EXAMINATION IN PUBLIC OF THE RUNNYMEDE 2030 LOCAL PLAN
HEARING STATEMENT
18 January 2019

MATTER 5, QUESTIONS 5.1, 5.2 AND 5.4
ELYSIAN RESIDENCES
REPRESENTOR 2006

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?

1. The Runnymede Local Plan 2030 allocates land in the Borough primarily for new housing, informed by the Runnymede 2030 Site Selection Methodology and Assessment (December 2017) which provides the methodology and a number of sites regarded as suitable for development.

2. Table 4-4 in the document contains the Accessibility Standards, relating largely to distances to local essentials that result in a score for a site.

   - The first factor is Journey Time to/from Major Centres or Centres of Employment in peak hours by public transport, the highest accessibility being when the site is located within 30 minutes journey time of two or more major centres, with the lowest being over 40 minutes journey time from any major or intermediate centre. The Longcross Garden Village site is approximately 40 minutes from Bracknell depending on train times and Longcross station, and over an hour away from Woking.

   - The second factor is based on distances to bus stops, with the highest accessibility indicated through distance to a bus stop with very good or good level of service within 400 metres up to over 1.6 kilometres as the worst case. Longcross Garden Village features no bus stops located under 1.6 kilometres from the site.
The third factor considers the distance to a rail station with very good or good level of service. A site located within 800 metres is considered well connected, whereas over 2 kilometres is considered worst. The Longcross site is located near Longcross station however this station provides a low level of service, and therefore it is located over 2 kilometres to a well serviced station, such as Woking.

The fourth factor is Journey Time to/from Major Centres or Centres of Employment in peak hours by cycling. A site within 10 min (2.6 kilometres) cycle time of 2 or more major centres is considered highly accessible, whilst over 20 min (5.2 kilometres) cycle from any major centre is considered poorly accessible. A cycle speed of 16 kilometres per hour. The Longcross Garden Village site is located approximately 58 minutes cycle or 15 kilometres from Bracknell, whilst Woking is 46 minutes or 12 kilometres distance.

3. Table 5-1 illustrates Longcross Garden Village gained a score of ‘Low’ for accessibility performance, with the overall performance being described as: “Site accessibility is poor for all local services but accessibility to service centres is good by rail/cycling. This could be improved if primary education/health and retail facilities were provided on site. The DERA site south is large enough to secure on site local services and facilities which would improve accessibility. Only limited significant non-absolute constraints on site. Although heritage assets are located on site, harm could be avoided through design. Potential loss of open space but this could be retained, replaced or improved elsewhere on site. Based on limited constraints and that the site is large enough to improve accessibility to local services by securing facilities on site, site scores medium overall.”

4. Significant investments to infrastructure including upgrading the existing provision or the provision of new infrastructure will be required for Longcross Garden Village to acheive only a medium overall score for accessibility. On the basis of the above assessment, it is clear that the Longcross Garden Village site is not in a sustainable or accessible location, contary to the conclusion in the Site Selection Methodology and Assessment report.

5. We agree that exceptional circumstances exist to justify alterations to the Green Belt boundary, and further detail on this matter is provided in our Matter 6 statement. Specific comments
regarding wider Green Belt release and the assessments that informed the Local Plan are also discussed in further detail in the Matter 6 statement.

**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?**

6. The paragraphs below set out in detail a range of transport infrastructure considerations facing the Longcross allocation which represent barriers to the deliverability and functionality of the dwelling allocated to the site.

7. The Longcross Garden Village – Infrastructure and Viability Assessment produced by AECOM in December 2017 details the impact the development and committed developments would have on the surrounding road network, known as Scenario 2. It states “In Scenario 2, involving implementation of the Local Plan, the Transport Assessment identifies 11 link hotspots and 18 junction hotspots where traffic impacts are deemed to be severe, causing considerable delay to drivers, and likely requiring mitigation in order to bring forward further development. Of these hotspots, the areas between Longcross and west of Chertsey / St Peter’s Hospital and south of Virginia Water are particularly impacted by the garden village development. These areas include 6 of the link hotspots and 8 of the junction hotspots, namely:

**Link Hotspots:**
- Silverlands Close (St Peter’s Hospital)
- B386 Holloway Hill
- B386 Longcross Road
- Portnall Rise
- Wellington Avenue
- A320, Guildford Road

**Junction Hotspots:**
- Chobham Lane j/w Longcross Station
• B386 Longcross Road j/w Lyne Lane
• B389 Christchurch Road westbound approach to j/w Callow Hill and Wellington Avenue
• Callow Hill southbound approach to j/w B389 Christchurch Road and Wellington Avenue
• Trumps Green Road j/w Wellington Avenue
• Holloway Hill j/w Hardwick Lane
• Holloway Hill j/w St Peter’s Hospital Access
• St Peter’s Hospital Access approach to A320 Guildford Road roundabout.”

8. It should be noted that the following junctions and links are on the A320 and would require significant mitigation directed to addressing the impact. At the time of writing it is still to be agreed with Highways England the extent of mitigation that will be necessary to cater for the additional traffic. As a result, there is significant doubt that these could be delivered in the planned period, but we reserve our position until such time as the outcome of these discussions is known. The junctions included are:

- Holloway Hill j/w Hardwick Lane;
- Holloway Hill j/w St Peter’s Hospital Access, and
- St Peter’s Hospital Access approach to A320 Guildford Road roundabout.

Whilst the links include:

- Silverlands Close (St Peter’s Hospital);
- B386 Holloway Hill, and
- A320, Guildford Road.

9. The initial Transport Assessment (2006) for Longcross recognises the site is not located in a sustainable location in relation to travel. A Mobility Management Plan (MMP) was produced in an attempt to improve the sustainability of the site. The MMP lists the following measures as improvements to the site:

- “Increase in frequency of trains stopping at Longcross railway station. It has been agreed with South West Train (SWT) that the frequency will be increased to two trains an hour in each direction throughout the day, Monday to Saturday inclusive. Correspondence relating to this from SWT is contained in Appendix I.”
• Improvement to station facilities...

• Provision of a new shuttle bus service between Woking railway station and the site. Providing accessibility from Woking railway station to the site will encourage employees / visitors to opt for rail as Woking station offers a variety of direct routes and as such travellers would no longer need to change at numerous railway stations. The shuttle bus will also link to the surrounding area, local off-site facilities and the facilities on site, providing connections with existing services and reducing the need to travel by car, not only to or from the site but internally as well.”

10. The Longcross Garden Village – Infrastructure and Viability Assessment produced by AECOM in December 2017 provides mode share data, and states “The vehicular trip rates set out in the northern masterplan transport assessment have been extracted and scaled up to calculate a provisional trip generation for the whole site. These vehicular trip rates have been used in tandem with the existing mode share set out in Section 8.2 to create a provisional multi modal trip generation for the purposes of identifying likely demand by mode before the transport strategy outlined in this document is implemented. The trip rates from the northern masterplan have been used as opposed to the Local Plan Transport Assessment because they are higher and will therefore provide a more robust worst case scenario.”

<table>
<thead>
<tr>
<th>Mode of Transport</th>
<th>Mode Share</th>
<th>AM</th>
<th>PM</th>
</tr>
</thead>
<tbody>
<tr>
<td>Train</td>
<td>15%</td>
<td>548</td>
<td>393</td>
</tr>
<tr>
<td>Bus</td>
<td>3%</td>
<td>106</td>
<td>76</td>
</tr>
<tr>
<td>Taxi</td>
<td>0%</td>
<td>11</td>
<td>8</td>
</tr>
<tr>
<td>M/C</td>
<td>1%</td>
<td>39</td>
<td>28</td>
</tr>
<tr>
<td>Car</td>
<td>66%</td>
<td>2438</td>
<td>1751</td>
</tr>
<tr>
<td>Passenger</td>
<td>4%</td>
<td>147</td>
<td>105</td>
</tr>
<tr>
<td>Bicycle</td>
<td>2%</td>
<td>93</td>
<td>67</td>
</tr>
<tr>
<td>On Foot</td>
<td>9%</td>
<td>316</td>
<td>227</td>
</tr>
</tbody>
</table>
11. The report also included the total infrastructure costs and improvements as part of the planning application. The Infrastructure and Viability Assessment also supports the initial TA, stating the development would provide 2 services per hour in each direction, for a four year period. In addition in regard to bus provision, “A new DRT service will be provided offering routes to Addlestone, Chertsey and Egham operating within a six mile radius of the site for nine years in lieu of a full bus route serving the site. The DRT service will be on an interim basis from the occupation of the first dwelling and until the occupation of the 185th dwelling or 20,000 sq.m of GIA Class B1 floorspace, when the Bus Service is introduced. The DRT will be a bookable service operating Monday to Saturday from 7am until 7pm; subject to demand, a more frequent / hourly service may be provided at the County Council’s discretion. In addition to the DRT, the developer for the site will contribute £150,000 towards the provision of school buses” (Page 60).

12. The initial Transport Assessment (2006) provided an adjusted modal split data, this is based on four nearby wards, with the walking and cycling trips removed due to limited paths to and from the site, and the bus services removed due to no services within 400 metres of the site. The resulting modal split is:

- “Rail: 2%
- Car Driver: 89%
- Car Passenger: 8%
- Motorcycle: 1%”.

13. The table below provides a comparison between the 2001 Modal Split, 2011 Modal Split, and the Proposed Modal Split, these are all included in the Longcross Garden Village – Infrastructure and Viability Assessment (December 2017).
<table>
<thead>
<tr>
<th>Mode of Transport</th>
<th>2001 Mode Share</th>
<th>2011 Mode Share</th>
<th>Proposed Mode Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>Train/Underground</td>
<td>8%</td>
<td>10%</td>
<td>15%</td>
</tr>
<tr>
<td>Bus</td>
<td></td>
<td></td>
<td>3%</td>
</tr>
<tr>
<td>Taxi</td>
<td></td>
<td></td>
<td>0%</td>
</tr>
<tr>
<td>M/C</td>
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<td></td>
<td>1%</td>
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<td>Car</td>
<td>67%</td>
<td>61%</td>
<td>66%</td>
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<td>Passenger</td>
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<td>3%</td>
<td>4%</td>
</tr>
<tr>
<td>Bicycle</td>
<td>7%</td>
<td>7%</td>
<td>2%</td>
</tr>
<tr>
<td>On Foot</td>
<td></td>
<td></td>
<td>9%</td>
</tr>
<tr>
<td>Other</td>
<td></td>
<td></td>
<td>1%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
<td><strong>100%</strong></td>
</tr>
</tbody>
</table>

14. The above table shows that public transport uptake increased from 2001 to 2011 by 2%. It is therefore difficult to assume that there would be an 8% increase to 18% for the proposed development, considering the development additionally will provide limited public transport benefits with some additional train services and a shuttle bus service. It should be noted that this bus service is not even being proposed as an hourly service.

15. Longcross Garden Village has been allocated to provide 1,700 dwellings over the plan period, which represents approximately 23% of the RBC’s projected housing supply over the plan period. The delivery of these homes relies on the implementation of certain transportation measures (identified in paragraph 8 above) as well as mitigation to the A320 corridor, which is not committed. In light of the well-rehearsed concerns facing the A320 works and the wider barriers to delivery set out above, it is unlikely that 740 dwellings will be delivered within 5 years of the adoption of the plan.
Question 5.4 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?

The TCPA principles referenced above are intended to ensure the delivery of a functional and well-designed village and include the provision of “integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.” The outcome of the changes identified above will be an increased, or at least maintained, reliance on car travel with no significant shift toward more sustainable transport modes. The increased frequency of train service to Longcross Garden Village from one train an hour to two trains an hour does not materially improve access to public transportation and encourages reliance on car travel, which is inconsistent with the TCPA principles.

16. Increased reliance on car travel will contribute to longer journey times around the local transport network and contribute to congestion on key transport corridors, both of which are likely to have negative impacts on air quality within Runnymede. Some of the worst transport impacts identified in paragraph 7 above will occur on the A320 corridor, which will require the delivery of significant mitigation measures to first remedy existing issues regarding congestion and queue lengths, and then to mitigate additional impacts caused by the delivery of a significant amount of new housing allocated along the route. Our Matter 3 hearing statement details the reasons why the A320 mitigation works are unlikely to come forward, at least in the timescales envisaged by RBC, and raises issues relating to the modelling which suggest that they will not effectively mitigate the impacts, resulting in unsustainable patterns of development.
Included as part of Woking's Green Belt Plan.