1.0 Introduction

1.1 This Statement has been prepared by Cannon Consulting Engineers (CCE) on behalf of our client, Kitewood Estates Ltd (Kitewood). The Statement considers the Inspector’s Questions for the Stage 3 Hearing session of the Runnymede 2030 Local Plan Examination, which is to be held on the 14th November 2019, with particular regard to highways and traffic matters, specifically the A320 Corridor and M25 Junction 11 improvement works.

1.2 Kitewood remain concerned that the highways assessment of the A320 Corridor and M25 Junction 11 improvement works has not been adequately considered as part of the Local Plan Review and that the latest work carried out – whilst clearly helpful in clarifying that issue – does not change the position that the Local Plan Review remains unsound. Kitewood, and other objectors, have in submissions on previous matters raised by the Inspector suggested that given the likely lack of delivery of a suitable supply of housing to meet requirements because of problems with the sites linked to the A320 Corridor, that the Inspector should conclude that it is necessary for the Council to identify and allocate additional sites for housing (or reserve sites/safeguarded land).

1.3 Having considered the latest supporting documents, it remains Kitewood’s position that considerable doubts can be expressed about housing delivery which has not changed Kitewood’s overall conclusion that the Local Plan Review remains unsound.

1.4 In addition to consideration of the Inspector’s Questions, a review of the Kitewood controlled unallocated site at Wey Manor Farm has been undertaken with respect to highways and traffic matters.

1.5 CCE have undertaken a review of the supporting documents that have been prepared for consideration at the Stage 3 Hearing session. These include the following:

- Runnymede 2030 Submission Local Plan (July 2018) (CD_001)
- Runnymede 2030 A320 Topic Paper (July 2018) (examination document SD_021B)
- Runnymede 2030 A320 Update Paper (September 2019) (RBCLP_52)
- A320 North HIF Bid (April 2019) (RBCLP_44)
- Strategic Highway Assessment Report Part 1 and 2 (SHAR) (June 2019) (RBCLP_47)
- A320 Corridor Study Feasibility Study Final Report (April 2018)
- Runnymede A320 Corridor Study M25 Junction 11 – Feasibility Study Report (September 2019)

1.6 The A320 Corridor Study Feasibility Study Final Report informed the A320 Topic Paper and identified a total of approximately 6,800 dwellings from 9 key potential developments that could have an impact on the A320 Corridor, as presented on Figure 1 and Table 1 of that report. The A320 Corridor Study considered 15 key junctions and four links including the M25 Junction 11, as presented on Figure 8 and Table 4 of that report. Of these, 12 junctions and...
four links were considered to require mitigation, which were presented at Table 44 – Junctions and Link Scheme Summary.

1.7 In support of the Stage 3 Hearing sessions, the A320 Update Paper has been prepared, which was supported by the A320 North HIF Bid, the M25 Traffic Impact Assessment Note, and an updated SHAR. These reports reflect an amended forecast year of 2030, remove the Fairoaks Airfield scheme and the Martyr’s Lane proposed allocation, ensure that the most up-to-date information on the proposed quantum of strategic development is reflected, and ensure that the most up-to-date DfT forecast trip rates were used.

1.8 The A320 HIF Bid identified a total of approximately 3,700 dwellings across 7 sites, which are identified as being able to come forward as a result of the A320 Corridor and M25 Junction 11 improvement works, as presented in the Table at para 1.2.2 on page 7. The HIF Bid identifies that a total of 5 junctions (including the M25 Junction 11) and 4 links are to be improved, as per the plans contained at Appendices 10 to 17 of the HIF Bid.

2.0 Inspector’s Questions

Have the Plan’s implications for traffic growth on the Borough’s critical highways infrastructure, specifically the A320 and the connections with the M25, been adequately assessed?

2.1 No. Whilst the original A320 Topic Paper identified that the A320 Corridor and the M25 Junction 11 is “the only piece of critical highways infrastructure which has been identified as being necessary to support the growth which is proposed to be delivered through the Runnymede Local Plan”, it was originally identified that a total of 9 sites would have an impact on the A320 Corridor and the M25 Junction 11. These identified developments equated to a total provision of approximately 6,800 dwellings + commercial floorspace.

2.2 The A320 Update Paper notes at para 3.1 that the large development sites of Fairoaks Airfield and Martyr’s Lane have been removed from the SHAR as the Fairoaks Airfield scheme remains undetermined and the Martyr’s Lane proposed allocation has not been taken forward by Woking Borough Council (WBC).

2.3 A review of the RBC planning portal identifies that the Fairoaks Airfield scheme (Planning Ref RU.18/1615) is still valid and further information was uploaded to the RBC planning portal as recently as the 17th September 2019. As the Fairoaks Airfield scheme includes for up to 1,000 residential units, elderly care accommodation, and up to 65,004sqm of non-residential floorspace, it is our view that this site should be included within the updated assessments for the A320 Corridor and the M25 Junction 11 as there is every prospect that the scheme will be determined within the RBC Local Plan period to 2030. In fact, the signed PPA identifies that the Fairoaks Airfield scheme is expected to go to Planning Committee in early 2020 with a decision as soon as March 2020. Table 23.1 of the Fairoaks Airfield Transport Assessment (August 2019) identifies that in 2025 the Fairoaks Airfield scheme would result in an increase of 163 vehicles in the AM and 144 vehicles in the PM peak hour on the M25 Junction 11, and 347 vehicles in the AM and 306 vehicles in the PM peak hour in 2030. A copy of the Table is included at Attachment 1. This level of increase at the Strategic Road Network is considered to be significant.

2.4 As such, it is our view that the updated SHAR does not adequately assess the implications for traffic growth on the critical highways infrastructure as it omits the traffic associated with the current planning application for the Fairoaks Airfield scheme. Once included, it is likely that previously considered junctions that were excluded from the updated SHAR and the Arcadis reports, may have to be reconsidered to accommodate the additional traffic associated with
the Fairoaks Airfield scheme. As noted in paragraph 2.3 above, the Fairoaks Airfield scheme is projected to add a significant number of vehicles to the M25 Junction 11 in the AM and PM peak hours. This increase in proposed development traffic amounts to almost twice the development traffic at the M25 Junction 11 and must therefore increase the levels of proposed development traffic along the A320 Corridor to a similar significant level.

Taking account of planned development in and around the Borough, are there reasonable prospects that satisfactory mitigation can and will be provided in time to avoid unacceptable impacts on the operation of the A320 and M25? Does the submitted Plan provide appropriate guidance about how this will be achieved?

2.5 No. The planned development that is currently being considered within the updated SHAR and the Arcadis reports does not include the Fairoaks Airfield scheme, or any traffic associated with this current planning application. Therefore, it is our view that it has not been demonstrated that satisfactory mitigation can or would be provided to avoid unacceptable impacts on the operation of the A320 Corridor and the M25 Junction 11.

2.6 The A320 Update Paper identifies a timetable to deliver the A320 Improvement Programme as set out in the HIF Bid, at paragraph 5.12, which identifies the completion of all the works by March 2024. It is noted that the Compulsory Purchase Order (CPO) process is not referenced in the Table contained within the A320 Update Paper. However, Appendix 58 of the HIF Bid includes a more detailed programme, which identifies that the Land Acquisition and CPO process will be completed by the 06th August 2021.

2.7 In our view, insufficient mitigation has been identified to address the traffic impacts expected on the A320 Corridor and the M25 Junction 11, particularly in light of the fact that the Fairoaks Airfield scheme has been excluded from the assessments. In addition, it is considered ambitious to complete all the necessary land acquisitions and CPO processes within the identified timeframe to August 2021, particularly as the full extent of land acquisition and CPO is not currently known as further junctions may have to be improved to accommodate the additional proposed development traffic associated with the Fairoaks Airfield scheme.

Overall, can there be reasonable confidence that the level of development proposed in the Plan can be viably delivered while making an appropriate contribution to the necessary mitigation measures for the A320 and M25?

2.8 Section 8 of the A320 Update Paper addresses viability and identifies that the HIF Bid suggests RBC might seek to clawback 25%, which equates to £11m, of the total £44m cost of the improvement works as currently identified.

2.9 Table 2 of the A320 Update Paper sets out the Residual Land Values (RLV) and Benchmark Land Value (BLV) for each of the seven A320-Dependant Sites, which identifies that each of these sites are expected to have RLVs that are greater than their BLVs. Therefore, it could be considered that the viability calculations identify that appropriate contributions can be made.

2.10 However, as has already been identified, it is our view that the Fairoaks Airfield scheme should be included in the assessment(s), which in turn may result in additional junction/link improvements being required, which would need to be factored into the calculations. The inclusion of the Fairoaks Airfield scheme does also provide the opportunity for additional contributions, but this must be weighed against the impacts.

A revised trajectory and supporting information for development of Longcross Garden Village (LGV) is presented in RBCLP_56, and for all the A320-dependent sites in RBCLP_52,
having regard to the Council’s and Surrey County Council’s (SCC) priorities for improvement of the A320 and safe conditions on the local road network.

i) Is the revised trajectory based on reasonable assumptions and sound principles to seek to maintain housing delivery rates at LGV and the other A320-dependent sites while avoiding unacceptable impacts on the highway networks?

2.11 Whilst the A320 Improvement Programme identifies that the works would be completed by March 2024, the housing trajectory contained at Appendix 2 of the A320 Update Paper, identifies that 1,746 dwellings could be completed by March 2024.

2.12 It is acknowledged that the A320 Corridor is already congested and the occupation of a further 1,746 dwellings prior to the completion of the A320 Corridor and M20 Junction 11 improvement works, is considered to place an unacceptable level of impact on this key corridor.

2.13 A Statement of Common Ground (SoCG) between SCC and RBC dated the 13th September 2019, identified that SCC accept the principle of development coming forward prior to the completion of the A320 Corridor improvement works. However, SCC also state that “there will be a need to consider the extent to which any additional trips resulting from the further delivery of housing prior to the completion of the A320 highway works may add pressure to an already impacted network, given safety concerns and in particular, the ability of emergency vehicles to negotiate the local network, and the location of St Peter’s Hospital with its major A&E unit.”

2.14 Considering that the Fairoaks Airfield scheme is seeking a permission in March 2020, and it is noted that occupations could commence as early as 2020 (PBA TA para 2.8.1), the identified figure of 1,746 occupations prior to the completion of the A320 Corridor highway works might extend to a figure in excess of 2,000 occupations.

ii) Apart from the distinction drawn between A320-dependent sites with or without planning permission, what is the basis for the estimated number of completions on these individual sites by 2023/2024, and by the end of the Plan period?

2.15 Whilst this is not a specific highways matter, we are aware of Kitewood’s concern regarding this issue due to the deliverability problems that have been identified.

The updated evidence confirms that the proposed mitigation works for the A320 and M25 will only go some way towards negating the entire traffic impact of the Plan’s proposals. In this light, and bearing in mind the suggested changes to the Plan that have already been put forward during the course of the examination, does the Plan make sound provision for sustainable transport, particularly public transport and active modes of travel?

2.16 The Submission Local Plan acknowledges that the Council’s growth aspirations cannot be implemented without the delivery of supporting transport and other infrastructure. It also recognises that there are a number of existing transport and infrastructure issues within the Borough. These include, amongst other elements, infrequent and limited bus services during peak hours and limited connectivity by walking/cycling routes in some areas.

2.17 Whilst paragraph 5.49 of the Submission Local Plan states that RBC’s Spatial Development Strategy “seeks to direct development to the urban areas of the Borough and allocate sites in areas which perform well in terms of accessibility to public transport and active travel connections to local services” a review of the Final A320 Corridor Study identifies the key bus routes in proximity to the A320-Dependant Sites.
2.18 It is clear that at present, whilst there are bus services along the A320 Corridor, the larger sites at Longcross Garden Village and Fairoaks Airfield, do not currently have any bus services linking these schemes to local services. It is acknowledged that Policy SD10: Longcross Garden Village, would require funding or the provision of permanent bus services for the village, which would link with Longcross rail station and local service centres, and the supporting TA for Fairoaks Airfield suggests that a 30minute frequency bus services would be provided between Woking and St Peter’s Hospital, albeit insufficient funding is currently identified to provide these services. However, the public transport provision for these major development sites is by no means confirmed or committed.

2.19 It is our view, that the Submission Local Plan does not proactively identify mechanisms for the implementation of a sound provision for sustainable transport. There are consistent references to RBC working with partners, such as SCC, with the aim of ensuring improvements to support sustainable growth, but these are not clearly defined.

3.0 Wey Manor Farm

3.1 Based on our consideration of the documents that support the Local Plan Review, the Submission Local Plan in its current form is not sound as it has not demonstrated that the highway constraints can be adequately overcome to allow the timely delivery of the A320-Dependent Sites in accordance with the schedule set out by RBC. As such, there could be a shortage of deliverable dwellings within the 5-year housing trajectory period and sites that are currently not allocated, but are in sustainable locations and are not dependent on the A320 Corridor highway improvement works, should be considered.

3.2 With the above in mind, Kitewood have control of a 12.8-hectare site at Wey Manor Farm. The site is located east of New Haw and southeast of the M25 Junction 11. The site can deliver approximately 220 dwellings, including affordable housing with potential for additional uses such as employment, retail and leisure alongside complementary residential and non-residential uses. Kitewood retain a flexible approach to the additional uses provided on the proposed site.

3.3 The proposed site is bound to the west by the A318 Byfleet Road, a commercial site and a residential development, green fields along its north and east boundaries, and the Byfleet Electricity Switching stations at its southern boundary.

3.4 Highway frontage with the A318 Byfleet Road currently enables a direct access to the proposed site via an agricultural gate. It is our view that an appropriate site access junction could be deliverable in terms of acceptable visibility splays and junction capacity and there is sufficient available land to provide a ghost right turn lane if it is necessary to address any potential for delay to vehicles travelling northwards on the A318 Byfleet Road as traffic associated with the proposed development waits on the carriageway to make a right turn into the site during peak periods.

3.5 The proposed site has excellent accessibility to public transport. Three bus stops are located to the north and west of the site within 200 metre walking distance of the proposed site access junction providing access to 8 bus routes to various destinations within Surrey including Woking, Addlestone, Weybridge and Kingston. Byfleet & New Haw railway station is located within 900 metre of the site access and provides frequent services between Woking and London Waterloo.

3.6 A review of the surrounding area has revealed that there is a supermarket within 200m walking distance from the proposed site access and there is a total of six primary schools within a 2km radius from the site access.
3.7 It is our view that the proposed site is in a sustainable location where there is an excellent opportunity to promote sustainable modes of transport. These include the use of bus, walking and cycling through Travel Plan promotions and measures.

3.8 To understand the potential traffic impact from the proposed site, a trip generation and distribution exercise has been undertaken for the site based on the site coming forward with 220 dwellings, in order to understand the potential impact of the proposed development on the local highway network.

3.9 Using consistent trip rates from the recently permitted site at Hanworth Lane (Planning Ref: RU.18/1280) identifies that Wey Manor Farm could generate approx 90 two-way vehicle movements in the AM and PM peak hours respectively, of which approximately 25 two-way vehicle movements are expected to use the M25 Junction 11 in either peak hour. This level of traffic impact at the M25 Junction 11 is less than what was identified for the Hanworth Lane scheme, to which Highways England confirmed that it would have a negligible impact. As such, it is considered that the traffic impact associated with the Wey Manor Farm scheme would also have a negligible impact at the M25 Junction 11.

3.10 Additionally, the trip distribution indicates that traffic from Wey Manor Farm would not travel via the section of A320 Corridor that is subject to the mitigation works required to bring forward the 7 A320-Dependent Sites. Therefore, Wey Manor Farm is not considered to be reliant on the A320 Corridor or the M25 Junction 11 improvement works to come forward for development.
Attachment 1

Table 23.1 M25 / St Peter’s Way – Percentage Impact (PBA Transport Assessment)
23 M25 / St Peter’s Way

23.1.1 This junction is a part signal controlled roundabout which connects the M25 (junction 11) with the A320 St Peter’s Way. The junction location is illustrated opposite.

23.2 Percentage effect of development

23.2.1 The table below summarises the percentage effect of development traffic. This is based upon a comparison of junction throughput between the baseline scenario and the “baseline plus development” scenario.

<table>
<thead>
<tr>
<th>AM</th>
<th>PM</th>
</tr>
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<tbody>
<tr>
<td>2025 baseline</td>
<td>6802</td>
</tr>
<tr>
<td>2025 with development</td>
<td>6966</td>
</tr>
<tr>
<td>Increase / Decrease</td>
<td>+163 (2.4%)</td>
</tr>
<tr>
<td>2030 baseline</td>
<td>7064</td>
</tr>
<tr>
<td>2030 with development</td>
<td>7411</td>
</tr>
<tr>
<td>Increase / Decrease</td>
<td>+347 (4.9%)</td>
</tr>
</tbody>
</table>

Table 23.1 M25 / St Peter’s Way – Percentage impact

23.2.2 It is noted that the proposed development traffic is predicted to increase traffic flows between 2.3% and 2.4% at 2025 and between 4.7% and 4.9% at 2030. On this basis, it is considered necessary to model the effect of the development in detail and this is summarised below.

23.3 2017 base year

23.3.1 This junction has been modelled for a 2017 base year as a signal controlled roundabout junction using TRANSYT. The results from the 2017 models are summarised below whilst the TRANSYT output is included as Appendix 23a.