RUNNYMEDE 2030 LP EXAMINATION

MATTER 10: INFRASTRUCTURE PROVISION

STATEMENT ON BEHALF OF ST EDWARD
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1. **Introduction**

1.1 This Statement is submitted on behalf of St Edward, and follows representations made on their behalf throughout the emerging Local Plan process.

1.2 St Edward are a joint venture company owned by the Prudential Assurance Company and Berkeley and have an interest in an omission site at North East Ottershaw (referred to as Site 46 in the SLAA). Representations have been made previously setting out the merits of the site, but this Statement focusses only upon the specific questions asked by the Inspector.
2. **Matter 10.1**

**Overall, does the Plan provide an evidence-based, integrated and effective policy framework for transport that will support the implementation of the spatial strategy and contribute to sustainable development?**

2.1 The current question marks regarding the implementation and effect of the necessary A320 works mean that it is not yet clear if the Plan’s policy framework for transport will be able to support the spatial strategy and contribute to sustainable development.

2.2 If some of the assumed enhanced junction works to the A320 do not take place, then this will clearly put the spatial strategy in jeopardy because some of the allocated sites may not be deliverable without causing unacceptable congestion, as recognised by the Council’s own SA, in conflict with the requirement for sustainable development. The Council’s SA Addendum May 2018 (Table 3.1) refers to it not yet being known whether sites SL12 – 18 and SD10 will have an unacceptable negative impact in connection with A320 works, implying that the appropriateness of their subsequent allocation is in some doubt. These allocations total a delivery of 2,973 dwellings during the Plan period, according to the Council’s housing trajectory at Appendix 6 of the SLAA. This equates to 40% of the Council’s own housing target over the Plan period, and hence has a considerable impact upon the spatial strategy.

2.3 In order to minimise the likelihood of unacceptable congestion, site allocations should be identified that can deliver the necessary and recommended junction improvement works. A significant example of this is recommended works associated with junction 10, which requires land associated with the site at NE Ottershaw, in order to be implemented. The allocation of such land within the Plan for dwellings and supporting infrastructure and facilities, would help support the spatial strategy by increasing the likelihood of its implementation.
3. **Matter 10.2**

With regard to the Plan’s potential effects on the A320 and the strategic road network in particular, are there reasonable prospects that satisfactory mitigation can and will be provided in time, taking account of the proposed phasing of development sites? Are there effective mechanisms to ensure that any significant cross-boundary impacts are addressed and resolved?

3.1 This is a major concern. There are not currently reasonable prospects that mitigation will be provided in time.

3.2 The Council’s SA Addendum (May 18) identifies at Table 3.1 that negative effects of proposed allocations SL13 – 18 cannot be ruled out until the A320 investigations are complete. It is understood that such investigations are not yet complete, and agreement is not reached with Highways England with regard the impact of such works upon the strategic road network.

3.3 As a result, the appropriateness of at least 6 allocations remains in doubt, due to the currently unknown impact they will have upon the road network. One of the allocations (SL 13 at St Peters Hospital) already benefits from partial consent and according to the Council’s delivery trajectory will be built out during the years 2018 – 2023. It is therefore apparent that mitigation, as recommended within the A320 Study, will not be provided in advance of the SL13 development commencing, which would have been ideal.

3.4 Whether appropriate mitigation can be introduced during the course of SL13 being delivered will now depend up whether the recommended major works associated with junction 10 of the A320 can be implemented. This is acknowledged at 5.52 of the Plan, which refers to the importance of the first phase of highway improvement works required, including the A320 corridor in the vicinity of St Peters Hospital. At present, the swift introduction of such mitigation would appear very unlikely on the basis that the Council have not even commenced discussion with the landowners who control the land required to implement the works recommended by the A320 Study.

3.5 The most effective way of ensuring swift implementation of the necessary works to junction 10, would be to identify such works as a requirement of a site
allocation in the Local Plan. Such an approach is commonly undertaken in order
to enable important and significant infrastructure to be provided, alongside
housing needed to provide for the Council’s requirements. However, in this
instance, despite recognition that the junction works are both needed and needed
swiftly, the Council have not identified the necessary works as part of a site
allocation. This could, and should, be addressed through the allocation of land at
NE Ottershaw for development including housing and necessary infrastructure,
most notably the recommended works to the A320 junction 10. St Edward
(Berkeley), who control much of the land in question, are experienced in
delivering complex and significant highways infrastructure as part of larger
development allocations, and will help ensure that the necessary and
recommended A320 mitigation works at junction 10 have the best chance of a
successful and swift implementation.

3.6 St Edward reserve the right to comment further upon the associated A320 issue
once relevant reports are completed and a greater understanding obtained of the
Council’s intentions, and likely implications of them.

3.7 Part of the doubt about the undertaking of necessary A320 mitigation works is
understood to relate to the currently unknown outcome of the HIF bid. If the bid
is unsuccessful it would appear to question the potential for some of the
necessary works to be undertaken. As a result, the identification of works that
can be delivered through alternative funding would appear eminently sensible.
The identification of an allocation at NE Ottershaw in this respect would help
ensure a solution for works to junction 10 of the A320 that are not dependent
upon the outcome of the HIF bid.
4. **Matter 10.3**

Taking account of the Infrastructure Delivery Plan and all the relevant policies of the Runnymede 2030 Plan, is there a reasonable basis for confidence that the other necessary infrastructure will be provided in a timely manner to implement the spatial strategy? How will any cumulative impacts of the proposed scale of development be mitigated?

4.1 There can be no confidence that other necessary infrastructure will be provided if the Plan remains as currently proposed.

4.2 Reference will be made to SANG under provision below, whilst the Council’s own IDP acknowledges that necessary education and playing pitch provision will not be provided for through allocations in the Local Plan. Due to both the scale and importance of such infrastructure provision it is not considered appropriate to leave their introduction to chance over the Plan period.

4.3 The IDP refers to there being a net requirement for 7-9 early years facilities, 6-8 new Primary forms of entry and 6 new Secondary forms of entry over the Plan period. The net requirement allows for introduction of education facilities at LGV. No other educational provision appears to be identified in the Plan, which inevitably questions whether it will be provided for in a timely manner.

4.4 The IDP refers at Table 41 to a net demand (once planned capacity, including LGV, is allowed for) of 23.5 hectares of outdoor sports provision over the Plan period. It is not apparent where this will be delivered.

4.5 The Council have prepared a Playing Pitch Strategy which identifies a current and predicted future shortage in pitch provision, relating to a number of specific sports. The Local Plan offers an ideal opportunity to address this through the allocation of pitches, either independently or as part of development allocations, yet has chosen not to do so to any notable extent.

4.6 Land at NE Ottershaw offers the opportunity to address this under provision. If allocated, the site would incorporate playing pitches as required, alongside delivering necessary SANG and highways infrastructure to the benefit of the wider community, and in support of the spatial strategy.
5. **Matter 10.4**

With regards to Policy EE10 (subject to the modifications put forward in CD_001A), the site-specific policies and the prospects for additional SANGs identified in RBCLP_09, are the Plan’s provisions for the Thames Basin Heaths Special Protection Area sound?

5.1 Allocations SL2-6, SL9-10, and SL14-18 are understood to require mitigation through SANG solutions that are not currently identified through the Plan, which equates to 2,200 dwellings.

5.2 It is recognised that during the Stage 1 Hearings the Council did provide a list of possible SANGs that might be introduced during the Plan period. However, this list included a number of possible sites that had not been discussed with Natural England, some which included constraints likely to prevent them from being suitable, and others that were not available at present or areas were unknown. It is not clear when any of the sites would be made available and whether they would be dependent upon other works taking place.

5.3 It is acknowledged that some of the sites might come forward for SANG provision during the Plan period. However, such provision should not be left to chance, especially given that the lack of necessary provision would be a reason to prevent the necessary housing requirements being delivered during the Plan period. It needs to be in place prior to first occupation of sites.

5.4 Previous submissions have been made by St Edward explaining why the Council’s policy wording of EE10 is in danger of applying a brake to the delivery of housing if insufficient SANG is found to be available through the Plan period, with a review of the Plan being suggested by EE10 if such a situation arises. Rather than taking the opportunity to plan positively for the provision of SANG at this stage, such an approach by the Council is encouraging further delay to occur, with the subsequent under provision of housing, and fundamental conflict with the spatial strategy that will result. If appropriate allocations are made at this stage to address the requirements, an almost inevitable review, with the delays this would bring, can be avoided.
5.5 Question marks have now also been raised via the Stage 1 Hearings with regard to the appropriateness of the allocated SANG at Longcross Garden Village, and this will need to be addressed in more detail under Matter 5.

5.6 At present the Plan is therefore not considered to be sound due to the inadequate provision it makes for SANG, which may in turn prevent the delivery of the spatial strategy.

5.7 The Local Plan offers the perfect vehicle to ensure the introduction of the necessary amount of SANG. It should be amended to incorporate additional allocations that will enable sufficient SANG to be delivered during the Plan period. Land at NE Ottershaw offers the opportunity for such delivery, alongside the provision of other strategic infrastructure requirements and necessary housing.