

# Strategic Development Framework - Supplementary Planning Document - Consultation response by Compton Parish Council

## Comments related specifically to Blackwell Farm

### Phasing

The deliverability of Blackwell Farm hinges on adequate provision of water and waste management, access to the site, and the widening of the A3. No dates have been given for the implementation of this infrastructure and there are question marks over availability of funding (for the A3 widening). It is understood that the water treatment centre at Pirbright is at full capacity, hence the existing site cannot take any more and new development can't therefore take place until the new centre north of Slyfield is built. Compton Parish Council (PC) believes that there should be no building whatsoever on Blackwell Farm before the infrastructure (road and water/sewerage) is in place **for the whole development**. If the A3 widening does not go ahead, Blackwell Farm would not be viable, and the 'exceptional circumstances' that were put forward in order to take the site out of green belt would disappear if the site only comprised 150 houses.

The updated five-year land supply figure published on GBC's website on 1/11/2019 was for 4,966 dwellings, of which 1,175 were windfall sites. Due to the high number of windfall sites and the likelihood of future windfall sites, such as the Debenhams site (200 homes) and the Council's estimated additional capacity at North Street (400 homes), there is no longer the need to build 150 homes at Blackwell Farm in the early years of the Local Plan to meet the Council's 5-year housing supply figure. The housing trajectory can therefore be amended so that there is no building at Blackwell Farm until the site as a whole becomes viable.

Likewise Compton PC would also recommend that the Surrey Research Park is not extended until the A3 is widened and the existing Research Park is built out and fully tenanted.

Paragraph 6.1.3 – Compton Parish Council supports the planned Guildford West railway station, which will provide some relief to the traffic problems around the hospital and Research Park. We also support the idea that any housing on Blackwell Farm should be located close to these employment and transport hubs. We would recommend that the first tranche of houses on the site are built close to this existing transport infrastructure, and that they are capable of being a stand-alone development as it could potentially take many years for the entire site to be built out.

In the event that future development on the site does not come forward due to economic factors or changes in government policy (eg the cancellation of the A3 widening), it would be inefficient and wasteful to have 150 houses spread across productive and, in places, high-grade farmland. This scenario would have a greater impact than necessary on the landscape and on the environment.

## Design

Paragraph 6.3.2 – Compton PC welcomes the fact that any housing on the Hog's Back would be designed for energy efficiency. However, we strongly object to the suggestion that the development should be inspired by the new modern, hi-tech research facilities at the Research Park. This site is on the foothills of the Hog's Back, which the SDF itself acknowledges to be a "highly attractive landscape setting" (page 123, paragraph 6.3). As a new Hog's Back settlement, Compton PC believes the style of buildings should be in keeping with that of other villages on the Hog's Back, such as Wanborough, Puttenham, and Compton. It should not simply become an area of suburban sprawl, which adopts the 1950s architecture of Onslow Village (as shown on page 127 of the SDF) or the 1980s architecture of Park Barn, and it should certainly not be "inspired by" the low-density and low-quality buildings on the Research Park.

The new development is also very visible from the Hog's Back ridge (the AONB) and from the north (para 6.3.1), and buildings should, as the SDF states, "nestle" into the landscape as much as possible. The white and glazed facades of the Research Park are highly reflective, and buildings using the same type of materials would not be capable of blending into the landscape. In viewing Guildford from The Mount (a popular viewing platform), there is a notable change as the eye moves from the red-brick buildings and grey-tiled rooftops of Guildford's town centre, which are relatively unobtrusive, to the largely white, higher-rise buildings of the University estate, which do not blend into the landscape at all. Compton PC believes that views out of and into the AONB, should be protected as much as possible.

Page 47 – 50. It is difficult to see how effective screening can be achieved from the Hog's Back and other vantage points/public rights of way at Blackwell Farm if buildings along the main thoroughfare are 4-5 storeys high.

Page 136, Para 6.1.10 – The densities referenced are compared to suburban densities, yet the plan makes the point that these are urban extensions and that GBC's preference was to avoid development in the suburbs? Blackwell Farm was formerly farmland in the green belt and it has no housing adjoining it, it was never an urban extension, but as it was approved on that basis, then densities should be applicable to urban space, NOT to suburban, otherwise this is irresponsible use of former green belt and countryside.

Figure 38. Compton PC welcomes the relocation of the playing fields from south-east of the site (where there would be greater impact on the AONB and AGLV) to an area to the north-east. The proposed new location north of Wildfield Copse provides more screening from the Hog's Back, but this area remains in the green belt and therefore ancillary sports buildings, all-weather pitches and flood-lighting would be inappropriate.

Compton PC believes that with higher density development (as discussed above), it would be possible to provide sports pitches within the site allocation itself.

## Environment

Figure 38. Compton PC does not believe that ancient woodland should be designated as Suitable Alternative Green Space (SANG). The additional recreational use that would result if the woodland became a SANG would exert direct pressures on this sensitive woodland,

which is home to rare plant species, such as wild daffodils and wild orchids. Designating ancient woodland as SANG is incongruent with the NPPF's policies on protecting and enhancing the natural environment, and is also at odds with Natural England's own guidance on selecting SANGS, which states that: *"The identification of SANGS should seek to avoid sites of high nature conservation value, which are likely to be damaged by increased visitor numbers."* [Natural England Guidelines for the creation of SANGS Introduction, 12-06-08.]

Compton Parish Council notes that the University has significant landholdings adjacent to Blackwell Farm to the west of the site, which could be designated as SANG. Therefore, there is no need to encourage footfall in a sensitive ecological area, such as ancient woodland. Designated SANG to the west of the site would also help to protect the Hog's Back from further development encroaching to the west.

Access should be allowed to the ancient woodland, but this should be carefully managed to support the wildlife (for example, dogs should be kept on leads). The University did state that it would provide an information centre and trails through this woodland when Manor Park was taken out of green belt 15 years ago, although these did not materialize. The recent PINS case of refusal in Elstead, which dealt with the use of common land exchange on land that was already designated a SANG on the grounds of double dipping, suggests that all existing public recreation land being used for SANGS is unlawful.

Figure 38 shows a 15m buffer zone to protect the ancient woodland. Compton PC would like to see this buffer increased to 50m and circumnavigating the whole of the woodland (not just its western edge). Government guidance points out that nearby development can have a direct and indirect impact on ancient woodland, including:

1. reducing the amount of semi-natural habitats next to ancient woodland
2. increasing the amount of pollution, including dust
3. increasing disturbance to wildlife from additional traffic and visitors
4. increasing light or air pollution.

Compton is concerned that the woodland would be threatened by all of the above if the buffer is not increased and extended. Whilst a 15m buffer remains the minimum buffer for ancient woodland recommended by Natural England and the Forestry Commission, this guidance is under review and it would be advisable to allow for a wider buffer in the event that the guidance is amended. Guildford's previous Local Plan specified a 50m buffer to the eastern edge of this woodland and this is in line with The Woodland Trust guidance, which was specifically designed for local planning authorities to use in the preparation of local plans and other planning documents.

It should be noted that GBC has already allowed encroachment on the eastern edge of the ancient woodland (adjacent to Manor Park) with the construction of the new vet school buildings, despite assurances that this wouldn't happen. Compton PC recommends that the Woodland Trust's guidance is followed and respected by the planning authority and by the developer/ landowner and that the GBC shouldn't pander to economic pressures.

Page 56 – Trees as well as hedges should be protected and their presence should ideally be part of the overall ‘garden feel’ of the estate. The estate will look more established if trees are retained as new trees take a long time to grow.

It should be noted that manicured lawns and manicured hedges do not support wildlife to the same extent as mixed, established hedgerows, and these should not be ripped up as has happened on Manor Park.

## **Infrastructure**

Figure 36 (p125) highlights the area of noise pollution from the railway line. However the noise from the A31 is a greater problem and Compton PC would recommend that acoustic screens are introduced at the southern end of the site along the length of A31 and the main access road, and that low-noise tarmac is used on this stretch of the Hog’s Back. The fact that the access road follows a steep gradient means that noise pollution is likely to be a problem for residents in the vicinity and therefore measures should also be put in place to limit the impact of this new road.

Figure 42 refers to “Controlled access to Surrey Research Park and the wider road network”, and Para 6.6.5 states that the “Means of controlling vehicular access through the site will be agreed prior to the commencement of development.”

Compton Parish Council would like to understand who will be entitled to use the new road, whether the road will be adopted by SCC, and how and by whom it is proposed that its usage will be controlled. Figure 40 (“movement framework”) shows the site connecting with the existing highway network at just two points. We question the practicability of controlling the access through one of these points to a 1,800-home estate, with two schools, a community centre (with supermarket) and an extended business park.

Compton PC is concerned that the access route linking the A31 to wider Guildford will almost certainly be used as a shortcut. A thorough traffic study, taking into account the changes and their potential impact, therefore needs to take place. This study needs to be made available to the public (to avoid unnecessary public expense in Compton PC having to undertake duplicate studies).

Contrary to claims by the University that through traffic would be prevented from rat-running by the use of ANPR systems or ticketed barriers, these suggestions now have been replaced with ‘street design’ restrictions and ‘monitor and manage’. It appears that access and its management has not been thought through. Details concerning the access and its management must be comprehensive, workable and proven. It is disingenuous to postpone agreement of this vital part of the equation until just before commencement of development. An enormous amount of time, money and energy has gone into the development site already and the postponement of this important aspect creates concerns that ‘something will happen to tick the box’ whether workable or not. It seems that there are no acceptable solutions to date or they would be included in this document, and this is of major concern.

Compton PC would also like reassurance that the access to the Hospital will not be further impeded at peak hours, and would recommend that GBC commission detailed traffic

modelling to determine the level of traffic that can be accommodated along Gill Avenue with all mitigation measures in place. This modelling was requested by the Inspector during the EIP. The Mott MacDonald report 'Study of Performance of A3 Trunk Road Interchanges in Guildford Urban Area to 2024 Under Development Scenarios', April 2018 (paragraph 5.3.4), shows a 94.5% saturation of the queuing space between the Tesco roundabout and the Egerton crossroads when just 150 homes are built. Over 85% saturation means that overcapacity and junction failure is a real risk.

The SDF focuses on the site and movement to and from it, presuming that everyone will go to the local school, use the local surgery, shops etc. People are free to choose and this works both ways, ie people living outside the Blackwell Farm estate may wish to use the facilities there. There is no allowance for reality or freedom of movement in this strategy. There is also no allowance or information relating to the impact this estate and its facilities (including the railway station) will have on the wider community. A detailed traffic study, taking into account the changes and their potential impact, needs to take place. For example, it has been acknowledged that both a widened A3 and the new Blackwell Farm access road linking Gill Avenue with the A31 are likely to pull more traffic through B3000 where an AQMA exists at Compton, and where to date no effective mitigating steps have been proposed.

## **Landscape**

Figure 36 (p125) highlights "sensitivity to key views" to the north. Compton PC would like to see views to the east from the main access road also protected, as this road will become the only place in the borough where the cathedral can be seen rising from a rural setting.

Paragraph 6.4.4 – Compton PC welcomes the plan to introduce new areas of woodland running east-west to break up the roof-scape and to provide additional screening of the development from the AONB to the south and from the north. We would recommend that these 'green corridors' follow the existing medieval hedgerows and that the existing field patterns are retained as much as possible in planning groups of housing. GBC might also consider naming streets after the historical field names to maintain a link with the history of the area. Compton PC would also welcome a further line of screening between the Blackwell Farm development and the community at Down Place.

Existing properties have not been factored in, other than a cursory note to provide a buffer between them and new buildings (page 69). They should be included on all maps with the buffer.

There is mention of existing properties being put to new uses, but it is not specified what the new uses would be. Blackwell Farm itself is a rare example of a model farm, and its historic importance should be recognised and preserved. Likewise, other historic features such as the medieval deer leap, and 18<sup>th</sup> century parkland should be labelled and preserved.

Paragraph 6.4.7 refers to the existing network of Public Rights of Way. There is also an existing network of permissive rights of way across the site which residents enjoy, and Compton PC would like these to be retained also.

## General comments

Compton PC welcomes GBC's design aspirations to incorporate greenery into street scenes and overall design.

The street hierarchy should apply as a matter of principle throughout Guildford and not just for the new housing estates. Throughout Guildford, management of existing green verges/ areas has been a problem due to lack of funding. This has on several occasions resulted in power cuts as trees and power lines do not fare well in windy weather. Will all power lines be subterranean?

Who will make up the 'design panel' and what are their qualifications and experience?

Page 4 – The introduction refers to 9,000 houses? Has the OAN been reduced?

It is disingenuous to state that the plan avoids suburban development in favour of urban development whilst developing open fields in and outside the suburbs. If this statement is to remain, an explanation as to its meaning would be needed.

To conform with the Council's plans to reduce the impact of climate change, new housing must be eco-friendly in design.

Page 6 – It is difficult to see how the development of four enormous housing estates on the green belt is better for the landscape and environment than small unplanned development.

Page 7 – The SPD refers to the importance of a spatial framework plan, but it is impossible to see how people and the movement of people can be understood and properly considered without a joined-up assessment of the collective impact of all the key sites on the borough's infrastructure and on roads in particular.

Page 9 – Development at Ash and Tongham referred to on pages 6 and 7 is missing from the overall plan and so is the Town Master Plan. It is unclear how supporting infrastructure will be implemented? There is reference to planning infrastructure under the title of 'supporting information', but no reference to implementation or to the need to implement ahead of development (as has been promised throughout the process).

Page 11 – Supporting documents should include all professionally commissioned surveys. Compton PC commissioned landscape and traffic surveys, neither of which were included as evidence and excluding them will result in a plan that lacks balance, increasing the risk of unwanted consequences.

Page 12 – It is not clear from this table which policies or indeed whether any policies will protect existing communities against adverse impact from new development.

Page 14 – CPRE should be included as a helpful resource for good design especially in street scene and the importance of planning green areas.

Page 21 – The graphic is at odds with the statement that design should not be subject to clutter. The style of solar panels depicted do not blend in with the tiles and as solar options exist that do blend with tiles we consider that this would look less cluttered and provide a cleaner street scene.

Page 24 – Design principles should include enough flexibility to cater for an ageing population as well as new technology and provision for disabled people.

Para 3.1.18 – How will water usage be monitored/adhered to? The level cited is above the average use per person.

Page 35 – Compton PC hopes that the housing designs planned can do better than the examples used to achieve densities of 30 and 40dpa?

Page 37 – Ideally garage space should be sufficient for two bicycles and designed for bicycles to be stored on walls rather than taking up floor space. A survey into how essential a garage is as a garage (rather than an external storage facility) might be useful as many residents convert garages into offices/ extensions and then park on the street.

Inclusion of electrical charging points is to be applauded.

3.3.3 – We support the aspiration to provide an example of development that is truly sustainable and that does not encourage car journeys, but this does not work if by doing so, it is at the detriment of surrounding areas. The aspiration must therefore be to establish a new benchmark for new residents in the new developments whilst at the same time taking care to not make matters worse for existing residents throughout the region.

Page 43 – A new Park & Ride is necessary to deal with traffic from the east that will use the new railway station at Gosden. Sufficient parking will be needed at Park Barn new station or residential roads will undoubtedly be used by commuters from the west/south. Areas south of Guildford have no sustainable means of accessing the town or new amenities.

Page 47-50 – Street Hierarchy and Design is well thought out, but fails to include or consider subterranean parking options rather than ground-level garages.

Page 50 – Compton PC welcomes all workable initiatives to reduce car use. In practice, it would be useful to know how well the car clubs work elsewhere as their success would be dependent on workers finishing and starting work at the same time and why they would be needed if trains and buses will make regular trips to the hospital, Research Park and town.

What is planned for those benefiting from growth of jobs at the Research Park, hospital and town, but who choose to live in the surrounding villages? There is an overriding assumption that 'new residents' will live in the new houses and this will most certainly not always be the case. The strategy must consider the wider impact that the new jobs and general growth will have outside the strategic sites.

Page 52 3.4.1 – The phrase *“the strategic sites should be well-informed by, but not driven by, site constraints and characteristics”* does not make it clear how existing constraints and characteristics will be incorporated. *“Well informed by”* suggests that a nod may be given to existing matters of importance, but that may be all. The Blackwell Farm site has AONB and AGLV designations and this should form a necessary constraint.

Page 56 3.5.6 – Compton PC recommends that GBC seeks the guidance of an independent Arboricultural Impact Assessment company to determine how hedges should be graded before GBC produces its assessment.

Page 66 – Designers should seek to work with local galleries and artists when producing ‘street art/sculptures’.