

Runnymede Local Plan Enquiry

Stage 3 Hearing

Representor Ref 587 Michael John Freshney

I wish to represent in writing at the Stage 3 Hearing. I am unable to attend in person as I am out of the Country.

I limit my representations to the Questions set out by the Inspector for this hearing, as follows.

1. I submit that the Plan's implications for traffic growth on the Boroughs critical Highways infrastructure, specifically the A320 and the connections with the M25, may have been adequately assessed, in terms of the volumes and vehicle movements, and thus the implications for capacity and overload identified. The means of mitigation, extent of mitigation, and consequent implications upon design of junctions and routes has **NOT BEEN** adequately assessed. (this excludes the assessment and design solutions for the M25 Junction which have been given detailed consideration) Whilst the immediate M25 junction and its close Easterly approach along St Peters Way have been considered, there is no evidence of consideration or mitigation of the Westerly congestion along St Peters Way to the A320 Roundabout and beyond along the A320 and its joining roads.
2. There is **NO EVIDENCE** in the Plan to give assurance that there are reasonable prospects that satisfactory mitigation can and will be provided in time to avoid unacceptable impacts on the operation of the A320, or at any time. (M25 Junction mitigation appears to have been suitable considered) The Plan does not give clear Guidance about how this will be achieved. The mitigation measures along the A320 have been given consideration only in the Study by Consultants Arcadis in support of the HIF Bid. These proposals, particularly in relation to the Ottershaw Roundabout junction have not been given thorough design assessment nor consideration of comparative and efficient or cost effective alternative solutions. Both Surrey County Council and Runnymede Borough Council Officers and Members appear now to be of the opinion that more appropriate solutions warrant serious consideration. Such solutions, including those contained within the HIF bid have significant consequences on land allocation including that for potential housing and other community facilities. There is no suitable guidance within the Local Plan on how to achieve satisfactory mitigation in respect of the A320 nor the associated feeder roads which have been totally and erroneously excluded from any consideration. The trajectory for housing delivery from sites such as Ottershaw East is totally flawed, if deliverable at all, without any consideration of possible and feasible mitigation having been given. The failure to provide such Highways design and mitigation consideration arises entirely out of the failure by Runnymede Borough Council to prepare the Local Plan in a suitable sequence. Land allocations were identified in advance of any detailed infrastructure considerations and impacts. The Highways design considerations were hurriedly undertaken as evidenced by the timing of instruction of Highways Consultants and subsequent ill consider potential designs, simply to 'brush over' Local Plan Enquiry examination and particularly to satisfy a HIF bid. The impact of the increase in housing numbers along with the existing evidenced at, or over, capacity highways and junctions and the failure to recognize or consider the effect on and mitigation solutions for the feeder roads renders the ability to deliver the plan housing numbers unlikely. This is clearly evident from my

experience over 4 decades of working with Local Authorities throughout the Country in assembling and delivering Local Plans, including one such in Runnymede Borough.

3. The ability for the proposed level of development to contribute an appropriate contribution to completion of the necessary mitigation measures is dependent on several factors:
 - a) Without clear recognition of the design issues and thus necessary mitigation solutions, **a cost cannot be assessed.**
 - b) **The 'appropriateness' of the level of contribution is subjective and not defined.**
 - c) The level of contribution available from each development is naturally subject to a Land Viability assessment, and the 'residual' funds identified as available. Those 'available funds' will be distributed according to the level of contributions sought by the Authorities to Schooling, Affordable Housing, Transport, open space, and other community benefits, and of course Highways infrastructure.

It is clear that subject to other demands on the 'residual' funds, the relative Land Values in Runnymede should support a suitable range of community benefits of which Highways infrastructure is one.

4. 4 (i) the revised trajectory of housing delivery rates **is NOT suitable to achieve** without unacceptable impacts on the Highways network, in that, for the reasons stated above, there is no clearly established method and designs of mitigation.
 - 4 (ii) This is a question for RBC. Based on the above, **I cannot foresee a credible basis.**
5. **I do not believe that the Plan makes sound provision for sustainable transport**, particularly for public transport and active modes of transport. It has to be recognized that Runnymede is largely a rural community and also a 'dormitory' for a large population of commuters to workplaces outside of the Borough. The Plan relies on diminution of car journeys rather than the practical and reasonable accommodation of such. Whilst diminution maybe very desirable, the reality of its achievability is unrealistic and thus the provisions for sustainable transport, public transport and active transport modes are not sound. Public transport in the context of Runnymede Borough means the provision of bus services. Much of the Borough by its rural nature cannot sustain a commercially viable private service to all destinations, without public subsidy.

Michael J Freshney

10 October 2019