Hearing Statement - Runnymede 2030
Local Plan Examination

Representations by DPDS Consulting
incorporating PFA Consulting

Matter 5: Longcross Garden Village

On behalf of SMECH Management Company Ltd

January 2019

C11786
Hearing Statement - Runnymede 2030
Local Plan Examination

Matter 5: Longcross Garden Village
On behalf of SMECH Management Company Ltd

January 2019
# Contents

0.0 Introduction .......................................................... 1

1.0 Response to Matter 5 (Longcross Garden Village) .......... 2

## Appendices

Appendix 1: Critique of the Runnymede Borough Council Green Belt Review (January 2019)

Appendix 2: Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?’ (November 2016), NLP (Executive summary and page 8 only)

Appendix 3: An email dated June 2012 between White Young Green and Thames Water Utilities Ltd

Appendix 4: Longcross Garden Village Expression of Interest Bid (July 2016)
0.0 Introduction

0.1 This statement has been prepared by DPDS Consulting Group (DPDS) on behalf of SMECH Management Company Ltd in respect of its property interest at the Longcross Estate, Runnymede. It sets out the response to the questions included in Matter 5 of the Hearings Programme. This matter is in relation to Longcross Garden Village.

0.2 DPDS has acted on behalf of SMECH Management Company Ltd since February 2013 in respect of its property interest at the Longcross Estate, Runnymede. DPDS has engaged in the development plan process since that date and has made various representations to Runnymede Borough Council (RBC) in respect of both the former Runnymede Core Strategy and, more recently, the Runnymede 2030 Draft Local Plan.

0.3 Our previous representations have demonstrated that the plan does not comply with the requirements identified at section 20(5)(a) and (c) of the Planning and Compulsory Purchase Act 2004 and that it is not sound.

0.4 This statement should be read in conjunction with our previous representations to the Draft Runnymede Local Plan, part one and two. Hearing Statements have also been submitted on behalf of SMECH Management Company Ltd for Matters 1 (Legal Requirements, the Duty to Cooperate and the Plan Period), 3 (Overall spatial strategy) and 4 (Green Belt boundaries and exceptional circumstances) of the Local Plan Examination at Stage 1 in November 2018.

0.5 DPDS welcome the invitation to appear at the Hearing Session to expand on the comments included in this statement and confirm that representatives from DPDS and our client’s legal team will be attending the Hearing Session.

0.6 The Runnymede 2030 Local Plan was submitted on 31 July 2018 and subsequently paragraph 214 of the revised National Planning Policy Framework (NPPF) applies. References to the NPPF in this Hearing Statement refers to the 2012 version. The section of the PPG on Local Plans states: “Where plans are being prepared under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework, the policies in the previous version of the framework published in 2012 will continue to apply, as will any previous guidance which has been superseded since the new framework was published in July 2018.” Unless otherwise indicated references to the National Planning Practice Guidance (NPPG) are to guidance that was published prior to the publication of the revised NPPF in July 2018.
1.0 Response to Matter 5 (Longcross Garden Village)

Q5.1 Overall, is the geographical extent of the proposed allocation and quantity of development justified? Is it based on a clear, robust, consistently applied site selection process, properly informed by the Green Belt review, sustainability appraisal and habitats regulations assessment? Are there exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary?

5.1.1 No. It is considered that the proposed allocation has not been properly informed by the Green Belt Review, Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

Green Belt Review

5.1.2 As referred to in paragraph 1.4.3 of our Hearing Statement 4, DPDS have carried out our own critique of the Runnymede Borough Council Green Belt Review (GBR) parts 1 (SD_004L to SD_004P) and 2 (SD_004Q to SD_004U), other methodologies used by surrounding local authorities and also by Arup who also carried out other GBR studies and have identified significant differences in their approach to Green Belt Reviews.

5.1.3 The ‘Critique of the Runnymede Borough Council Green Belt Review’ was undertaken by DPDS in 2017 and completed in October 2017. It therefore reviewed the Green Belt Review evidence that was published by the council up to October 2017. This document can be found in Appendix 1.

5.1.4 This critique was produced by DPDS on behalf of our client to inform:

- representations on the draft Runnymede Local Plan consultations and also Local Plan examination hearing statements.
- representations our client may seek to submit in relation to planning applications for development at the DERA Longcross site.

5.1.5 After October 2017, the Council published further evidence documents to inform their emerging Local Plan. Section 7 (Addendum) of our critique also reviews and assesses the additional evidence that has been published and provides an updated conclusion to the critique as a whole.

5.1.6 Our critique concludes that Runnymede Borough Council has failed to provide clear, justified and robust evidence, either in the two stage report undertaken by Arup or elsewhere. The two fundamental reasons for this are summarised below but explained in depth in our critique.

Fundamental flaws in the tendering process

5.1.7 As raised in our representations to the consultations on the draft Local Plan, our Hearing Statement 4 and our conclusions in sections 6 and 7 of our critique the Council’s GBR evidence has been predetermined to ensure that particular sites (namely the Longcross site) is removed from the Green Belt. This predetermination goes back to the original tender document and is pervasive throughout all iterations of the associated evidence.
5.1.8 As noted in section 5 of our critique we have identified flaws in the tendering process for appointing a consultant to undertake a GBR for the Council. It is clear that the scope of the GBR should have enabled the Council to assess whether or not there are any potential sites that could be released from the Green Belt and that the release of any site from the Green Belt, including Longcross, should be based on clear and justified evidence.

5.1.9 Although the Part 1 Report (SD_004L) at paragraph 5.2.3 emphasises that the Longcross site is included in the GBR, the procurement process that led to Arup being instructed, and the results of the GBR, imply that the review was intended to enable Longcross to be developed.

5.1.10 The Introduction to the Contract for Green Belt Review Instructions for Tendering document (this can be found in Appendix 8 of RBCLP_14), which resulted in Arup being instructed to undertake the Review, includes the following:

1.1 “The Council wishes to engage a Consultant to undertake Green Belt review, which will further inform the new Local Plan Core Strategy (LPCS). The LPCS (2013-2028) is scheduled for examination in mid 2014 with a preliminary hearing scheduled for 9th April 2014.

1.2 The LPCS is the foundation of the Borough’s Local Plan (LP). It sets out the overall ambitions and priorities for Runnymede Borough, and contains a set of strategic level policies to ensure that there is a mechanism in place to realise ambitions and priorities while considering the significant number of constraints within the borough.

1.3 The Local Plan Core Strategy (LPCS) housing strategy relies on new residential development being directed to areas within existing urban settlements, apart from the proposal for the development of a new community at the former DERA site at Longcross. This site, which is currently in the Green Belt, will provide a substantial element of the future housing requirements for Runnymede.” (DPDS Emphasis)

5.1.11 The Borough Context section of the instructions notes that:

3.1 “Approximately 80% of the borough is located in the Green Belt and as such, the submitted LPCS confirms that development over the plan period will be focused within the borough’s existing urban areas, and in particular in the main centres of Addlestone, Chertsey, Egham and Virginia Water. In addition, up to 1500 new residential units and 80,000sqm of commercial floorspace are forecasted to come forward at the former DERA site on the western side of the Borough over the plan period, following its removal from the Green Belt (on adoption of the plan).”

5.1.12 On the basis that Runnymede Borough Council was forced to withdraw its previous Local Plan Core Strategy partly because the removal of DERA Longcross from the Green Belt was not adequately justified, the suggestion that DERA Longcross is to be removed from the Green Belt was premature and prejudicial to the whole Green Belt Review process.

5.1.13 Any tenderer would read this to mean that the Council’s housing strategy is reliant on DERA Longcross being developed, and that Runnymede Borough Council plans to remove DERA Longcross from the Green Belt.
5.1.14 These matters were also raised by Leading Counsel, Rhodri Price Lewis QC, who was representing our client during the Stage 1 Hearing Sessions.

Fundamental flaws in the Arup Green Belt Review Part 1 and Part 2

5.1.15 As stated in Section 6 of our critique, the Arup Review only assesses three of the five Green Belt purposes which are as outlined in our critique are as follows:

1. to check the unrestricted sprawl of large built up areas
2. to prevent neighbouring towns from merging into one another
3. to assist in safeguarding the countryside from encroachment

5.1.16 The remaining two purposes are as follows:

4. to preserve the setting and special character of historic towns
5. to assist in urban regeneration by encouraging the recycling of derelict and other urban land

5.1.17 Most other Reviews also exclude the final purpose, but many include an assessment of the fourth. The analysis that follows explains that the assessment against the purposes of the Green Belt bears very little relationship with the Review’s ultimate recommendations about potential development sites. If it did, then this inconsistency of approach would be significant.

5.1.18 The Longcross site falls within two General Areas: 21, to the north of the M3, and 22, to the south of the M3.

5.1.19 When assessed against the three purposes of the Green Belt that Arup chose to assess, General Area 21 scored zero, and General Area 22 scored 8.

5.1.20 The scores against each Green Belt purpose as outlined in table 6.1 of the Part 1 GBR were as follows:

General Area 21

- Purpose 1 – Criterion 1: 0 points – “Area is not contiguous with or connected to a large built-up area”
- Purpose 1 – Criterion 2: 0 points – “Area is not contiguous with or connected to a large built-up area”
- Purpose 2: 0 points – “Area is not contiguous with or connected to neighbouring settlements”
- Purpose 3: 0 points – “Contains more than 50% built form and/or possesses an urban character”

General Area 22

- Purpose 1 – Criterion 1: 3 points – “Connected to a large built-up area and protects open land from urban sprawl”
- Purpose 1 – Criterion 2: 1 point – “Provides an additional barrier for a large built-up area, which is bordered by prominent, permanent and consistent boundary features”
• Purpose 2: 1 point – “Less essential gap, which is of sufficient scale and character that development is unlikely to cause merging between settlements”
• Purpose 3: 3 point – “Contains between 10% and 25% built form and/or possesses a largely rural open character”

5.1.21 On this basis, General Area 22 meets the purposes of the Green Belt better than the following General Areas (source: table 6.1 of the Part 1 GBR):

• General Area 1 – total score of 6
• General Area 3 – total score of 6, with 5 points for Purpose 1 Criterion 1, which suggests the Area is “contiguous with a large built-up area and protects open land from urban sprawl”
• General Area 4 – total score of 8, with 5 points for Purpose 3, which suggests the Area “contains less than 10% built form and/or possesses a strong unspoilt rural character”
• General Area 6 – total score of 5, with all 5 points for Purpose 3, which suggests the Area “contains less than 10% built form and/or possesses a strong unspoilt rural character”
• General Area 7 – total score of 2
• General Area 8 – total score of 6
• General Area 9 – total score of 8, distributed exactly as for Area 22
• General Area 11 – total score of 7, with 5 points for Purpose 1 Criterion 1, which suggests the Area is “contiguous with a large built-up area and protects open land from urban sprawl”
• General Area 13 – total score of 8, distributed exactly as for Area 22
• General Area 17 – total score of 2
• General Area 18 – total score of 6, with 5 points for Purpose 3, which suggests the Area “contains less than 10% built form and/or possesses a strong unspoilt rural character”
• General Area 19 – total score of 2
• General Area 20 – total score of 4
• General Area 21 – total score of zero – see above
• General Area 27 – total score of 6, with 5 points for Purpose 3, which suggests the Area “contains less than 10% built form and/or possesses a strong unspoilt rural character”
• General Area 37 – total score of 6, with 5 points for Purpose 1 Criterion 1, which suggests the Area is “contiguous with a large built-up area and protects open land from urban sprawl”
• General Area B – total score of 7
• General Area D – total score of 5, with all 5 points for Purpose 3, which suggests the Area “contains less than 10% built form and/or possesses a strong unspoilt rural character”
• General Area E – total score of 8

5.1.22 Section 5 of our critique of the Runnymede Green Belt Review concludes the following with regards to the scoring:
According to paragraph 8.2.2 of the Part 1 Report, the Resultant Land Parcels put forward for further investigation fall within General Areas 7, 8, 10, 11, 19, 21, 22, 25 and 28. These General Areas have a score against the purposes of the Green Belt of (respectively) 2, 6, 10, 7, 2, 0, 8, 14 and 16.

It is therefore clear that the Resultant Land Parcels proposed for further consideration bear very little relationship with the assessment of the General Areas in which they fall. On the basis of the Green Belt Review, Resultant Land Parcels from General Areas 7, 17, 19 and 21 would logically have been favoured. If additional land was needed, the Review implies that Resultant Land Parcels from General Areas 1, 3, 6, 8, 18, 20, 27, 37 and D might then be considered.

General Areas 22, and also 10, 25 and 28, meet the purposes of the Green Belt to a greater extent than all the General Areas above, according the Part 1 Assessment.

5.1.23 As stated in paragraph 5.21 of our critique, the Resultant Land Parcels identified in the Green Belt Review Part 1 appear to have been selected primarily on the basis of the sieve analysis of Absolute and Significant Non-Absolute Constraints. The Resultant Land Parcels that are proposed are those that were considered to not be affected, on the whole, by these constraints. A review of Map 7.1 (which shows the Refined General Areas excluding the Absolute Constraints), Map 7.2 (which shows the Significant Non-Absolute Constraints), and Map 8.2 (which shows the Resultant Land Parcels) clearly shows this to be the case. This has nothing to do with the purposes of the Green Belt.

5.1.24 Furthermore as stated in paragraph 5.22 of our critique, one of the Absolute Constraints included is the site being within 400m of the Thames Basin Heaths SPA. Land within an Absolute Constraint is excluded from the Refined General Areas in Map 7.1, and not taken forward. Part of both the northern and southern section of the DERA Longcross site fall within 400 metres of the Thames Basin Heaths SPA so are rightly excluded from the Refined General Areas and the Resultant Land Parcels. Nevertheless, Runnymede Borough Council continues to promote development on both halves of the DERA Longcross site, including the part within 400 metres of Thames Basin Heaths SPA.

5.1.25 As discussed in paragraph 5.24 and 5.25 of our critique, the methodology employed in other local Green Belt Reviews, and even by Arup in later reviews such as Buckinghamshire, would simply have proposed that the General Areas that meet the purposes of the Green Belt least well should be considered further, and that sustainability factors should be included at this later stage. On that basis, the relatively high score given to General Area 22 suggests that this area would not normally have been considered in the Part 2 Assessment.

5.1.26 The Introduction to the Part 2 Report notes that the Part 1 Report was subject to significant criticism. Despite this it accepts the outcomes of the Part 1 Report, seemingly without question and perhaps on the basis that it gave the outcome that Runnymede Borough Council wanted.

5.1.27 The Part 2 report went on to review land within 400 metres or 250 metres of existing settlements. No further review of the DERA Longcross site was undertaken. Part 2 had the opportunity to redress the pre-determination that influenced Part 1 but it did not do this.
5.1.28 Paragraphs 5.28 to 5.31 of our critique also concludes the following with regards to Part 1 scoring:

- The outcomes of the Part 2 Report bears no relationship with the Part 1 Report. The sub areas assessed in the Part 2 report fall within General Areas 4, 5, 7, 8, 9, 10, 11, 12, 13, 22, 23, 24, 25, 26, 28, 29, 30, 31, 35, 40, and 41. These do not correspond in any way with the way that these General Areas were assessed against the purposes of the Green Belt, nor with the Resultant Land Parcels that were the outcome of the Part 1 Report.
- Part 1 Report is therefore of very limited value. Nevertheless, Longcross is proposed for removal from the Green Belt solely on the basis of the Part 1 Report.
- The justification for removing Longcross from the Green Belt seems to be that is not covered by any Absolute or Significant Non-Absolute Constraints. Except it is; part of it is within 400 metres of the Thames Basin Heaths SPA.
- The Green Belt Review should have demonstrated the exceptional circumstances required to justify removal of the land from the Green Belt, or at least provided the Council with evidence on which to make this decision. It does not do so.

Lack of Consideration of other Sustainability Factors

5.1.29 Section 5 of our critique also discusses the lack of consideration of other sustainability factors. Paragraphs 82, 84 and 85 of the NPPF, and case law set out above, require Local Planning Authorities to consider the consequences of sustainable development when refining Green Belt boundaries.

5.1.30 The Study Purpose in the Part 1 Report explains that the study brief required the Review to “recommend the most sustainable area(s) that could be allocated to deliver future residential or employment growth”.

5.1.31 The Part 1 Report included an assessment of Absolute and Non-Absolute Constraints and, as explained above, seems to have been more heavily influenced by these than the Green Belt purposes.

5.1.32 The Part 1 Report was informed by factors referred to in the 2013 Housing Context Paper, but only the environmental constraints were considered. The social and economic strands of sustainable development were not included in the Review. In this regard, the Housing Context Paper refers to infrastructure capacity and funding.

5.1.33 It is necessary for decisions about Green Belt boundary refinement to be informed by factors such as ease of access to, and capacity and cost of upgrade of, local infrastructure and services, and the proximity to employment. No such analysis has been undertaken as part of the Green Belt Review.

5.1.34 The Part 2 Report notes that the Council, and not the Part 2 Green Belt Review, will undertake the balance with other sustainability factors. However, the decision to focus the Part 2 Review only on land within 400 metres or 250 metres of existing settlements is justified on the basis that “these buffers indicate the likely maximum extent of sustainable development” (paragraph 2.2.4).
5.1.35 Needless to say, DERA Longcross is not within this “sustainable” distance of an existing settlement, so on this basis it is not sustainable according to the Review’s definition.

5.1.36 The Review suggests that “a site ... large enough to form its own settlement”, would be an exception to this. It would seem that the Council and Arup had the DERA Longcross site in mind in this regard. However, there is no analysis of the size that a settlement would need to be to constitute a sustainable settlement, so the basis of identifying DERA Longcross in that regard remains unjustified.

Conclusions on the council’s GBR

5.1.37 The council’s evidence reads in such a manner as to suggest that the entire process has been designed to ensure that the DERA site is removed from the Green Belt and is therefore suitable for development. Further, as a result of this predetermined element, the exceptional circumstances for releasing land from the Green Belt have not been made out.

5.1.38 General Area 22, which includes the part of the DERA Longcross site south of the M3, performs better against the purposes of the Green Belt than many other General Areas. Based on the methodology used in all other recent Metropolitan Green Belt Reviews, including Arup’s own Review in Buckinghamshire, General Area 22 would not have been taken forward for consideration in the Part 2 Assessment.

5.1.39 The only reason that the DERA Longcross site within General Area 22 has been recommended for further review by the Part 1 Review is because it is wrongly defined as being unaffected by any Absolute or Significant Non-Absolute Constraints. Part of the site falls within 400 metres of the Thames Basin Heaths SPA. The Runnymede Review defines this as an Absolute Constraint.

5.1.40 The site does not meet Runnymede’s own definition of a sustainable location for development because it is too far from any existing settlement, and there is no evidence to justify any suggestion that it is large enough in its own right to form a sustainable settlement.

5.1.41 It is noted that the Council has published Examination document RBCLP_14 since the Stage 1 Hearing Sessions. This document outlines the Council’s ‘Sequence of Events and Timing of Tender Brief for the Runnymede Stage 1 Green Belt Review’.

5.1.42 Following the review and assessment of this new and updated evidence, our detailed comments in section 5 and conclusions in section 6 of the critique still remain. Runnymede Borough Council continues to fail to provide this clear, justified and robust evidence, either in the two stage report undertaken by Arup or elsewhere.

Sustainability Appraisal and Habitats Regulations Assessment

5.1.43 Our response to examination question 1.2 set out in our Hearing Statement for Matter 1 fully explains our fundamental concerns with Sustainability Appraisal (SA) and the Habitats Regulation Assessment (HRA) in specific relation to the Longcross Garden Village site. The SA and HRA are both inadequate and have therefore been unable to properly inform the proposed site allocation.
5.1.44 It is noted that table 3.1 of Sustainability Appraisal Report Addendum Regulation 19 Addendum Report (SD_018P) on page 66 updates the results of the SA for policy SD10. The following wording has been added to the conclusion for the ‘potential effects’:

“...The site will affect the A320 which suffers from congestion. Further additional work has been commissioned in the form of the A320 study which assesses the cumulative quantum and distribution of vehicular trips from development proposals in Runnymede, Surrey Heath and Woking boroughs and forecast the impacts on the A320 corridor. The study has found on average around a 20% increase in traffic volumes in the 2036 Do Minimum Forecast Year compared to the 2017 Base Year traffic volumes. Further modelling has been undertaken taking into account interim design of mitigation measures with the aim of increasing capacity at junctions and along links on the corridor. These measures include engineering solutions to increase capacity (i.e. increase supply) ranging from minor improvements to larger junction improvements that would require land acquisition (and are therefore currently uncertain) plus travel demand management measures. The study also notes that even with the mitigation measures suggested, as the network is congested the implementation of engineering solutions to increase capacity is likely to result in additional traffic being processed through the network and may not have a significant effect on decreasing congestion. This could increase the volume of traffic that reaches the M25 Junction 11. Therefore, an uncertain effect on traffic and congestion has been recorded.”

5.1.45 The following wording has been added to the ‘Mitigation measures identified for significant and uncertain effects’ column of table 3.1:

“The Local Plan and the A320 study put forward a range of mitigation to combat the effect of development on traffic levels and congestion. However, until the investigations on the A320 are complete it is not possible to rule out negative effects. The mitigation for this uncertain effect at this point is for the Council to consider further evidence on final designs and effectiveness of mitigation as the A320 study process continues and development with associated Transport Assessments come forward.”

5.1.46 The SA for policy SD10 states that the site “will have no significant negative effects”, however as can be noted from the SD_018P the site will have an uncertain effect on transport and congestion. It is therefore considered that it is also currently not possible to conclude whether the site will or will not have no significant negative effects. In light of this uncertainty, it is not possible for the SA to properly inform the proposed allocation.

5.1.47 It is now acknowledged that Natural England have not raised objections with the HRA and also the bespoke SANG required for the development.

Exceptional Circumstances

5.1.48 Green Belt Review Part 1 and Part 2 documents have formed the basis for subsequent Green Belt Review evidence based documents. As Part 1 and 2 are fundamentally flawed it is our view that any subsequent Green Belt evidence based documents, including the Council’s Exceptional Circumstances document (SD_004X) and Exceptional Circumstances Addendum (SD_004Y), will be totally unable to be robust and justified.
5.1.49 The Council has published evidence based documents, including in relation to exceptional circumstances, after the publication of the Green Belt Part 1 and Part 2 which do not overcome the failings of Part 1 and 2 and in any event would have been incapable of overcoming these failings. The failings could only have been overcome by means of starting Part 1 and 2 afresh. Starting this work afresh will also enable the consultant/author of the evidence documentation to be briefed without any element of pre-determination that the former DERA site is/should be allocated and developed.

5.1.50 It is our opinion that the Council’s Green Belt evidence base has been further elongated and it is at a point now where it is very difficult to clearly and concisely understand how the Green Belt evidence base has exactly informed (or not informed) the Local Plan and particularly the choice of both development strategy and subsequent individual site selection. The same argument can be applied to the Local Plan evidence as a whole.

5.1.51 The content of the evidence based documents continues to underlie our view that the evidence base has been retrofitted to fit the approach and content of the draft Local Plan – this includes the proposed allocation of Longcross Garden Village as the major development element of the Local Plan.

5.1.52 We consider that the submitted Runnymede 2030 Local Plan is not sound as it is not ‘justified’, and as it is not ‘consistent with national policy’ for the reasons identified above. The Longcross Garden Village allocation (policy SD10) should therefore be deleted from the Local Plan.
Q5.2 Is the expected rate of housing completions within 5 years of the adoption of the Plan (740 dwellings, 2019/20-2023/24 (SD_023G, July 2018)) and the target of at least 1700 completions by 2030 justified by robust evidence, including progress to date on master planning, outline and full planning permissions, and market evidence of achievability and deliverability? Have any potential barriers to delivery been identified? Is there sufficient flexibility to address them?

5.2.1 No. The expected rate of housing completions within 5 years of the adoption of the Plan and the target of at least 1700 completions by 2030 are not justified by robust evidence. The Runnymede Updated Housing Trajectory (July 2018) document (SD_023G) outlines the proposed housing trajectory for Longcross Garden Village as follows:

<table>
<thead>
<tr>
<th>Year</th>
<th>Housing Completions</th>
<th>Which part of Longcross?</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017-18</td>
<td>72</td>
<td>Longcross North</td>
</tr>
<tr>
<td>2018-19</td>
<td>36</td>
<td>Longcross North</td>
</tr>
<tr>
<td>2019-20</td>
<td>90</td>
<td>Longcross North</td>
</tr>
<tr>
<td>2020-21</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2021-22</td>
<td>200</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2022-23</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2023-24</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2024-25</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2025-26</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2026-27</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2027-28</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2028-29</td>
<td>150</td>
<td>Longcross South</td>
</tr>
<tr>
<td>2029-30</td>
<td>120</td>
<td>Longcross South</td>
</tr>
<tr>
<td>Total within the plan period for whole site</td>
<td>1748</td>
<td></td>
</tr>
</tbody>
</table>

Five year housing land supply period. Contribution is 740 dwellings.

5.2.2 As highlighted in paragraph 5.93 of the Submission Local Plan development of Longcross Garden Village is already partially under construction on the area north of the M3 motorway (known as Upper Longcross) for 200 dwellings. The remainder of the Longcross site does not have planning permission and it is expected that it will start to deliver housing completions in the monitoring year 2020-2021 as confirmed in Appendix A (Monitoring Framework) on page 178 of the submission Local Plan.

5.2.3 It is noted that an EIA Scoping Opinion request (reference RU.17/0793) for Longcross South for the following was registered by the Council on 19th May 2017 and a decision issued on 27th September 2017:

Application details: EIA scoping opinion for proposed development for up to 1,400 dwellings, a primary school, 3,210 sqm of commercial space (restaurants, retail, public house), 930 sqm of community space, publicly accessible open space, landscaping, ecological habitats, and access. Suitable Alternative Natural Greenspace (SANG) will be provided on site, which will link to Trumps Farm.
5.2.4 Several stages need to take place before housing completions could be delivered on the remainder of the Longcross site – these are as follows:

i. Examination of the Local Plan
ii. Further masterplanning/production and agreement of council Development Brief
iii. Consideration of and determination of a final site wide village masterplan (as per the requirements of policy SD10)
iv. Consideration of the submission and determination of outline planning application
v. Completion of a Section 106 Legal Agreement
vi. The grant of outline planning permission
vii. Consideration of the submission and determination of Reserved Matters Planning Application(s)
viii. Delivery of critical and significant infrastructure and discharge of pre-commencement conditions/Grampian conditions.
ix. Construction of the site and homes.

5.2.5 Taking into account the significant lead-in times, planning approval period and the time to deliver the first set of completions, it is completely unrealistic that all of the above could all take place within the period January 2019 to April 2020/March 2021 (15 to 27 months).

5.2.6 There are significant question marks as to whether the Longcross Garden Village can be delivered at all let alone being partially delivered within the period 2019/20 to 2023/24. On this basis it is clear that 740 dwellings will not be capable of being delivered in the period 2019/20 to 2023/24. This Longcross Garden Village site forms a key part of the Council’s projected five year housing land supply.

5.2.7 This is of course also subject to the Longcross Garden Village continuing to be allocated in the Local Plan. We consider that policy SD10 should be deleted from the Local Plan.

5.2.8 As noted above Longcross Garden Village is already partially under construction on the area north of the M3 motorway (known as Longcross North) for 200 dwellings. The unrealistic trajectory for the remainder of Longcross Garden Village can also be emphasised by the time it has taken for planning applications to be submitted and determined for Upper Longcross. The table below provides information on the applications submitted for Upper Longcross, when they were registered and their respective decision date:

<table>
<thead>
<tr>
<th>Application Update</th>
<th>Date Registered</th>
<th>Decision Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outline Planning Application submitted for erection of up to 200 dwellings and</td>
<td>22/07/2013</td>
<td>Withdrawn</td>
</tr>
<tr>
<td>associated development with Longcross North.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hybrid Planning Application submitted for detailed first phase comprising of 108</td>
<td>25/11/2013</td>
<td>12/08/2014-Granted subject to conditions</td>
</tr>
<tr>
<td>dwellings, with outline planning application for remaining 92 dwellings.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Reserved Matters application for the development of a 3 storey building (Focal Building)  
25/07/2017  
08/12/2017-Granted subject to conditions

Phase 2 reserved matters application for the development of one part 4 / part 5 storey residential building, one 5 storey residential building and one 4 storey residential building comprising 78 dwellings (comprising 18 x one bed apartments, 60 x two bed apartments)  
10/08/2017  
15/02/2018-Granted subject to conditions

Phase 2 reserved matters application for the development of two 4 storey office buildings to create 16,765 sqm (GEA) of B1 office floorspace;  
11/08/2017  
08/12/2017-Granted subject to conditions

Phase 2A reserved matters application for the development of 10 x three bed dwellings; vehicle parking;  
13/06/2018  
13/09/2018-Granted subject to conditions

5.2.9 As can be seen from the above, the hybrid application for phase 1 was registered in November 2013 and granted subject to conditions approximately 9 months later. Housing completions for phase 1 were first delivered in the monitoring year 2017/18. The first reserved matters was submitted in 2017. Based on the timeframes for the Longcross North planning applications, this supports are view that the trajectory for the remainder of Longcross Garden Village are fundamentally unrealistic. The planning applications for the remainder of Longcross Garden Village will relate to a much larger and complex planning application than for Longcross North. Therefore the time between submission of an outline application and subsequent reserved matters will be extensively more elongated than that for Longcross North. The determination periods and completion of legal agreements will also be longer than those for Longcross North.

5.2.10 The dedicated Longcross Garden Village website defines the timetable for ‘Longcross South’ as follows:
5.2.11 The outlined timetable indicated on the website is incorrect. The outline application has not been submitted and construction will therefore not start this year. As a result the first homes will not be available in 2020.

5.2.12 The research document called ‘Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?’ (November 2016) produced by NLP looks at the evidence on speed and rate of delivery of large-scale housing based on a large number of sites across England and Wales (outside London). Page 8 of this research document (the executive summary and page 8 of this research document can be found in Appendix 2 – the remainder of the research document can be provided to the Inspector if requested) outlines an average time taken for the first housing completion after planning approval of development of over 500 dwellings:

“In combination, the planning approval period and subsequent time to first housing delivery reveals the total period increases with larger sites, with the total period being in the order of 5.3 – 6.9 years. Large sites are typically not quick to deliver; in the absence of a live planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations.”

5.2.13 This research clearly highlights that the Council’s anticipated delivery rates taking into account the current stage of the proposed development site are hugely unrealistic. Taking into account that a planning application has yet to be submitted and that the length of time between the planning approval period and subsequent time to first delivery of first housing delivery is likely to be in the region of 5.3-6.9 years (based on the NLP research), it is our view that the earliest housing completions could be delivered on the remainder of the Longcross Garden Village would be in the 2025-26 monitoring period. The following table justifies our view by reviewing each stage outlined above that needs to take place before housing completions could be delivered on the remainder of the Longcross site:

<table>
<thead>
<tr>
<th>Stage</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Autumn 2017: Submission of outline application</td>
<td></td>
</tr>
<tr>
<td>2019: Construction</td>
<td></td>
</tr>
<tr>
<td>2020: First homes available</td>
<td></td>
</tr>
<tr>
<td>Approx 2027: Completion</td>
<td></td>
</tr>
</tbody>
</table>
Examination of the Local Plan

2019

Council currently anticipate the examination to end in 2019.

Inspector to consider whether the plan submitted is ‘sound’.

Further masterplanning/ production and agreement of council Development Brief

2019/20

Consideration of and determination of a final site wide village masterplan (as per the requirements of policy SD10)

2020/21

Consideration of the submission and determination of outline planning application

2021/22

Completion of a Section 106 Legal Agreement

2022/23

Consideration of the submission and determination of Reserved Matters Planning Application(s)

2024/25

Delivery of critical and significant infrastructure and discharge of pre-commencement conditions/ Grampian conditions.

Construction of the site and homes.

2025-26

5.2.14 It must also be highlighted that the Longcross Garden Village is dependent on the delivery of critical infrastructure projects which could restrict occupation of new dwellings until these projects have been completed. The ‘precise’ timings for the delivery of critical infrastructure are not known and therefore this again will add to delays in the delivery of the housing completions on the Longcross Garden Village site.

5.2.15 Given the potential complexities of the transport issues it would appear that any assessment work sufficient to support a planning application for Longcross South cannot be progressed until Arcadis have reported and their work agreed with Highways England and Surrey County Council which suggests a long lead in time before an application can be submitted – with a further significant period before determination and the completion of any legal agreements sufficient to allow a planning permission to be granted.

5.2.16 In conclusion and based on the information outlined above, Longcross Garden Village will not be capable of delivering housing completions within the five year housing land supply
period of the period 2019/20 to 2023/24. It will also not be capable of delivering the full anticipated quantum of development within the plan period.

Have any potential barriers to delivery been identified?

5.2.17 Yes. It is clear that potential barriers to the delivery of the site have already been clearly identified including via the Council’s own evidence base.

5.2.18 Minor Modification 28 (CD_001A) adds the wording ‘subject to delivery of necessary mitigation on the A320’ to the Phasing 2017 – 2030 in Policy SD3 as it relates to Longcross Garden Village.

A320 Improvements

5.2.19 The Strategic Highway Assessment Report (SHAR) (2017) prepared by Surrey County Council (SD_015C) concludes that:

“5.2.2 The greatest concern is the impact on the St Peter’s Hospital area. The increase in vehicle trips, primarily from the development sites of St Peter’s Hospital, Chertsey Bittams and nearby Longcross South, create substantial increases in delay in this area, which could compromise emergency vehicle access to and egress from the Hospital.

5.2.3 If development is progressed at this site, it is likely that major investment will be required to mitigate against this impact and ensure that hospital emergency access is not compromised. Since, at the time of writing, no mitigation has been identified, the cumulative progression of these sites has to be classed as having the potential to have a severe transport impact. Unless suitable mitigation measures can be shown to resolve this issue, it is recommended that these sites are not progressed together in their current size and composition.”

5.2.20 St Peter’s Hospital is accessed from the A320 Guildford Road west of Junction 11 of the M25, as shown on the Google Maps extract below: Location of Longcross & St Peter’s Hospital
5.2.21 The Runnymede 2030 A320 Topic Paper, July 2018, (SD_021B) notes that the A320 is the only piece of critical highways infrastructure which has been identified as necessary to support the growth proposed to be delivered through the Runnymede Local Plan (Section 1 and paragraph 5.1). (This ignores the views of Highways England, discussed below.) SD_021B discusses funding and delivery of mitigation along the A320 over the period of the Local Plan.

5.2.22 The cost of delivering all the mitigation along the A320 corridor is identified in SD_021B (paragraphs 3.30 and 5.3) as £42 million, or £33 million for the sections within Runnymede.

5.2.23 Funding to be contributed by Longcross Garden Village is set out in Table 1 of SD-021B, reproduced below.

<table>
<thead>
<tr>
<th>Development scheme</th>
<th>Number of units</th>
<th>Development Phasing (sites listed to reflect order of phasing)</th>
<th>Infrastructure funding to be committed</th>
<th>Schemes which development may need to contribute to fully fund/achieve target</th>
<th>Likely contribution for transport infrastructure expected to be secured through development</th>
</tr>
</thead>
</table>
| SD10 Longcross Garden Village | 1700 remaining (including 200 units, business park and supporting uses already consented and u/c) | 2017-2030 | 2019 | - Junction 8a and 8b (Guildford Rd/Green Lane and A320 Guildford Rd/Holloway Hill) (£5.2 million)  
- Junction 10 (A320 Guildford Rd/Murray Rd/Chobham Rd) (£8.8 million) | £9,879 per unit for transport infrastructure (on and off site)³.  
Total contribution expected=£14,818,500 (based on remaining 1500 units not consented) |

³ As set out in the Longcross Garden Village Infrastructure and Viability Assessment (December 2017)

5.2.24 The figure of £9,879 per unit, or £14.8 million in total, for transport infrastructure associated with Longcross is to cover all such infrastructure, including sustainable transport measures, and pre-dates the assessment of the impacts of cumulative development within the area on the A320 (see paragraph 8.3.11 of the Viability Assessment). The A320 schemes to which Longcross is expected to contribute total £12 million, which would leave only £2.8 million for other measures (walking and cycling, bus and rail travel) over the period of development of the Garden Village from 2017 – 2030.

5.2.25 Improvements numbered 6 and 10 listed in Table 1 can be identified on Figure 1 of SD-021B.
5.2.26 **SD-021B** goes on to say (paragraph 5.13) that the Council has identified that if it relies on S106 funding and match funding alone to fund the required mitigation along the A320, the delivery of some of the mitigation schemes in a timely manner could be at risk with associated risks for housing delivery. Accordingly, Figure 3 of **SD-021B** sets out the risks associated with the schemes.

<table>
<thead>
<tr>
<th>Junction 10 (A320 Guildford Rd/Marbury Rd/Chobham Rd)</th>
<th>Time</th>
<th>Cost</th>
<th>Land Acq</th>
<th>Political</th>
<th>Delivery</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*If the current feasibility design for this junction is progressed, it would require the purchase of a large area of third-party land. This increases the risk of programme delivery slipping and also increases the overall cost of the mitigation solution. To mitigate this risk, the detailed design of this junction is to be reassessed with the aim of minimizing or eliminating the need for third-party land purchase to reduce complexity, costs and risks to delivery timetable.*
5.2.27 Further details of the potential amendments to the schemes are not available at the time of writing. At present there is no evidence that these schemes can be delivered for a reasonable cost and in a timely manner, which must therefore throw doubt on the deliverability of Longcross Garden Village.

Highways England

5.2.28 The A320 Topic Paper (SD_021B) reports that in May / June 2018 Highways England expressed a concern that the Draft Runnymede Local Plan 2030 was not sound because sufficient transport evidence had not been provided (paragraph 3.36). In July 2018, Highways England requested further information on the transport implications of the Local Plan for the Strategic Road Network, particularly in relation to M25 Junction 11. It was agreed to prepare a Statement of Common Ground (SoCG) (SD_021B paragraphs 4.7 – 4.8).

5.2.29 A SoCG between Runnymede Borough Council and Highways England (RBCLP_10) was completed in November 2018. This refers to the A320 Corridor Study, commissioned jointly by Runnymede Borough Council and the neighbouring Surrey Heath and Woking Borough Councils, and to the SHAR (SD_015C). Matters of disagreement set out in the SoCG include concerns about modelling methodology, including trip rates. Highways England has yet to agree that the Local Plan has no severe impact on the strategic road network, nor that any impacts can be mitigated.

5.2.30 A scoping document (RBCLP_15) produced by Arcadis on behalf of the Council in late December 2018 proposes further traffic modelling of the A320 Corridor, aimed at addressing the Highways England concerns regarding the M25. It proposes a two-step methodology: Step 1 is to confirm the source of congestion, and spare capacity on the network, and Step 2 will develop mitigation measures, likely to include upgrading M25 Junction 11, and potentially ramp metering at M25 Junction 13. Step 2 is programmed for February onwards.

5.2.31 Again, there is no certainty that schemes which will satisfy Highways England can be identified and delivered for a reasonable cost and in a timely manner, including whether land acquisition may be necessary. Apart from the implications for Runnymede 2030, there is the potential that it will not be possible to reach agreement with Highways England regarding the implications of a planning application for Longcross South. This would present a barrier to the deliverability of Longcross Garden Village.

Sewage

5.2.32 The Water Cycle Study (November 2018) (SD_007S), at Section 6.3.1 identifies that
Thames Water Utilities Ltd (TWUL) has serious concerns in relation to this site. Specifically it confirms that sewage treatment capacity in this area is unlikely to be able to support the demand anticipated from this development.

5.2.33 Although the statement then goes on to indicate that TWUL is confident that the necessary network and treatment upgrades can be delivered, this is clearly dependent upon their Business Plan being accepted and the necessary upgrades being able to be delivered within an appropriate timescale.

5.2.34 The overall foul drainage solution (for both DERA North and DERA South) was considered in a Utilities and Waste Water Statement prepared in support of the Longcross North development proposals. An email dated June 2012 between White Young Green and TWUL from the statement (Appendix 3) confirms that the flows from the Longcross Garden Village development will be conveyed to the Lyne (Chertsey) Sewage Treatment Works (where, as indicated above, additional capacity needs to be provided).

5.2.35 The email however goes on to note that the foul flows from the Longcross Garden Village site cannot be drained via the existing network (the emphasis is made in the email). Accordingly, either a new cross country rising main will need to be provided, or significant upgrades to the existing network (along Longcross Road) will need to be provided by TWUL.

5.2.36 The timescales for such upgrades, which have been known for some time, are unknown and may necessitate land, or easement, acquisitions. This places significant uncertainty as to the timing of delivery of housing at Longcross Garden Village as such upgrades will need to be in place prior to the occupation of any significant level of development at LGV.

Water Supply

5.2.37 The Water Cycle Study (November 2018) (SD_007S) identifies major network reinforcements are required to support this development with no indication that such reinforcements can be timely provided to ensure deliver of housing at Longcross Garden Village.

Rail Services

5.2.38 The LGV Infrastructure and Viability Assessment forecasts a level of usage at Longcross Station (effectively the capacity of a complete train) of 400-500 passengers during the peak periods indicating the need for two additional services in each direction to accommodate these additional passengers. There is no evidence to demonstrate that there is capacity on the rail network to accommodate these additional trains can be delivered. This increased level of usage will also need a significant upgrade of Longcross Station which will be required at a very early stage in the delivery of LGV in order to promote and encourage sustainable travel. There is no evidence that such upgrades can be secured in a timely manner.

Is there sufficient flexibility to address them?

5.2.39 Given the nature of the barriers, we consider that there is no scope for flexibility to address the potential barriers to delivery. Taking the Strategic Road Network as an
example, if the improvements required to support the development cannot be delivered then providing flexibility is not an option. As outlined in our representations to the draft Local Plan Part 1 and 2 (Regulation 19) consultations, we are very concerned that the necessary infrastructure to support the Longcross Garden Village allocation is not deliverable. Our representations to the draft Local Plan 2 (Regulation 19) consultation outlines our objections to the last paragraph of policy SD6 (Infrastructure Provision & Timing) states the following:

“Dependent on the timing of critical infrastructure projects the Council may instead grant permission with conditions or planning obligations restricting occupation until completion of critical infrastructure projects or phases.”

5.2.40 Paragraph 17 of the NPPF outlines the ‘Core Planning Principles’ and the first bullet point emphasises that planning should be genuinely plan-led. The Longcross Garden Village allocated site is a largest housing site allocation in the draft Runnymede Local Plan and this flexibility which enables the granting of permission with conditions restricting occupation until completion of critical infrastructure or phases is contrary to the plan-led approach. It emphasises the question marks over the deliverability of the Longcross Garden Village and our view that the site should not be allocated for housing.

5.2.41 The use of such conditions on the Longcross Garden Village site, if permission was granted, could also result in the delivery of housing completions on the site being significantly delayed and not in line with the Borough Council’s suggested trajectory for the site. Delays to the housing completions will affect the borough council’s 5 year housing land supply.

5.2.42 In addition to this, the Council’s Table of Minor Modifications (CD_001A) to the Submission Runnymede Local Plan identifies a minor modification to policy SD3 (Site Allocations). This includes the insertion of the following wording in the ‘Phasing’ column to several of the proposed allocated housing sites in policy SD3 (Site allocations), including Longcross:

“...subject to delivery of necessary mitigation on the A320...”

5.2.43 This is a subtle insertion of words but an important one nonetheless. This wording along with that in policy SD6 (as highlighted above) clearly demonstrates that the Council themselves have concerns about the deliverability of its own Plan.

5.2.44 The issues raised above to the question along with the Council’s evidence base, that also demonstrates concerns with the deliverability of key infrastructure, clearly identify the Plan is unsound as it is not ‘justified’, ‘effective’ or ‘consistent with national policy’. Policy SD10 should be deleted from the Local Plan.
Q5.3 Are the detailed requirements of Policy SD10 justified and deliverable? Do they strike the right balance between specificity and flexibility as appropriate? In particular:

a) Do they provide a clear, achievable policy framework to help deliver a high quality, distinctive garden village?

5.3.1 No. We consider that the policy does not provide an achievable policy framework to help deliver the proposed allocation. The policy includes a vast ‘shopping list’ of infrastructure related requirements to enable the site to be delivered. As discussed in our response to Q5.2 we have fundamental concerns over the deliverability of key transport infrastructure items.

5.3.2 We would also like to highlight the ‘purpose’ of policy SD10 as the last sentence of the first paragraph of the policy which states:

“Consent for a site wide village masterplan will be permitted if it can demonstrate delivery of;”

5.3.3 This policy is therefore only seeking to consent a site wide village masterplan and not a planning application. Our response to Q5.2 discusses in the detail that the anticipated delivery trajectory is fundamentally unrealistic. The development and consent of a masterplan will add to the delay in the delivery of the site. As noted in our response to Q5.2, Longcross Garden Village will not be capable of delivering housing completions within the five year housing land supply period of the period 2019/20 to 2023/24. It will also not be capable of delivering the full anticipated quantum of development within the plan period. Granting consent to a site wide village masterplan will not grant planning permission.

b) Is the mix of uses, including employment and local facilities and services, justified and deliverable at the right time?

5.3.4 No. We consider that the mix of uses will not be delivered at right time. We have concerns regarding the overall deliverability and viability of the development to the vast ‘shopping list’ of infrastructure related requirements to enable the site to be delivered. As can be seen in the council’s Infrastructure Delivery Plan Schedule (May 2018) (SD_007O) there remains substantial funding gaps for infrastructure items required for the Longcross Garden Village. Delays to critical infrastructure items such as improvements to the Strategic Highway Network may impact on the deliverability of other local facilities and services. The costings associated with critical infrastructure items could also delay the delivery of other infrastructure items.

c) Does the evidence justify the proposals for a range of residential accommodation, including the percentage of housing that is affordable, and are there reasonable prospects that it will be delivered over the Plan period? What number of outlets is currently proposed?

5.3.5 No, there is not reasonable prospects that the range of residential accommodation will be delivered over the plan period. In our response to Q5.2 we explain in detail why the site will not be capable of delivering housing completions within the five year housing land supply period.
supply period of the period 2019/20 to 2023/24. It will also not be capable of delivering the full anticipated quantum of development within the plan period.

5.3.6 It is not clear from the current evidence base how many outlets is currently proposed for Longcross South. The rate of annual delivery on the site will be influenced by the number of outlets expected to operate on the site and also the strength of the local housing market.

d) Can further detail be provided about how and when the policy requirement for Gypsy and Traveller accommodation will be met? Should provision be made for more than 10 pitches, given the potential level of unmet need in the Borough?

5.3.7 No comment.

e) With regard to criterion e) of Policy SD10, are the requirements sufficient to provide for sustainable transport choices, and are they realistic and achievable over the Plan period? Can there be reasonable confidence that criterion h), including the Council’s proposed minor modification 44 (CD_001A), will be effective in this regard?

Criterion e)

5.3.8 No. Given the significance of the proposed allocation at Longcross Garden Village, it is surprising that there is not a requirement for a formal Development Brief to be agreed in advance of a planning application, setting out the criteria in more detail, and identifying the opportunities. Paragraph 5.106 of the supporting text to Policy SD10 merely asks for a village-wide masterplan and an agreed suite of supporting strategies and parameter plans to be submitted with a site-wide application.

5.3.9 Notwithstanding the good intentions expressed under Criterion e), it is difficult to envisage how sustainable transport links can be provided to neighbouring / existing settlements, particularly on foot or by cycle, given the location of the Longcross site (bullet 4).

5.3.10 Longcross is bounded to the north by the M3 and the London Waterloo to Reading railway line, to the east by Kitsmead Lane, and to the south by the B386 Longcross Road, and is surrounded by common land, private estates and golf courses. The nearest settlements of Chobham, Sunningdale and Virginia Water and Trumps Green are 2km away as the crow flies, Ottershaw is 4km distant, and Chertsey is 5km away on the opposite side of the M25. There is a narrow footway along the west side of the northern part of Kitsmead Lane leading towards Trumps Green, but no facilities for pedestrians on Longcross Road in the vicinity of the site. There is no existing street lighting and the national 60mph speed limit applies. There are no existing facilities for cyclists apart from the normal road network. The provision of off-site pedestrian and cycle links to neighbouring / existing settlements is likely to require land acquisition.

5.3.11 It is not clear which ‘major service centre outside of the Borough’ is to be served by bus (bullet 3). However, the pattern of settlements around Longcross is so dispersed as to make a suitable bus route difficult to identify, and unlikely to be commercially viable. Currently, the nearest bus stops are in Trumps Green to the northeast, and served by a bus about every 90 minutes during the day.
5.3.12 Longcross Station, on the northern edge of Longcross North, according to the National Rail website currently has no road or formal footpath access, no parking, no disabled access, no toilet or waiting facilities and just 4 cycle parking spaces, without a shelter. At present five train services each way between Reading and London Waterloo call at Longcross in the AM peak (07:00 – 09:00), and three each way during the PM peak (17:00 – 19:00). Services during the daytime are infrequent. Significant investment is required and also complex negotiations are required before Longcross Station will be able to play a major role in encouraging modal shift (bullet 1).

5.3.13 Regarding bullet 5, given the proposed phasing of the Longcross development from 2017 to 2030, a proportion of communal residential and non-residential parking spaces, and indeed a proportion of private parking spaces, should be provided with active electric vehicle charging points from the outset, not merely with passive wiring for future installation of charging facilities.

5.3.14 From the information available to date, it seems most unlikely that Longcross will be able to offer sufficient sustainable transport choices to result in a modal shift away from the private car for travel outside the site. There is also uncertainty about their realism and achievability over the plan period. This is particularly pertinent when we consider the site as a whole is not deliverable and certainly not deliverable in its full extent within the plan period.

5.3.15 It is noted that paragraph of the council’s Longcross Garden Village Infrastructure and Viability Assessment (2017) (SD_007P) states:

“...the car represents the majority of trips (69% and 64% respectively) undertaken by residents travelling to work...”

5.3.16 This evidence demonstrates the current reliance on the private car to get to work. For the reasons discussed above it is considered that the majority of trips will continue to be via private car.

5.3.17 Longcross Garden Village is therefore likely to result in significant vehicular trip generation, with consequent implications for the surrounding road network, as raised by both Surrey County Council and Highways England.

Criterion h)

5.3.18 No. A requirement for a Development Brief would assist in illustrating a satisfactory phased approach to development of Longcross Garden Village. However, a critical consideration will be the provision of sustainable transport links, on foot, by cycle and by public transport, from a very early stage, in order to ensure that opportunities for sustainable travel are available from the outset.

5.3.19 In relation to highways, the appropriate schemes to satisfy Surrey County Council and Highways England with regard to traffic impact have not yet been identified. It is impossible at this stage to say how the need for off-site highways improvements will affect the pace of delivery of development.
f) Based on the Plan’s requirements, will the proposed development provide satisfactorily for the protection and enhancement of the natural environment, especially in regard to the SPA and SAC?

5.3.20 No. It is clear that the approach to Suitable Alternative Natural Greenspace (SANG) demonstrates a clear and unequivocal shortfall, which affects the robustness and effectiveness of the Plan. This is outlined on page 140 of the council’s Regulation 22: Statement of Consultation (SD_016I):

“By officers’ calculations, there are predicted to be approx. 575 dwellings that do not currently have SANG mitigation in place over the period of the Local Plan. It is predicted that further SANG would be needed in 2025. This could be delivered through bespoke solutions that could arise to meet needs. The Council is also currently exploring further site options.”

5.3.21 The failure to allocate sufficient SANG demonstrates the undeliverability of the plan over the plan period, with the delivery of dwellings predicated on SANG to provide mitigation. The recognised shortfall in SANG provision does not provide a Local Plan that is based on a strategy to meet objectively assessed development and infrastructure requirements nor that is deliverable over the plan period. On this basis the Local Plan is not positively prepared or effective.

5.3.22 The council’s Duty to Cooperate Update and Compliance Statement (July 2018) (SD_016F) at paragraph 8.2 confirms that additional work still need to be undertake states:

“The Council is also currently exploring further options and will continue to work with Natural England on this matter.”

5.3.23 g) Are the proposals viable?

No. In our representations made to the draft Local Plan Part 1 and 2 (Regulation 19) consultations, we raised significant concerns as to the validity of the Council’s Viability Whole Plan Testing Draft Final Report (2017) (SD_13A) and the Longcross Garden Village Infrastructure and Viability Assessment (2017) (SD_007P). We consider that the Council’s viability evidence base continues to inadequately deal with a number of the potential costs involved with the Longcross Garden Village site. There are a number of areas where insufficient or reliable costing information is available or where there is a lack of agreement to key strategy issues. The following are examples of key areas which are not dealt with in sufficient detail or where costing information is inadequate:-

• Impact on the Strategic Road Network including the A320, M3 and M25 is not yet agreed by the key agencies, namely Highways England and Surrey County Council Highways.
• The cost of securing the necessary improvements to the strategic road network and the proportion of that cost attributable to Longcross. The Total cost of this appears to have omitted a number of key elements
• Viability of key infrastructure, such as rail and bus services to serve the site and the full costing of both providing and maintaining such services at a sustainable level
• On site contamination and remediation
- The cost of on-site infrastructure, particularly distributor roads and drainage systems. DPDS/PFA are of the opinion that this could be much higher than the £40K per unit indicated in the LGV Infrastructure and Viability Assessment as it appears to have omitted a number of major items

- Off site foul and surface water drainage strategy would appear to require considerable capital investment that has not been fully quantified

- Uncertainty surrounding how the funding gaps will be overcome to ensure key infrastructure is delivered and is delivered on time.

5.3.24 This is meant to give examples of where we believe that costings may be under-estimated or omitted and not intended to represent a definitive or exhaustive list. Furthermore, the issue is not so much simply as to whether or not the proposal is ultimately viable in its own right as a development scheme but whether or not the cost of addressing infrastructure coupled with its implementation will impact so significantly upon the delivery of Longcross Garden Village as to seriously impact upon its implementation and undermine the soundness of the housing strategy of the Local Plan.

5.3.25 On topics such as road improvement “provisional”, “very early, high level, preliminary cost estimates....” are given and the language underlines the lack of certainty and precision and these are consequently are considered to be significantly under-estimated. In particular, there is still no general level of agreement in terms of the highway strategy between RBC, Highways England and Surrey County Council Highways let alone a detailed costing and allocation of those costs to inform the Examination.

5.3.26 As a result of this lack of information it is impossible to quantify our client’s position on this particular issue at this point in time. Consequently we therefore believe that there is an inadequate level of information upon which to find the Longcross Garden Village proposal sound in this regard, particularly with regard to the delivery of the anticipated level of housing completions within the Local Plan period.

General Infrastructure Costs

5.3.27 The Longcross Garden Village Infrastructure and Viability Assessment (2017) (SD_007P) identifies a figure of £9,879 per unit for transport infrastructure (on and off site). As identified in our response to question 5.2 above, this only leaves £2.8 million for other measures and point out that those other measures will need to include the on-site highway infrastructure as well as general on/off site transport infrastructure.

5.3.28 Furthermore, the contribution per dwelling is based upon the total number of dwellings whilst it is normal to apply such development costs only to the total number of OM dwellings. Notwithstanding this, the figure is likely to change as a consequence of the new A320 study being undertaken by Arcadis, who have indicated (in a memo of the 9th January 2019 (RBCLP_19)) that three to four months could be required in order to identified whether any mitigation measures will be effective or indeed whether there are any “showstoppers” – should a new motorway junction be considered this would be a “showstopper” in terms of cost, time for delivery and (not least) HE policy. We therefore reserve the right to comment further on the general viability of LGV once Arcadis have submitted their assessments.
5.3.29 As a result of this lack of information it is impossible to quantify our client’s position on this particular issue at this point in time. Consequently we believe that there is an inadequate level of information upon which to find the Longcross Garden Village proposal sound in this regard.

Q5.4 Overall, do the Plan’s proposals for Longcross Garden Village align with the key principles that guided its identification as a Locally-Led Garden Village by the Government in 2017? Are they an appropriate reflection of the TCPA’s principles as set out in paragraph 5.90 of the Plan?

5.4.1 No. DPDS consider that the Plan’s proposals for Longcross Garden Village do not align with the key principles that guided its identification as a Locally-Led Garden Village by the Government in 2017.

5.4.2 The table below outlines our response to each TCPA principle outlined in paragraph 5.89 of the submission Local Plan:

<table>
<thead>
<tr>
<th>TCPA Principles for Locally-Led Garden Villages, as per Paragraph 5.89 of the Submission Local Plan</th>
<th>DPDS Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land value capture for the benefit of the community</td>
<td>The Plan’s proposals for Longcross Garden Village do not align with this principle. The number of objections from local residents and local community groups towards Longcross has been evident throughout the evolution of the Local Plans and also in the examination to date. There are also question marks over the costing, funding and delivery of critical infrastructure needed to support this development. It is for these reasons that we believe this land value capture will not benefit the community.</td>
</tr>
<tr>
<td>Strong vision, leadership and community engagement;</td>
<td>The Plan’s proposals for Longcross Garden Village do not align with this principle. Paragraph 5.97 of the Submission Local Plan states that: “The Local Authority expects the new garden village at Longcross to come forward as an exemplar form of development, epitomising good practice in the delivery of sustainable new communities and their supporting infrastructure.” We consider that due to the infrastructure</td>
</tr>
<tr>
<td>Matter 5: Longcross Garden Village</td>
<td></td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td><strong>Community ownership of land and long-term stewardship of assets;</strong></td>
<td>We consider that the Longcross Garden Village is not deliverable.</td>
</tr>
<tr>
<td><strong>Mixed_tenure homes and housing types that are genuinely affordable;</strong></td>
<td>We consider that the Longcross Garden Village is not deliverable. Longcross Garden Village will not be capable of delivering housing completions within the five year housing land supply period of the period 2019/20 to 2023/24. It will also not be capable of delivering the full anticipated quantum of development within the plan period.</td>
</tr>
<tr>
<td><strong>A wide range of local jobs in the Garden Village within easy commuting distance of homes;</strong></td>
<td>The provision of employment to the site North of the M3 is too small to be meaningful, especially given that the data collection centre provides very few opportunities. Therefore residents will need to commute to work. As noted earlier 64-69% (source: SD_007P) of residents will travel to work by car. Road infrastructure improvements are required and the deliverability and extent of these if currently not certain.</td>
</tr>
<tr>
<td><strong>Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food;</strong></td>
<td>The Plan's proposals for Longcross Garden Village do not align with this principle. We consider that the Longcross Garden Village is not deliverable.</td>
</tr>
<tr>
<td><strong>Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience;</strong></td>
<td>We consider that the Longcross Garden Village is not deliverable. DPDS accept that previous concerns regarding SANGs have been satisfied and that Natural England do not have objections with the bespoke SANG. However, as outlined by the council there are predicted to be approx. 575 dwellings that do not currently have SANG mitigation in place over the period of the Local Plan.</td>
</tr>
<tr>
<td><strong>Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods;</strong></td>
<td>We consider that the Longcross Garden Village is not deliverable.</td>
</tr>
</tbody>
</table>
| Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport. | The Council’s Longcross Garden Village Expression of Interest Bid (July 2016) (*Appendix 4*) explains in paragraph 2.20 how the garden village will meet each of the TCPA principles. In regards to the transport systems, it states the following:

“Both the northern and southern parcel of the village will be served by Longcross Rail station. Whilst services to this station are at present limited, the permission granted for the northern parcel has secured funding towards more frequently stopping services and during non-peak as well as peak hours as well as improvements to the rail station for a period of four years. The permission on the northern parcel of the village has also secured provision of a funded bus service for 9 years to Addlestone, Chertsey and Egham operating within a 6 mile radius of the site. This service would also complement the southern parcel and the masterplanning for the southern parcel has embedded walking and cycling within its illustrative design.”

The services to Longcross Rail station as stated is currently limited and infrequent. The Infrastructure Delivery Plan Schedule (May 2018) (*SD_007O*) shows the proposed improvements to be completed by 2024/25, by this time according to the council’s housing trajectory 850 houses will be delivered. We are unable to comment on the attractiveness of this form of transport without further information regarding the frequency of the services following the improvements proposed.

The secured provision of a bus service is to be funded for only 9 years and therefore this is currently not seen as long term sustainable provision of public transport unless this service is extended. Information has also not been provided as to when this service will begin and how frequent it will be.

The relevant principle states clearly that walking, cycling and public transport should be the most attractive forms of transport. However, the needs of private transport must... |
also be met, especially given RBC’s figure of 64-69% will be travelling to work and accessing services via car.

As discussed in our response to questions 5.2 and 5.3, it is still unclear what is likely to be the impact of development (including Longcross Garden Village) on the Strategic Road Network including the A320 corridor and Junction 11 of the M25. It also remains unclear as to the specification at a strategic level of any works that need to be undertaken on the Strategic Road Network to ensure that development arising from the local plan does impact **severely** upon it.

5.4.3 Overall, DPDS strongly consider that the proposed Longcross Garden Village does not align with the principles of Garden Villages set out by the TCPA. The fundamental reason for this is due to the deliverability and viability of the proposed infrastructure and services which have been outlined in more detail in our hearing statements. We consider that the garden village will achieve the vision because of these issues.
Appendix 1:

Critique of the Runnymede Borough Council Green Belt Review (January 2019)
Appendix 2:

Start to Finish: How Quickly do Large-Scale Housing Sites Deliver? (November 2016), NLP (Executive summary and page 8 only)
Appendix 3:

An email dated June 2012 between White Young Green and Thames Water Utilities Ltd
Appendix 4:
Longcross Garden Village Expression of Interest Bid (July 2016)
Old Bank House
5 Devizes Road
Swindon
SN1 4BJ

t: 01793 610222
e: dpds.swindon@dpds.co.uk

3 Gleneagles House
Vernon Gate
Derby
DE1 1UP

t: 01332 206222
e: dpds.central@dpds.co.uk

www.dpds.co.uk