18 October 2019

Dear Ms Banks

Runnymede 2030 Local Plan: Matters Statement
Stage 3 hearing, 14 November 2019: ID19
Andrew Black Consulting on behalf of Primhill Limited (Parcels B and C, Chertsey Bittams)

I write on behalf of the owners of Parcels B and C, Chertsey Bittams, Chertsey in response to the Inspector’s questions for the Stage 3 Hearing Sessions due to take place in November. Representations on the above site have been made throughout the examination process.

The Site is recognised within Policy SL15 of the draft Local Plan as a Housing Allocation for 120 net additional dwellings (increased from 110) and 2 net additional serviced Gypsy/Traveller Pitches. Policy SL15 identifies the Development Requirements associated with the allocation as summarised (including alterations) below;

- **Timing** - Post 2022-2024 contingent on delivery of mitigation to the A320.
- Ensure appropriate mitigation from noise arising from the M25/St Peters Way.
- Appropriate landscaping strategy to be provided.
- Contribute towards safe and attractive links to the existing public rights of way.
- Provide net gains in biodiversity, demonstrated through habitat/species surveys and management plans.
- Provision of financial contributions towards a community hub building at Parcel A rather than the provision of sports facilities and allotment contributions.
- Contribution towards the provision of early years, primary and secondary school infrastructure.
- Approved scheme of mitigation which makes provision for the delivery of SANG and a financial contribution(s) towards SAMM.
- Provide or contribute towards any other required infrastructure.

These representations address the questions raised by the inspector in the ‘Questions for Stage 3 Hearing’ document and will provide a response to each question in turn.
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?

Document RBCLP_58 ‘Runnymede Local Plan Further Update Note (20 September 2019)’ sets out the substantial body of work which has been undertaken by RBC since the previous hearing sessions in February 2019.

Of significance is the ‘Updated Statement of Common Ground between Runnymede Borough Council and Highways England: September 2019’ (RBCLP_53) which demonstrates substantial progress since February 2019.

For the reasons set out within the subsequent sections of this matters statement it is considered that the council has adequately assessed the implications of traffic growth on the highway infrastructure for the Borough.

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?

Paragraph 3.4 of the SCG between RBC and Highways England (RBCLP_53) states:

*It is agreed that the ‘Step 2’ Feasibility Study for M25 Junction 11 shows a reasonable prospect, subject to detailed design, that the proposed mitigation scheme can be delivered at Junction 11 which will enable the impacts of the Runnymede Local Plan proposals to be mitigated.*

It is considered that the feasibility study shows that there are reasonable prospects that the mitigation can be provided and this is reflected in acceptance within the SCGs between the council and both Highways England.

It is accepted that modifications to the plan will be required to signal how this mitigation will be achieved and it is suggested that these could be made following acceptance of the plan as sound by the inspector.

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?

It is acknowledged that the delivery of the mitigation measures is dependent on RBC securing funding from central government through the Housing Infrastructure Fun (HIF) of £44m. There A320 Update Paper (RBCLP_52) sets out (paragraphs 5.2-5.13) the timescales and implications in this regard.

Section 6 of the Update Paper sets out the ‘other potential funding mechanisms’ available to the council, given that the HIF funding is not guaranteed. This indicates that the highway

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authority and council will look to draw funds from the Public Works Loan Board to deliver the improvement works.

Section 7 of the Update Paper sets out the approach to the clawback requirement from the Local Plan site allocations closely dependent on completion of the A320 corridor improvement works. This would be done through either CIL contributions or s106 (should CIL not be in place yet). Section 8 sets out the viability of sites to provide this level of clawback through analysis of the difference between proposed Residual Land Value (RLV) and Benchmark Land Value (BLV). It is confirmed that our client is satisfied that the analysis set out in table 2 in relation to the Bittams Lane site is accurate and reasonable.

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.

1. 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?

Paragraph 3.8 of the SCG between RBC and Highways England (RBCLP_53) states that:

*Highways England acknowledges the delivery for homes and jobs set out in the Runnymede Local Plan 2030. It is recognised that there are unlikely to be any impacts from Local Plan development upon the M25 main carriageway and slip roads prior to the completion of the planned M25 Junction 10 to 16 Smart Motorway Scheme, at which point the Local Plan mitigation scheme will require implementation to maintain the safe operation of the motorway. This will need to be reviewed to ensure the timely implementation of mitigation as the Local Plan progresses.*

Paragraph 4.9 of the SCG between RBC and Surrey County Council (RBCLP_54) states that:

*Surrey County Council also acknowledges that the delivery trajectory for homes and jobs set out in the Runnymede Local Plan 2030 proposes to deliver an element of development that will impact on the A320 before completion of the A320 improvement works. 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, 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.*
Section 9 of the A320 Update Paper (RBCLP_52) sets out an update to the Local Plan Housing Trajectory in relation to the A320 dependent sites in Appendix 2. In specific relation to the Chertsey Bittams sites the trajectory indicates delivery of the units from 2023-24 to 2025-26.

This trajectory is achievable and this has been evidenced within the previous representations made within these sites. However, there is no restriction to the delivery of units from the Bittams B site and the delivery of units earlier in the plan period should not be ruled out or resisted in policy terms. Given the positive nature of the clawback from the planning obligations / CIL contributions established by the council, earlier delivery is not considered to be detrimental to the delivery of the A320 improvements.

2. 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?

As part of the previous representations a technical note was provided by Mode Transport to identify the impact of Parcel B on the A320. Mode Transport state within their note that delivery of Parcel B could commence prior to 2020. Impact has been assessed on any trips that travel west from the site access towards the St Peters Hospital access roundabout, which is identified by Runnymede as a key concern in relation to congestion.

Proposed development of up to 130 dwellings, following TRICs analysis, is forecast to produce 75 two-way vehicle trips in the AM peak hour and 67 two-way vehicle trips in the PM peak hour. It is also demonstrated that 68% of the traffic from the proposed development will head west out of the site towards the A320 which equates to 51 two-way trips in the worst case peak hour (AM).

Development of the Site is likely to be delivered across 2 phases which will therefore limit the impact further and should be considered in the timeframe set out within Policy SL15.

As set out, our client is satisfied that delivery of units in line with updated trajectory is achievable and deliverable.

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?

Paragraph 4.11 of the Statement of Common Ground between RBC and Surrey County Council (RBCLP_54) states that:

Surrey County Council will also continue to work in partnership with Runnymede Borough Council to produce a Local Transport Strategy for the Borough to support the growth set out

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in the Runnymede Local Plan. Surrey County Council agrees to consult on a draft Local Transport Strategy, in 2020 in parallel to the adoption of the Runnymede Local Plan.

It is therefore clear that measures are in place to ensure that the further methods of sustainable transport are continuing to be examined and will be put in place through a transport strategy which sits alongside, but outside of, the local plan.

Whilst writing I can confirm our intention to appear in person at the forthcoming hearing sessions on Thursday 14 November and I would be grateful for confirmation in this regard.

Yours Sincerely

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