Representations to Inspector Runnymede Local Plan 2030

Matter 1: Legal requirements, the Duty to Co-operate and the Plan period

- Is the Runnymede 2030 Local Plan (the Plan) compliant with the Planning and Compulsory Purchase Act (2004) (as amended) and the 2012 Regulations (as amended)? In particular, is the Plan compliant with the Local Development Scheme and the Statement of Community involvement?
  
  No comment

- Is the Habitats Regulation Assessment and the Sustainability Appraisal (SA) adequate? Does the SA demonstrate that the Plan has been tested against all reasonable alternatives?
  
  No comment except that the plan is unsustainable please see details set out in Annex 1

- Does the Plan as a whole accord with s19(1A) of the Act by including policies that are designed to secure that the development and use of the land in the Borough contribute to the mitigation of, and adaptation to, climate change?
  
  The Plan does not contribute to the mitigation of and adaptation to climate change with regard to air pollution or surplus rain water run off in fact likely the reverse

- Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan’s preparation, as required by the Duty to Cooperate?
  
  The Council has not engaged in any meaningful or conclusive way with several organisations including Surrey County Council and Highways England with regard to roads infrastructure development or funding thereof

1.5 Is the Plan period (2015-2030) justified? If not, how should this be rectified?

No comment
Annex 1

These objections are raised by both myself and my wife independently. We are strongly in favour of the building of new homes to reduce the gap in supply and demand particularly those, which have an affordable element.

However, we are very strongly opposed to any development, which threatens to overwhelm the already severely strained infrastructure capacity air pollution and green belt quality of Virginia Water. To our mind development should always be focused first on brown field sites, with easy and obvious access to major arterial routes, which can be easily adapted to increased traffic flows rather than fragmenting the Green Belt with the justification of leaving narrow strips of a couple of hundred meters separation in order to prevent allegations of urban sprawl. We are concerned that the exceptional circumstances required by statute to remove land from Green Belt are not met if the consequences of removal cause such an increase in congestion with concomitant strain on infrastructure and increases in air pollution as to vitiate the exceptional circumstances ex post facto by a substantial degradation in the amenity of the remaining Green Belt.

By infrastructure we refer to schools, dentists and GP practices and hospitals both of which we understand to be under extremely severe capacity pressures currently and roads and transport with the delays, air quality deterioration and heightened road safety issues, which increases in traffic, both construction related and ongoing from an increased local population, will inevitably bring.

Our representations focus on the following facts, which are freely observable to an interested party:

1. traffic may travel on a limited number of routes through Virginia Water frequently using the routes as "rat runs" to avoid substantial peak time congestion on the A30. There seems to be no data on how much traffic on these routes is "rat running" and how much has a legitimate destination in Virginia Water. Any traffic survey must identify that data in order to be meaningful. These routes include

across Virginia Water to/from Chertsey and Egham to the A30 and wider motorway network via the M25 – Sandhills Lane and Christchurch Road

from the South/North and to/from Chobham to the A30 and wider motorway network via the M25 – Trumps green Road and Stroude road

effect of Local Plan- substantial pinch points already exist in Trumps Green Road as it is very narrow and there are traffic flow obstructions at the railway bridge, the very narrow Bourne bridge and the traffic lights at Stroude Road (1 lane only with right turns in both directions obstructing through flow)- the effect of this is to push traffic onto the route below thereby exacerbating the situation

Wellington Avenue and Callow Hill

effect of Local Plan- Wellington Ave is already extensively used by "rat runners" as a result of the difficulties associated with the first route mentioned above and by "speed trial" motor cyclists at speeds in excess of 70mph; the route is lined with houses, slowing traffic by attempting to enter residents
drives and or exit them with increasing degrees of difficulty. These factors and an increasing number of cyclists and heavy rat running lorries mean that it is only a matter of time before there are a number of potentially severe accidents on the road. There has been a fatality on Wellington Ave within the recent past. There is a severe pinch point at the Christchurch road roundabout, which can regularly gridlock with traffic queuing back from the A30 traffic lights and from there into Wellington Ave and back down Christchurch road towards the station. This situation is exacerbated by school and church parking and increasing numbers of cyclists. Queuing traffic is a regular feature outside the school in Christchurch road. This restricts access to the roundabout leading to queuing traffic and increasing air pollution outside the school and in residential areas. In addition, Callow Hill is a dangerous narrow road with dips, bends, high pavement kerbs and multiple blind access points to establishments and private residences. It seems that it will only be a matter of time before there are one or more serious accidents especially since the route is used increasingly by cyclists. The presence of a single cyclist causes multiple car back up on this route due to the narrowness of the road and its multiple bends. Frustrated drivers are often to be observed executing very foolhardy overtaking. Travelling from the roundabout towards the station there is already a pinch point at peak times at the lights between Christchurch road and Stroude road as a result of ingress and egress to the substantial gated community on the corner, which can tail back past both the accesses to the shops all the while pumping out PM 2.5, and carbon monoxide.

2. current position - traffic may travel into Virginia Water to access the train station or shopping facilities or schools and services

effect of local plan - the parking facilities at the station and at the shops are at full capacity at most times—there is simply no possibility of parking at either of these venues for substantial numbers of extra vehicles. Existing parking facilities would require to be very substantially increased to facilitate the new Plan even if the Longcross development is served by its own station stop on a frequent basis with extensive parking facilities (but for those impacts see below please). There is simply nowhere to accommodate such a substantial increase in parking facilities for shops, services or train parking. The result must be that car journeys would have to continue further afield for access to the rail network or shops and services, thereby increasing use of the overcapacity road network and falling foul of criteria for sustainability. The physical impossibility of accommodating the potential amount of extra traffic generated by the Plan with parking facilities for shops, services or the train station would in itself seem to disqualify the Plan from proceeding on the grounds that since the rail network and local services would be de facto closed to these residents of the borough, it does not satisfy the sustainability test.

3. If there is a major event on the arterial and motorway network currently then complete gridlock very rapidly ensues on the A30 and all minor roads joining it including the above mentioned.

4. there is little scope if any for material improvements to the roads described above due to the fact that these at minor roads, which cannot be widened. It seems therefore that a matter of policy, traffic must be prevented from "rat running" but it is not at all obvious how that could be achieved given open access to these roads and the increasing congestion on the A30. The fact is that these roads were designed for local traffic and not for use as through routes, which is what they have become including large numbers of lorries associated with new builds and construction generally. They have no available capacity for the scale of traffic envisaged in the local plan and no sufficient mitigation (depending on how much traffic is established as "rat running") appears to be possible other than forcing traffic away from the rat runs perhaps by extensive and wholly effective calming measures on the roads in question,
which would so reduce the perceived advantage of the rat run that motorists would be actively dissuaded from using them. It would not however solve the issue of putting thousands of extra vehicles on village roads as the Council proposes.

It seems that from the point of view of road safety, air pollution from queuing traffic and overloaded roads, Wellington Ave, Christchurch road and Callow Hill are all at or approaching peak capacity. Wellington Ave and Callow Hill are very dangerous already due to non-adherence to speed limits, large numbers of lorries and increasing numbers of cyclists, speeding traffic and over density at peak times and seem to be **undesignated roads rather than even B roads.** Incidents of being nearly forced off the road by a lorry coming along Callow Hill on the wrong side of the road at a bend are legion. In fact, all of the above roads are candidates for traffic calming measures of some sort and speed cameras in any event in order to stop them being used increasingly, variously as "rat runs" to avoid the major road network, race tracks for motorbikes, exercise tracks for cyclists and very bad drivers in a hurry even without the proposed new development. The lack of off-road parking for school traffic adds to the problem and Christ Church visitors seem to spill onto the road for parking all too often. It is difficult to exit properties in Christchurch Road, Wellington Ave and Callow Hill at times already and very unnerving to do so only to meet an overtaking car coming down the road.

The existence of major attractions such as the Great Park and Wentworth Club bringing increasing visitor numbers from outside into the area together with major event locations in the area such as Ascot, Henley and Windsor Horse show must also be taken into effect when modelling.

Lastly a concern exists with regard to the loss of rain water runoff at the DERA sites if they are extensively developed. Those sites appear to be at a higher elevation than Virginia Water and one wonders what the flooding effects of prolonged rain in the context of ongoing climate change might be on Virginia Water. It has proven impossible to identify any modelling of those possible effects by the Council based on potentially increasing rainfall and flash downpours such as occurred earlier in August 2016 when some areas experienced 1/2 a month's rainfall in one day?