HEARING STATEMENT

On Behalf of Ashill (Respondent ID 1481)

Matter 5 – Longcross Garden Village

January 2019
1.0 Introduction

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

1.2 As discussed in more detail in Chapter 3 of this Matter Statement, both sites are strategically located and offer a solution to the identified issues of soundness arising from Matter 5.

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

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

Overview of Soundness Issues for Matter 5

1.5 Longcross Garden Village represents over 20% of the proposed housing supply in Runnymede over the Plan period with one in five of the needed houses coming from Longcross Garden Village. In addition, completions from the site are included in the first five years of the Plan. For this reason, any obstacles to its delivery and build out rates will have a direct impact on the ability of the Plan to meet its housing needs.

1.6 As set out in the Longcross Garden Village Infrastructure Assessment 2017 (SD_007P), the total infrastructure costs are anticipated to be £101.7 million and anticipated to be underpinned by a range of financing options including CIL, s106 and direct government funding.

1.7 At present the over reliance in the Plan on Longcross Garden Village is unsound as it is not consistent with the NPPF. It is important that the Plan can be flexible enough to ensure that any potential delays in the planning application submission, infrastructure delivery and funding at Longcross Garden Village are dealt with by the Plan. Paragraph 21 of the NPPF states that ‘Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.’

1.8 In ensuring that such flexibility can be built into the Plan, it would be appropriate to allocate additional sites to provide contingency to potential delays in the build out rates at Longcross Garden Village. With a site assessment score mirroring allocated sites, Stroude Farm (SLAA13), if allocated, would build in the necessary contingency. With no significant upfront infrastructure requirements, Stroude Farm (SLAA13) could be delivered in the early years of the Plan and provide contingency to delays at Longcross Garden Village.

1.9 In turning to the matter of the A320, it is acknowledged in the evidence (SD_007P, SD_21B) that Longcross Garden Village will impact Junction 10 of the A320. The relationship between Longcross Garden Village and Junction 10 is an important consideration for the Plan, with delays in completion of the Junction 10 works likely to prevent occupations at Longcross. Indicative assessment work undertaken by iTransport indicates that circa 230 homes and 11,000 sqm of employment floorspace on the site could be delivered before material and severe impacts resulted at Junction 10.

1.10 As detailed in SD_21B, Junction 10 of the A320 has the most significant uncertainty in terms of its delivery. Land at Christmas Tree Farm (SLAA284) includes land needed to ensure the timely delivery of the Junction 10 improvement works and should be allocated in the Plan as part of a wider development in this location to remove the current uncertainty associated with this key junction.
QUESTION 5.1

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?

Response

2.1 Our response to Matter 5.1 should be read in conjunction with Matter 6 which deals with the proposed allocation SL10 to the north of Longcross Garden Village.

2.2 As drafted, the extent of the allocation at Longcross Garden Village is unsound as it is inconsistent with the NPPF (Paragraphs 52 and 85).

2.3 Paragraph 52 states:

‘The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development.’

2.4 With reference to the highlighted section of Paragraph 52 of the NPPF, where land is already in the Green Belt we consider that it is equally important to consider whether or not it is appropriate for Green Belt land adjoining larger scale development to be released.
2.0 Matter 5: Longcross Garden Village

2.5 As seen in Figure 1, when the extent of Green Belt release is considered against the proposed release at SL10 there is significant scope for a key function of the remaining Green Belt land to be undermined – namely to prevent merging towns from merging into one another.

2.6 Given the extent of the existing tree cover on the Longcross Garden Village site and the need for local planning authorities to ‘define [Green Belt] boundaries clearly, using physical features that are readily recognisable and likely to be permanent’, it would be consistent with the NPPF for the proposed extent of the allocation to be revised to ensure that the significant tree buffer remains in the Green Belt and physical separation between Longcross and Virginia Water maintained.

2.7 Figure 2 of Policy SD10 should be revised to make it clear that the north-eastern part of the site (that area closest to Virginia Water South) is not allocated for development.

2.8 As detailed in our Matter 6 response, it is evident that Green Belt release has been considered on an individual basis rather than being considered holistically.
QUESTION 5.2

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?

Response

Planning Application Progress at Longcross Garden Village

2.9 Our response to Question 5.2 is that the proposed housing trajectory in SD_023G is not justified due to not being informed by robust evidence on the progress made on the outline planning application. Furthermore, the over assumed rates of delivery result in a plan that will not be consistent with national policy as it will result in a shortfall against the five-year housing requirement.

2.10 From the ‘Phasing of the Development’ section of the Longcross Village website we understand that the following dates were originally anticipated:

Subject to planning permission being granted, the timescales for the site would be:

2.11 With respect to timings, the Expression of Interest Bid Document1 (2016) to the Garden Village Prospectus produced by Runnymede Borough Council sets out at 2.40 that a planning application submission for the southern parcel (anticipated to be 1,500 homes) will follow the adoption of the Plan. At the point of drafting the document in 2016 it was assumed that the Plan (and site) would be allocated by early 2018. On this basis it was assumed that a planning application would quickly follow and that Phase 1 of the southern parcel could start from 2019/2020.

2.12 From our review of SD_023G, Runnymede has been unrealistic in amending the trajectory for housing completions in the southern parcel by only one year to 2020/2021. Whilst an updated Local Development Scheme has not been produced, given the current position of the Examination in Public and, particularly, the identification of further hearings to resolve

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1 https://www.runnymede.gov.uk/article/15572/Garden-Village-at-Longcross
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matters associated with Highways England, it would seem realistic to assume the adoption of the Plan in later 2019/early 2020 at the earliest.

2.13 With a planning application submission seemingly tied to the allocation, the delays currently being experienced with the Plan should be reflected in delays to the submission and approval of a planning application and, in turn, the associated build out rates on the site.

2.14 Notwithstanding this, a November 2016 report prepared by NLP\(^2\) found that in the absence of a live planning permission, large sites (1,000 to 2,000 units) are (on average) unlikely to be contributing to five-year housing land supply calculations.

2.15 At this moment in time it would not be justified (based on available evidence) to suggest that housing completions in the order of 150 dpa will be achieved before 2022 at the earliest.

2.16 As an important component of the Council’s five-year land supply, Main Modifications are required to ensure that the Plan is sound in light of the shortcomings. The risk would be that at the point of adoption of the Plan Runnymede are quickly in a position in which they are unable to demonstrate a five-year housing land supply as required by Paragraph 73 of the NPPF (2018).

Potential Barriers to Housing Completions at Longcross Garden Village

*Junction 10 of the A320*

2.17 As set out in **SD_021B**, Junction 10 of the A320 represents a key junction that will require significant upgrade work as a consequence of the planned housing allocations in Runnymede. This includes Longcross Garden Village.

2.18 As extracted from **SD_021B**, of all of the junctions along the A320 Junction 10 is noted as having the greatest level of uncertainty for delivery due to its significant reliance on third party land and the need to relocate the existing community car parking serving Ottershaw.

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<thead>
<tr>
<th>Junction 10 (A320 Guildford Rd/Munsey Road/Chobham Rd)</th>
<th>Time</th>
<th>Cost</th>
<th>Land Aq</th>
<th>Political</th>
<th>Delivery</th>
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<td>If the current feasibility design for this junction is progressed, it would require the purchase of a large area of 3rd party land. This increases the risk of the programme for 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 minimising or eliminating the need for 3rd party land purchase to reduce complexity, costs and risk to delivery timelines.</td>
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<tr>
<th>Junction 11 (A320 Guildford Road/Box Road)</th>
<th>Time</th>
<th>Cost</th>
<th>Land Aq</th>
<th>Political</th>
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<tr>
<th>Junction 1 (Chilworth Green Road/ St Ann’s Road/388 Thorpe Road/Staines Road)</th>
<th>Time</th>
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2.19 The potential for delays associated with Option 3 and its requirement for additional CPO processes is a significant consideration that sits at the heart of the soundness of the plan. In the context of Matter 5 it has a key relationship to the rate at which housing occupations will be realised at Longcross. Indicative assessment work undertaken by iTransport indicates that approximately 230 homes and 11,000 sqm of employment floorspace at Longcross Garden Village could be occupied before material and severe impacts were seen at Junction 10 (see Appendix B).

2.20 The disruption in acquiring third party land and time taken to resolve an alternative location for the car park could affect the vitality of the local centre and will also result in delays to the

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

Consideration of the Christmas Tree Farm Site in Delivering A320 Mitigation

2.21 At the present time there is no confidence that the required mitigation can be delivered within the timeframes required to deliver the necessary homes in the early to middle part of the plan, including the assumed contribution from Longcross Garden Village.
3.0 Main Modifications Required to Matter 5

3.1 In order to address the soundness issues identified in response to Matter 5 the following Main Modifications are required to the plan:

1. Allocate sites outside of the A320 Stress Area to allow housing delivery that is divorced from the uncertainties associated with the mitigation being delivered in a timely manner. SLAA13 represents a site that would respond to this.

2. Review the extent of the allocation at Longcross Garden Village and Virginia Water South to avoid the potential for ribbon development as a result of the Green Belt release. Green Belt should endure over the Plan period and, as drafted, this area is exposed to Green Belt development during the plan period.

3. Allocate development and land at Christmas Tree Farm (consistent with the identification in the A320 study) to allow the current uncertainties with the A320 package of mitigation for Junction 10 (and associated delays to housing delivery) to be resolved.
3.0 Main Modifications Required to Matter 5

Appendix A – Site Location Plan
3.0 Main Modifications Required to Matter 5

Appendix B – iTransport Note
SECTION 1    INTRODUCTION

1.1 This note sets out transport comments with regard to Matter 5.2 to be discussed at the forthcoming Stage 2 Hearings for the Runnymede Borough Council (RBC) Local Plan. The Inspector has asked the following:

“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?”

SECTION 2    IMPORTANCE OF A320 CORRIDOR TO DELIVERY OF HOUSING

2.1 The A320 Topic Paper of July 2018 is clear that improving the A320 corridor is central to the delivery of housing in Runnymede:

“...the Borough is seeking to deliver the A320 improvements within a 5-year window from 2019 to 2024. Whilst this can be considered ambitious, the infrastructure improvements are required for a Borough committed to meet its housing and development targets.” (ref: para 5.17)

2.2 The A320 / Murray Road / Chobham Road (known as ‘Junction 10’ in the A320 Corridor Study) is among the most sensitive junctions within that corridor:

- Three out of four approaches are forecast to operate over capacity in 2036 with Local Plan developments (without mitigation) during the morning peak (ref: A320 Corridor Study Table 32); and
2.3 The A320 Corridor Study therefore presents a mitigation scheme - costed at £6.8m:

Image 2.1: Junction 10 Improvement Scheme

2.4 Table 1 of the A320 Topic Paper identifies Longcross Garden Village (referred to herein as 'Longcross') as one of three (and by far the largest) developments in Runnymede that will need to fund / deliver the improvements to Junction 10. Longcross is identified as the single largest financial contributor to A320 corridor improvements and delivery of Junction 10 improvements is financially reliant on Longcross as the Local Plan stands.

2.5 However, the A320 Topic Paper acknowledges that the improvements at Junction 10 are flawed:

“If the current feasibility design for this junction is progressed, it would require the purchase of a large area of 3rd party land. This increases the risk of the programme for 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...” (ref: Figure 3: Risk Assessment of the A320 Topic Paper with regard to Junction 10).

2.6 No further scheme has been identified (or subject to the scrutiny of the EiP process) and thus there is no certainty that there is a feasible and deliverable improvement scheme at Junction 10 to enable development at Longcross to come forward.

2.7 Table 1 of the A320 Topic Paper identifies two improvement schemes towards which Longcross may need to contribute to / fully fund / deliver, one of which is at Junction 10. It is clear therefore that development at Longcross is dependent on improvements at Junction 10.
2.8 The possible quantum achievable in the absence of the improvements is considered further in the following section.

SECTION 3 QUANTUM OF DEVELOPMENT AT LONGCROSS THAT THE EXISTING JUNCTION 10 CAN ACCOMMODATE

3.1 Longcross is a mixed-use development comprising, among other uses:

- An additional 1,700 homes; and
- Some 80,000 sqm of employment floorspace.

3.2 During a network peak hour, these elements scheme alone are likely to generate:

- 1,700 homes: approximately 1,000 vehicles per hour (vph);¹
- 80,000 sqm of employment: approximately 1,200 vph²; and
- Total: 2,200 two-way movements.

3.3 Given that the most direct route to/from the southern end of the A320 corridor and M25 junction 11 is likely to be via junction 10 (ref: Image 3.1 below), a conservative estimate is that at least circa 20% of these trips will route through Junction 10.

¹ A typical two-way peak hour trip rate for private homes is 0.6 trips per dwelling. 1,700 x 0.6 = 1,020vph
² Assuming an office development, a typical two-way trip rate is 1.5 trips per 100 sqm. 80,000 / 100 x 1.5 = 1,200vph
3.4 This is equivalent to an additional 440 vehicles per hour using Junction 10 during the peak hours.

3.5 The quantum of development that can be delivered without mitigation depends on the operation of Junction 10 without development. ‘Without Local Plan’ modelling results are not provided in the A320 Corridor Study. However, given the existing issues at the junction – notable levels of queuing and delay in the peak hours and there is no existing spare capacity – any material increase in traffic is likely to result in a severe impact in NPPF paragraph 109 terms. On this basis, any impact greater than one additional vehicle per minute (i.e. 60 vph) is likely to be noticeable/material.

3.6 On this basis, circa 14% of development (60/440) could be delivered without mitigation. This is equivalent to some 230 homes and 11,000 sqm of employment floorspace on the site.

3.7 It is therefore apparent that a material quantum of development at Longcross is dependent upon improvements being implemented at Junction 10.

3.8 Any delay resulting from the acquisition of third-party land (ref. Section 2) therefore has the potential to significantly delay the delivery of a material quantum of housing at Longcross.
SECTION 4  BENEFITS OF CHRISTMAS TREE FARM SITE

4.1 The Christmas Tree Farm provides:

- An alternative funding source for improvements at Junction 10.

- A genuine opportunity to provide an alternative improvement scheme (using land within Christmas Tree Farm but no third-party land at significantly reduced cost (up to £3m) and risk of delay associated with compulsory purchases. The scheme is shown below.

Image 4.1: ‘Ashill’ Improvement using only Christmas Tree Farm / Highway Land

- A genuine opportunity to ‘unlock’ capacity on the network at an early stage of the Local Plan’s lifespan whilst delivering a significant quantum of housing.

- Additional infrastructure community and educational benefits.
SECTION 5  CONCLUSION

5.1 On this basis:

- A material barrier to implementation of housing at Longcross has been identified, i.e. Longcross's dependence on mitigation at Junction 10;
- The only mitigation scheme put forward by the Council is expensive and requires third party land. It may not be deliverable at all, but is certainly not deliverable in the timescales anticipated by the Council;
- The Council accepts that it needs to think again but has not identified or consulted upon a demonstrably deliverable alternative scheme;
- A material quantum of development at Longcross (at least 86% on i-Transport’s figures) is dependent on a comprehensive improvement scheme coming forward at Junction 10;
- Early delivery of a material number of homes is therefore jeopardised by the Council’s approach to Longcross and its transport evidence base, which is not justified; and
- Alternatives are needed to deliver the required levels of housing – the Christmas Tree Farm site offers the opportunity to effectively deliver improvements at Junction 10 and is not constrained by third party land in delivering such improvements – it would therefore help to ‘unlock’ the Local Plan.