HEARING STATEMENT

On Behalf of Ashill (Respondent ID 1481)

Matter 6 – Other Allocations for Housing and Mixed Uses

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 Both sites are strategically located and offer a solution to the identified issues of soundness arising from Matter 6.

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.
2.0 Response to Question 6.1

**QUESTION 6.1A & 6B**

2.1 Our response to 6.1a & 6.1b is primarily focused on SL9 – Virginia Water North. For the reasons set out below the allocation of Virginia Water North is not sound as it is not consistent with the NPPF or justified when considered against reasonable alternatives.

2.2 Submission Document SD_012B (Site Selection Methodology Assessment, December 2017) sets out the Council’s approach to site selection based on an 8-stage approach.

2.3 The staged approach of the site selection methodology results in shortcomings at one particular stage precluding further site assessment being undertaken and the site is discounted. This approach heightens the need for stage assessments to be undertaken in a consistent and robust manner. Within SD_012B we have identified weaknesses associated with key stages of the assessment. The nature of the errors are such that they result in unsound site allocations.

**Stage 4 Assessment – Landscape Character**

2.4 The criteria assessment for Stage 4 is clear at 4.49 that ‘if a site has constraints identified at Stage 4 which cannot be overcome without significant impact or which renders the developable area of a site less than the threshold set out in Stage 1, the site will be excluded from further consideration and not taken forward to stage 5.’

2.5 In following the methodology established by the Council, the Stage 4 assessment of Site SL9 is fundamentally flawed. The Stage 4 assessment for the site states:

‘Site within unit SW1 of Surrey Landscape Character Assessment. Built development strategy for SW1 seeks to, amongst other things conserve a sense of seclusion with sparse settlement enclosed by woodland and to maintain wooded and undeveloped skyline. It is not considered site would adversely affect these principles although account will need to be taken of principles and enhanced through design, especially retention of more wooded area toward west of site. No other constraints present.’

2.6 In the Stage 4 assessment, only one site in precluded from reaching Stage 5 – this being a site that is completely covered by vegetation. Through the lack of robust assessment and...
2.0 Response to Question 6.1

interrogation through the Stage 4 assessment in respect of landscape character, the site assessment methodology fails to respond to Paragraph 110 of the NPPF which states that ‘Plans should allocate land with the least environmental or amenity value.’ In considering Paragraph 110 of the NPPF, it would be reasonable and justified for a ‘ranking’ approach to be undertaken at Stage 4 to ensure that those sites with least environmental or amenity value are prioritised through the selection process.

2.7 Considering the built development strategy for SW1 no reasonable judgement (when considered against other sites) can conclude that the allocation of SL9 for 120 units would not have a significant impact on landscape character.

2.8 As discussed in more detail below (see Paragraph 2.22), the assessment of SL9 does not consider (as part of its assessment of landscape character) the necessary tree clearance that would be required in order to establish a safe visibility splays for the site.

2.9 In following the Council’s methodology for Stage 4, this significant impact should have resulted in SL9 being discounted at Stage 4.

Stage 5 Assessment – Green Belt

2.10 We have identified inconsistencies in the Green Belt approach which results in sites being discounted at Stage 5 that should have continued to Stage 6.

2.11 Within Core Document SD_004Q – Green Belt Review Part 2 Report (March 2017) Stroude Farm (SLAA 13) is incorrectly discounted at Stage 5 of the Site Selection process due to an assessment that the Green Belt in this location performs strongly. The allocated sites (SL9 & SL10) are considered as performing moderately in comparison.

Virginia Water Green Belt Assessment

<table>
<thead>
<tr>
<th>SITE ALLOCATION</th>
<th>SUB AREA REF – GREEN BELT</th>
<th>PURPOSE 1</th>
<th>PURPOSE 2</th>
<th>PURPOSE 3</th>
<th>OVERALL SUMMARY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Virginia South SL10</td>
<td>Water South SL10</td>
<td>52</td>
<td>0</td>
<td>0</td>
<td>3          Moderate</td>
</tr>
<tr>
<td>Virginia North SL9</td>
<td>Water North SL9</td>
<td>70</td>
<td>0</td>
<td>1</td>
<td>3          Moderate</td>
</tr>
<tr>
<td>Stroude Farm (SLAA 13)</td>
<td>72</td>
<td>0</td>
<td>1</td>
<td>4</td>
<td>Strong</td>
</tr>
</tbody>
</table>

Summary of SD_004Q

2.12 The assessment of Purpose 3 for Stroude Farm SLAA 13 as being higher than SL9 (and thus putting it in the ‘strong’ category) is not a reasonable judgement. The stated assessment criteria for Purpose 3 is ‘Protects the openness of the countryside and is least covered by development.’
2.0  Response to Question 6.1

2.13 As show above, SLAA 13 is surrounded by development on three sides and abuts the railway line on its fourth boundary. By comparison, SL9 is significantly more undeveloped with mature and established trees on site creating a transition to the open countryside to the north (consistent with its designation in the Surrey Landscape Character Assessment).

2.14 The clear inconsistent and unreasoned approach in assessing the two sites results in SLAA13 being precluded from further assessment. The implications for this in terms of the soundness of the plan is discussed below.

2.15 Similarly for Purpose 2, there are significant errors in the assessment (see Paragraph 2.24).

**Stage 6 – Sustainability Appraisal**

2.16 The unreasoned removal of SLAA13 at Stage 5 means that it is not formally considered as part of Stage 6. However, in exemplifying why the error at Stage 5 in respect of the site is significant it is important to consider the outcome of the Sustainability Appraisal for SLAA13 against SL9.

**Comparison of SLAA 13 with Allocated Sites**

<table>
<thead>
<tr>
<th>Policy</th>
<th>SL9</th>
<th>SLAA 13</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>+/-</td>
<td>+/-</td>
</tr>
<tr>
<td>2</td>
<td>-</td>
<td>?/-</td>
</tr>
<tr>
<td>3</td>
<td>-</td>
<td>-</td>
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<tr>
<td>4</td>
<td>0</td>
<td>0</td>
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<tr>
<td>5</td>
<td>0</td>
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<td>6</td>
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<td>+</td>
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<tr>
<td>7</td>
<td>+</td>
<td>+</td>
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<td>8</td>
<td>+</td>
<td>+</td>
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<td>9</td>
<td>+</td>
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<tr>
<td>10</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>11</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

1 Objectives and Key from Core Document SD_018M.
2.0  Response to Question 6.1

Source: SD_018M, Assessment of Alternatives

2.17 As detailed in the above summary, across Sustainability Appraisal objectives 1, 4, 5, 6, 7, 8, 9 and 11 the outcome of the objectives is comparable across the two sites.

2.18 Against Objective 3 Stroude Farm SLAA 13 is identified as performing significantly worse than SL9. SLAA 13 is scored poorly on Objective 3 as it is assumed to be needed for mineral safeguarding. However, SD_012B (Page 132) confirms this in not the case:

‘100% of site within minerals safeguarding area and adjacent safeguarded minerals site and preferred area of Whitehall Farm. However, SCC has accepted evidence that on-site resource is not economically viable.’

2.19 In addition, with respect to Objective 2 it is apparent that the level of assessment work to inform the Sustainability Appraisal is more detailed for SL9 compared with SLAA 13. This is evident on Page 191 of SD_018M in which is states ‘Because the care home will be retained on site (and development will be used to fund improvements to the care home) this site has scored as positive.’ Conversely, the fact that a large area of publicly accessible open space would be provided for as part of the SLAA 13 to contribute to improving health and well-being is not considered as part of the Sustainability Assessment. The consequence of this is that sites are not considered against an equal benchmarking process thus affecting the soundness of the allocated sites.

2.20 This pattern of inconsistency in assessment is also seen in other allocated and non-allocated sites in Ottershaw.

Response to 6.1 C

Site SL9 – Virginia Water North

2.21 A detailed assessment of the proposed highways access has been undertaken by Vision Transport in respect of Site SL9 (see Appendix B) which concludes that there is no evidence in support of the proposed allocation to confirm that severe highways impacts associated with the proposed access arrangements can be avoided (as required by Paragraph 32 of the NPPF, 2012).

2.22 Appendix B notes that only a visibility splay of circa 2.4m x 33 metres can be achieved for the north and 2.4 metres x circa 27 metres to the south. This is significantly less than the 120m that Design Manual for Road and Bridges (DMRB) recommends for streets subject to a 40mph speed limit. To assist the full extent of the 120 metre splays has been added to the drawing attached as Appendix B to the report, which clearly demonstrates that a substantial area of third party land and tree clearance would be required to facilitate the required visibility splays.

2.23 The proposed allocation of the site is not sound on highways grounds.
2.0 Response to Question 6.1

Above – Images Showing Lack of Visibility Splays for SL9

Site SL10 – Virginia Water South

2.24 As detailed in our submission to Matter 5, we do not consider the Green Belt approach at SL10 and Longcross Garden Village to be sound.

2.25 From reviewing the evidence (SD_004T) it is evident that the assessment of Parcel 52 (Site SL10) has occurred without regard to the proposed development at Longcross Garden Village. An excerpt of the Purpose 2 Assessment for Site SL10 is included below:

**Purpose 2 Assessment**

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Criteria</th>
<th>Assessment</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>(2) To prevent neighbouring towns from merging</td>
<td>Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements</td>
<td>As a result of its very small scale, the configuration of surrounding developments in Virginia Water, which creates an enclosed feel, and the role of man-made features as additional buffers (including the railway line to the south), it is judged that the sub-area does not provide a gap between any settlements and makes no discernible contribution to separation.</td>
<td>0</td>
</tr>
</tbody>
</table>

2.26 The assessment includes no reference to the proposed development at Longcross Garden Village. When the context of Longcross Garden Village is considered it is apparent that Parcel 52 plays an important role in preventing further merging with Longcross Garden Village through the establishment of ribbon development along the train line.
2.0 Response to Question 6.1

2.27 Considered in the context of Longcross Garden Village, Parcel 52’s Green Belt contribution becomes more significant. To ensure that the wider Green Belt is able to endure over the Plan period and to prevent neighbouring towns from merging into one another it should be retained as Green Belt and unallocated as a development site.

Delivering Land for Infrastructure

2.28 As discussed in more details with respect to Matter 10.3, Paragraph 70 of the NPPF is clear that planning policies and decisions should ‘plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.’ This is reflected in Local Plan Objective 3 and 4 which states the Plan will:

3. continue to support the improvement of local leisure activities that are accessible Runnymede Submission Local Plan 2015-2030 23 to all;

4. To ensure Runnymede’s communities are supported by new or enhanced community and other infrastructure services and facilities, including a range of sustainable and active travel choices.

2.29 Taken cumulatively, the proposed allocations in the Plan fail to respond to Paragraph 70 of the NPPF and Objectives 3 and 4 of the Local Plan in planning positively to meet infrastructure needs. Instead, with the exception of a couple of proposed allocations the delivery of much needed infrastructure is left to financial contributions rather than proactively identifying land for development.

2.30 In respect of Ottershaw, it is noted in the Infrastructure Delivery Plan 2017 (SD_007M) at 4.2.9 that: ‘Consultation with SCC has also revealed that within certain schools, there is a shortage of available places, with local authority infant and junior schools in Ottershaw noted as being at or near capacity by the County.’
2.0 Response to Question 6.1

2.31 With respect to the proposed allocations at Ottershaw East and Brox End Nursery it is apparent that the delivery of needed education infrastructure is unclear. As stated on Page 201 of SD_007M, ‘Generated need to be absorbed within Marshfields CofE Infant and Ottershaw CofE Junior schools (assuming they are able to expand – both are CofE schools so agreement for expansion will need to be made with RBC).’

2.32 Throughout the Site Consultations and Regulation 19 Submissions Christmas Tree Farm (SLAA284) in Ottershaw has been promoted as a site for meeting housing development and educational need in Ottershaw. The NPPF at Paragraph 72 places great weight to the need to create, expand or alter schools. However, through the Sustainability Assessment no consideration has been given to this and the contributions that the site would make to delivering these social sustainability objectives.

2.33 It is apparent that the issue is compounded through the approach taken in SD_012B. Stage 5 Green Belt constraints are treated as absolute constrains rather than subject to assessment as to whether there are Exceptional Circumstances in respect of individual sites (i.e. the opportunity to delivery an identified need for a primary school) that may weigh in favour of the proposals as a consequence of the social benefits.
3.0 Response to Question 6.2

QUESTION 6.2

With regard to the specific characteristics of each of the allocations, are there exceptional circumstances that are sufficient to justify the proposed alterations to the Green Belt boundary?

Response

3.1 Document SD_004Y ‘Exceptional Circumstances Addendum’ April 2018 sets out RBC’s justification for the local level exceptional circumstances that justify the release of individual sites from the Green Belt. Our response to Question 6.2 is primarily focused on the proposed allocation at Virginia Water North.

Site Allocations and Local Exceptional Circumstances

<table>
<thead>
<tr>
<th>SITE/ POLICY</th>
<th>LOCAL EXCEPTIONAL CIRCUMSTANCES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy SL9 – Virginia Water North</td>
<td>1. The need for housing — to provide sufficient land to achieve the full Objectively Assessed Housing Need and to meet identified needs for gypsies and travellers; and</td>
</tr>
<tr>
<td></td>
<td>2. To need to ensure that the Green Belt boundary is defensible and logical in the light of changes which have occurred since drawing the Green Belt boundary in 1986</td>
</tr>
</tbody>
</table>

Source: Runnymede Borough Council Exceptional Circumstances Addendum 2018

3.2 As commented in numerous Planning Inspector’s reports into Local Plans, including Waverley Borough Council, the ability to redefine a Green Belt boundary to ensure that it its permanence can endure has been considered as constituting exceptional circumstances.

3.3 In respect of Policy SL9, the extensive tree cover on site represents a mature Green Belt boundary. Accordingly, it is clear that the need to create a more logical and defensible boundary to the Green Belt cannot be considered an Exceptional Circumstance.
QUESTION 6.3

Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?

Response

Delivery of A320 Upgrades

4.1 Our Matter 3 and forthcoming Matter 10 Statements will deal with the substantive response to the deliverability of the proposed A320 mitigation. At this stage, and in response to Question 6.3, we wish to highlight that as detailed in the submitted Plan (CD_001) 5 site allocations (totalling 728) are reliant upon the delivery of mitigation to the A320. The list below excludes St Peter’s Hospital which we are aware has recently had planning permission granted.

Site Allocations Contingent on A320 Mitigation (as reported in CD_001_)

<table>
<thead>
<tr>
<th>SITE</th>
<th>UNIT NUMBERS</th>
<th>PHASING</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chertsey Bittams. Parcel A. Green Lane</td>
<td>175</td>
<td>2019 – 2022</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel B. Woodside Farm</td>
<td>120</td>
<td>2022 – 2024</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel C. Last east of Woodside Farm</td>
<td>35</td>
<td>Post 2027</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel D. Oracle Park</td>
<td>200 + 93 Bed Care Home</td>
<td>2019 – 2022</td>
</tr>
<tr>
<td>Chertsey Bittams. Parcel E. Land east of Wheelers Green</td>
<td>105</td>
<td>2022 - 2027</td>
</tr>
<tr>
<td>Total</td>
<td>728</td>
<td>/</td>
</tr>
</tbody>
</table>

Source: CD_001

4.2 In addition to the sites at Chertsey Bittams, the A320 Study (SD_015H) also identifies the following key developments along the A320 corridor:

- Longcross Garden Village – 1,700 Homes
- Veterinary Laboratory site at Rowtown – 210 Homes
- Ottershaw East – 250 Homes
- Brox End Nursery – 40 Homes
- Pyrcroft Road Housing Site – 280 Units

4.3 Collectively the Runnymede allocations in the A320 study total 3,590 or 48% of the minimum housing target for the Plan.

4.4 For the reasons set out in Matter 3 and our forthcoming Matter 10 Statement there is significant uncertainty of the required upgrades being delivered in a timely manner (as required by Paragraph 177 of the NPPF) which will directly and significantly affect the housing trajectory, particularly in the first five years of the Plan.

4.5 Without Main Modifications the Plan will be unsound as it will not be effective. The Plan would also be inconsistent with Paragraph 47 of the NPPF as at the point of adoption the Council would be unable to provide five years worth of housing against their housing requirement.
5.0 Main Modifications Required to Matter 6

5.1 In order to address the soundness issues identified in response to Matter 6 the following amendments are required to the Plan:

1. Site allocations SL9 and SL10 are unsound as they are not consistent with Green Belt policy of the NPPF (2012) and, in respect of SL9, cannot demonstrate that severe highways impacts can be avoided. When assessed consistently, SLA13 has been identified as better performing site in the Sustainability Appraisal and should be included as a replacement allocation to SL9 and SL10.

2. The assessment of sites through the site selection process needs to be revisited to ensure that the opportunities to deliver the Local Plan objectives presented by strategic sites (such as Christmas Tree Farm – SLAA284) feed into the assessment process, particularly at Stage 5 This includes the contribution to meeting key educational and highways infrastructure needs.
5.0 Main Modifications Required to Matter 6

Appendix A – Site Location Plan
5.0 Main Modifications Required to Matter 6

Appendix B – Vision Transport Note
TECHNICAL REPORT: 11 NOVEMBER 2016

Land at Merlewood Care Home, Virginia Water
Transport Note Review

1 Introduction

1.1 This report has been prepared following a review of the Transport Note (dated 24th August 2016) prepared by JMP Consultants Ltd (JMP) on behalf of Elizabeth Finn Care, in respect to a potential residential development site at Merlewood Care Home, Virginia Water.

1.2 The JMP Transport Note (JMPTN) has been prepared to support representations to Runnymede Borough Council in respect to their emerging Local Plan (New Local Plan 2035). It has been prepared in support of the allocation of land at Merlewood Care Home (the site) for circa 40 residential units.

1.3 Within the introduction of the JMPTN, it is clarified that the technical note seeks to ascertain "if safe and satisfactory access can be achieved to the site for vehicular traffic as well as for non-car modes of travel and to identify if there are any transport or highway barriers to allocating the site for residential use."

1.4 Having carried out an access appraisal the JMPTN concludes that "there is no reason why the site could not come forward for residential use in transport and highways terms. The site is in an accessible location by sustainable modes of transport and can provide suitable pedestrian, cyclist and vehicular access from Hollow Lane”.

1.5 This report reviews the access appraisal carried out by JMP and comments on the conclusions reached within the JMPTN. In summary it finds that the conclusions set out within the JMPTN should not be relied on and there are technical highway reasons relating to access, as well as reasons relating to accessibility, that would prevent the development of the site coming forward in accordance with national and local policy. In particular it is considered that there are shortcomings and a lack of assessment in respect to the access strategy, whilst the accessibility of the site is considered poor and unlikely to encourage travel by sustainable modes of transport. These aspects i.e. access and accessibility are considered in greater detail within the remainder of this report.

2 Background

2.1 It is noted that the site forms part of a wider site referred to as land at Virginia Water North (ID 258), which is identified within Runnymede Borough Council’s interim Strategic Land Availability Assessment (SLAA) 2016. The SLAA seeks to identify sites that could be developed to meet the Borough Council’s need for future housing supply. The SLAA assesses sites to determine if the sites are suitable, available and viable.
2.2 Virginia Water North (which is identified as site ID 258) is included within Runnymede’s interim SLAA as a site that could deliver residential development; however, in assessing whether the site is ‘achievable’ the SLAA comments that the site “could have difficulties relating to access” and that “Further work on access would be necessary” were the site recommended for allocation within the Local Plan. It is in this context that the JMPTN has been reviewed.

3 Accessibility

3.1 The importance of ensuring future residential development sites are located in locations that are or can be made sustainable is clearly set out within national and local policy and within the JMPTN. To enable sites to be identified for future residential development it is necessary, therefore, to consider the accessibility of the site’s location to local facilities and public transport. In particular consideration needs to be given to the likelihood that the locational characteristics of a potential development site will encourage and facilitate travel by sustainable modes of transport such as walking, cycling and public transport. A site that fails to facilitate access by such sustainable modes of transport could be considered ‘car dependent’ and may therefore fail both national and local policies aimed at encouraging sustainable travel and sustainable development.

Walking

3.2 When considering the suitability of development sites emphasis is often placed on walk distances to local facilities and public transport nodes, as walking offers the potential to replace short car journeys and will also often be the first part of a journey to enable onward travel by public transport.

3.3 In referring to design guidance the JMPTN refers to relevant guidance set out within the Department for Transport’s Manual for Streets (MfS) and Manual for Streets 2 (MfS2) and reference is made to ‘walkable neighbourhoods’. It is important to note, however, that MfS defines walkable neighbourhoods as “typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot”. This aspect is not clearly set out within the JMPTN, which refers instead to walk distances set out within the Institute of Highways and Transportation’s (IHT) document entitled ‘Guidelines for Providing for Journeys on Foot’. This is further commented on below.

3.4 MfS recognises the benefits of having local facilities within a comfortable 800 metres walk distance of residential properties to reduce the need to travel by car and where daily needs are within walking distance of most residents. MfS does recognise that this 800 metres is not an upper limit and that walking offers the potential to replace short trips, particularly those under 2 km. However, the reference of 2 km is considered an upper limit and may apply to trips such as commuting where the pedestrian routes are both attractive (to pedestrians) and safe and/or where walking offers a degree of convenience over alternative modes of transport (i.e. to avoid congestion, parking fees etc.).

3.5 Further guidance on this is provided within the IHT document entitled ‘Guidelines for Providing for Journeys on Foot’ (GPJF). Reference is made within the JMPTN (para 3.10) to acceptable walking distances set out within the IHT’s GPJF setting out ‘desirable’, ‘acceptable’ and ‘preferred maximum’ walk distances for journeys by foot within three defined (by the IHT) categories of destinations namely ‘town centres’, ‘commuting/school’ and ‘elsewhere’.
3.6 The JMPTN makes reference (paragraph 3.11) to the site being situated "approximately 1.9 km from the centre of Virginia Water, which is within the IHT’s acceptable walking distances for commuting and school" [Vision emphasis] and then goes on to state that "There are a range of restaurants, shops, services and employment opportunities located in the centre of Virginia Water that can be reached in under a 25 minute walk from the site".

3.7 This statement is somewhat misleading as a distance of 1.9 km does not fall within the ‘acceptable’ distance as defined by the IHT but rather falls within the stated ‘preferred maximum’ distance. This preferred maximum is considered a maximum distance that residents may be likely to walk for the purpose of commuting to work, or travelling to school, and would be naturally influenced by other factors, such as attractiveness of pedestrian routes, perceived road safety and personal security, convenience and the availability of alternative modes of transport.

3.8 That the site falls within 1.9 km of the centre of Virginia Water should not be considered as a desirable aspect of the location of the development (although it may be the best that can be offered) and will do little to encourage travel by walking as a viable mode of transport for future residents. This conclusion is reached having regard to the guidance set out within MfS and the IHT’s GPJF as set out below.

3.9 Whilst it is recognised that the site is within the preferred maximum distance (as defined by IHT) to the centre of Virginia Water, it is important to note that this would only apply to commuting/school trips. As such this would only conceivably apply to those residents employed within the centre of Virginia Water (which is likely to be extremely limited, if any), rather than trips to the restaurants, retail or other services that may be located there. As defined by the IHT guidance the preferred maximum walk distance to ‘town centres’ is 800 metres (desirable 200 metres/acceptable 400 metres) and the centre of Virginia Water and its associated facilities is clearly far in excess of this distance.

3.10 Furthermore the walking routes to Virginia Water are not likely to be attractive to future residents and will further reduce any likelihood of future residents choosing to walk to Virginia Water. The IHT’s guidance refers to the needs of pedestrians. It makes reference to ‘steep gradients’ and ‘lack of or inadequate footways – particularly in and between villages’ as aspects that are likely to be off putting to future residents when considering walking as a viable mode of transport.

3.11 Having audited the pedestrian route between the site and Virginia Water it is apparent that the route would have many characteristics that would be unattractive to pedestrians, these include (starting from the site and working south towards Virginia Water):

- No footway provision within Hollow Lane.
- Lack of safe pedestrian crossing facilities. Pedestrians would need to cross Callow Hill to access the existing footway on the west (opposite) side of Callow Hill. Callow Hill is subject to a 40 mph speed limit. There are no pedestrian crossing facilities within Callow Hill (in the vicinity of Hollow Lane) to enable pedestrians to cross to the footway on the west side of Callow Hill. Pedestrians would be encouraged to cross where visibility is restricted (due to the alignment of Callow Hill) and where speeds may be intimidating to pedestrians. This is a potential road safety aspect that appears to have been overlooked within the JMPTN.
Lack of adequate pedestrian facilities within Callow Hill. The footway within Callow Hill is narrow and likely to be unattractive for pedestrians and may also be perceived to be unsafe. The JMPTN refers (paragraph 3.11) to this footway being approximately 1.0 metre wide, which is below the desirable 2 metre footway width (MfS and IHT) and the 1.8 metre desirable minimum width (set out within IHT guidance). Furthermore the footway is subject to encroachment from overhanging trees/bushes/vegetation that further narrows the effective width of the footway. Additionally the footway is immediately adjacent to the carriageway (i.e. not separated by a verge) and as such there is a perceived and potentially real road safety aspect for pedestrians having regard to the proximity and speed of passing vehicles (including HGVs). There is also limited overlooking further adding to the issue of perceived pedestrian safety and security.

Callow Hill (as the name suggests) is subject to significant changes in gradient along its route between Hollow Lane and Christchurch Road. A change in gradients is likely to again be an aspect that is off putting to future residents when considering walking as a viable mode of transport when travelling to Virginia Water.

Christchurch Road benefits from improved footway provision (wider footways) and provides a level and more attractive route for pedestrians. However, issues remain in respect to limited overlooking and proximity to and the speed of vehicles within the adjacent carriageway.

In assessing access for pedestrians, the JMPTN fails to demonstrate suitable accessibility to local services within recognised walk distances, beyond commuting trips to the centre of Virginia Water, which would be doubtful to occur given the level of employment and nature of the pedestrian routes. Given the above factors it is considered that future residents will be highly unlikely to view walking as an attractive or viable means of transport when travelling to local facilities located within Virginia Water. This is the case even when considering the very limited opportunities for commuting journeys (to employment destinations within Virginia Water) which may be within the ‘preferred maximum’ walk distance of 2 km set out within the IHT guidance but which will remain unattractive and likely to be viewed as unviable alongside alternatives such as the private car.

In respect to cycling the JMPTN refers (paragraph 3.12) to cycle infrastructure within the B389 Christchurch Road. However, Callow Hill is less attractive to cyclists, having regard to the gradient and nature of Callow Hill. Indeed the Personal Injury Accident (PIA) records presented within the JMPTN suggest that four of the nine PIAs (circa 44%) that occurred within Callow Hill (including the roundabout with the B389 to the south) involved cyclists. Whilst the PIA data has not been provided (which would enable a more detailed review) it is apparent that the conditions within Callow Hill have resulted in a high number of PIAs involving cyclists, which may raise road safety concerns in respect to the future use of Callow Hill for cyclists.

Virginia Water rail station is a circa 2 km walk distance from the northern part of the site. With perhaps the exception of the first two or three houses (to the north of the site) the vast majority of dwellings will be in excess of a 2 km walk distance to Virginia Water rail station. Again the route for pedestrians is unattractive, being subject to significant change in gradients, narrow footways and alongside busy roads. These aspects make it highly unlikely that future residents will choose to walk or cycle to the station.
3.15 Reference is made (paragraph 3.13) to the closest bus stops to the site being located on Virginia Water Station Parade, approximately 1.9 km walk distance from the site. It is stated, within the JMPTN, that these stops are within the preferred maximum walking distance for commuting or travelling to school and therefore would be acceptable for these trips. This conclusion is somewhat surprising and should not be accepted.

3.16 The walking distances set out within the IHT guidance (Table 3.2 of the guidance) are suggested acceptable walking distances to facilities. In respect to commuting they should be seen as a distance to a place of work (or school), rather than the first part of a journey that would be completed by public transport (in this case bus).

3.17 The IHT's guidance on 'Planning for Walking' refers to a 400 metre walk distance to bus stops (200 metres within town centres) and 800 metres to railway stations. When considering the appropriateness of access to bus services (for new development sites) it is typically expected that bus services should be accessible with a 400 metre walk distance of future residents to encourage travel by bus. Furthermore, in this case, the pedestrian routes to the bus stops are unattractive and unappealing to pedestrians (as set out above), whilst (as set out within the JMPTN) bus services are limited in terms of frequency. Having considered all aspects it is concluded that the site’s location and the availability of bus services will not encourage or facilitate access by public transport.

Accessibility Summary

3.18 In summary it is concluded that evidence has not been provided that adequately demonstrates the acceptability of the site in terms of sustainable transport and accessibility to local services. It is apparent that having regard to walk distances and the nature of the surrounding highway network that the location of the site will not encourage short trips by walking or cycling. Furthermore public transport services are remote, accessed via a poor quality environment (for pedestrians) and in respect to bus services provide access to limited services.

3.19 It is concluded, based on the information presented within the JMPTN, that the site is inappropriately located to encourage travel by sustainable means of transport and will be highly likely to be car dependent. In this respect it is concluded that the redevelopment of the site for residential purposes fails both national and local policy that aims to encourage sustainable and accessible development.

4 Access

4.1 In considering access to the site the JMPTN principally considers vehicular access to Hollow Lane and only briefly touches on access from Hollow Lane to Callow Hill (which provides access to the public highway and will therefore be the focus of the Highway Authority). The assessment of access to Hollow Lane is commented on below. However, it is considered that the key issue in considering the viability of accessing the site is in respect to the acceptability of the Hollow Lane/Callow Hill junction. In a simplistic sense, due to the ‘no through road’ nature of Hollow Lane all traffic generated by the development will require access and egress through this junction, and this is where access to the site will impact on the public highway. Given the limited appraisal within the JMPTN a review of this critical junction has also been set out below.
Access to Hollow Lane

4.2 Hollow Lane is currently a private road, with no footway or pedestrian facilities and operates as a shared surface environment. The carriageway is subject to a variable width but narrows to circa 4.3 to 4.5 metres. Hollow Lane is also a public bridleway (Bridleway 44). There are occurrences of on-street parking taking place within Hollow Lane.

4.3 Paragraphs 4.5 to 4.7 of the JMPTN set out the proposed access strategy. In respect to the proposed access to Hollow Lane it is generally accepted that the appropriate guidance is set out within MfS. It is also accepted that it is somewhat unclear as to what speed limit Hollow Lane is subject to due to the private nature and lack of signing. It is noted (at paragraph 4.5 of the JMPTN) that "it was observed that vehicles were driving at an appropriate speed for the nature of the road, which is to say between 20 mph and 30 mph".

4.4 No details of how this speed measurement was observed have been provided i.e. whether this was via a speed survey, use of a hand held radar gun or simply an estimate based on on-site observations. Verification on this should be sought as (given the lack of clarity on the posted speed limit) it is considered fundamental to the design of the new access and the associated visibility splays.

4.5 When considering the appropriateness of visibility splays, the extent of the visibility splay (sight line) is determined by reference to a design speed. This is defined as the 85th percentile speed and represents the speed that 85% of vehicles are travelling at or below. It represents, therefore, a higher speed than the average speed, which is of course entirely logical to ensure the safe operation of an access, whilst ensuring the access is not overdesigned for the highest 15% of recorded vehicle speeds (which are effectively discounted).

4.6 Given that the JMPTN sets out that speeds have been observed as 20–30 mph, it then seems inappropriate to design the access and associated visibility splays assuming a design speed of 20 mph. i.e. at the lower end of the observed speeds. Crucially this may mean that the visibility splays of 2.4 metres x 25 metres (that are proposed) may be inadequate for the actual (85th percentile) design speed of vehicles travelling along Hollow Lane.

4.7 Subject to verification of actual speeds the suggested visibility splays may need to be extended. To the east this may impact on the boundary treatment to the front of the adjacent Lodge building. It is concluded that the assessment presented within the JMPTN fails to demonstrate that adequate access can be achieved to Hollow Lane. It is recommended that further clarification on how speeds were ‘observed’ is obtained. Subject to this it is considered that a speed survey should be undertaken to verify speeds and that the access to Hollow Lane and the associated visibility splays should be designed to take account of actual (as surveyed) 85th percentile speeds, to comply with MfS design guidance.

Hollow Lane/Callow Hill Junction

4.8 No detailed analysis of this critical junction has been included within the JMPTN and therefore it cannot be concluded that access to the development site can be achieved. Paragraph 3.19 of the JMPTN makes reference to the junction simply stating “Hollow Lane, a private road, is accessed off a priority T-junction with Callow Hill, which complies with the Design Manual for Roads and Bridges (DMRB) standards.”
4.9 It is accepted that Callow Hill is a higher category road and may therefore be subject to the design standards set out within the DMRB. However, no detailed assessment appears to have been provided to support the claim that this junction complies with DMRB standards. As such a review of this junction has been undertaken and is set out below.

4.10 From an on-site review it is apparent that the junction of Hollow Lane/Callow Hill has substandard geometry and visibility splays (in both directions). The photos below provide an indication of the nature of Hollow Lane and the level of visibility at the junction with Callow Hill.

Hollow Lane Visibility (looking to the south)  Hollow Lane Visibility (looking to the north)

Note: restricted visibility, lack of kerb radii, evidence of over-running and presence of third party land (to north and south of the junction).

4.11 Callow Hill is a distributor road that is subject to a 40 mph speed limit. Due to the nature of Callow Hill it is considered that the design of any new access or alteration to an existing access should be in accordance with the guidance set out within the Design Manual for Roads and Bridges (DMRB). Based on the 40 mph speed limit DMRB standards would require visibility splays that extend 120 metres, to ensure an appropriate level of visibility is provided at the junction of Hollow Lane and Callow Hill.

4.12 It is apparent that the existing level of visibility at this junction falls materially and significantly short of this. Visibility in both directions is restricted due to the alignment of Callow Hill and the presence of third party land to the north and south of the junction. An assessment of the available visibility has been undertaken, based on the OS mapping and having regard to the extent of the public highway. A copy of the public highway plans has been attached as Appendix A, whilst a drawing detailing the visibility splays available (within the public highway margin) has been attached as Appendix B.
4.13 It can be seen from reviewing the drawing attached as Appendix B that visibility splays of circa 2.4 metres x 33 metres can be achieved to the north, and 2.4 metres x circa 27 metres can be achieved to the south. This is considerably less than the 120 metres that DMRB recommends for streets subject to a 40 mph speed limit. To assist the full extent of the 120 metre splays has been added to the drawing attached as Appendix B, which clearly demonstrates that a substantial area of third party land would be required to facilitate the required visibility splays. Indeed the property to the south (known as Kenwolde) falls partly within the visibility splay envelope. Given the above it is clear that there is a substantial shortfall in visibility at this junction, to such an extent that any additional traffic generating development accessed via Hollow Lane (in its current format) may be likely to result in serious road safety consequences. Given this conclusion the statement made within the JMPTN that the junction complies with DMRB standards is surprising and fundamentally misleading.

Access Conclusion

4.14 Having reviewed the JMPTN it is clear that the development proposals will result in a material increase in vehicular traffic via Hollow Lane and via the Hollow Lane/Callow Hill junction. Given the accessibility conclusions reached within this report it is considered that the level of vehicular trips may be higher than that which has been presented within the JMPTN, as there will be less trips by sustainable means of transport. Nonetheless it is clear that the development of the site for residential purposes (as set out) will result in material levels of new traffic via Hollow Lane.

4.15 It is concluded that insufficient evidence has been provided to demonstrate that adequate access to Hollow Lane can be achieved. It is recommended that speeds are verified through a speed survey and that the access and associated sight lines are designed to take account of the surveyed speeds.

4.16 However, a far more serious shortcoming in the JMPTN assessment of the ability to achieve a safe and satisfactory access, is the lack of assessment and misleading conclusion in respect to the Hollow Lane/Callow Hill junction. This junction suffers from a significant and considerable shortfall in visibility (in both directions). No mitigation measures are proposed and it is concluded that the redevelopment of the site for residential purposes would result in a severe impact in terms of access and road safety. Contrary to the conclusions set out within the JMPTN it is concluded that it has not been demonstrated that a safe and satisfactory access can be achieved to facilitate the development of the site for residential purposes.

5 Summary

5.1 This report has been prepared following a review of the Transport Note (dated 24th August 2016) prepared by JMP Consultants Ltd (JMP) on behalf of Elizabeth Finn Care, in respect to a potential residential development site at Merlewood Care Home, Virginia Water.

5.2 The JMP Transport Note (JMPTN) has been prepared to support representations to Runnymede Borough Council in respect to their emerging Local Plan (New Local Plan 2035). It has been prepared in support of the allocation of land at Merlewood Care Home (the site) for circa 40 residential units and seeks to ascertain "If safe and satisfactory access can be achieved to the site for vehicular traffic as well as for non-car modes of travel and to identify if there are any transport or highway barriers to allocating the site for residential use."
Having carried out an access appraisal the JMPTN concludes that "there is no reason why the site could not come forward for residential use in transport and highways terms. The site is in an accessible location by sustainable modes of transport and can provide suitable pedestrian, cyclist and vehicular access from Hollow Lane".

This report reviews the access appraisal carried out by JMP and finds that the conclusions set out within the JMPTN should not be relied on. It is considered that there are shortcomings and a lack of assessment in respect to the access strategy, whilst the accessibility of the site is considered poor and will not encourage travel by sustainable modes of transport.

In respect to accessibility it is concluded that evidence has not been provided that adequately demonstrates the acceptability of the site in terms of sustainable transport and accessibility to local services. It is apparent that having regard to walk distances and the nature of the surrounding highway that the location of the site will not encourage short trips by walking or cycling. Furthermore public transport services are remote, accessed via a poor quality environment (for pedestrians) and in respect to bus services provide access to limited services.

In respect to access the JMPTN fails to adequately assess the junction of Hollow Lane and Callow Hill. This junction suffers from a considerable shortfall in the available visibility (both towards the north and the south). All development traffic will require access and egress via this junction and as such the development proposals (as presented) will have a clear and detrimental impact on road safety. No mitigation measures are proposed in respect to this issue and it is concluded that the redevelopment of the site for residential purposes would result in a severe impact in terms of access and road safety.

Furthermore the assessment of the access arrangements onto Hollow Lane itself is considered inappropriate and requires further verification.

Contrary to the conclusions set out within the JMPTN it is concluded that it has not been demonstrated that a safe and satisfactory access can be achieved to facilitate the development of the site for residential purposes.

In summary the site is inappropriately located to encourage travel by sustainable means of transport and will be highly likely to be car dependent. Furthermore it has not been adequately demonstrated that safe and satisfactory access can be achieved. It is concluded that there are transport and access barriers that would prevent the allocation of the site for residential use and that the redevelopment of the site for residential purposes would fail national and local policy that aims to encourage sustainable and accessible development and policy that seeks to secure safe and appropriate access.
Appendix A
Public Highway Plan
Appendix B
Visibility Splays
This drawing has been specifically prepared to meet the requirements of the named client and may contain design and innovative features which differ from conventional design standards.

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FOR PLANNING