HEARING STATEMENT

On Behalf of Ashill (Respondent ID 1481)

Matter 3

November 2018
1.0 Introduction

1.1 CBRE is appointed to act for Ashill on behalf of their land interests at Christmas Tree Farm (SLAA 284) and Stroude Farm (SLAA 13). Within the submission Local Plan both have the status of omission sites.

1.2 As discussed in more detail within the four Matter Statements, both sites are strategically located and offer a solution to the identified issues of soundness with the submitted plan.

1.3 For reference the two sites are identified in Appendix A.

1.4 Ashill have previously made representations during the Additional Sites and Options Consultation and Pre-Submission Consultation (February and May 2018). The representation references for this submission is 1481.

Overview of Soundness Issues

1.5 Whilst we agree with the overall spatial strategy insofar as it seeks to direct the greatest amounts of development to larger settlements in the hierarchy, the approach in Runnymede is undertaken too crudely to the extent that the submitted approach is unjustified (and unsound) as:

- Through the spatial strategy, fails to appropriately consider opportunities to direct development to areas of lower flood risk (i.e. Ottershaw and Virginia Water).

- Promotes Green Belt release that does not promote sustainable patterns of development as, in many instances, Green Belt releases are located as extensions to existing settlements rather than considering the release of Green Belt in locations where opportunities to promote sustainable development can be maximised.

- Contrary to the requirements of Paragraph 19 of the NPPF (2012), the plan does not appropriately plan for economic needs, with suppressed OAN figures against economic demand (including the impact of a third runway at Heathrow).
2.0 Matter 3 – Overall Spatial Strategy

QUESTION 3.1A & B

Is the broad apportionment of housing, economic and other development to the various centres and locations throughout the Borough consistent with the Plan’s spatial vision and objectives?

Is it based on robust evidence, consistent with national planning policy, and is it deliverable?

Response

2.1 Paragraph 5.6 of the Plan states that ‘Runnymede will be resilient to, and mitigate climate change impacts especially by reducing and minimising the risks from flooding, reducing greenhouse gas emissions and improving water quality and efficiency.’ For the reasons set out in response to Matter 1, it is unclear how flood risk has been considered in the broad apportionment of housing as part of the overall spatial strategy.

2.2 As further stated at Paragraph 5.6 of the Plan a key vision for the Plan is through ‘supporting infrastructure schemes and improvements which promote the use of active and sustainable modes of transport which help reduce congestion will have been a focus to unlock growth across the Borough and reduce pollution.’

2.3 The dominance in the spatial strategy (as per Policy SP2) of the role played by larger settlements is unjustified and not consistent with the NPPF as it relates to Paragraph 30 which states:

‘Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.’

2.4 The inconsistency in the approach taken when considered against Paragraph 30 of the NPPF is highlighted when considered against the characteristics of Virginia Water.

2.5 The train station as Virginia Water is strategically located on the local train network (particularly when compared with Chertsey and Addlestone) as it provides both local connections and wider connection to major employment areas along the M4 corridor including Reading. Sites in close proximity to Virginia Water (such as Stroude Farm) should be better reflected in the apportionment of housing in Runnymede if the vision to reduce congestion and deliver more sustainable modes of transport is to be achieved.

2.6 At present Virginia Water site allocations over the plan period account for less than the housing target for one year.

2.7 As highlighted in response to Matter 1, shortcomings in the assessment of alternatives in the SA has resulted in a spatial strategy which is not based upon robust evidence.

QUESTION 3C

Does it take proper account of potential impacts on the natural environment, landscape, flood risk, air quality and other matters and provide for mitigation where necessary?

Response

For the reasons set out in response to Matter 1, it is unclear how flood risk has been considered in the broad apportionment of housing as part of the overall spatial strategy.
2.0 Matter 3 – Overall Spatial Strategy

2.8 Paragraph 004 of Planning Practice Guidance ‘Taking Flood Risk into Account in the Preparation of Local Plans’ states that through the SA process local authorities should consider the potential for options that direct development to areas with a low probability of flooding.

2.9 Paragraph 100 of the NPPF states ‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.’

2.10 Within options SS1 – SS7 the baseline assumption across all is to ‘deliver development within the Borough’s existing urban areas and on previously developed sites in the Green Belt.’ Within Runnymede, all of the major urban areas are located within either flood zone 2 or 3 and, as such, no options are considered in the SA that seek to direct development away from areas of greatest flood risk. Page 28 of SD_018M further confirms that, with respect to flooding, no alternative scenarios have been considered that direct development to lower areas of flood risk with the alternatives being predicated on different approaches to mitigation rather than seeking to consider an alternative approach to the spatial distribution of development.

2.11 Whilst there is a balance to be struck in presenting reasonable alternatives, considering development options in areas of lower flood risk (such as Virginia Water and Ottershaw) represents a reasonable alternative, consistent with the requirements for planning for flood risk which is not considered in the sustainability appraisal. As a consequence, the Plan is not justified.

QUESTION 3D

Have the strategic infrastructure constraints and needs been adequately assessed and is there reasonable confidence that they will be addressed in a timely manner?

Response

2.12 RBC identify in SD_021B ‘it [referring to the A320] is the only piece of critical highways infrastructure which has been identified as being necessary to support the growth which is proposed to be delivered through the Runnymede Local Plan.’ Of the housing allocations identified in Policy SD3 six are dependent on the delivery of mitigation associated with the A320. The six allocations total 1,035 homes. Longcross Garden Village (1,700 Homes) is also identified as resulting in improvements to the A320 being required.

2.13 In responding to whether the constraints and needs associated with the A320 have been adequately assessed, iTTransport have produced a note (see Regulation 19 Response – ID 1481) which presents serious flaws against how the assessment has been undertaken. We note that Highways England have also not withdrawn their pre-submission response that the plan is currently unsound.

2.14 At the present time there is no confidence that the required mitigation can be delivered within the timeframes required to deliver the necessary homes in the early to middle part of the plan.

2.15 As set out in SD_021B the mitigation proposals are reliant upon funding mechanisms which have yet to be confirmed. A significant reliance is placed upon planning obligations to fund the necessary improvement works. Such an approach is likely to risk the appropriate level of affordable housing being brought forward across these allocations due to viability pressures to meet transport costs.

2.16 Along the stretch of the A320 the Guildford Road (Chertsey) and Guildford Road (Ottershaw) are noted as being key hotspots. This area covers Junction 10 of the A320 which is a critical junction for improvement in facilitating the necessary improvements. Improvements to
2.0 Matter 3 – Overall Spatial Strategy

Junction 10 are identified as key in the delivery of Longcross Garden Village (1700 Units), Ottershaw East (202 Units) and Vet Labs Site (152 Units).

2.17 As extracted from SD_021B, in addition to uncertainties over funding there are also time and land acquisition uncertainties that may jeopardise the delivery of the required mitigation at this junction.

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<tr>
<th>Junction 10 (A229 Guildford Rd/Ottershaw Rd)</th>
<th>Time</th>
<th>Cost</th>
<th>Land Acq</th>
<th>Political</th>
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| If the current feasibility design for the junction is progressed, it could include the purchase of a large area of 3rd party land. This increase the risk of the programme for delivery slipping by also increasing the overall cost of the mitigation solution. To mitigate this risk, the detailed design of the junction is to be reassessed with the aim of minimising or eliminating the need for 3rd party land purchase to reduce complexity, costs and risk to delivery timelines.

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<tr>
<th>Junction 11 (A229 Guildford Road/Box Road)</th>
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| Risk to scheme delivery considered to be low given the limited scale, complexity and cost (£3.3 million) of this intervention.

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<tr>
<th>Junction 1 (Chilshay Green Road/ St Ann’s Road/B369 Thorpe Road/Staines Road)</th>
<th>Time</th>
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| Risk to scheme delivery considered to be low given the limited scale (£3.3 million) and complexity of this intervention.

2.18 The table included in SD_021B provides a crude assessment of the constraints on the Junction 10 improvements and fails to account for the impacts that the proposed project (relative to other proposed mitigation of this junction) would have on the function and viability of Ottershaw Local Centre.

2.19 The final A320 study includes a revised mitigation scheme (Option 3) for the Ottershaw roundabout. Option 3 is expected to cost £6.8 million, will require significant third party land to the east, and will have a potentially substantial impact on large areas of green space and an existing public car park.

2.20 The potential for delays associated with Option 3 and its requirement for additional CPO processes is a significant consideration that sits at the heart of the soundness of the plan. Whilst important for housing delivery, the A320 route also represents a strategically important route for economic growth (as identified by Enterprise M3) with delays having potential disruptive effects to investor confidence along the route.

2.21 The existing car park provides is an important component in the health and vitality of Ottershaw District Centre. This is depicted in the emerging Proposals Map for Ottershaw with the car park being included as part of the District Centre designation:

2.22 The disruption and time taken to resolve an alternative location for the car park could affect the vitality of the local centre and will also result in delays to the delivery of the wider scheme.
2.0 Matter 3 – Overall Spatial Strategy

An alternative improvement scheme is proposed by Ashill alongside residential development to assist in funding the works which offers comparable capacity benefits to the Option 3 improvement scheme and is considered superior from a cost, timescale, and townscape perspective. The alternative scheme is estimated to cost between £1.75 - £3million and will retain the village car park and is included in the Regulation 19 representations.

2.23 As proposed the approach to the A320 study is not consistent with Paragraph 177 of the NPPF which states ‘It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.’ The requirement for a ‘reasonable prospect’ in the NPPF needs to be considered against the fact that for the Plan this is critical infrastructure that is needed through the early to middle part of the plan to deliver growth in a sustainable manner.

2.24 The recent decision by Woking Borough Council to not include Martyrs Lane as a site in its forthcoming plan is significant and places additional pressure on the required funding to deliver the infrastructure. As set out on Page 24 of SD_021B Martyrs Lane was anticipated to provide £11,853,800 of funding to the project – representing almost 25% of the identified budget. The removal of this site from the plan results in a significant shortfall to the identified funding sources.

Consideration of the Christmas Tree Farm Site in Delivering A320 Mitigation
3.0 Main Modifications Required to Matter 3

3.1 In order to address the soundness issues identified in response to Matter 3 the following amendments are required to the plan:

1. The SA needs to be reviewed to assess growth options that include a higher proportion of development in middle tier settlements in the hierarchy, including Virginia Water and Ottershaw. Once this has been assessed this should result in Main Modifications to the distribution of development that is currently set out in Policy SD2.

2. The SA needs to reflect the potential alternative mitigation approaches suggested in the A320 study. At present the SA assessment of alternative sites (i.e. Christmas Tree Farm) fails to consider the potential role that such sites can play in delivering the required mitigation to the A320. The role that Christmas Tree Farm can play in delivering the required mitigation whilst enhancing Ottershaw Local Centre needs to be properly considered through the SA.

3. Additional sites need to be considered that are not dependent upon mitigation works to the A320 to provide an alternative source of housing delivering. Virginia Water would meet this requirement. In considering sites at Virginia Water preference should be given for sites that can assist in meeting requirements to promote sustainable patterns of development.
3.0 Main Modifications Required to Matter 3

Appendix A