I represent that the Draft Local Plan fails to satisfy the question under matter 3, 3.1 d).

The infrastructure constraints and needs have not been adequately assessed. The Highways infrastructure assessment regarding the Major constraint of capacity on the A320 (‘A320 Corridor Study), has not addressed or provided mitigations for the significant congestion currently occurring, and to significantly increase, on the feeder roads leading into/from the A320.

The lack of identified feasible mitigation in relation to the Site allocation at Brox Road East and its traffic generation onto the existing heavily congested Brox Road, eliminates the ability for this site to be delivered to meet the LA’s housing targets. There are no feasible mitigations identifiable.

There are no feasible mitigations identified to resolve the present and future planned over capacity traffic volumes, along Chobham, Foxhills and Murray Roads, feeding into the Ottershaw roundabout. The Runnymede ‘Topic Paper’ dated July 2018 acknowledges that ‘a number of the allocations around the A320 are contingent on the delivery of the necessary infrastructure improvements.’ …… ‘development phased to ensure mitigation occurs prior to or alongside development proposals’.

As no feasible or suitable mitigations have been identified or even recognized as being needed for a number of key over capacity points, which are critical to the delivery of the Plan housing numbers, then the plan must be considered as being ‘unsound’, or at the least referred back to the Authority until such feasible mitigations have been identified and consulted upon.
This arises from a lack of Strategic approach to the assembly of the evidence base in a considered and timely manner to inform the allocations and influence proper decision making and consultation.

(The County Highway Authority, as **the responsible body**, have only been engaged to consider the A320 issues and design mitigations since early 2018. Their declared timescale for conclusion, after public consultation, is Spring 2019)

There is no evidence to substantiate the strategic infrastructure will be properly assessed and delivered in a timely manner to enable the phased housing delivery targets to be met.

The plan has:

a) Not been positively prepared in that the infrastructure requirements have not been objectively assessed

b) It is not justified in that proportionate evidence regarding the highways infrastructure has not included all reasonable alternatives

c) The Plan is not considered to be effective as suitable mitigations have not been identified, evaluated and consulted upon, with regard to the highways, and other infrastructure limitations and constraints.