Runnymede 2030 Local Plan
Public Examination

Response to Inspector’s Questions for Stage 3 Hearings (ID-19)
On behalf of Crest Nicholson and CGNU
(ID:1990)

October 2019
Runnymede 2030 Local Plan

Public Examination

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Barton Willmore LLP on behalf of Crest Nicholson and CGNU

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<td>Authorised by:</td>
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</tbody>
</table>

Barton Willmore
The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000  Ref: 24209/P13c/A5/KJ/MK/dw
Fax: 0118 943 0001  Date: 17th October 2019
Email: planning@bartonwillmore.co.uk

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1.0 INTRODUCTION

1.1 Barton Willmore LLP is instructed by Crest Nicholson (Crest) and Commercial Union, General Accident and Norwich Union (CGNU) to submit this written Hearing Statement in response to the Inspector’s Questions for Stage 3 of the Runnymede 2030 Local Plan Examination. This Statement has been prepared in conjunction with Crest & CGNU’s Transport consultants, RPS, and Viability Consultants, Turner Morum. These representations expand upon the representations submitted on behalf of CN and CGNU in response to the consultations for the Submission Draft RBC Local Plan 2030.

1.2 Crest and CGNU own the former DERA site at Longcross, Surrey, which is proposed for allocation and removal from the Green Belt in the Runnymede 2030 Local Plan under Policy SD10 (Longcross Garden Village).

1.3 The site was designated by the DCLG (now Ministry of Housing, Communities and Local Government, MHCLG) as a Locally Led Garden Village (LLGV) in January 2017. Part of the north of the site to the north of M3 Motorway (the western edge, now referred to as ‘Longcross Park’) is designated as part of the EZ3 Enterprise Zone. The other is being marketed as a residential development named Upper Longcross.
2.0 RESPONSE TO QUESTIONS FOR THE STAGE 3 HEARING

Q1. 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 Yes. Following the Stage 2 Examination hearing, RBC committed to undertaking further transport modelling to support its A320 Update Paper (RBCLP_52).

2.2 RBC’s Highways Update Note (RBCLP_43) proposed that the October 2017 Strategic Highway Assessment Report (SHAR) supporting the Submission Local Plan (CD-001) would be updated, the outcome of which would be considered at the Stage 3 hearings. This update committed to:

i. amending the forecast year to 2030 in line with the regulation 19 Local Plan consultations and submission Local Plan period;

ii. removing the forecast large development sites of Fairoaks Airfield and Martyr’s Lane as there is now greater confidence that these sites, which are just outside Runnymede Borough, will not be progressed at all, or until after the Runnymede Local Plan period; and

iii. ensure the most up-to-date information on the proposed quantum of strategic development is reflected in the proposed Local Plan allocations.

2.3 To this end, RBC commissioned SCC to prepare the Revised SHAR Report (July 2019) (RBCLP_47) which considers the cumulative transport effects of development within and outside the Borough on the A320 corridor and re-confirms that the delivery of a package of highway infrastructure works would be necessary to support the Local Plan.

2.4 The Revised SHAR Report (RBCLP_47) presents a comparison between Scenario 2 (Local Plan) and Scenario 3 (Local Plan + Mitigation) and concluded that the A320 North of Woking Scheme would have the same mitigating effects as was previously concluded in the previous 2017 SHAR Report (SD_015C), continuing to support the scope of the infrastructure works presented within A320 Corridor Study Feasibility Study of April 2018 (SD_015H).
2.5 Separate discussions between RBC and Highways England (HE) were also progressed which focused on the Strategic Road Network (SRN), specifically the performance of Junction 11 and Junction 13 of the M25. The Statement of Common Ground (SoCG) between RBC and HE dated November 2018 summarised the matters of disagreement (RBCLP_10, para 5.2 to 5.3).

2.6 The first matter raised by HE was one of compliance with Planning Practice Guidance (PPG) covering the transport evidence base requirement for Local Plans and especially the use of appropriate trips rates. In this respect, the Revised SHAR confirms that an additional scenario has been modelled as a ‘sensitivity’ which “… has been designed to represent the worst case situation to test the implications of higher forecast trip rates.” (RBCLP_47, paras 5.2.1-5.4.5).

2.7 The second matter concerned the methodology for establishing correct ‘with’ and ‘without’ development scenarios to determine the impacts of the Local Plan upon the highway network. In this respect, the specification for the Revised SHAR confirms that the following scenarios have been modelled (RBCLP_47, para 2.1.1):

- Scenario 1 (S1) - 2030 Do Minimum: including committed developments identified from the base year (since 2014), where committed developments comprise sites already built, or in the process of construction, or have planning permission. They exclude Local Plan allocation sites with planning consent.
- Scenario 2 (S2): Local Plan. This scenario is a continuation of S1 plus the Local Plan allocation sites.
- Scenario 3 (S3): Local Plan + Mitigation. This contains all the developments of S1 and S2, and includes highway mitigation which form the A320 North of Woking Housing Infrastructure Fund (HIF) business case.

2.8 The above scenario specification demonstrates how the Revised SHAR modelling is based on ‘with’ and ‘without’ development scenarios (S1 & S2, respectively) from which it then assesses the effect of the A320 North of Woking Scheme (S3) on the surrounding road network.

2.9 The third matter of disagreement concerned “the use [and application] of the Department for Transport’s trip rate model”. In this respect, SCC has confirmed that the modelling undertaken for the Revised SHAR makes use of CTripEnd version 7.2. which the County considers “… provides a realistic forecast of demand based on the local demography and the DFT’s future estimation of travel demand, which is suitable for strategic modelling” (RBCLP_47_5.1.3).
2.10 While the Revised SHAR Report confirms the appropriateness of the strategic transport modelling as a robust basis on which to inform the Runnymede Local Plan, SCC recognises that the use of the TRICS database has a place in deriving trip rates for the purpose of assessing individual planning applications, such as would be used in the type of ‘operational’ assessment covered by Transport Assessment. In this respect, SCC describes this as being “... ideal for assessments submitted as part of the planning process. The application of TRICS is typically used for individual junction assessments” (RBCLP_47, para 5.1.4).

2.11 It is with a focus on the operation of the M25, and in particular Junction 11 and 13, that separate work was undertaken by RBC to look at the performance of the SRN in greater detail. RBC confirmed in its Update Note of 16 January 2019 (RBCLP_19) that the authority would continue to engage in joint working on these parallel workstreams which would seek to address Highways England’s primary concern that the “… traffic conditions on the M25 mainline have not been considered while the corridor is experiencing regular congestion” (RBCLP_19, Section 1).

2.12 RBC’s consultants, Arcadis, confirmed in its Letter of 3 February 2019 (RBCLP_27) that the scope of that separate more detailed study was agreed with Highways England and included “a new way of calculating 2030 traffic volumes as well as an agreed traffic modelling method”. The M25 Traffic Impact Assessment Note of May 2019 (RBCLP_45, Section 3.1) confirmed that the methodology for carrying out this more detailed operational assessment would be based on the following traffic inputs:

i. For the mainline: Highways England’s WebTRIS1 traffic count data;
ii. For the roundabout: M25 Junction 11 traffic count data (See Appendix B); and
iii. For establishing traffic background growth, the use of TEMPro 7.2.

2.13 This led to an assessment which was described by Arcadis as being ‘more conservative’ (RBCLP_45, Section 2), compared to the approach adopted within the Revised SHAR which maintains a strategic outlook. The trip distribution information from the model underpinning SHAR was, however, used to distribute development trips.

2.14 By adopting a further two-step process, the ensuing assessment considered the cumulative changes in traffic of the Local Plan in ‘Step 1’ (RBCLP_45) while a 'Step 2' assessment (RBCLP_49) identified how this would lead to a potentially significant impact at M25 Junction 11, having confirmed that none would be experienced at Junction 13.
2.15 A subsequent Feasibility Study Report (RBCLP_50) for M25 Junction 11 considers the deliverability of a proposed mitigation scheme which, subject to detailed design, would accommodate the impacts of the Local Plan. The SoCG between RBC and HE confirms that the feasibility assessment focused on “... controlling the arrival rate of vehicles from the A320 / A317 on to the M25 during peak periods” (RBCLP_53, para 3.3).

2.16 In addition to the above strategic infrastructure, SCC considers that a further Transport Assessment or Statement would be submitted as part of the planning application process (RBCLP_47, para 7.1.5) to address the localised impacts which are directly attributable to developments which are not otherwise the subject of strategic studies, with any mitigation required being expected to be secured through Section 106/CIL and Section 278 agreements. This is something that Crest & CGNU has committed to advancing in the preparation of a planning applications for future phases of development at Longcross Garden Village.

2.17 It is understood that SCC will be issuing a further SHAR Addendum Report prior to the Stage 3 examination which seeks to address an identified difference in modelling approach within the Revised SHAR outputs for trips assigned to the (consented) Longcross North Commercial Development. The SHAR Addendum will ensure that there remains modelling consistency between the original SHAR Report of October 2017 and the Revised SHAR (RBCLP_47). Given that the modelling approach for Longcross North will remain consistent with the original SHAR Report, Crest & CGNU expect that the conclusions will remain the same.

2.18 In summary, it is Crest & CGNU’s position that implications for traffic growth have followed a sequence of assessment which is consistent and applies methodologies which are adequate and proportionate to robustly support the Local Plan. The Revised SHAR Report (RBCLP_47), in common with the original SHAR Report from October 2017, concludes that Local Plan developments can be accommodated on the local highway network subject to suitable mitigation measures.

Q2.  **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?**
2.19 Yes. The A320 Update Paper (RBCLP_52) summarises the outcome of the various technical assessments that have been undertaken to demonstrate how the cumulative traffic impacts of development within the Local Plan would be satisfactorily mitigated. At the strategic level, this mitigation includes the A320 North of Woking Scheme, which comprises improvements to the corridor through Runnymede as well as at M25 Junction 11. Other localised transport mitigation schemes would on the other hand be identified in line with individual Transport Assessments (TAs).

2.20 The feasibility of delivering the improvements at M25 Junction 11 were further covered by separate submission made by RBC (RBCLP_49, RBCLP_50). The SoCG between RBC and HE confirms that “the low level of assessed impacts at M25 Junction 13 does not require any mitigation to be considered in association with the Local Plan proposals” (RBCLP_53, para 3.2).

2.21 It also confirms that the mitigation scheme proposed for the M25 Junction 11 has a reasonable prospect of mitigating the impacts of the Runnymede Local Plan (RBCLP53, para 3.4). This has been judged to be sufficient in allowing HE “... to withdraw its previous objection to the Runnymede Local Plan” (RBCLP_53, para 3.7).

2.22 The delivery of the A320 North of Woking Scheme comprises a package of different highway works which, together, are associated with eleven ‘dependent’ developments including Longcross Garden Village. The A320 Update Paper (RBCLP_52) highlights the importance of the timely delivery of this package and recognises the submission by SCC of a Housing Infrastructure Fund (HIF) Bid (RBCLP_44) in April 2019 that outlined the business case for seeking the necessary funding to deliver the works by 2023/24.

2.23 The HIF Bid considers that “while site specific Transport Assessments at the application stage will examine the direct impacts in further detail, the Council is satisfied that obliging relevant development to support the delivery of necessary mitigation along the A320 in a proportionate way will clearly satisfy the policy test for planning obligations laid out in the NPPF” (RBCLP_44, Response to Question 6.2.4).

2.24 Securing the involvement of SCC to lead and manage the improvement works will ensure the earliest delivery of the A320 North of Woking Scheme, with the SCC confirming that “... it will take the client role in delivering the improvement works ...” and that “... it is the County Council’s preference to deliver the improvement works itself” (RBCLP_52, para 5.7).
2.25 In its SoCG with RBC, SCC agrees to “… work in partnership with Runnymede Borough Council to jointly progress and deliver the infrastructure schemes in a timely manner and within the Local Plan period, subject to available funding” (RBCLP_54, para 4.3).

2.26 The prospect for timely delivery is also evidenced by a further commitment to resourcing, by which “the two authorities continue to work positively together to ensure that resources are made available in the current year and future years for the continued forward funding of the design, preparation and initial implementation works for the A320 Improvement Scheme as required, until HIF/MRN/ and/or developer funding is received to pay for the improvement works” (RBCLP_54, para 4.8). It is understood SCC has since selected a Project Manager to oversee the scheme and is in the process of appointing a Design Consultant to take forward detailed designs for the works. On this basis, SCC and RBC are continuing to advise Crest and CGNU that the A320 North of Woking Scheme will be completed in line with the HIF timetable i.e. by March 2024.

2.27 The HIF Bid also considers the role of planning conditions in restricting development “… until such time as the highways works have been completed” (RBCLP_44, Response to Question 3.3.1), unless other means can be used to demonstrate this would not have a significant impact on the A320 corridor.

2.28 In this regard, the SoCG between RBC and SCC itself acknowledges that the Local Plan housing trajectory proposed development in advance of the works, and that “whilst the County Council accepts in principle that this element of development is to come forward in order to ensure the timely delivery of new homes and jobs as part of the overall Runnymede Local Plan strategy, 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…” (RBCLP_54, para 4.9).

2.29 The A320 Update Paper (RBCLP_52) further clarifies that 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" (RBCLP_52, para 9.3).
2.30 This is consistent with the County Council’s view on the Longcross Garden Village in that any delivery of additional units, including those which are planned to arise before the full completion of the A320 highway works, should be subject to the outcome of prior assessment work” (RBCLP_54, para 4.10).

2.31 The means through which such a prior assessment could demonstrate early delivery of development at Longcross Garden Village ahead of the completion of the A320 North of Woking Scheme has been presented in the SoCG between RBC and Crest & CGNU (RBCLP_56). This includes the principle of off-setting the vehicular trips associated with already consented B1 Commercial development at Longcross North (PP REF: 13/0856) in providing sufficient ‘headroom’ to allow corresponding residential trips to come forward. The balance of any further housing that could come forward would be the subject to a further assessment to determine the available resilience that exists on the road network in accommodating further trips ahead of the delivery of the A320 North of Woking Scheme or parts thereof.

2.32 This process will invariably form the subject of further assessment given that the calculation would itself be dependent on the mix of land-uses (e.g. dwelling types) when determining the trip generation from the different methods (see further under Q4i) below).

2.33 It is also understood that a commitment to securing delivery of works through other means may also be considered by the local authorities, such that “S106 planning obligations also allow the potential for developers to bring forward physical improvements on the corridor themselves through S278 agreements with the Highways Authority rather than contribute solely through a tariff … [allowing] … earlier delivery of some sites or elements of the proposed A320 improvement works” (RBCLP_52, para 7.9).

2.34 This position is again confirmed in the SoCG between RBC and Crest & CGNU which confirms that any risk of delays to the programme could be satisfactorily mitigated through more direct form of intervention in “… prioritising or delivering aspects of the A320 infrastructure so that they can be provided in a timely fashion to support development” (RBCLP_56, para 4.4).
2.35 This is consistent with RBC’s A320 Update Paper which states that the current approach adopted by SCC “… does not preclude the ability of the County Council to agree with another party (such as a developer reliant on any element of the improvement works needed), that an element of the improvement works can be delivered separately, in order to facilitate an earlier or more cost-effective delivery of the improvement needed…” (RBCLP_52, para 5.7).

2.36 In this respect, the proposed Minor Modifications to Policy SD10 (underlined) allows for “delivery on and off site improvements to the local road network to mitigate significant impacts as set out (but not limited to) in the Infrastructure Delivery Plan (IDP) and contribution or delivery of improvements to the A320 as set out in the final A320 study” (CD_001A, No. 40).

2.37 Similar flexibility also applies if it is shown that alternative means of procurement would allow specific items or phases of the A320 North of Woking Scheme to come forward earlier in minimising delay, further supporting timely housing delivery.

2.38 In this respect, in proposed Minor Modifications to Policy SD6, RBC confirms that Council would look to apply where “…dependent on the timing of critical infrastructure projects the Council may instead grant permission with conditions or planning obligations restricting full or partial occupation until completion of critical infrastructure projects or phases of projects” (CD_001A, No. 39).

2.39 In both cases, the policies would allow either partial completion of the A320 North of Woking Scheme to come forward in supporting interim levels of development, or for the delivery of certain phases of the projects to be delivered, either ahead of when they would otherwise have been expected or in avoiding the requirement any conditions to be tied to the entirety or full completion of the works.

2.40 To summarise, the conclusions that can be drawn from the above are:

i. The supporting transport modelling evidence base confirms the need for the A320 North Woking Scheme to support the Local Plan (RBCLP_47, RBCLP_49, RBCLP_50);
ii. SCC and RBC are committed through its advancement of concept and feasibility design stages to undertake the necessary work in support of taking forward the mitigation to the detailed design level that would support the implementation phases of the project, including the election of a contractor and construction of the works, so that all works may be completed by March 2024. Early delivery of development ahead of the full implementation of the A320 North of Woking is a principle accepted by RBC and SCC (RBCLP_54, para 4.9), which itself will be the subject of individual assessments;

iii. The Longcross Garden Village would be able to secure early delivery of housing through the potential off-setting the impacts of residential trips by delaying B1 commercial land-uses (RBCLP_56, para 4.4);

iv. In the event that remaining housing was shown to be delivered to meet the revised trajectory, the residual traffic impact would be the subject of an assessment of capacity of the road network. The outcome of that assessment would confirm the extent of any resilience that would exist by that point or whether through prioritisation of the A320 North of Woking work, any elements of the implementation phase (RBCLP_52, para 7.9); and

v. Proposed minor modifications to the Local Plan policies provide the additional flexibility required to secure either contribution or direct delivery of these identified works to minimise any delays to implementation (CD_001A, No. 39).

2.41 The approach outlined above provides a firm basis for securing the realistic prospect of timely implementation of infrastructure to support housing delivery at the Longcross Garden Village, establishing a proportionate and sound basis on which the Local Plan can rely.

Q3. 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?

2.42 Yes. The Runnymede A320 Impact and Longcross Garden Village Viability Study (RBCLP_51) revisits and updates the previous high-level viability analysis carried out in relation to Longcross Garden Village in December 2017, and has been submitted to the examination following discussions between RBC and Crest & CGNU. The conclusions of this viability assessment indicate that LGV is viable and deliverable, whilst making an appropriate contribution to the A320 and M25 mitigation measures.
2.43 RBCLP_51 has been reviewed by specialist viability consultants Turner Morum (instructed by Crest & CGNU) who are in agreement with the headline conclusion put forward in the assessment, that LGV is both viable and deliverable, and can support an appropriate contribution to the necessary mitigation measures for the A320 and M25.

2.44 It was found, however, that the approaches by which the respective viability consultants reached this shared view differed, and there are a number of inputs and assumptions (underpinning the analysis which supports the conclusions of RBCLP_51) which were not agreed. Crest, CGNU & their appointed viability consultants do not agree with the assertion in the report that the site shows “...significant viability...” (S6, RBCLP_51), nor that “...ambitious Section 106 requirements are deliverable whilst still providing developers and land owners with very large returns” (RBCLP_51, para 6.5).

2.45 It is important to highlight also that, at present, the Section 106 obligations and works in relation to Longcross Garden Village are based upon estimates anticipated by RBC and have not been finalised.

2.46 In this regard, in the absence of HIF, it is understood that SCC and/or RBC would pursue alternative sources of Government funding or, alternatively, explore whether it is able to provide the necessary funding for the A320 North of Woking Scheme alongside developer contributions.

2.47 Therefore, although it is clear to all parties that the site is viable and deliverable, in accordance with the PPG, viability testing at this stage is proportionate to the Local Plan process.

Q4. 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.

4i) 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?

2.48 Yes, with regard to LGV. The revised trajectory contained in the SoCG between RBC and Crest Nicholson & CGNU (RBCLP_56) explains how LGV can reasonably be expected to be delivered in full by 2030 in accordance with the allocation under Policy SD10. This is based on the following:
Upper Longcross

- Longcross North benefits from planning permission (RBC reference RU.16/0584) including a first phase of residential development (108 dwellings). This first phase of housing was completed in June 2019. Reserved Matters consent for a second phase of residential development on Longcross North (78 dwellings) has also been approved (RBC reference RU.17/1295). First completions are anticipated by February 2021 (35 dwellings), with the remainder (43 dwelling) due for completion for occupation by September 2022;
- A full planning application for a Private Rental Sector (PRS) phase of development for approximately 240 dwellings on Longcross North will be submitted in the first half of 2020;
- A resolution to grant planning permission for the PRS development is anticipated in late 2020 with discharge of relevant pre-commencement conditions in early 2021; and
- Delivery of 120 PRS units in each of the 2021/2022 and 2022/2023 is therefore realistic and achievable.

Longcross South

- An outline planning application for Longcross South is currently being prepared and is at an advanced stage. Subject to the progress of the Local Plan towards adoption, this application will be submitted by Spring 2020;
- Given the extensive pre-application discussions between Crest & CGNU and RBC, and statutory consultees, it is reasonable that a resolution to grant planning permission could be obtained by Autumn 2020 – allowing circa. six months for determination - with s106 negotiations substantially completed by determination. It is anticipated that planning permission will be secured in late 2020;
- A reserved matters application for a first phase of development at Longcross South will be prepared alongside the outline planning application and will be submitted in late 2020; and
- This first phase reserved matters application is anticipated to be approved by Spring 2021 with delivery of 50 dwellings on Longcross South in the 2021/2022 period, increasing to 150 per annum in 2022/23.
2.49 For Longcross South, the trajectory has been revised to reflect first completions in 2021/2022 which is realistic and achievable given the timeframes for the submission and expected determination of the outline planning application. Delivery across LGV is likely to be delivered through three outlets, and at its peak with construction across Longcross North and Longcross South, potentially four outlets. As such, our (and RBC’s) expected peak rate of delivery of 175 dwellings per annum is a realistic estimate.

2.50 RBC acknowledge through the SoCG with Crest and CGNU (RBCLP_56) that LGV is a strategically significant housing allocation and that suspending development until 2024/2025 pending the full completion of the A320 North of Woking Scheme could delay the delivery of approximately 450 dwellings at LGV beyond the plan period (i.e. post 2030).

2.51 RBC, SCC and Crest & CGNU are continuing discussions to agree how early delivery can come forward at LGV in parallel with the delivery of the A320 North of Woking Scheme without having an unacceptable impact on the highways network, either through the proposed off-setting of consented vehicular trips or assessment of the road network resilience, once the effects of sustainable transport improvements have been taken into account.

2.52 Based on the planned 240 PRS being considered at Longcross North, up to 23,760 sqm B1 could be delayed, leaving 38,500 sqm from the Hybrid permission. This approach is based on the currently expected level of vehicular trip generation associated with this land-use, which in turn is expected to provide sufficient ‘headroom’ against the existing Longcross North consent for a large proportion of the development anticipated to be delivered between 2021/22 and 2023/24.

2.53 The balance of the 590 dwellings shown in the revised trajectory up to 2023/2024 would be met through the proposed assessment of the road network, which would identify the effects arising from the balance of dwellings or what mitigation measures (consistent with the A320 North of Woking Scheme or elements thereof) which would be required by that point.

2.54 The principles of this approach are shown against the revised Longcross Garden Village trajectory between 2021 and 2024 in Figure 2.1 below:
### Figure 2.1 – Revised Longcross Garden Village Trajectory (2021-2024) with A320 North of Woking Scheme Delivery Timetable

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<th>Year</th>
<th>Upper Longcross</th>
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<td>150</td>
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<td>Completion of Phase 1</td>
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<td>150</td>
<td>150</td>
<td>Completion of Phase 2</td>
<td>Network tolerance and/or advanced developer-led delivery elements of the A320 North of Woking Scheme</td>
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<td><strong>240</strong></td>
<td><strong>350</strong></td>
<td><strong>590</strong></td>
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2.55 It is also the case that, in parallel with the lead-in to the completion of first phase completions development being built-out, substantial progress will have been made in the implementation of A320 North of Woking Scheme. The delivery of some elements of the Scheme will have been completed, which means that additional road capacity will have been created to accommodate development. Other elements of the Scheme will also be at an advanced stage, including the mobilisation of construction activities and the requirement for traffic management.

2.56 As with any phasing of large infrastructure schemes, the authorities will also want to ensure the most appropriate sequencing of the individual works to minimise disruption caused by construction. Such prioritisation of specific elements of the A320 North of Woking Scheme could allow the most relevant elements to be brought forward. In this respect, the Revised SHAR indicates that the improvements to Junction 6a/6b would likely be the most relevant for Longcross Garden Village, by providing the additional highway capacity necessary to cater for subsequent phases of development.
2.57 It has also been identified in the A320 Update Paper how it would be possible for Surrey County Council to agree that an element of the improvement works can be “delivered separately, in order to facilitate an earlier or more cost-effective delivery of the improvement needed” (RBCLP_52, para 5.7). If this is shown to be beneficial in minimising the risk of delays in Longcross Garden Village delivering on its housing trajectory following review, then this type of active participation in delivering elements of the scheme (e.g. individual junction works, with any over-provision to be off-set within the overall s106 package) would again ensure that the development is able to meet the revised trajectory.

2.58 Crest & CGNU are committed to the above approach, which demonstrates how delivery of housing at LGV could commence in advance of the A320 North of Woking Scheme being completed without unacceptably impacting upon the A320 corridor.

4ii) 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?

2.59 No comment.

Q5 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?

2.60 Yes. The evidence base presented in the Revised SHAR Report (RBBLP_47) makes it clear that the assessment of the transport impacts from the Local Plan is primarily focused on car traffic. It stated that “this assessment is intended to represent a worst case. As a result no allowance has been made for rail park and ride trips derived from Local Plan allocation sites, nor public transport improvements planned to compliment the development sites” (RBCLP_47, para 2.1.3).

2.61 The effects of sustainable transport measures will therefore not have been explicitly included within the outcome of the SHAR modelling, in so far as “… to ensure robust assessment, all scenarios exclude the impact of improvements to public transport and active modes, such as increased rail service frequency at Longcross station and Egham Sustainable Transport Package” (RBCLP_47, para 7.1.4).
2.62 In respect of the sensitivity tests which incorporated trip rates from the TRICS database to address some of concerns raised by Highway England, the Revised SHAR stated that “the derived trip rates are solely based on data from the past. The application in this context, particularly to a forecast year of 2030, ignores both short and longer term travel behavioural change” (RBCLP_47, para 5.1.5).

2.63 The Submission Local Plan itself recognises that “the permission granted for Upper Longcross has also secured a number of contributions towards improving local roads and public transport in the area including improvements to Longcross rail station” (CD_001, para 5.93). These improvements will see rail service frequencies increase from December 2019, delivering half-hourly services on weekdays and Saturdays, as well as hourly on Sundays, which will significantly improve services availability for existing residents and new users.

2.64 The Runnymede Local Plan requires Longcross Garden Village to demonstrate “a range of sustainable transport choices which facilitate connections within the village and to other nearby settlements and which maximise opportunities for modal shift by optimising connectivity within the site by walking/cycling with improvements to the local road network to mitigate significant impacts” (CD_001, Policy SD10 e). In line with this, the SoCG between RBC and Crest & CGNU commits to “…strongly promoting modal shift in line with the draft Local Plan policies and NPPF…” in line with the Vision for delivering a Garden Village. As part of the commitments, parties have committed in particular to ensure “… measures to maximise use of the enhanced rail service now secured for at Longcross station” (Para 3.2). Such measures are considered to be entirely consistent with the objective of limiting the impact of car-traffic across the Borough’s road network, as would be explored and agreed within the Transport Assessments for Longcross Garden Village. Such measures include:

i. A range of accessible facilities which minimise the need to travel externally and allow people to access services locally, including providing some opportunities for local employment.

ii. A dense network of pedestrian and cycle paths throughout the Longcross Garden Village, who purpose to provide both direct and leisure routes to connect all part of the development, in line with Manual for Streets (2007).

iii. A network of new public transport bus routes to improve accessibility for existing and future users and maintain a sustainable network of services (Ref. Surrey Transport Plan: Passenger Transport Strategy: Part 1 – Local Bus (July 2014), Section 4.1), including:
a. Diversion of the proposed Service 73 secured for Longcross North so that it is able to service Longcross South;
b. Extension to Service 461 which would provide an additional link to/from the development with St Peter’s Hospital and Addlestone; and
c. An internal shuttle services to connect all parts of Longcross Garden Village with Longcross railway station.

vi. Off-site cycle improvements, including the creation of a segregated footway/cycleway on Kitsmead Lane, providing a connection to Virginia Water. Such provision is in line with the principles for infrastructure design and delivery (Ref. Surrey Transport Plan: Cycling Strategy 2014 – 2026, Section 6.1).


viii. Provision of car clubs spaces in convenient locations within the development to support a greater sharing economy, contributing to reducing the reliance on a private or, or curtail second car ownership. This is in line with draft Guidance on Car Clubs in New Developments, August 2018.

ix. Electric charging points for homes to facilitate the take up of electric vehicles. This is in accordance with Surrey County Council’s Electric Vehicle Strategy (November 2018) and application through its Vehicular and Cycle Parking Guidance (January 2018).

x. Implementation of a site-wide Travel Plan which will promote a number of other sustainable transport initiatives, overseen by a dedicated Travel Plan Coordinator. This will reflect the approach contained in the Travel Plans – A Good Practice Guide for Developers, July 2018 and include means of monitoring travel patterns.

2.65 As the estimates for car-based traffic assumed within the transport modelling evidence will not have taken into account the benefits of further investment in sustainable transport, the effect of such measures on reducing the demand for car travel will not have been factored into the predicted volumes that would use the Borough’s road network. This means that some additional trips would be encouraged to use walking, cycling or public transport, leading to better outcomes than those which have been forecast.
2.66 The Submission Local Plan recognises the benefits that public transport and other sustainable measures will provide at a development-specific level, such as for Longcross Garden Village. It states that "further improvements to public transport and the local road network will be necessary given the scale of the village as a whole and the impact of other major development on key road corridors" (CD_001, para 5.93).

2.67 Sustainable transport measures, such as those which are being strongly promoted by Longcross Garden Village are therefore complimentary to other 'hard' infrastructure improvements which are being considered within the SHAR Report. This is certainly the conclusion the report itself reaches when stating that, while the effect of sustainable transport measures "...have not been assessed here, [these] are integral to a successful implementation of a Local Plan to both minimise the impacts and also be of benefit to both new and existing transport users" RBCLP_47, para 7.2.4).

2.68 The A320 Update Paper (RBCLP_52) also states that putting in place these measures will "...reduce reliance on the private car and ensure successful implementation of the Local Plan, by minimising impacts on the highway network arising from the Local Plan proposals" (RBCLP_52, section 3.4).

2.69 In conclusion, we are therefore satisfied that the Local Plan makes sound provision for sustainable transport.