Runnymede Local Plan EIPP - Statement for 14th November 2019
Statement on Behalf of Taylor Wimpey for the Stage 3 hearing on 14th November 2019

October 2019
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David Murray-Cox
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**Client**
Taylor Wimpey Strategic Land

**Our reference**
TAYR3011

17 Oct 2019
1. **Introduction**

1.1 This Statement is submitted on behalf of Taylor Wimpey, in relation to land to the north east of Green Lane, Chertsey Bittams, Chertsey. This site is proposed to be allocated (through Policy SD3 and Policy SL14) for residential development. This site is ‘Parcel A’, one of five sites proposed for allocation at Chertsey Bittams, Chertsey (Parcels A – E). This particular Statement addresses Matter 4 and should be read in conjunction with Taylor Wimpey’s previous representations in relation to this site.

1.2 Our client has an option in relation to Parcel A, Chertsey Bittams, Chertsey. Parcel A is located between Green Lane (which forms its south western boundary) and the M25 (which forms its north eastern boundary). A number of residential properties are located along the south western boundary of Parcel A on Green Lane. The Salesian School (a comprehensive school for pupils aged 11 – 18) is located to the north of Parcel A.

1.3 The site is proposed for release from the Green Belt to facilitate its allocation for residential development.

1.4 We provided detailed representations to the Regulation 19 Consultation on the Proposed Submission Local Plan. Accordingly, we do not seek to extensively repeat the analysis set out previously, but provide commentary in relation to the ‘Inspectors Initial Questions’, where appropriate.

1.5 Taylor Wimpey has participated in other sessions of this examination.

1.6 This Statement responds specifically to the highways related matters to be discussed at the Stage 3 hearing statement on 14th November 2019.

1.7 This site is identified in the emerging Local Plan as an ‘A320 dependent’ site and as such Taylor Wimpey has an interest in the matters to be discussed on 14th November 2019.
2. Responses to the Inspector’s Questions

1. 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 In broad terms the Evidence Base presents an adequate appraisal of the impacts of growth on the critical highway infrastructure in Runnymede, and clearly identifies the locations where improvements to the network will be required to accommodate the projected growth of the plan to the end of the Plan period.

2.2 Plans for the improvement of the M25 Junction 11 are now reasonably developed.

2.3 However, as noted in earlier representations (in the Statement to Matter 6 on behalf of Taylor Wimpey (TW)), it is considered that the scale and nature of the improvements required along the A320 corridor, particularly but not exclusively at Junction 6 (Green Lane / Holloway Hill), requires re-consideration to reduce the significant risks to delivery and to make the works cost effective and deliverable. Alternative options for Junction 6 which would reduce risks / improve value for money have already been presented to SCC.

2.4 Nevertheless, whilst the assessment of impacts at the end of the plan period may be adequate, there is no assessment of intermediate impacts or to consider the necessary dependency or phasing of infrastructure and development, which would be required to properly support its revised Housing Trajectory (RBCLP_52) which allows some A320 Dependent sites to deliver in advance of the A320 works but not others. Furthermore, TW note that the trajectory assumes a significant quantum of development at Longcross for example, but the delivery rates elsewhere have been supressed. TW are concerned that the Council’s trajectory risks undermining its overall strategy and preventing otherwise deliverable sites coming forward at an early stage in the plan.

2.5 TW is promoting the site at Chertsey Bittams Site A (SL14) which is confirmed to be available and free from any significant constraints that would prevent it coming forward (Taylor Wimpey’s Statement to Matter 6) and yet the Council’s revised trajectory seeks to unnecessarily and significantly delay its delivery. Pre-application engagement with SCC has confirmed that the site is able to be delivered in a satisfactory manner. In traffic terms, SCC confirms (Appendix A) that it:

“4.3 .... would not seek to object to or delay the site coming forward until the full A320 corridor works were in place.”

“4.6 .... has no objection to an application coming forward in the short term for the site and considered that in transport terms it could be dealt with through Development Management processes”

2.6 The position of the local highway authority is therefore at odds with the Council’s position.
2. 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?

2.7 The delivery of the A320 corridor improvements and M25 improvement are dependent on forward funding being achieved through current and/or future funding bids. The Council has submitted bids to both HIF and MRN in this regard and there are signs of positive progress towards a funding award. TW agree that this demonstrates that there are reasonable prospects of the delivery of key infrastructure at an early stage of the plan. The release of deliverable development sites early in the plan process will help to bring forward necessary funding for the works.

2.8 However, as noted at Question 1, the Council has not carried out any intermediate testing to determine the point at which significant impacts would occur, or to understand which sites should be released and the scope for releasing further A320 Dependent Sites at an early stage of the plan.

3. 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 completion of the necessary mitigation measures for the A320 and M25?

2.9 Yes, subject to details of the final cost burden placed on developers in combination with all other obligations. The Plan presents the broad scope and scale of infrastructure interventions that will be needed to support the proposed growth, and through the Housing Paper (SD_021B), identifies a mechanism for each of the development allocations to help to deliver these improvements through making financial contributions. This would collectively recover c25% the A320 works costs.
4. 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 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 network?

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?

2.10 No. The revised trajectory for the A320 dependent sites contained in RBCLP_52 is not based on any published substantive evidence to determine which sites should and shouldn’t be permitted to come ahead of the A320 improvements.

2.11 For instance:

- There is no assessment of the individual traffic impacts of each site on the A320 corridor locations to determine those which have the greatest impact relevant to each scheme and which would cause significant effects – individual impacts are simply untested;

- There is no assessment of intermediate impacts, to consider what the traffic implications would be of delivering various combinations of sites in advance of the A320 works (or indeed the different phases of the A320 Improvement works); and

- There is no relationship between the sites proposed to be released at an early stage of the plan and the programme for the A320 improvements. The Stage 1 works focus on the northern section of the corridor (north of St Peter’s Way) and are due to be completed by March 2023, whilst the Phase 2 works relate to the southern part of the corridor and are due for completion by March 2024. Logically, those sites dependent on the Phase 1 works should be programmed ahead of those dependent on the Phase 2 works, but that is not the case in the Council’s trajectory.

2.12 At 9.2 of RBCLP_52 it is stated that:

“9.2 In terms of the housing trajectory of A320 dependent sites, the table included at Appendix 2 indicates the revised housing trajectory the Council considers to be appropriate, mindful of the need to complete the improvement works to the A320, before all development impacting on the A320 (or M25 Junction 11) could come forward for occupation.”
“9.3 The revised SHAR does not indicate a point at which the level of planned development impacting on the A320 would become problematic, and discussions with Surrey County Council have indicated that it would prefer to assess developments on a case by case basis, taking account of the outcome of transport assessments which accompany planning applications.”

2.13 Instead of taking an evidence-led approach, the Council has developed its revised housing trajectory in a largely unexplained fashion. TWs particular concerns relate to the following factors:

- **Unconstrained Delivery at Longcross** - No compelling justification is presented to demonstrate why Longcross should be permitted to deliver housing in an entirely unconstrained manner in line with its preferred housing trajectory when other sites which have a much lesser impact on the corridor are held back (Longcross is by far the single greatest impactor on Junction 6 for example – Rep 1968-003 Appendix 2 Table 4.5).

- **Progression of schemes** – Whilst planning consents are in place for Hanworth Lane (part), St Peter’s Hospital and Longcross North (part), all other A320 Dependent sites require planning consent yet there is significant variance in the progress made on each scheme to this point. Specifically, there is very limited progress evident on Bittams B, C and E, Chisley Green Farm and Central Vet Labs. Despite this, RBC proposes that those sites will deliver 100 dwellings prior to the completion of the A320 works, whereas Bittams A, a site that is being actively pursued by a developer and which is immediately available, is proposed to deliver only 25 dwellings. This is not logical and fails to recognise the deliverability of sites.

<table>
<thead>
<tr>
<th>Site</th>
<th>Capacity</th>
<th>Delivery Information – RBCLP_21</th>
<th>Dwellings before A320 Works</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Developer</td>
<td>Application</td>
</tr>
<tr>
<td>Hanworth Lane</td>
<td>340</td>
<td>Yes</td>
<td>Ph 1 under construction</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ph 2/3 submitted</td>
</tr>
<tr>
<td>Chertsey Bittams A</td>
<td>175</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Chertsey Bittams B</td>
<td>120</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Chertsey Bittams C</td>
<td>9</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Chertsey Bittams D</td>
<td>200</td>
<td>No</td>
<td>Submitted</td>
</tr>
<tr>
<td>Chertsey Bittams E</td>
<td>105</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Longcross North</td>
<td>426</td>
<td>Yes</td>
<td>Ph 1 under construction</td>
</tr>
<tr>
<td>Longcross South</td>
<td>1320</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>
Similarly, there is no reasoned justification as to why Bittams D is proposed to deliver 75% of its dwellings (150 dwellings) prior to the completion of the A320 works whereas Bittams A is only suggested to be allowed 15% (25 dwellings). The two schemes are reliant on the same infrastructure and are being equally pursued through the planning system.

- **Relationship to Phased A320 works** - The A320 works are to be delivered in two phases, with Phase 1 completed by March 2023 and phase 2 completed by March 2024. No reflection of this is included in the trajectory. Logically, those sites dependent on the Phase 2 works which comprises Longcross, Ottershaw East and Vet Labs (SD_021B), should be phased to be released later in the trajectory than those dependent on the Phase 1 works.

- **Lack of flexibility** - The approach provides no flexibility to account for the potential under delivery of those A320 Dependent Sites that RBC is proposing to come ahead of the A320 works. Significant risk of under delivery must particularly exist at Longcross South where:
  
  - No planning consent is in place or application submitted, and yet delivery is envisaged in 2021/2022 - as a large site there is often unavoidable planning and delivery delays.
  
  - The trajectory assumes 50 dwellings in Yr 21/22, rising immediately to 150 dwellings in 22/23, a rate much higher than achieved at Longcross North in any year. In combination with the projected delivery on Longcross North (which despite only delivering 23 dwellings in 2020/2021 anticipates 120 dwellings in 2021/22), would mean that Longcross in total would deliver some 270 dwellings in 2022/2023. This is a highly ambitious delivery rate and there is consequentially a high risk of under delivery.

2.14 In relation to the proposed trajectory (RBCLP_52) the Council reaches the conclusion that:

“9.10 The impacts on the A320 of enabling this level of additional housing development to come forward in parallel with the completion of the A320 improvement works are considered to be relatively insignificant, though they would of course be tested through detailed transport assessments which accompany planning applications as they come forward. In this context, the Borough Council is of the clear view that the Local Plan strategy remains sound and deliverable.”
2.15 If the Council is of the mind that the proposed release of this level of development in advance of completion of the A320 works is insignificant, it remains unclear why it has not sought to determine through its evidence base the level of development that could be released before impacts are considered to reach a significant level.

**Deliverability of Chertsey Bittams A**

2.16 In transport terms, TW’s earlier representations confirmed the deliverability of the site and provided detailed analysis of both traffic impacts and engagement with SCC as Highway Authority. Since the suspension of the Hearing Sessions, TW has continued to engage RBC and SCC in pre-application discussions to explore delivery of the site.

2.17 The A320 Housing Paper (SD_021B) identifies dependencies on three A320 Improvement schemes:

- Junction 8 (St Peter’s Roundabout)
- Link 2 (connecting St Peter’s and Holloway Hill)
- Junction 6 (Green Lane / A320 / Holloway Hill)

2.18 The Junction 8 improvement is secured to be directly delivered by the St Peter’s Hospital site, with a planning obligation that requires delivery prior to 150 occupations. This improvement will be delivered in the short term irrespective of the Council’s A320 improvement programme.

2.19 The Link 2 scheme does not deliver any material capacity enhancements, focussing on delivering sustainable transport enhancements. In traffic terms, there is no reason for the site to be dependent on these works.

2.20 For Junction 6, TW has prepared work to consider the relative impact of the Bittams Site A site at this junction in its current form which shows that the impacts of the site are very small (less than 2% increase in traffic and an 8 second delay increase), and has also presented an interim improvement to SCC to demonstrate how any short-term impacts can be addressed. It cannot reasonably be considered that the site will have a severe impact on the operation of the junction, and it is no reason to hold back the development in the context of national policy requirements.

2.21 The deliverability of the site has been discussed in detail with SCC in its role as highway authority, most recently at a meeting of 11 October 2019 (Meeting notes at Appendix A). SCC confirm that:

“4.3 .... on the basis that Taylor Wimpey is prepared to pay its share of the A320 costs through a financial contribution which will help delivery the scheme, in terms of determining a planning application, SCC would not seek to object to or delay the site coming forward until the full A320 corridor works were in place. “

“4.4 .... SCC would adopt the same approach that it has at the Hanworth Lane and St Peter’s Hospital sites whereby it secures the payment of contributions to the longer term strategy, but does not consider it necessary to restrict the delivery of the
development until the works are constructed. It is accepted that there may be some minor and short term detriment to the network, but that this is acceptable.”

“4.6 .... in principle SCC had no objection to an application coming forward in the short term for the site and considered that in transport terms it could be dealt with through Development Management processes, with a package of mitigation secured by S106 mechanisms for the site. TD confirmed SCC would have no objection on the basis of prematurity of the site in the context of the A320 works.”

2.22 There is no in principle nor site specific reason that the Local Highway Authority considers the site cannot come forward in the short term and in advance of the A320 improvements being completed. In the event that there is any harm, this will be short in duration, small in extent and mitigated to a large degree by the early availability of scheme funding and delivery of necessary housing.

Way Forward

2.23 The Council is encouraged to:

(a) Prepare and present evidence to determine the level of development that can reasonably be delivered ahead of the completion of the A320 Works (taking account of its phasing) and before a ‘severe’ impact is created

(b) Review its approach to apportionment of any development that can be delivered ahead of the A320 works based on this evidence, and to consider:

(i) The deliverability of the A320 Dependent sites in the short-term

(ii) The relationship of the A320 Dependent sites to the A320 improvement works

(iii) A more balanced and realistic assessment of housing delivery rates

(iv) The accessibility of sites

(c) Provide flexibility in the approach to enable sites to come forward to deliver needed housing in the event of reduced or stalled delivery on other sites in the early part of the plan

5. 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?

2.24 In general terms the plan recognises the importance of promoting sustainable transport modes and Policy SD4 of the submission plan (CD_001) sets out a series of requirements to achieve sustainable development, including the delivery of travel...
plans and securing improvements to sustainable travel infrastructure and services. Site specific requirements are then translated to individual draft allocation policies.

2.25 However, in view of the clear highway constraints which necessitate an approach to limit traffic impacts on the A320 corridor, and the timing needed to deliver necessary infrastructure to the corridor, the plan trajectory should be refocussed to deliver the more sustainable sites first and at an early stage of the plan. This will provide the best opportunities for the establishment of sustainable travel behaviours for new residents and so limit traffic impacts on the A320 corridor.

2.26 The Council’s Local Plan Evidence base has already assessed the comparative accessibility credentials of the proposed allocations in its Site Selection Assessment (SD_012B), repeated below.

<table>
<thead>
<tr>
<th>Site</th>
<th>Capacity</th>
<th>Accessibility Performance – SD_012B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hanworth Lane</td>
<td>340</td>
<td>High</td>
</tr>
<tr>
<td>Chertsey Bittams A</td>
<td>175</td>
<td>Medium-High</td>
</tr>
<tr>
<td>Chertsey Bittams B</td>
<td>120</td>
<td>Medium</td>
</tr>
<tr>
<td>Chertsey Bittams C</td>
<td>9</td>
<td>Medium</td>
</tr>
<tr>
<td>Chertsey Bittams D</td>
<td>200</td>
<td>Medium</td>
</tr>
<tr>
<td>Chertsey Bittams E</td>
<td>105</td>
<td>Medium-High</td>
</tr>
<tr>
<td>Longcross North</td>
<td>426</td>
<td>Low</td>
</tr>
<tr>
<td>Longcross South</td>
<td>1320</td>
<td>Low</td>
</tr>
<tr>
<td>St Peters Hospital</td>
<td>408</td>
<td>Medium-High</td>
</tr>
<tr>
<td>Chilsey Green Farm</td>
<td>275</td>
<td>Medium-High</td>
</tr>
<tr>
<td>Central Vet Lab</td>
<td>150</td>
<td>Medium</td>
</tr>
<tr>
<td>Ottershaw East</td>
<td>200</td>
<td>Medium-High</td>
</tr>
</tbody>
</table>
Appendix A: Meeting Notes
Notes of Meeting

Project No: ITB12183
Project Title: Green Lane, Chertsey
Date: 11 October 2019
Venue: SCC Offices - Quadrant Court, Woking

Attendees

- Tim Dukes — Surrey CC (TD)
- Tim Wall — i-Transport (TW)
- Glenn Coles — Taylor Wimpey (GC)
- James Newton — Taylor Wimpey (JN)
- Luca Martins — Taylor Wimpey (LM)
- David Murray-Cox — Turley (DMC)

<table>
<thead>
<tr>
<th>Item</th>
<th>Meeting Context</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td></td>
<td></td>
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<tr>
<td>1.1</td>
<td>TW outlined purpose of meeting:</td>
<td></td>
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<tr>
<td></td>
<td>• To review the i-Transport LLP Technical Note presented (ITB12183-007) which addressed earlier SCC comments in relation to:</td>
<td></td>
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<tr>
<td></td>
<td>▪ Impacts of development on Junction 6 (current arrangement);</td>
<td></td>
</tr>
<tr>
<td></td>
<td>▪ The design elements of the Alternative junction approach; and</td>
<td></td>
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<tr>
<td></td>
<td>▪ Modelling comments on the Interim and Alternative arrangements.</td>
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<td></td>
<td>• To consider the channels for delivering the site, from a transport perspective.</td>
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<tr>
<td>2.0</td>
<td>Impacts of Development on Existing Junction</td>
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<tr>
<td>2.1</td>
<td>TW summarised the findings of the latest assessment which identified that:</td>
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<td></td>
<td>• The existing junction of A320 / Green Lane operates within capacity, and would continue to do so with the inclusion of development traffic from Green Lane; and</td>
<td></td>
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<tr>
<td></td>
<td>• The existing junction of A320 / Holloway Hill exhibits capacity issues on the Holloway Hill approach, with long projected queuing. This is marginally worsened by the proposed development (tested in 25 dwelling increments), but the overall impact of development on this junction is small, representing an increase in delay on Holloway Hill of 8 seconds. This is less than the ‘severe’ NPPF threshold.</td>
<td></td>
</tr>
<tr>
<td>2.2</td>
<td>TD noted that there were locally held concerns that on some days the operation of the junction is worse than that projected by the modelling. Further investigation of existing conditions would be needed at the application stage to confirm the i-Transport conclusions. Any application would need to assess the short-term impacts on the existing junction prior to mitigation. This would need to be presented in the TA.</td>
<td></td>
</tr>
</tbody>
</table>
### 3.0 Interim and Alternative Improvements to Junction 6

3.1 TW explained that the SCC comments in relation to the Interim and Alternative improvements to Junction 6 had been addressed. TD noted that there were further detailed comments which would be forward for consideration.

3.2 TD noted that a PUFFIN crossing was now proposed outside Salesian College to provide access to the proposed playing fields west of the A320 along with parking restrictions to better manage school drop-off. TD to provide plans which would need to be considered in any future modelling. TW noted that the primary demand for the crossing (i.e. to access the playing fields) would occur outside of network peak hours.

3.3 TD confirmed that SCC’s preference was not to pursue an Interim scheme associated with the Green Lane development, but instead to secure (proportionate) funding from the site to assist the delivery of the full and final improvement to the junction. This would be the scheme that results from the A320 study.

3.4 TW considered that the potential improvement for Junction 6 would be developed by design consultants and would not necessarily be that proposed in the original study and may be more likely to reflect the alternative improvement presented by i-Transport. TD to pass on the alternative improvement for consideration.

### 4.0 Approach to Delivery of the Site

4.1 TW explained that the RBC LP promotes a tariff based contribution requirement for each site to mitigate the impact on the A320. In relation to the Green Lane site (Chertsey Bittams Site A), this is derived by considering the most relevant infrastructure improvements, being Junction 6, Junction 8 (St Peters Hospital) and Link 2 (connecting Holloway Hill and St Peters Way). The approach proposes a contribution of some £720k using the earlier costs of the A320 study. TW and GC/JN confirmed that Taylor Wimpey is in no way seeking to avoid paying its share of the necessary mitigation and was committed to paying an appropriate contribution to the A320 improvements.

4.2 TW and DMC explained that the latest RBC LP submissions seek to delay delivery of the site until 2024, timed to comply with when it considers the A320 improvements will be completed. Taylor Wimpey are concerned that this unnecessarily delays delivery of an otherwise suitable and unconstrained site and will be making reps to the LP EIP.

4.3 TD explained that on the basis that Taylor Wimpey is prepared to pay its share of the A320 costs through a financial contribution which will help delivery the scheme, in terms of determining a planning application, SCC would not seek to object to or delay the site coming forward until the full A320 corridor works were in place.

4.4 TD confirmed that SCC would adopt the same approach that it has at the Hamworth Lane and St Peter’s Hospital sites whereby it secures the payment of contributions to the longer term strategy, but does not consider it necessary to restrict the delivery of the development until the works are constructed. It is accepted that there may be some minor and short term detriment to the network, but that this is acceptable.
### In the context of the A320 and this site, it was discussed that:

- The A320 Study is predicated on a scenario which considers operation in 2036 with all development included on the network. It does not consider the phasing of works or development or test dependencies;

- The impacts of the site on the A320 are in real terms small, around a 2% increase in traffic on the network, and the site is too small in scale to directly deliver any part of the wider A320 strategy;

- The HIF Bid estimates delivery of Phase 1 (the section relevant to the site) in 2023 and Phase 2 (south of St Peters Way) by 2024. These are short-term delivery timescales and would in all reality mean that the improvements to the A320 are delivered whilst the development is being delivered even assuming an early application and delivery of the site; and

- In practice the impact of the development coming forward early (i.e. in the next few years) would be that there would be some limited harm on the network in advance of the A320 improvements being delivered. However, this harm would likely be small in scale (as per i-T study), limited in timescale and less than projected on the basis that the remainder of the LP allocations will not deliver in that period (i.e. Longcross is a long term project and many other sites have not progressed at this time).

### On this basis, TD confirmed that in principle SCC had no objection to an application coming forward in the short term for the site and considered that in transport terms it could be dealt with through Development Management processes, with a package of mitigation secured by S106 mechanisms for the site. TD confirmed SCC would have no objection on the basis of prematurity of the site in the context of the A320 works.

### Author

Tim Wall