I wish to be represented at the Stage 2 Hearings. In respect of Matter 3 and Matter 5. (SL2 and SL12)

I regret that I am out of the Country at the time scheduled for those hearings, being 5th through 22nd February 2019. I am advised by Charlotte Clancy that these further written representations will be taken with equal weight as would a personal representation.

With Regard to Matter 3

The Inspectors latest communication advises that the issue of the A320 and agreement between the Authorities, have not yet been concluded and therefore, consideration at the next stage of the hearing has been deferred to a date yet to be established.

My further representation is based on new evidence, which has been provided by RBC, and which does not appear to have been presented to the Inspector or have been made publicly available.

I refer to a Runnymede Borough Council ‘Management/A320 Study scope Final 190717. Doc.x’.

This is represented as the brief to Arcadis to undertake their A320 Corridor Study and ‘recommended mitigation measures to help address and minimize the impacts to enable delivery of the Development’ proposed in the draft Local Plan.

The stated objectives include:

- Ensuring the future housing requirements does not create severe impacts which will undermine planned economic growth.
- Improve the journey time reliability for buses and other vehicular traffic
- Reducing community severance.
- Support the economic vitality of the area.

It is stated that ‘off line solutions, such as a bye pass, should not be contemplated’.

It further states that ‘...schemes must not result in significantly increased traffic arriving to join the M25 (J11) earlier than occurs currently’. Similarly it seeks to guard against increased queuing on J11 slip roads (on and off) which would reduce safety.

The resultant Arcadis A320 Study proposal submitted to support the Draft Local Plan, fails to meet the flow restriction objective arriving at J11 nor the safety issues of slip road congestion.

It would appear that the flow restriction requirement at J11 M25 is directly in contradiction of the objectives of accommodating increased traffic volumes on the A320 and mitigating the current and future congestion arising along that road and its surrounding feeder roads. Flow restriction will result in increased congestion on the A320, and thus will not facilitate the development releases proposed in the Draft Local Plan and thus make the Plan undeliverable.
The proposals in respect of the J10 (Ottershaw Roundabout) drastically increases the community severance of Ottershaw village, contrary to the stated objective. It further causes major economic destruction and viability of the commercial and social enterprises forming the Village, by the physical severance of the village, and the elimination of the only parking facility to serve the shops, services, and Community Hall, again entirely contrary to the stated objectives.

There is no justification provided for the barring of consideration of ‘bye pass solutions’ when they could provide highly credible and beneficial answers to eliminating the detriment to the Village, and secure major enhancements to the Village, and both physical and economic opportunities, as set out in detail in my submission dated 29 June 2018.

Much of the A320 study proposals seek to, and potentially deliver an increase in, both journey time reliability, and time reduction along the A320. This however is incompatible with the key objective of not increasing the flow and volume rate of vehicle arrival/and departure from J11.

The study proposal have not considered the detriment to traffic flows and journey times on the adjoining feeder roads, for example at A320 J10 and J6. Surrey County Council have only recently (November 2018) appointed consultants to come forward with final designed, costed, and business case substantiated proposals for the A320. Surrey and Runnymede Councilors have stated in open Public and private forums that such proposals would by fully consulted upon. This was further re-affirmed in response to my enquiry of the Local Plan Inspector at Stage 1 hearings, when both Runnymede and Surrey CC Officers confirmed to the Inspectors’ question that there would be appropriate public consultation.

There is no indication of any Consultation time schedule, and there is no program indication that will enable the A320 finalized proposals and HIF bid to secure funding, being in place by the HIF deadline. This gives rise to the Plan housing delivery being highly uncertain and thus unsound.

With Regard to Matter 5 (SL2 and SL12).

My further representations made originally to the Local Plan, dated 16 Feb 2018, are repeated. They relate to the non-viability of the proposed site allocation at Ottershaw East (Policy Nos SL2 and SL12) and the absence of any possible technical, practical or economic solutions to the accommodation of the increased vehicular traffic generation onto and through the currently heavily congested and peak time stagnation of Brox Road. The inability to provide suitable mitigation will result in this site being not deliverable, and it should be removed from the proposed allocations.

The delivery and timing of the Housing Numbers in this plan are substantially dependent on suitable Highways solutions being found and delivered in advance of housing completions.

I further repeat that there are no ‘exceptional grounds’ established for the release of the Green belt land which constitutes SL12.

Further, the ‘prescription’ of a minimum of 40 dwellings on site SL2 is both unsuitable and unnecessary. A scheme for 14 dwellings has previously been agreed and proposed by the developer and supported by the local residents and Officers. This has only been rejected subsequently by RBC to seek to fulfill a purely hypothetical numerical housing objective, and which has no regard to the site specific local environment, local village housing mix need, the local residents wishes and support, and the excessive impact on the local infrastructure and services. The prescription of 40 dwellings should be removed.