Matter 3: Overall Spatial Strategy (Policy SD2, Paragraphs 5.8-5.13, 5.19-5.21, 5.28-5.36) [Note: This deals with the soundness of the overall spatial strategy apart from the justification for review of the Green Belt which will be considered under Matter 4. The remaining SD and other policies, including the site-specific implications of policies and proposals in the Plan, will be considered in the Stage 2 hearings] 3.1 Is the Plan’s overall framework for the roles that will be played by various parts of the Borough in meeting development needs and protecting and, where possible, enhancing the environment sound? In particular:

a) 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?

No. The Plan appears to have no properly or adequately constructed spatial vision and objectives

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

No for the following reasons admitted by the Council. In the latest version of the draft Local Plan dated December 2017 and Infrastructure delivery Plan (IDP) the Council makes the following responses and admissions (references are to the local plan except where stated):

**Air quality**

Appendix B p2. The Council has a responsibility to review and assess the current and likely future air quality in the Runnymede area on a yearly basis. Air quality is assessed against objectives for various pollutants which are set out in the National Air Quality Strategy and are known to impact negatively on human health and the environment.

P.62. Estimates of the percentage of mortality attributable to long term exposure to particulate air pollution in Runnymede is 4.9%. This is higher than England and the South East averages (both 4.7%) (Public Health England, 2017).

**Comment**

Clearly no air quality readings have been taken in the Virginia Water area and no impact assessment has been undertaken with regard to the future effect on air quality of modelled congestion as a result of the Local Plan. This is highly regrettable especially in light of the Council’s acknowledgement that existing air quality is worse than the average in Surrey and the South East and the presence on these routes of schools, pedestrians and housing. The Council appears to ignore air quality issues (the last annual assessment was in 2014) and assumes it may take mitigation measures at some time in the future ex post facto. This is not what Government policy calls for.

**Traffic congestion and safety**

Appendix B p1. The Council commissioned further Strategic Highway Modelling Assessment work (known as the SHAR). This work has now been produced and shared with Duty to Cooperate partners including Highways England.

p.22 There is increased car dependence causing increased congestion and air pollution.

p.15 IDP Runnymede is characterised by a higher level of car based commuting trips than both Surrey or England

p.15 IDP However there are several challenges to be overcome by additional infrastructure and policy provision. Key strategic road corridors are often congested, resulting in increased pressure on the
surrounding network. The speed and volume of traffic on the road network in key town centres like Egham, Chertsey or Addlestone affects cyclists and pedestrians, notably in terms of safety.

p. 25 IDP Congestion is evident across the Borough, in particular sections of the M3 to the west of the M25 which runs through Longcross, at rural junctions in the Longcross and Virginia Water Area and at Junction 11 of the M25

Comment
There is no reference to any of the concerns made in representations by many people, concerning the vastly increased traffic or safety issues on Christ Church Road (B road), Callow Hill (undesignated road), Wellington Avenue (undesignated road), Stroude Road (undesignated road) or Sandhills Lane (B road) or other undesignated village roads. These roads do not form part of the Strategic Highway modelling since they are not considered strategic. Nevertheless, together they represent the main traffic flow through Virginia Water despite the fact they were not designed for such volumes of traffic and cannot physically be upgraded to a strategic or arterial status. The Council seems to simply prefer to ignore them even though they are the heart of the village of Virginia Water.

There has apparently been no assessment of current traffic congestion or modelled future congestion and its impacts

No notice has been taken of the safety aspects of access and ingress from these roads to housing or from concealed bends, changes in elevation or dangerous (unsighted) junctions such as Harpesford Ave and Wentworth Drive.

Only a completely inadequate reference is made to mitigation regarding Virginia Water roads in the IDP at p. 185 viz “Signalisation on Trumps Green Road / Wellington Avenue / Virginia Water junction”

The greatest part of proposed mitigation in the IDP and the Local plan relate to increasing and linking the number of pedestrian and cycle routes, despite the admission at p.21 that there are high levels of dependence on the private car; and that there are high levels of traffic resulting in a large carbon footprint, which make it clear that congestion is a serious issue before development under the Local Plan even starts. The Council completely fails to address or recognise the admitted issues inherent in the Local Plan

Obviously, no account has been taken of the effects rat running through the Wentworth Estate between parts of the village or elsewhere in the Local Plan as the Estate roads are not part of the public network

Infrastructure

P.21 The infrastructure may not be able to accommodate the expected population growth in specific parts of the Borough.

Appendix B p.7 Runnymede has undertaken an Infrastructure Needs Assessment (INA) which considers the existing capacity of infrastructure in the Borough and how this will be affected by the future growth aspirations of the Local Plan. The INA finds that a number of infrastructure typologies such as highways, education and health services will need to be improved and/or expanded in order to accommodate growth, especially in some areas of the Borough where existing deficits have been identified.

p. 185 IDP Key gaps in rail infrastructure required to support growth anticipated within the Borough are as follows: 20 trains per hour and 12 car operation to provide sufficient capacity late 2020’s / early 2030s on the Windsor Line;

p.16 IDP To address current and projected capacity issues on the rail network, the following schemes have been identified: additional frequency of 3tph on the Reading to London Waterloo line (1tph via Richmond, 2tph via Hounslow)
p.23 IDP Increased development in the area will lead to increased stress on the rail network. Increased 10 car services will be facilitated by some stations including Longcross Station, however congestion is still likely.

p.27 IDP Available information on funding indicates that Runnymede’s infrastructure requirements are largely unfunded.

Comment

To have 20 trains per hour on the Windsor line (Waterloo-Reading seems completely impracticable given the current and planned situation and is not currently funded and is therefore merely aspirational.

There appears to be no modelling of the effect of development from Reading into Virginia Water or thereafter on train usage including the use by new residents of Longcross under the Local Plan.

In any event, there is no parking capacity whatsoever in Virginia Water for station use or shop use as a result of the sale of the Bourne Car park by the Council for retirement homes in less than transparent circumstances, which of itself makes reliance on extra train services, even were they to be realistic, a complete non-starter for Virginia Water.

c) 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?

No. See above at 3 b)

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

No. See above at 3 b)