance of 83 dpa already contained within the Waverley Local Plan.*

*3.2 The constraints imposed by Green Belt and other designations, and the fact that it appears necessary for the plan to release substantial sites from the Green Belt in order to meet its own identified OAN.*

*3.3 Any other unmet need issues.”*

2.2 As noted in our previous representations, we consider that the housing requirement for the Plan period identified at Policy S2 should include an allowance to accommodate unmet need arising within the Housing Market Area. Paragraph 182 of the National Planning Policy Framework (NPPF) emphasises that meeting unmet requirements from neighbouring authorities (where reasonable to do so and consistent with achieving sustainable development) is a key aspect of soundness. It is therefore important that Guildford Borough’s Local Plan considers all reasonable steps to ensure the unmet need arising from Woking is accommodated, unless to do so would be unreasonable or unsustainable having regard to the principles set out at paragraph 7 of the NPPF.

2.3 Although Guildford Borough Council have sought to suggest (at paragraph 2.25 of GBC-LPSS-001) that Woking would be seeking to review their Local Plan and the potential to meet their own portion of housing need within the HMA in due course, we are unaware of any evidence to indicate that this will occur in the short term, and in the meantime there is a pressing requirement to ensure housing needs across the HMA are met in order to avoid the significant negative socio-economic consequences of failing to meet such needs, as recognised by the NPPF and the National Planning Practice Guidance (NPPG). Clearly, this was also a consideration at the Examination of the Waverley Local Plan, at which it was concluded that it would be necessary to include an 83 dwelling per annum allowance within the housing requirement to help accommodate the unmet need arising from Woking in order to make the Plan sound.

2.4 Whilst Waverley has sought to accommodate a portion of the unmet need within its housing requirement, there is still a significant element of Woking’s housing need which remains unmet. In accordance with the Duty to Cooperate and the requirements of the NPPF, Guildford Borough must ensure that all potential sources of housing supply are explored to accommodate this unmet need.

The Council has robustly demonstrated that Exceptional Circumstances exist to release Green Belt, having regard to the acute housing need in the Borough and the Green Belt Review undertaken, and the proposed allocation of Green Belt sites makes a crucial contribution towards the housing trajectory for the Plan period, including the delivery of housing in the early years following adoption. However, in our view the Council has not provided sufficient evidence to demonstrate that delivery from these sources has been maximised (in order to meet unmet need arising from Woking as well as ensuring sufficient levels of delivery in the early years of the Plan). For example, the assumed capacity of proposed allocations such as A43 (Land at Garlick's Arch, Send Marsh) could potentially be increased, particularly if priority were given to the delivery of housing in preference to other potential uses identified within the draft allocations. Given the emphasis at paragraph 83 of the NPPF that amended Green Belt boundaries should endure beyond the end of the Plan Period, it is necessary to ensure that the proposed amendments to Green Belt boundaries identified within the current Plan maximise the potential to meet the Borough's needs, and to ensure they will not require further amendment at the end of the Plan period to meet future needs.

- 2.5 Paragraph 152 of the NPPF notes the requirement to achieve each of the economic, social and environmental dimensions of sustainable development, and that significant adverse impacts on any of these aspects should be avoided. Consequently, an element of judgement is required to balance these three separate aspects of sustainability. Whilst the Council has (at paragraph 2.26 of GBC-LPSS-001) suggested that it does not consider the additional need arising from Woking to be sufficient to provide appropriate justification for releasing additional Green Belt land, the substantial benefits of boosting housing supply and seeking to meet identified needs should be given significant weight in the balancing exercise. Should this balancing exercise indicate that the release of additional sites would not be appropriate, all other potential options should be considered, including making more effective use of sites already identified in the submitted Plan, in accordance with the approach taken at the Waverley Local Plan Examination to accommodate the 83 dpa figure identified. It has been demonstrated that the Land at Garlick's Arch site allocation has capacity to facilitate a further uplift in new homes.

### **Summary and Proposed Amendments**

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- 2.6 Having regard to the above, we therefore consider that the identified housing requirement within Policy S2 is currently unsound, as it does not include an allowance for accommodating unmet need arising from elsewhere in the HMA (taking account of the 83 dpa allowance within the Waverley Local Plan), and in our view the Council has not provided sufficient justification as to why additional supply cannot be identified to accommodate this need within Guildford Borough, notwithstanding the necessity to release Green Belt to meet Guildford's own housing needs. As such, in our view the policy has therefore not been sufficiently positively prepared, in accordance with the requirements of paragraph 182 of the NPPF.

2.7 In order to make Policy S2 sound, we therefore contend that all potential options should be explored to accommodate the remaining unmet need within the HMA arising from Woking. One such option could include increasing the assumed capacity of sites identified as proposed allocations in the submitted Plan.

### 3. MATTER 4 – HOUSING TRAJECTORY

3.1 This section responds to the following question raised in relation to Matter 4:

*“Is the plan’s housing trajectory, which starts at a low level and rises towards the later years of the Plan period, a sound basis for meeting housing need? Relevant topics include:*

*4.1 The ability or otherwise of increasing the rate of delivery in the early years.*

*4.2 Whether the housing trajectory is realistic and deliverable, and whether there are any identifiable threats to delivery.*

*4.3 The key infrastructure improvements influencing the housing trajectory.”*

3.2 As stated previously in our representations, we consider the proposed phased annual housing requirement identified within Policy S2 to be unsound. The adoption of a phased housing target, with the annual requirement not exceeding the annualised 654 dwellings per annum figure until 2026/27, would permit a significantly constrained rate of housing delivery in the first 12 years of the Plan, thereby failing to meet the identified needs of the Borough. Given the requirement for Local Plans to be reviewed at least every 5 years, as set out at paragraph 47 of the NPPG<sup>1</sup> and at paragraph 23 of the March 2018 consultation draft of the updated NPPF, it is unlikely that such constrained annual requirements would ensure that the housing needs of the Borough were met within the realistic life of this Plan, resulting in a greater shortfall and worsening affordability situation to address in 5 years’ time. The imposition of phased housing requirements would thus in our view be contrary to the purpose of paragraph 47 of the NPPF, which requires Local Planning Authorities to identify a 5-year supply of deliverable sites in order to significantly boost the supply of housing and meet identified housing needs.

3.3 Furthermore, based on the latest trajectory provided within Table 1 of GBC-LPSS-001, the cumulative housing supply would not exceed the cumulative requirement (based on the Council’s proposed phased approach to the annual requirement) until 2024/25, thereby emphasising the importance of those (predominantly Green Belt release) sites already included within the trajectory for the first 5 years following adoption, and the necessity of identifying additional supply in the early years of the Plan. Our client notes the challenge faced by the Council in seeking to identify additional supply to meet housing needs, particularly in the early years of the Plan, however we do not consider

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<sup>1</sup> Reference ID: 12-008-20140306



the evidence provided by the Council to date (such as at paragraph 3.25 of GBC-LPSS-001) is sufficiently robust to demonstrate that all potential options have been explored in detail to increase the supply of housing. For example, one potential option would be to re-examine the assumed capacity of proposed allocations. Notwithstanding the need to ensure assumed capacities are robust and realistic in advance of the preparation of detailed site-specific proposals, we consider that further consideration should be given to the potential capacity of proposed allocations and whether the delivery of housing should be given preference over other non-residential uses identified for these allocations, given the acute housing need in the Borough and the significant adverse socio-economic impacts arising from a failure to meet housing needs. In our opinion this is necessary in order to ensure the Plan is positively prepared, having regard to the requirements of paragraph 182 of the NPPF.

- 3.4 In this context, our client's land at Garlick's Arch (site allocation A43) will make a valuable contribution towards the housing supply within the first 5 years following adoption, and is not constrained by any significant infrastructure requirements or other technical issues. The potential capacity could be greater than the 400 dwellings identified in the Council's trajectory, particularly if the entire site were developed for residential purposes. Furthermore, the availability of land within our client's control to accommodate new slip roads onto the A3 in accordance with allocation A43a could assist with the prompt delivery of housing elsewhere, including the former Wisley airfield site (allocation A35).

### **Summary and Proposed Amendments**

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- 3.5 Based on the above considerations, we maintain that the Council's proposed phased approach to the annual housing requirement within Policy S2 is unsound, as it would not ensure the delivery of a sufficient quantum of housing within the early years of the Plan following adoption, and would likely result in a deficit against housing needs by the time the Plan is reviewed in 5 years' time. As such, we consider that this approach would be unsound, as the Plan would not be positively prepared in this regard, unless clear evidence can be provided to demonstrate that all potential options to boost housing supply in the early years of the Plan have been explored in detail.
- 3.6 The sites already identified by the Council as proposed allocations will make a vital contribution towards the anticipated trajectory in this context, particularly the less constrained, medium scale sites identified for release from the Green Belt. However we consider that further efforts should be made to ensure the capacity of such sites is maximised, in order to ensure that the annual requirement is sound.

## 4. MATTER 6 – HOMES FOR ALL

4.1 This section responds to the following question raised in relation to Matter 6:

*“Are the plan’s policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community? Relevant issues are:  
...  
6.2 The delivery of affordable homes (having regard to Item 14 of my Initial Questions).  
...  
6.6 Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.”*

### **Affordable Homes**

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4.2 As discussed in our previous representations on draft Policy H2, we note that whilst the supporting text to the policy (at paragraphs 4.2.38 to 4.2.44 of GBC-LPSS-CD-001a) indicates that the proposed 40% requirement will be subject to viability considerations, the policy text itself lacks any reference to such provisions. Given the importance of viability to the delivery of housing and the requirement of paragraph 173 of the NPPF to enable development to be deliverable, we consider that the relevant supporting text should be included within the policy wording, to avoid any ambiguity and ensure the Plan is effective and consistent with national policy. In our view this aspect of the supporting text amounts to policy and should thus be identified as such within Policy H2.

### **Gypsies, Travellers and Travelling Showpeople**

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4.3 With regard to the provision of sites to meet the needs of Gypsies, Travellers and Travelling Showpeople, we have identified our objections to the Council’s proposed approach in our previous representations. In particular, the proposed inclusion of 6 Travelling Showpeople plots as part of allocation A43 (Land at Garlick’s Arch) would be inconsistent with the threshold approach identified in Policy H1(7) to only require such provision on sites of 500 units or more, and it is unclear as to whether it would be suitable, viable, sustainable and the most-appropriate strategy to provide 6 plots in conjunction with a residential development of 400 dwellings.

4.4 Furthermore, we note that the 6 Travelling Showpeople plots identified for allocation A43 were originally proposed as part of a much larger allocation in the west of the Borough (A46 – land to the South of Normandy and north Flexford), as explained at paragraph 4.151 of GBC-LPSS-SD-TP-004. It is assumed that the deletion of this site and the removal of the previously proposed 7,000 sqm of employment floorspace for A43 resulted in the Council simply transferring these 6 plots to A43, without any further information regarding the suitability of site A43 to meet the identified need of Travelling Showpeople within the Borough. It is currently unclear whether the provision of plots on

site A43 would meet the need identified (at part M of GBC-LPSS-SD-005) as arising from overcrowding of existing plots in the western part of the Borough.

- 4.5 As discussed in our previous representations, the Council has not provided a clear justification as to why site A43 is the most appropriate location to accommodate the 6 Travelling Showpeople plots required in the Borough, and why other sites (particularly sites that are larger and/or closer to the existing Travelling Showpeople community, or a new site solely for the purpose of delivering Travelling Showpeople plots) have been dismissed as unsuitable for accommodating these plots. On this basis, the proposed approach to accommodating the needs of Travelling Showpeople in the Borough would not appear to be justified or effective, having regard to the requirements of paragraph 182 of the NPPF.

## **Summary and Proposed Amendments**

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### **Affordable Homes**

- 4.6 With regard to affordable housing, we consider that Policy H2 as currently worded is ambiguous and does not identify with sufficient clarity that the 40% requirement will be subject to viability considerations, as discussed within the supporting text to the policy.
- 4.7 In order to ensure the policy is effective and consistent with national policy, we consider that it is necessary to include reference to viability considerations within the policy text itself.

### **Gypsies, Travellers and Travelling Showpeople**

- 4.8 Based on the above considerations and our previous representations on this matter, we consider that the Council has not provided sufficient justification for the inclusion of 6 Travelling Showpeople Plots on site A43 (land at Garlick's Arch), and thus it is not clear that the Council's proposed approach would be justified or effective in adequately meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople across the Borough. In order to ensure the Plan is sound in this regard, we therefore consider that the requirement for 6 Travelling Showpeople Plots should be deleted from Policy A43, which would have the additional benefit of providing further land to accommodate residential development to meet the acute need identified for Guildford.
- 4.9 Notwithstanding the above and without prejudice to the points we have raised, should there be a justifiable need to potentially accommodate Travelling Showpeople on site A43, we contend that the wording of the policy should be sufficiently flexible to enable the land to be used for other purposes should there be no take-up of the plots or the need has been met elsewhere at the time of planning application coming forward. In this regard, we broadly welcome the reference at part (10) of the policy to the principle of utilising the land for other purposes following an appropriate period of marketing. However, in our opinion this should permit the use of this land for residential development in general terms (rather than specifically affordable housing), as the Council has not provided any justification

as to why it would be appropriate or viable to deliver in excess of the minimum 40% affordable housing requirement identified within Policy H2.

## 5. MATTER 11 – SITE ALLOCATIONS (SITES A43 & A43A)

5.1 This section responds to the following questions raised in relation to Matter 11:

*“11.34 Are there local exceptional circumstances that justify the release of this land from the Green Belt? In combination with the allocation at A25, Gosden Hill Farm, (see 11.14 above), is there a risk of a significant diminution of the Green Belt in this locality? Can the perception of the eastward sprawl of the wider Guildford urban area along the A3, and the encroachment into the undeveloped gaps, be avoided?”*

*11.35 Would the developments proposed in these allocations integrate with the village or would they be separate entities?*

*11.36 What steps would be taken to ensure that they promoted sustainable development and sustainable movement patterns?*

*11.37 What are the anticipated movement patterns arising from the new slip roads in combination with the housing and employment allocation, taking into account the potential for a redistribution of traffic from the strategic road network (notably from the east towards Woking), and what would their effects be on the roads through Send, including traffic flow, noise and air quality?”*

### **Green Belt**

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5.2 As indicated within our representations on the Regulation 19 consultation drafts of the Local Plan, we strongly support the allocation of sites A43 and A43a, and we consider that local Exceptional Circumstances have been robustly demonstrated to justify the release of this land from the Green Belt through the Local Plan process, in accordance with the provisions of paragraph 83 of the NPPF.

5.3 In particular, Volume 2 of the Council’s Green Belt and Countryside Study (document GBC-LPSS-SD-015e) assesses the land at Garlick’s Arch as performing some function against two of the four relevant purposes of Green Belt (checking the eastern sprawl of the village, and safeguarding the countryside from encroachment), and identifies that it does not make any contribution towards preventing neighbouring settlements from merging or preserving the setting and special character of an historic town.

5.4 Furthermore, Icen’s own site-specific assessment of the function of the Green Belt in this location indicates that the site only makes a limited contribution towards these two purposes. With regard to checking sprawl, the site is relatively well contained by the existing settlement of Send Marsh

immediately to the north and west and the A3 to the southeast, as well as an area of dense woodland to the north, and development would have only a limited impact on openness. The A3 will provide a clearly defined and logical enduring defensible boundary to the village, preventing sprawl to the southeast, and has the potential to be strengthened further by appropriate structural landscaping as part of the site's future development. Meanwhile in relation to safeguarding the countryside from encroachment, the site is already subject to a range of urbanising features such as elements of previously developed land and the adjacent A3, and is of only moderate landscape value, with limited visibility of the site. Consequently, we consider that the relatively limited contribution that the site makes towards the purposes of the Green Belt, and the acute housing need, provide the Exceptional Circumstances required to justify release of this site from the Green Belt.

5.5 Volume 5 of the Council's Green Belt and Countryside Study (document GBC-LPSS-SD-015i) notes that development of this site as a major village expansion would be appropriate as the resulting improvements to the sustainability credentials of the village (such as supporting the viability of local shops, education, healthcare facilities and services) would outweigh the limited harm to the openness and purposes of the Green Belt. Meanwhile the strengthening of the site boundaries with a carefully considered landscape scheme will serve to prevent sprawl of the settlement.

5.6 The land at Garlick's Arch would represent a logical extension to the urban form of Send Marsh, and is located on the other side of the settlement to the proposed allocations at Gosden Hill Farm (A25) and Burnt Common Warehouse (A58). It is well contained and is generally well screened, with only limited visibility into the site. As such, development of this site would not represent a significant diminution of the Green Belt in this location or contribute to a perception of eastward sprawl of the wider Guildford urban area. We further note that Policy A25 requires a green buffer to be incorporated into the proposals for Gosden Hill Farm adjacent to the A3 in order to maintain sufficient separation between the site and Send Marsh, whilst the Land at Burnt Common Warehouse would also appear to be relatively well contained by existing infrastructure and landscape features. The locations of these allocations, on alternate sides of the A3, mean that users of this main road will always see open countryside on at least one side of the road, thus protecting against actual or perceived encroachment.

### **Integration with the Village**

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5.7 Development at Garlick's Arch (A43) would integrate successfully with Send Marsh, located immediately to the north and west of the site, to become an integral part of the village. A series of key design principles were outlined within the Vision Document presented with our representations on the most recent Regulation 19 consultation version of the Local Plan, identifying how the development of the site is capable of successfully integrating with Send Marsh, providing significant links between the site and the existing settlement and creating the opportunity to provide local facilities and services for the benefit of the wider community.

- 5.8 It is envisaged that development of this site will provide significantly enhanced pedestrian and cycle links to the existing settlement, thereby increasing permeability and improving access to existing services and facilities in Send Marsh. The Motion plan provided at Appendix 1 clearly demonstrates that the Garlick's Arch site (Policy A43) is well located to the existing built up environment and that the current transport infrastructure provides opportunities to access a range of local amenities within accepted walk and cycle distances, including education, health, employment, leisure & recreation and retail facilities.
- 5.9 Furthermore, the development of Garlick's Arch has the potential to provide a range of services and facilities for the benefit of the wider community, including a village green/ amenity space, a village park, and a focal point for the village incorporating small convenience shopping and community space/ facilities. The development proposals also have the potential to encourage local traffic through the site, through the realignment of the Portsmouth Road, thereby enhancing its integration with the rest of the settlement as well as helping to alleviate traffic pressure. The precise nature and range of services and facilities delivered can be discussed further with the local community in due course, to ensure the development serves the needs of both existing and future residents.

### **Sustainable Development and Movement Patterns**

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- 5.10 As noted within Volume 5 of the Council's Green Belt and Countryside Study (document GBC-LPSS-SD-015i), such development will assist to achieve a critical mass to ensure the long-term viability of local services and facilities, thereby enhancing the sustainability of the village as a whole.
- 5.11 The development proposals for Garlick's Arch presented in the Vision Document previously submitted with our representations also identifies the option to provide SANG immediately to the south of the development, thereby ensuring the sustainability of the proposals having regard to environmental considerations.
- 5.12 Given the potential for the site to provide additional services and facilities for the village, this site would therefore provide a natural extension to Send Marsh. However, it is accepted that there are opportunities for the current sustainable transport infrastructure to be improved for the benefit of future residents of the Garlick's Arch site and existing residents of Send Marsh.
- 5.13 The emerging access strategy for the Garlick's Arch site was set out in the Transport Feasibility Assessment (TFA) that was submitted alongside the representations made on behalf of Ptarmigan Land. The information provided within this document shows the site access strategy to comprise:
- a three arm roundabout on Clandon Road, which has the potential to be converted to a four arm roundabout to facilitate a new northbound on-slip to the A3;
  - either a three arm roundabout or priority controlled junction on Portsmouth Road;

- a central spine road between the Clandon Road and Portsmouth Road junctions, which could be used by buses and would provide an alternative route for people travelling to and from the south thereby alleviating any pressure on the Send Roundabout; and,
- the introduction of new footways, cycle routes and associated crossing points.

5.14 By way of a summary, the Motion plan provided at Appendix 2 demonstrates that the Garlick's Arch site will deliver:

- new footways along the southern side of Portsmouth Road;
- new pedestrian crossing points on key desire lines;
- new footways alongside Tithebarns Lane together with associated crossing points, which would provide connectivity to the proposed SANG; and
- the introduction of advisory cycle lanes on the A247, which would supplement those currently provided on Portsmouth Road and improve connectivity to Clandon Railway Station.

5.15 In addition to this, it is worth noting that the emerging access strategy for the Garlick's Arch site makes provision for (i) the upgrade of bus stops located adjacent to the site and (ii) the diversion of one or more of the existing bus services that serve this area of Send into the site. Since the TFA was prepared, it is also important to acknowledge that the mitigation strategy for the nearby Wisley Airfield site includes the creation of a new high quality bus service that will provide a further service to Guildford.

5.16 As the route of that service could include Ripley, there is the potential for the future timetable of this service to include stops within the Garlick's Arch site. Not only would this enhance the overall accessibility of the Garlick's Arch site, and the Send Marsh area more widely, it would also ensure that the long-term viability of this service would be enhanced as a result of an increased customer base.

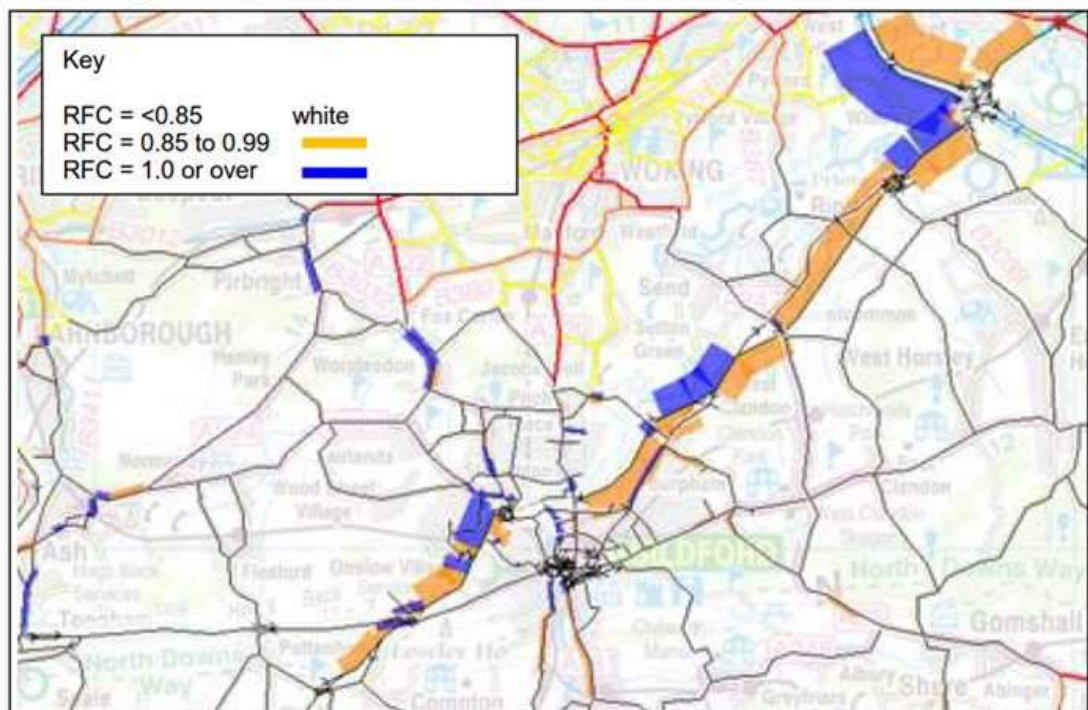
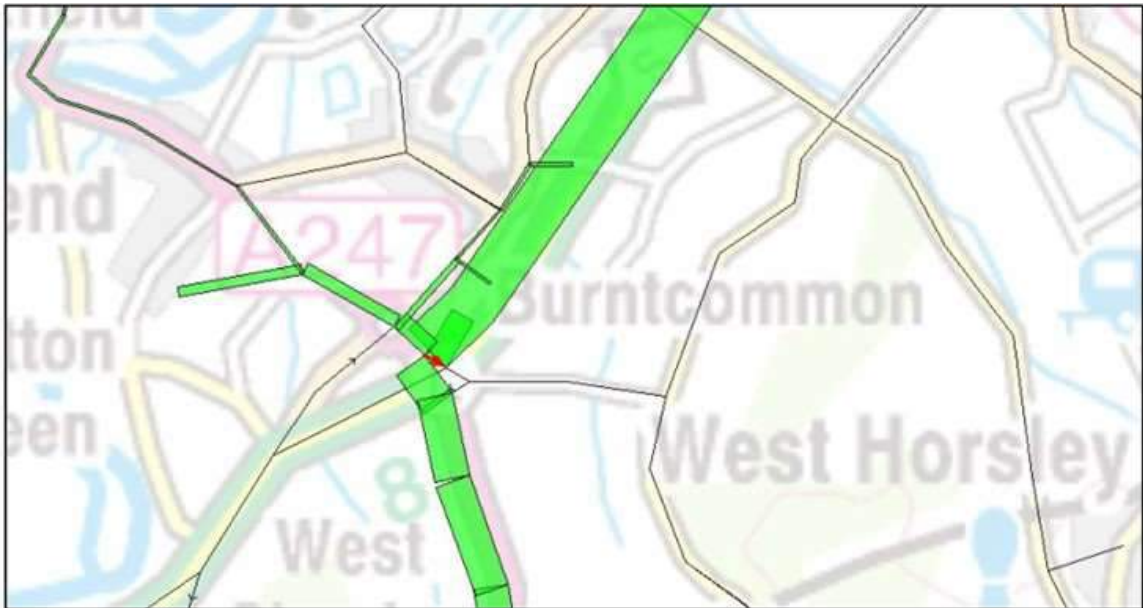
### **Slip Roads**

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5.17 The traffic impacts of the Local Plan are outlined in the Strategic Highways Impact Assessment (SHIA) prepared by Surrey County Council (document GBC-LPSS-SD-039a) and the subsequent Addendum that summarises the effects of the proposed minor alterations to the Local Plan (Ref: GBC-LPSS-SD-039b). With respect to the Garlick's Arch site (A43) and Land around Burnt Common Warehouse (Policy A58) sites, it is important to note that SCC has confirmed that the changes made by GBC in this location have no effect upon the results presented in the SHIA.



5.18 It is understood that the effects of the new slip roads, together with the wider Local Plan growth, are considered in Scenario 3 of the SHIA. Unfortunately, that document does not provide a detailed breakdown of anticipated traffic increases within Send. However, a plan is provided showing the routes that will be taken to access the A3 via the proposed northbound on-slip. In addition to this, the SHIA also provides a further plan that summarises the likely impact of the Local Plan (as tested under Scenario 3) on the local highway network. Copies of these plans are provided below for ease of reference:



SHIA Extracts

5.19 The above plans clearly show that there is a bias towards traffic re-routing from the south<sup>2</sup>, and that the A247 in Send is expected to operate with a Ratio of Flow to Capacity (RFC) of less than 0.85<sup>3</sup>. In this regard, it is reasonable to assume that traffic flows will not encounter any prolonged periods of delay given paragraph 4.13.3 of the SHIA states:

“...as the actual number of vehicles using the road approaches this theoretical capacity, congestion will start to arise resulting in slow moving, stop-start traffic and queuing. Generally it is recognised that such conditions start to occur as the RFC approaches the 0.85 threshold on a link.”

5.20 This is noteworthy from an air quality perspective as HA207/07 of the Design Manual for Roads and Bridges indicates that harmful exhaust emissions tend to occur at greater levels when vehicles travel at low speeds. On this basis, it is considered that the cumulative impact of the Local Plan, including the proposed A3 slip roads, is unlikely to result in any adverse air quality effects in Send.

5.21 It is not possible at this stage to confirm the impact that Garlick’s Arch site will have from a noise perspective, as this would be assessed in detail as part of a future planning application. However, it should be noted that the human ear detects changes in noise when there is a 3 Decibel (Db) increase, and that it is generally accepted that traffic flows need to double in order to achieve this. In this location, the likelihood of this being realised is highly unlikely given that:

- Baseline traffic flows in 2031 for the A247 in Send are understood to equate to circa 900 vehicles (see Appendix 3<sup>4</sup>);
- Just 21% of development related traffic associated with the Garlick’s Arch site are expected to travel along the A247 in Send (see Appendix 4<sup>5</sup>)
- Tables 3.3 and 3.4 of the SHIA indicates that SCC expects the Garlick’s Arch and Land around Burnt Common Warehouse sites to generate in the order of 160 and 200 vehicles in the morning and evening peak periods respectively; and,
- The SHIA shows that traffic increases associated with the new slip roads will have a southerly bias.

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<sup>2</sup> This reflects a re-distribution of traffic that currently uses the Ockham Interchange when accessing the A3.

<sup>3</sup> In reaching this conclusion reference has been made to the fact the SHIA plan does not show any roads highlighted in ‘orange’ or ‘blue’ within Send.

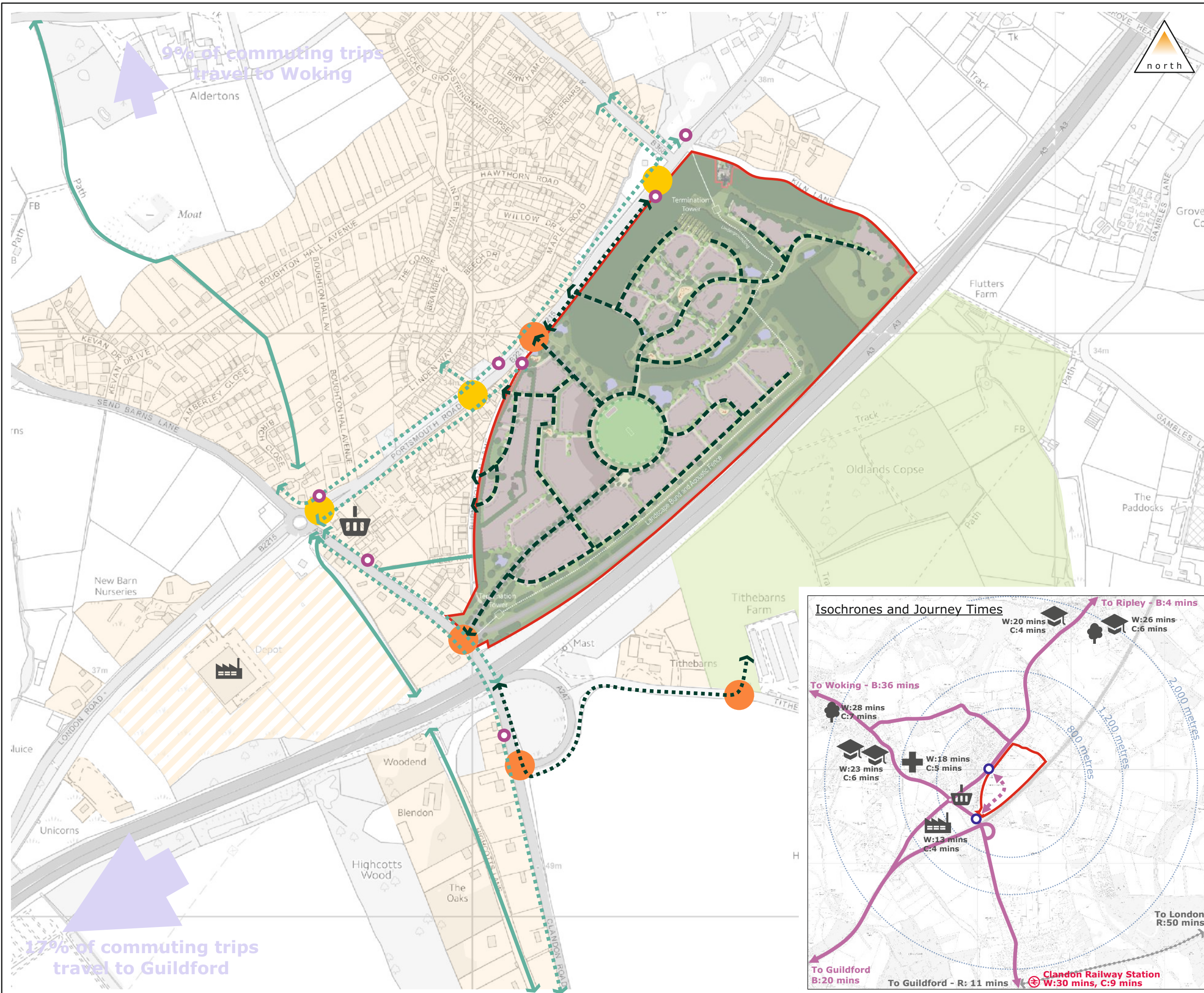
<sup>4</sup> The flows referenced relate to ‘Scenario B’ of the assessment undertaken by WSP on behalf of Wisley Property Investments for the recent Wisley Airfield Appeal. These flows are understood to include all current committed developments outside of the Local Plan as well as the Wisley Airfield development traffic (prior to any mitigation).

<sup>5</sup> This information is re-produced from the TFA submitted in support of Ptarmigan Land’s representations to date.

5.22 Notwithstanding the above, it is worthy to note that GBC has identified a traffic management scheme within its Transport Strategy that could be delivered to mitigate any severe impacts on the A247 through Send. Subject to the normal planning tests being met, it is reasonable to assume that the Garlick's Arch site would make a positive contribution towards bringing these forward.

## **A1. SITE CONNECTIVITY**



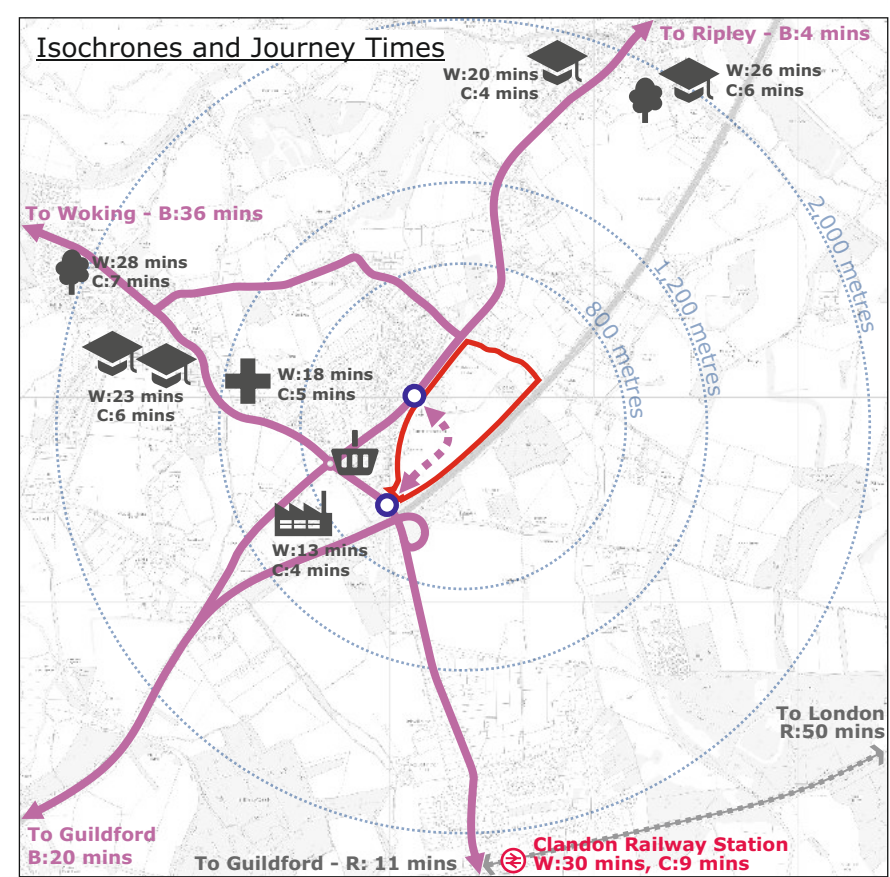


- Legend**
- Site Location
  - Proposed SANG
  - Proposed Site Access
  - ↔ Proposed Bus Route
  - ↔ Proposed Internal Pedestrian Routes
  - ↔ Proposed Pedestrian Footways
  - Proposed / Improved Pedestrian Crossing
  - Proposed Local Plan Site Allocation
  - ↔ Existing Bus Routes
  - Existing Bus Stops
  - ↔ Existing Public Footpaths
  - ↔ Existing Footways
  - Existing Pedestrian Crossing
  - Existing Urban Area

- Local Amenities**
- 🎓 Education
  - + Health
  - 🏭 Employment
  - 🌳 Leisure / Recreational
  - 🛒 Shopping / Retail

- Journey Times**
- W: Walking
  - C: Cycling
  - B: Via Bus
  - R: Via Rail

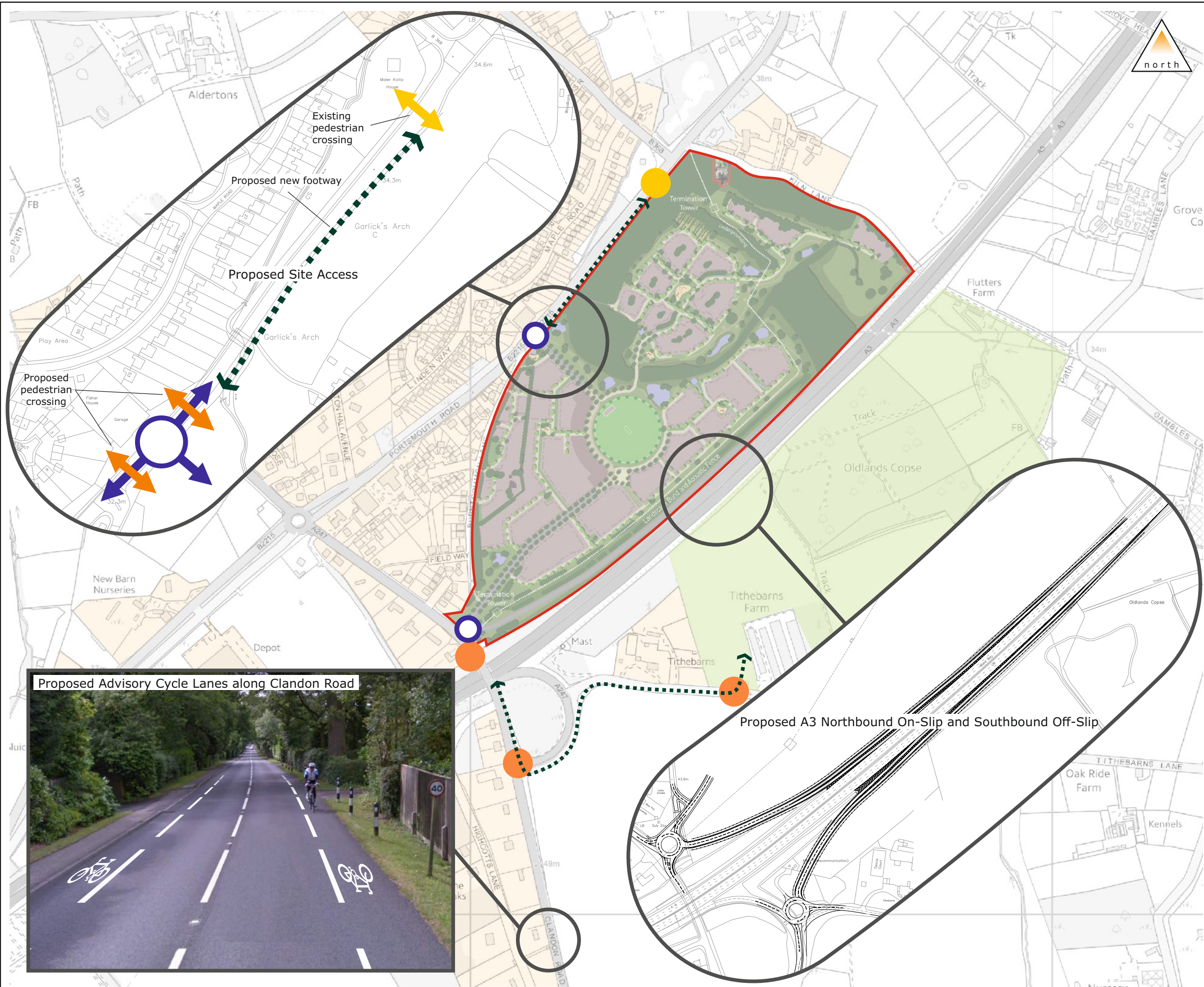
Notes: Walking / cycling journey times are taken from the centre of the site, accessing the network via the position of the site accesses, as shown. Bus journey times are based from the nearest bus stop to the site. Rail journey times are based from Clandon Railway Station. Journey times do not include waiting time between interchanging of modes. Commuter trip percentages are based on 2011 Census travel to work data for MOSA - Guildford 001.



Project: Land at Garlick's Arch, Burnt Common	
Title: Proposed Access and Movement Framework	
Figure: Figure 1	Revision: -



## **A2. PROPOSED HIGHWAY IMPROVEMENTS**



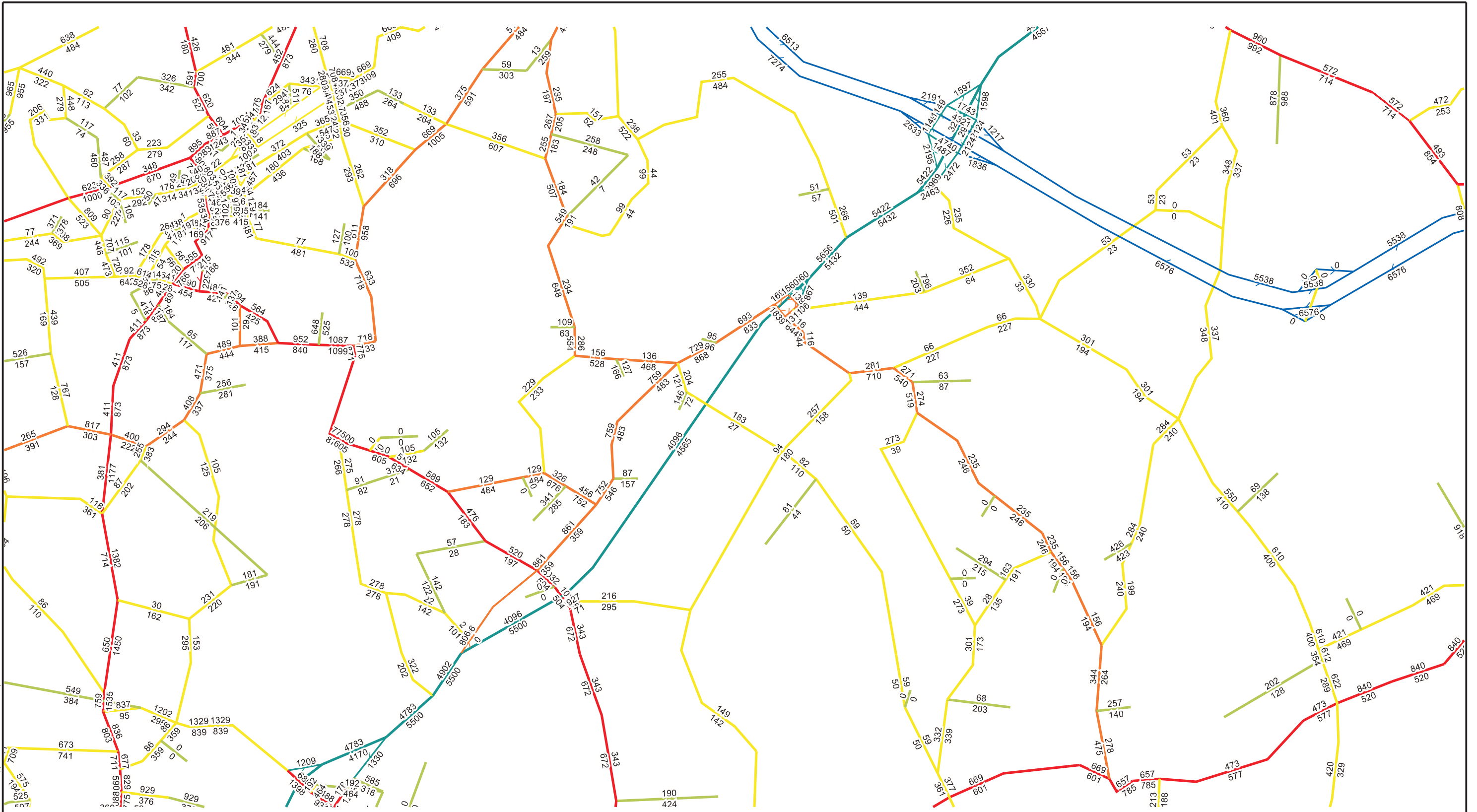
- Legend**
- Site Location
  - Proposed SANG
  - Proposed Site Access
  - Proposed Footway
  - Proposed New / Improved Pedestrian Crossing
  - Existing Pedestrian Crossing



Project: <b>Land at Garlick's Arch, Burnt Common</b>	
Title: <b>Proposed Highway Improvements</b>	
Figure: <b>Figure 2</b>	Revision: -

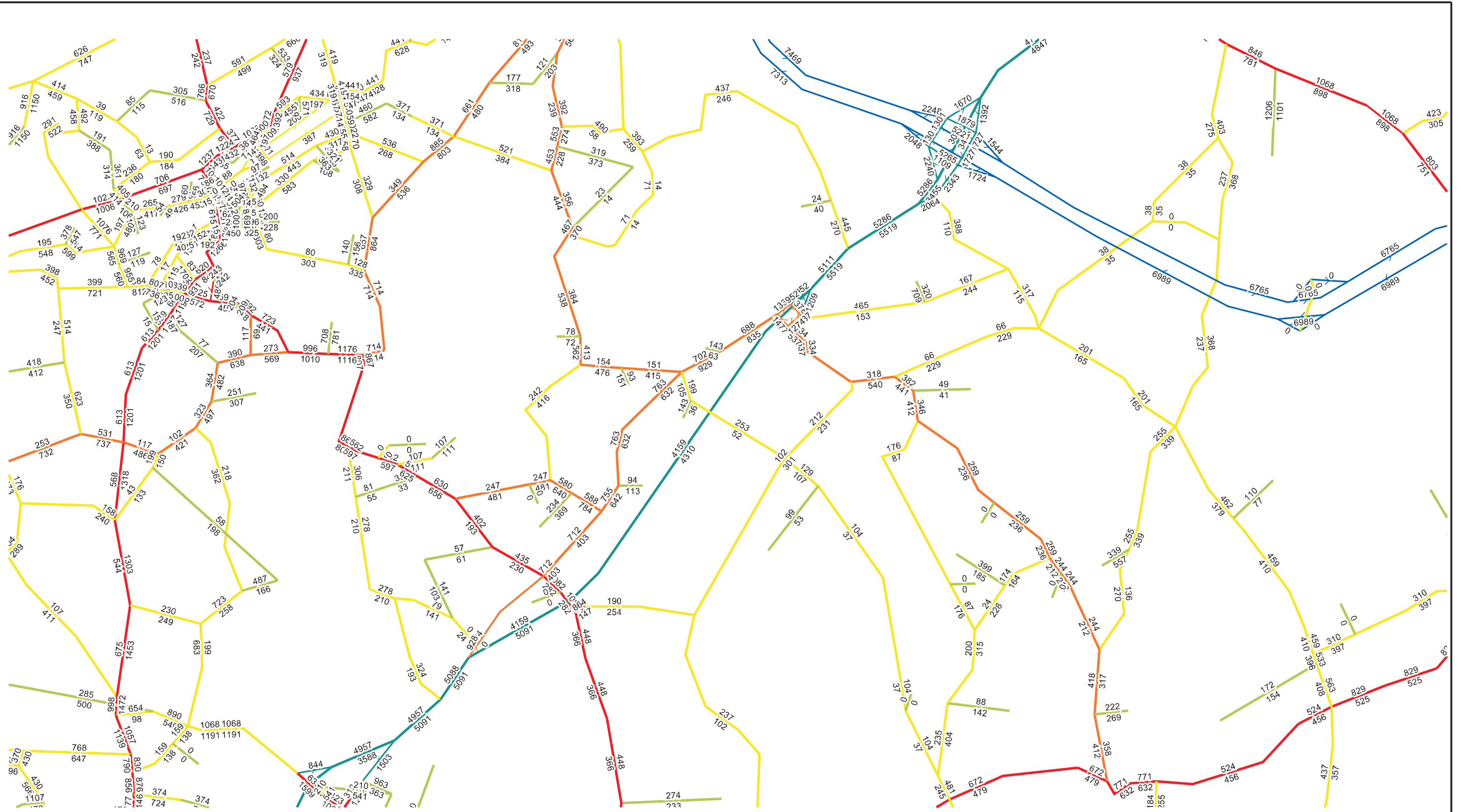
### **A3. BASELINE TRAFFIC FLOWS FOR 2031**





TITLE:  
Actual Flow Scenario B  
AM Peak

FIGURE No:  
5



TITLE:  
Actual Flow Scenario B  
PM Peak

FIGURE No:  
6

#### **A4. DISTRIBUTION OF TRAFFIC ASSOCIATED WITH GARLICK'S ARCH SITE**

## Land at Garlick's Arch - Residential Impact

Traffic Distribution (*Based on 2011 Census Data*)

Place of work	Place of Residence Guildford 001		Route
The North	10	0.5%	Portsmouth Road East, Ockham Interchange
Hertfordshire	13	0.6%	Portsmouth Road East, Ockham Interchange
Norwich	2	0.1%	Portsmouth Road East, Ockham Interchange
Greater London	329	15.5%	Portsmouth Road East, Ockham Interchange
Berkshire	51	2.4%	Portsmouth Road East, Ockham Interchange
Buckinghamshire	9	0.4%	Portsmouth Road East, Ockham Interchange
Brighton and Hove	4	0.2%	Portsmouth Road East, Ockham Interchange
Hampshire	98	4.6%	Portsmouth Road West, A3 West
Kent	8	0.4%	Portsmouth Road East, Ockham Interchange
Oxfordshire	7	0.3%	Portsmouth Road East, Ockham Interchange
Elmbridge	190	8.9%	Portsmouth Road East, Ockham Interchange
Epsom and Ewell	19	0.9%	Portsmouth Road East, Ockham Interchange
Guildford 001	175	8.2%	50% A247 North and 50% A247 South
Guildford 002	14	0.7%	Portsmouth Road West, A3 West
Guildford 003	46	2.2%	A247 South
Guildford 005	26	1.2%	Portsmouth Road West, A3 West
Guildford 006	7	0.3%	Portsmouth Road West, A3 West
Guildford 007	33	1.6%	Portsmouth Road West, A3 West
Guildford 008	39	1.8%	Portsmouth Road West, A3 West
Guildford 009	4	0.2%	Portsmouth Road West, A3 West
Guildford 010	1	0.0%	Portsmouth Road West, A3 West
Guildford 011	31	1.5%	Portsmouth Road West, A3 West
Guildford 012	40	1.9%	Portsmouth Road West, A3 West
Guildford 013	126	5.9%	Portsmouth Road West, A3 West
Guildford 014	4	0.2%	Portsmouth Road West, A3 West
Guildford 015	59	2.8%	Portsmouth Road West, A3 West
Guildford 016	21	1.0%	Portsmouth Road West, A3 West
Guildford 017	25	1.2%	Portsmouth Road West, A3 West
Guildford 018	24	1.1%	Portsmouth Road West, A3 West
Mole Valley	76	3.6%	Portsmouth Road West, A247 South
Reigate and Banstead	24	1.1%	Portsmouth Road East, Ockham Interchange
Runnymede	83	3.9%	Portsmouth Road East, Ockham Interchange
Spelthorne	38	1.8%	Portsmouth Road East, Ockham Interchange
Surrey Heath	46	2.2%	Portsmouth Road West, A247 North
Tandridge	1	0.0%	Portsmouth Road East, Ockham Interchange
Waverley	96	4.5%	Portsmouth Road West, A3 West
Woking	308	14.5%	Portsmouth Road West, A247 North
West Sussex	36	1.7%	Portsmouth Road West, A3 West
West Country & Wales	5	0.2%	Portsmouth Road East, Ockham Interchange
<b>Total</b>	<b>2,128</b>	<b>100.0%</b>	

### Summary

Route	%
Portsmouth Road East, Ockham Interchange	37.3%
Portsmouth Road West, A3 West	32.1%
Portsmouth Road West, A247 South	9.8%
Portsmouth Road West, A247 North	20.7%
<b>Total</b>	<b>100%</b>