Runnymede Local Plan Examination in Public

Representor Ref: Jim Nichol. Chair of Brox Lane Residents Association and Brox End Nursery Residents Association (approx 200 members/supporters)

Further Representation to that submitted to the first stage Hearings.

**Matter 3** (cont from Stage 1 hearing)

Further to discussion in the Stage 1 hearing there is some NEW, additional information/evidence which has come to light. I refer to the scoping document which was sent by the Steering Group to Arcadis (attached herewith) upon which Arcadis prepared their A320 Corridor Study in 2017. That study now underpins almost the entire RBC Local Plan. We are surprised this document has not been shared on the Local Plan website.

In essence the 2017 Arcadis report is significantly flawed and inadequate. We suggest it should NOT be used by SCC in their HIF bid this year or to underpin the RBC LP –

- The Arcadis report was denied proposing an adequate transport infrastructure solution because it was restricted from considering bypass options and was specifically instructed not to deliver traffic quicker to M25 J11 than presently exists.
- It failed entirely to reduce existing community severance by slashing Ottershaw in two by its proposal for a traffic scheme at A320 J10 which is in the middle of our village and eight times larger than the existing scheme. It will destroy the community and its businesses and in addition proposes to build over the village carpark which is at the heart of our community.

A comprehensive, detailed and professional study of the entire Runnymede transport infrastructure should be commissioned to support the RBC Local Plan and those of surrounding boroughs of Woking and Surrey Heath as significant additional population from their Local Plans will use the Runnymede road infrastructure to access the M25.

Regardless of a final decision from Highways England on whether to support the RBC LP, the start criteria for the A320 corridor study is flawed to the serious detriment of the community and future developments in the area. The new evidence proves this point and demonstrates the critical need to commission a full and detailed study of entire local and major roads and SRN with solutions offered that will to the benefit of the entire community.

More new information is the recent announcement that Surrey County Council is intending to close the Lyne Recycling Centre facility. The significant effect of this will be to divert even more traffic onto the A320 as it makes its way the Woking Recycling Centre in Martyrs Lane.
**Matter 5 (Longcross Garden Village - LGV)**

5.1 Regarding exceptional circumstances to justify proposed alterations to the Green Belt boundaries, by virtue of the fact that this land presently contributes significantly to the amenity value of that area through its greenness and its openness, exceptional circumstances do NOT exist for a development of the proposed quantum.

5.3 (d) We are left wondering how big the proposed traveller pitches are. Have the travellers themselves been consulted on whether they approve and will take advantage of these pitches? Who will pay for the provision of these pitches?

5.3 (f) We are not convinced that the status and purpose of Chobham Common will not be severely undermined by the proposed LGV. LGV is sited too close and the increased ‘convenient’ access to this sacred land will spoil it for the more discerning visitors who welcome and respect the special status of Chobham Common and the diverse, endangered wildlife it supports.

Some housing and some business development could gain our support but the proposed scale is unacceptable.

**Matter 6**

6.1 (overlaps with 6.2)

6.1(a) Policy SL12 – Ottershaw East.

This allocation is presently entirely Green Belt and the proposal is to remove it from that protection.

This policy has methodology inconsistencies within itself with respect to Green Belt boundary changes.

The main part of this allocation was proposed as housing development and to be restricted to the land to west of and bounded by the ancient public footpath designated FP30. This decision was promoted by RBC as providing a defensible GB boundary. The land proposed for housing development was argued as being under-used agricultural land (even though it undoubtedly contributed to GB values by virtue of its openness and greenness and has recently been used to graze sheep).

Without warning in December 2017 and without prior public consultation, land to the east of FP30 was amalgamated into SL12. This now presents a very clear incursion into the GB without any defensible boundary. In contrast to earlier SL12 allocation, the new land (which is under different ownership to rest of SL12) presently features a viable and thriving agricultural business known as The Field Nursery that sustains a local and successful Farm
Shop in Hardwick Lane. Altogether, valuable assets to the community. There are NO exceptional circumstances to include The Field Nursery land into SL12 and the loss of the agricultural value of this land will be immediate and to the detriment of the community and provide future argument for further incursion into the GB by offering no defensible boundary. The associated loss of viability and sustainability of The Farm Shop will have an unnecessary and very negative impact on the community and local employment.

**As it stands, policy SL12 is unsound.** At least The Field Nursery should be removed from the allocation and permitted to continue contributing to the principles of the Green Belt and its significant benefit to the community.

6.1(b) It is **NOT** clear why SL12 was extended to include The Field Nursery other than simply to provide more housing and we are informed that is **NOT** an exceptional circumstance.

We understand that the owners of the Field Nursery were specifically encouraged to offer their land for development but to date we have not been provided with any explanation as to why such extraordinary steps were taken to have this particular piece of land removed from the GB, why this was introduced at the eleventh hour or what exceptional circumstances exist to justify its removal from GB.

6.3 Policy SL2 Brox End Nursery

This allocation was removed from the GB about 30 years ago. It is entirely land-locked by private land. During a succession of subsequent failed planning applications and public enquiries, Inspectors observed that access to the land was only possible and safe via Brox Lane. Brox Lane is privately owned by third parties.

Policy SL2 **demands** provision of a 'minimum of 40 dwellings'. This is arguably viable if only the footprint area is considered (without taking into account the NPPF request that density of new development should be in keeping with surrounding are) but 40 dwellings are **UNDELIVERABLE**. In fact, in December 2015 when considering the then latest application (RU.15/1285) for 40 dwellings, the Council deferred a decision and advised the developer to come back with a proposal for up to 14 dwellings - the issue being mainly with third party ownership of the access land and public safety along the access road. The owners of that land worked with the developer who then submitted a good application (RU.16/0652) for 12 houses in 2017. All required issues were addressed but extraordinarily, the Council refused the application mainly on the grounds of inefficient use of the land. On this occasion and despite pleas for common sense, the council chose to overlook the fact that any application for above 14 units would be undeliverable due to lack of access across private land.
This allocation (SL2) is NOT available or deliverable for a ‘minimum of 40 dwellings’ – and a barrister’s opinion supports this claim. The council has evidence of that opinion document. A copy can also be provided to the Inspector should this be required.

**As it stands, SL2 is unsound** as it is undeliverable. That situation could be reversed by replacing the demand for ‘a minimum of 40 dwellings’ with ‘up to 14 dwellings’ and including some wording to recognise the unusual situation of the allocation being entirely land-locked by third party-owned land. It is of note that the owner of the SL2 land in his representation to you has made a similar request in order to make the allocation deliverable.

6.4

SL2. The specific requirement to build a minimum of 40 dwellings is NOT justified as it makes the allocation undeliverable (See comments in 6.3, above).

SL12. The highways infrastructure of the access road (Brox Road) will NOT support such a large development of an additional 200 houses. This is when considering SL12 alone without considering accumulative effect of other developments and with new traffic using Brox Road as a rat run to avoid the congestion at A320 J10. A present-day observation of traffic at the cross-road junction (a.k.a ‘Death Junction’ on the attached map) of Brox Road with Slade Road and Bousley Rise (which is the only vehicular access to Marshfield and Ottershaw primary schools) and the immediate location of two businesses (Travis Perkins and Hunts Transport) that depend on frequent visits by some of the largest juggernaut lorries permitted on UK roads will reveal the extent of the problems today. Furthermore, that cross-roads is the location of the busiest nursery school in Ottershaw (Toad Hall). The effect of existing and future levels of air pollution on our children has not been mentioned or considered in this Local Plan. A short video clip of the existing significant congestion and hazards for local school children at this cross-roads could be made available to the inspector if it is deemed useful.

SL12 also reduces protection of natural environment because of no defensible boundary to loss of more GB in future.

SL2 and SL12 (and other allocations) suggest that school infrastructure can be improved by expanding existing schools. These schools were sited and built decades ago to serve a smaller community when most children were transported without vehicles. Today the road system around the schools is dangerous and grid-locked twice a day - impassable by other residents and road users. These schools and their access road infrastructure cannot sustain further expansion. It is **NOT** sufficient that these allocations merely specify **expansion** of existing primary schools. The Plan should include **NEW** schools that can be accessed in a safe manner by our children.
By any stretch of the imagination, neither of these two allocations enhances the natural environment.

In the Local Plan we note comment of the impact of development on the road networks in their respective point(s) and how it contrasts (on page 63) with the wording used in respect of Policy SD10. We believe that SL2 and SL12 should also demonstrate delivery of “On and off site improvements to the local road network to mitigate significant impacts as set out (but not limited to) in the IDP and contribution towards improvements to the A320 as set out in the final A320 Study”. (Although we hope that study will be significantly revised as per earlier in this statement).

SL2 and SL12 allocations are unsound. In summary, to make these allocations sound –

- SL2 – replace the demand for ‘a minimum of 40 dwellings’ with ‘up to 14 dwellings’ and note the unusual circumstances.
- SL12 – As a minimum, delete the land known as The Field from this allocation as no exceptional circumstances exist and no defensible boundary for GB. Better would be to delete all of SL12 as Brox Road and local schools cannot cope with the increased housing.