Runnymede Local Plan EIP
Statement on behalf of Richborough Estates –
Land at Ottershaw East (SL12)

Stage 3 Hearings
October 2019
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Contact
Tim Burden
tim.burden@turley.co.uk

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1. **Introduction**

1.1 This Statement is submitted on behalf of Richborough Estates Ltd in relation to ‘Land at Ottershaw East’. We have attended the Stages 1 and 2 Hearing Sessions.

1.2 This Statement responds to the Stage 3 Hearing questions set out in Document ID19, in advance of the Hearing session being held on 14 November 2019.

1.3 The comments contained within this Statement build upon the detailed representations submitted to support the Regulation 19 consultation on the proposed submission Local Plan, in light of the Inspector’s questions and the Minor Modifications that were submitted by the Council alongside the plan.
2. **Stage 3: Response to 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 This is largely a question for the Council, the highways authority, and Highways England to respond to. In broad terms we consider that 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.

   2.2 We note that plans for the improvement of the M25 Junction 11 appear to be reasonably developed.

   2.3 However we consider that there is a need to have regard to the necessary dependency or phasing of infrastructure and development, in order to allow some ‘A320 Dependent Sites’ to deliver in advance of the A320 works being fully completed. The Council should not prevent otherwise deliverable sites coming forward at an early stage in the plan and clarity on this matter is requested from the Council.

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?**

   2.4 Again, this is largely a question for the Council and the highways authorities to respond to.

   2.5 We note that 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.

   2.6 Flexibility however needs to be allowed in order that developers can take the option to undertake necessary local off-site mitigating works to allow their housing sites to come forward sooner and, if necessary, for the local authority to secure monies, via s106 or otherwise, in order to offset the development proportion of forecast cumulative impacts from core scenario development that may occur on the wider highway and sustainable transport network. Such an approach is particularly suited to developments with smaller transport impacts, such as our client’s site.

   2.7 By way of example, the Brox Road allocation could undertake (or directly pay for) the A320/Brox Road junction improvement to provide a right turning pocket at this junction, provided the improvement is deliverable without the need for third party land. The improvement lies very close to the proposed development site and the operation of the junction will be impacted upon by development traffic and, importantly, the proposal is affordable at £0.3M and certainly fulfils the relevant
CIL/s106 tests. The approach allows the authority flexibility to also require additional contributions where necessary. We consider that this proposal is in line with the statement in the Runnymede 2030 A320 Update Paper (RBCLP_52) where it says there is the potential for developers to do works...para 5.7 (earlier delivery).

2.8 In summary, the analysis presented seems to suggest that the Local Plan development would not have a big impact on the motorway network and A320 mitigation works have been proposed. The release of deliverable development sites early in the plan process will help to bring forward necessary funding for the works.

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 This is largely a question for the Council the highways authority, and Highways England to respond to.

2.10 We consider that 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 appropriate financial contributions. It is noted that this is proposed to collectively recover 25% 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?

2.11 This is largely a question for the Council and the highways authority to respond to.

2.12 The revised trajectory for the A320 dependent sites, including our client’s site (document RBCLP_52) appears somewhat arbitrary and does not appear to be based on published evidence to determine the timing of site delivery ahead of the A320 improvements.

2.13 Document RBCLP_52 states 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.

2.14 As such, there is no assessment of intermediate impacts in order to consider what the traffic implications would be of delivery various combinations of sites in advance of the A320 works, or indeed the different phases of the A320 Improvement works.

2.15 For clarity, our client is ready to submit a planning application for their site at the earliest opportunity and envisages delivery in advance of that stated in the revised trajectory.

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?

2.16 This is a question for the Council and the highways authority to respond to.