Runnymede 2030 Local Plan Examination

Responses to the Inspector’s Matters and Questions for the Stage 3 Hearing (A320)
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Stage 3 Hearing: Inspector’s Question 1:

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?

1.1 The Council considers that the Plan’s implications for traffic growth on the Borough’s critical infrastructure, specifically the A320 and the connections to the M25 have been adequately assessed.

1.2 Following the conclusion of the Stage 2 Hearings in February 2019, the Council working closely with Surrey County Council and Highways England commissioned an update of the Strategic Highway Assessment Report (SHAR) from Surrey County Council, which it published in July 2019 (document ref: RBCLP_47). The updated SHAR was undertaken to take account of various revised assumptions and used the latest version of C-TripEnd, version 7.2, to make use of the most up-to-date information from the Department for Transport on forecast trip rates. In addition, as part of the revised assessment and in response to comments made during the first two stages of the hearing, a sensitivity test was undertaken to reflect a possible higher growth in trips generated by the proposed new developments compared to that forecast by the use of C-TripEnd. The sensitivity test was designed to represent a ‘worst-case’ situation to test the implication of higher forecast vehicular trip rates. The result of this test is that a small number of additional links and junctions have been added to the hotspot list. However, with the exception of a few junctions, including the merges with the mainline carriageway at M25 J11, average delay is kept to within a few seconds of average delay per vehicle compared with Scenario 2, and most within 1 second.

1.3 The updated SHAR concluded that there was the risk of a severe impact to traffic conditions along the A320 corridor, unless the proposed A320 mitigation works were put in place. Once in place, the SHAR suggests that any risk of a severe impact is reduced and will be reduced further when complemented by sustainable and active travel measures to reduce reliance on the private car. Those sustainable and active transport measures will continue to be identified and implemented in association with planning permissions and/or through a Local Transport Strategy (LTS) for Runnymede Borough as part of Surrey County Council’s Local Transport Plan.
1.4 Since publication of the SHAR in July, Surrey County Council has advised the Borough Council that it picked up a processing error in a model run used in the SHAR Update. The error relates specifically to trips associated with the permitted commercial development at Longross North, Longcross Garden Village. To rectify the issue a re-run of the model has been undertaken along with a review of the original SHAR output. An Addendum to the SHAR, to be published as document ref: RBCLP_59, confirms that the conclusions of the SHAR Update published in July 2019, remain robust.

1.5 In relation to implications of the Local Plan on connections with the M25, further work was commissioned by the Council, working closely with Highways England and Surrey County Council to determine firstly, what the extent of any implications might be, and secondly, taking account of the impacts evidenced at M25 Junction 11, to test the feasibility for a suitable scheme of mitigation at that junction. This work is detailed in documents RBCLP_45, RBCLP_49 and RBCLP_50. Having closely examined this work, Highways England has confirmed its view that an acceptable and feasible scheme of mitigation can be designed for M25 Junction 11, to deal with the traffic implications arising from the Local Plan. The improvement of M25 Junction 11 is also an integral part of the A320 improvement works set out in the HIF Bid.

1.6 Further work is now underway, led by Surrey County Council to progress the A320 improvement works to detailed design and consultation stage, with both Surrey County Council, Runnymede Borough Council and the Surrey LEP having agreed resources towards that work.

Stage 3 Hearing: Inspector’s Question 2:

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?**

2.1 The Council is confident that there are reasonable prospects the proposed A320 and M25 Junction 11 improvements will be delivered in time to avoid unacceptable impacts on the operation of the A320 and M25.
2.2 Since the Stage 2 Hearings in February 2019, significant work has been undertaken by Surrey County Council and the Borough Council to progress the preparatory work required to deliver the A320 (and M25 Junction 11) improvement works. This includes:

- the preparation and submission of a HIF Bid for funding to help pay for the works;
- the submission of an initial expression of interest for an MRN funding bid in case HIF fails;
- the agreement of new funds and resources to take forward design work for public consultation, and;
- the appointment of consultants to lead this initial work.

2.3 The timetable for delivery of the completed works is largely a matter for Surrey County Council, rather than the Borough Council. However, all parties are currently working towards practical completion of the works in March 2024, recognising the importance of timely delivery to the Local Plan and the likely conditions for completion that will be attached to any successful funding bid. Whilst there remains a residual risk that HIF or MRN funding may not succeed and that funds need to be found from elsewhere to take the scheme forward in a timely manner, in such circumstances it is envisaged that Surrey County Council, working with Runnymede Borough Council and the Surrey LEP, will be able to access alternative funds (e.g. through the Public Works Loan Board), to enable forward funding to keep the programme of works on track for completion in 2024.

2.4 In the unlikely event that completion of the programme of works for the A320 is delayed beyond 2024, this is most likely to become clear to the Council before the end of 2021, when the tender for the construction of works is due to be awarded. Should this deadline not be met this could require the Borough Council to formally trigger a review of the Local Plan, if that review has not already commenced. In practice, given that this Plan has a plan period to 2030, it is likely that a review will have commenced before the end of 2021 in any event.

2.5 The submitted Local Plan does not include a specific policy to bring forward the A320 (and M25 Junction 11) Improvement Scheme within a specified timescale, although the Borough Council continues to work very closely with Surrey County Council to bring the scheme forward in a timely manner. However, Policy SD6 of the Local Plan is
clear that the Council will support infrastructure projects which help to deliver the spatial development strategy and will use appropriate mechanisms such as S106, S278 and CIL etc. to secure development contributions or direct provision of infrastructure where appropriate. If considered necessary, this policy could be modified to include more specific reference to the A320 (and M25 Junction 11) improvement scheme, making clear when delivery is expected. The direct provision by developers of parts of the A320 improvement scheme, may of course, be particularly helpful in ensuring timely delivery of the overall scheme, such as that recently agreed in association with the residential development at St. Peter’s Hospital.

2.6 Policy SD6, in association with the suggested modifications to the policy (set out in document CD_001A), is also clear that the implementation of development proposals which are dependent on the delivery of critical infrastructure projects (for example, the A320), will not be permitted prior to the completion of that project or where appropriate, a phase of that project which has been identified as necessary for the development to proceed. Instead the policy indicates that the Council may grant permission with conditions or planning obligations restricting full or partial occupation until completion of critical infrastructure projects or phases of a project.

2.7 At this stage, the detailed programme for the A320 (and M25 Junction 11) improvement works has not been determined and therefore, the Council is not in a position to identify in Local Plan policy, a particular phase or element of the A320 improvement works which needs to be completed before a particular site can come forward. Policy SD6 as modified, is nonetheless considered to capture such scenarios. In this context, planning applications for development which are dependent upon the wider delivery of the A320 improvement works must continue to be tested through detailed transport assessments associated with planning applications, as required by Policy SD5. The use of conditions or planning obligations to restrict occupation, if appropriate and necessary at the time, will avoid the possibility of unacceptable impacts on the A320 and the M25, whilst remaining responsive to the traffic volumes and highway circumstances at the time the planning application is determined.
Stage 3 Hearing: Inspector’s Question 3:

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?

3.1 Taking account of the conclusions set out in the A320 Impact and Longcross Garden Village Viability Study (document ref: RBCLP_51), the Council is clear that development proposed in the Local Plan has sufficient viability to make appropriate contributions towards completion of the A320 improvement works.

3.2 The total cost of the A320 works (including re-design of M25 Junction 11), is estimated in the HIF Bid to be approximately £44m. The HIF Bid is predicated upon a clawback from A320 dependent sites of 25% of the total costs, some £11m. The A320 Viability Study indicates sufficient viability to potentially enable the clawing back of a greater proportion of costs than suggested in the HIF Bid and indeed the level of clawback is a matter which is being tested by the team assessing HIF Bids on behalf of Government. In addition to the A320 dependent sites listed in the Local Plan, it would in principle also be possible for further funding to be allocated from CIL receipts secured from the wider delivery of development which the Local Plan is bringing forward. The level of funding which might be allocated from future CIL (timetabled to be in place by the beginning of November 2020) towards the A320 improvement works would need to be determined by the Council, but as Table 1 of the A320 Update Paper illustrates (page 15 of RBCLP_52), significant CIL receipts are likely to arise once CIL is in place and it would be feasible in principle for a further significant funding contribution towards the A320 improvement works (perhaps £10-15m) to be allocated from CIL receipts during the Plan period.

3.3 The remaining cost of the works would either come forward from the HIF Bid, other government funding sources such as MRN, or if no Government funding were to come forward, through the local authorities considering an application to the Public Works Loan Board.

3.4 In light of this, the Council does not envisage any reasonable circumstance in which the A320 improvement works could not be funded.
Stage 3 Hearing: Inspector’s Question 4:

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?

4.1 The Council considers that the revised housing trajectory set out in Appendix 2 and 3 of the A320 Update Paper (document ref: RBCLP_52) is based upon sound and reasonable assumptions.

4.2 Both Surrey County Council and Highways England accept, in their respective Statements of Common Ground (SoCGs), that a level of development can and will continue to come forward in parallel with completion of the A320 improvement works.

4.3 Over and above development already given planning permission, the trajectory indicates a further 915 dwellings forecast to come forward in parallel with the delivery of the A320 improvement works which are dependent upon those works being completed. 590 of those dwellings would be at Longcross Garden Village, where in principle, it is agreed by the authorities that there is scope to enable continued housing completions to come forward in lieu of permitted employment development, which is now likely to come forward for occupation after 2024. This has been reiterated in the Statement of Common Ground between the Council and Crest Nicholson/CGNU (RBCLP_56)

4.4 A further 150 dwellings at Chertsey Bittams D are also considered able to come forward without restriction, given the early completion of the St. Peter’s roundabout (in association with the St. Peter’s Hospital housing scheme) and the Council and statutory consultees’ previous consideration of the site, which
concluded there would be negligible impact from this development on the highway network compared to the site’s previous commercial use.

4.5 The Council considers that the relatively modest level of development it has permitted to date following its evaluation of detailed transport assessments, or is additionally forecasting to come forward prior to the completion of the A320 works (e.g. at Longcross Garden Village) will not have an unacceptable impact on the A320 until the improvement works are completed in 2024. Surrey County Council remains responsible for taking the A320 works forward and will liaise closely with local communities, businesses etc. in designing those proposals before putting a works management plan in place to ensure highway safety and traffic flow as the works progress. The County Council particularly recognises the importance of maintaining safe and convenient access for emergency vehicles exiting the ambulance station north of Ottershaw and for access to and from St. Peter’s Hospital whilst the works are in progress. St. Peter’s Hospital is aware of the works needed to improve the A320, is supportive of improvements in principle and of course, proposals to redevelop part of the hospital site for housing and future improvements to the hospital itself are bringing forward improvements to the A320 as an early part of the improvements required.

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?

4.6 In terms of Longcross Garden Village, the revised trajectory set out in RBCLP_52 and in the Statement of Common Ground (SoCG) between the Council and Crest Nicholson/CGNU (document ref: RBCLP_56), is based upon the expectations of delivery by the developer, taking account of ongoing pre-application discussions regarding the nature of development being considered and the intention to submit planning applications for residential development of both the remainder of Longcross North (a full application) and Longcross South (an outline application) in the first half of 2020.

4.7 The assumptions for the housing trajectory at Longcross Garden Village draw from the following:
• The fact that Longcross North is currently under construction, building out the active permission;
• The intention to develop additional and higher density, flatted development on Longcross North, built specifically for the private rented sector (PRS), with a shorter build time compared to traditional family homes;
• The improved convenience of the location in accessing major commuter destinations (London, Reading, etc.) by rail, as a result of the increased frequency of rail services due to operate from Longcross Station as of December 2019;
• Close working at the pre-application and determination stages between Crest Nicholson/CGNU and the Council to identify a planning framework of conditions and obligations that are supportive of early and consistent build-out rates;
• The attractiveness of the high quality ‘garden village’ environment that is planned to be created by the Garden Village concept and;
• The developer’s experience of building similar developments elsewhere and confidence in achieving the build rates set out in the trajectory.

4.8 In respect of the other A320 dependent sites currently without planning permission and which are shown in the trajectory to come forward in parallel with the completion of the A320 mitigation works, the assumption is that commencement of those sites may be held back by developers until 2023 as a result of planning conditions attached to any future permissions on those sites which would seek to restrict occupancy until the completion of the A320 improvement works scheme. The Council’s assumption is therefore that no more than 25 dwellings on each of those seven sites (at Hanworth Lane, Chertsey Bittams A, E and B, Chilsey Green Farm, Pycroft Road, the Veterinary Laboratory site and Ottershaw East) would be likely to come forward prior to the completion of the A320 improvement works scheme, though in practice, the extent of any restrictions on occupation would be tested through the transport assessments associated with each planning application submitted. Paragraph 9.9 of the A320 Update Paper (RBCLP_52) and the explanatory note included with Appendix 2 explains this further.
Stage 3 Hearing: Inspector’s Question 5:

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?

5.1 Surrey County Council is the highways and transport authority for the area and is directly responsible for the preparation of strategy (such as the Surrey Local Transport Plan), co-ordination and delivery of measures to encourage sustainable transport, including public transport and active travel modes such as walking and cycling.

5.2 The Runnymede 2030 Local Plan Policy SD4: Active & Sustainable Travel provides the clear commitment to work with Surrey County Council to support the preparation and delivery of strategy and measures the County Council puts in place, including through its decision making on planning applications.

5.3 Draft Local Plan Policy SD5 requires proposals which generate significant traffic movement to be accompanied by a Transport Assessment or Statement, to help identify precise local sustainable travel requirements associated with development. Furthermore a number of site specific policies included in the Local Plan set out specific requirements to bring forward sustainable travel measures or to contribute towards the wider encouragement of sustainable travel, such as cycleway links, improved pedestrian routes, bus and rail services associated with development (Policy SD10, guiding the development of Longcross Garden Village, for example).

5.4 In addition to the Surrey Local Transport Plan (LTP) and a number of complementary strategies it has produced to help deliver its LTP, Surrey County Council also prepares Local Transport Strategies (LTS) for each partner planning authority’s administrative area. The purpose of each LTS is to support the growth set out within borough and district local plans and provide an evidence base for future funding bids. As well as commenting on current transport provision and identifying transport problems in each area, the strategies set out a programme of interventions to promote and encourage sustainable travel in each borough. Infrastructure and service interventions are
contained in a forward plan, with schemes designed and programmed to help address local issues and mitigate the impact of future growth.

5.5 Currently, there are eight draft or adopted LTS across the county, with a further three still to be produced. Preparatory work for the Runnymede LTS has begun and is to be developed during 2020 to build on the borough’s Local Plan, taking into account the ambition for sustainability and informed by the relevant Surrey Transport Plan strategies, including those on Air Quality, Climate Change, Cycling, Local Bus, Passenger Transport Information and Travel Planning. Once prepared, each LTS is adopted and delivered by a local area committee. In Runnymede this operates as a Joint Committee between Surrey County Council and Runnymede Borough Council.

5.6 The delivery of sustainable travel measures, whether identified specifically through the future Runnymede LTS, or in association with developments that come forward, will in part be secured either through planning conditions associated with development, or through a combination of S106 or CIL contributions, supplemented by public funding allocated by Surrey County Council or secured through funding bids to Government, as appropriate to the sustainable travel measures being delivered.

5.7 In this context, the Council considers that the policies contained in the Local Plan provide a strong and sound framework to secure appropriate sustainable travel measures associated with new development proposed by the Plan. It also considers that many of the sustainable travel measures which come forward (improvements to rail services at Longcross, to the cycleway network, or the frequency of local bus services, for example) will complement Surrey County Council’s current and future strategies for sustainable and active travel across the County and Borough, facilitating and encouraging both incoming and existing residents to reduce their travel by car in favour of other transport modes.