To whom it may concern

Runnymede Local Plan Examination, Main Modifications Consultation

1. This letter has been produced by Shrimplin Planning & Development on behalf of the Wentworth Residents Association (representor ID 1998) in response to the consultation on the Runnymede Local Plan Main Modifications consultation.

   MM3, MM13, MM14, MM16: housing numbers

2. We object to the increase in the proposed number of dwellings and in particular to the increase for Longcross Garden Village and Virginia Water.

3. Evidence presented to the Local Plan Examination made clear that the Council are not able to meet their housing targets and the proposed sites are not deliverable. An increase in housing numbers will simply mean the Council will more quickly fail to meet their housing targets and decision making will more quickly revert to being made by appeal.

   MM12, MM22, MM26, MM31, MM32, MM33, MM34, MM35, MM36, MM37, MM38: A320 mitigation

4. Requiring Transport Assessments to be submitted as part of each separate planning application to assess impact on the A320 is a piecemeal approach that fails to take the strategic approach that is needed to deal with this fundamentally important piece of infrastructure. It will fail to provide a basis to secure contributions from developers to the A320 and will therefore fail to deliver the required improvements.

5. The shortcomings of this piecemeal approach have already been demonstrated with the recent approval of development of c.450 new homes at the St Peter’s Hospital site, very close to a traffic pinch point at the junction with the A320. The assessment of the application’s traffic impact was based upon a Traffic Assessment for that site
alone. As a result the planning decision was made without consideration of the overall development, including Longcross, which will feed into the same traffic pinch point on the A320 junction. As a result the applicant was not required to fund any junction improvements through a s.106 agreement.

6. This is of particular concern for the proposed Longcross Garden Village given its strategic scale and thus impact on surrounding roads and settlements. There must be certainty up front that the necessary infrastructure is in place in order to support the development.

MM22: Longcross

7. We refer to the letter of 12 December 2019 produced by Tom Hill QC and Shrimplin Planning & Development sent to the Inspector explaining how the promised improvements in rail infrastructure at Longcross Garden Village have not materialised. We request that this is reread in the light of the comments below.

8. The fact that over a year has passed since the Stage 2 Hearing Sessions and still there is no progress with these is evidence that the Local Plan needs to include specific criteria requiring improvements to this station.

9. We are aware of the letter dated 4 November from South Western Railway to Surrey County Council (RBCLP_62, published November 2019). This says that there will be improvements of the frequency of trains on the Reading Line, which is welcomed. However, this still only results in a half hourly service, which is not very frequent, and one which is stopping, which means that it will take a long time to get to Reading.

10. Moreover, no improvements are proposed to the London Waterloo line which is the most popular and important route. It is improvements to the service on this line which are needed.

11. The letter from South Western Railway does say that “we have drawn up plans“ for improvements, but does not put a timescale on these. The improvements are limited to “waiting facilities, information provision and ticket sales”, which is the absolute minimum that a functioning train station requires. Moreover, the improvements are confined to the land controlled by the railway and so comes no closer to delivering the promised new station, car park etc. that is needed to make this an effective and attractive train station. Longcross will therefore remain nothing more than a “halt” stuck in time.

12. It is also important what is not mentioned, namely the improvements that were due to take place as part of the Longcross North development. These have still not happened and there it is extremely worrying that these are not even mentioned in the letter. As we stated in evidence and at the Examination, emphasise the need for these to be written into policy for Longcross Garden Village.
13. In our letter of 12 December 2019 we also referred to ongoing engagement with the developer of the site. The most recent stage of this was that the Longcross Garden Village Steering Group met on 19 February 2020. A presentation was given by the developer, his planning advisor and property head of primary care for the NHS. The NHS consider the population of Longcross North (already built) as part of Virginia Water and as such the doctor’s practice in Virginia Water has been forced to take on all the 500 new residents. Questions were asked about the residents in Longcross South and the answer was that it was anticipated that they will be directed to Chobham. What is clear there is little appetite for another practice at Longcross and thus no way of making it a sustainable settlement and instead Virginia Water and its already stretched services and highways infrastructure will be forced to carry the burden of Longcross.

14. Questions were also raised about the provision of jobs and schools. Again there was no clear answer given, despite the length of time this site has been promoted and the apparently advanced stage of preparation of a planning application. This again raises significant concerns over the sustainability of this settlement and the impact on Virginia Water.

**MM29: Virginia Water North**

15. Our objections relate to concerns about ownership and access.

16. We refer to the letter of 4 March 2019 produced by Tom Hill QC and ShrimplinBrown (now Shrimplin Planning & Development) regarding ownership at Virginia Water North. We request that this is reread in the light of the comments below.

**Ownership**

17. The letter of 4 March expressed surprise that the letter dated 18 February 2019 from Colliers International was the first occasion on which there was any statement of support for Policy SL9 from any party other than the owners of Merlewood out of the at least 15 different land owners (see land ownership plan attached to our Matter 6 Hearing Statement).

18. The Council’s responded to this in a letter dated 7 March 2019 (RBCLP_64, published December 2019). This explained that, despite the Council directly contacting all of the landowners, only some of the landowners at Kenwolde, but not all, and none of the landowners for other parts of the site had contacted the Council or engaged with the Local Plan process:

“In relation to comments made by Shrimplin Brown about land availability within the Virginia Water North allocation, the Council can confirm that during the public consultations held on the Local Plan and in response to letters sent by the Council to landowners within each proposed allocation about the availability of their land, several land owners at ‘Kenwolde’ suggested their land was available for development. At Regulation 19 stage,
one of the landowners submitted a letter in favour of the allocation being put forward as a site for residential development. Another of the land owners submitted their site to the Brownfield Register in December 2018 confirming the site’s availability and noting that Kebble Homes had contacted Aston Mead Land outlining a feasibility study for developing part of the garden serving Kenwolde Place. The Council can confirm that the majority of the land in the ‘Kenwolde’ parcel has been confirmed by the landowners as being available. All of which supports the availability of the land.

Initial/informal pre-application discussions between some the land owners of Kenwolde and Merlewood and officers have also taken place in 2019, showing a commitment from the parties to developing their land. This is supported by the letter sent by Colliers (ref 744-001).” (emphasis added).

19. The letter, and indeed the Local Plan, anticipate this allocation not coming forward:

“With regards to the statement made by Shrimplin Brown that the land interests within the Virginia Water North allocation are required to be brought together in order to deliver SL9, the Council disagrees with this position. Policy SL9 itself sets out the minimum number of homes which are expected to be delivered on each part of the site should a comprehensive development not be possible.” (emphasis added).

20. The delivery of a reduced number of dwellings, if possible at all, does not outweigh the significant harms identified in our previous evidence to the Local Plan Examination.

21. Eight months after the Stage 2 hearing Sessions a letter dated 30 September 2019 from Colliers International and its attachment dated 26 September 2019 from Forsters (RBCLP_66, published December 2019) states that a Collaboration Agreement has been signed between the owners of Merlewood and the owners of five properties at Kenwolde. Given that the Local Plan Issues, Options and Preferred Approaches (IOPA) Consultation took place in July 2016 (to which the owners of Merlewood responded), over 3.5 years ago, it is staggering that it should take such a long time for the landowners to come together.

22. Moreover, whilst the letter from Colliers International talks of pursuing a planning application the letter from Forsters merely talks of compiling and submitting a masterplan. The extend of the agreed working between the parties and their commitment to bringing forward the site for development is therefore not clear.

23. The letter from Forsters also explains that a development agreement is still to be agreed. Without this there must be significant doubt over the effectiveness of the Collaboration Agreement.

24. As explained above, the Virginia Water North Allocation comprises at least at least 15 different land owners. The letters from Colliers International and Forsters refer
to only five properties. The properties are not identified so the actual area of land being referred to is still not clear. In any event, it is clear that all the land needed to deliver this allocation has still not been assembled, even at this very late stage of the plan making process.

Highways

25. We refer to our Matter 6 Hearing Statement and the highways advice attached thereto.

26. In response to this the Council’s letter dated 7 March 2019 (RBCLP_64, published December 2019) referred to comments by Surrey County Council (RMCLP_63 dated April 2018, published November 2019). It is extremely disappointing that this advice was sought after the Hearing Sessions.

27. Moreover, the brevity of the comments and the language used makes clear that this is informal advice and not based on any meaningful analysis, for example of land ownership, visibility splays, traffic speeds.

28. The comments accept that the historic wall at the “Merlewood access” will “limit visibility significantly”. This wall is listed and forms an important part of the historic building and so we do not consider that permission would be granted for its demolition.

29. We are concerned that the suggested solution to move the carriageway is not based on an understanding of the extent of the highways boundary. We do not consider that this is possible, especially given vehicle speeds and the road gradient. Moreover, this access point has not been promoted by the landowners and so even they do not consider it an option.

30. The comments on the “Kenwolde access”, i.e. Hollow Lane, are that it cannot be achieved:

“I’m not sure if the visibility provided on the submitted plan can be achieved. The road gradient at the proposed location seems to preclude visibility, particularly at the minimum height of 1.05 metres that we would normally request for visibility splays.”

31. The suggestion is made that the access can be “…moved farther up Callow Hill (towards Kenwolde Lodge)…”, but this is not within the promoter’s ownership. Moreover, it is on land which, it became clear at the Hearing Sessions, is being proposed by the Council as a SANG. Additionally, putting an access across this land it would result in the loss of a significant number of trees.
32. Even if an access were achievable the comments are not sure that the required visibility can be achieved:

“...vertical visibility improves a lot and I don’t think horizontal visibility would be excessively compromised.

So, I don’t think this is going to right off the site, as the site extends along the edge of Callow Hill in either direction then the land allocation should be okay.”

Conclusion

33. For the reasons set out above the Main Modifications to the Local Plan do not make the Local Plan Sound.

Yours faithfully

Robert Shrimplin
Director
Ms Charlotte Glancy
Programme Officer
Runnymede Local Plan Examination
C/O Banks Solutions
80 Lavinia Way East
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West Sussex
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Date: 4 March 2018
My Ref: 17134

Dear Ms Glancy


This letter has been produced by Tom Hill QC and ShrimplinBrown on behalf of the Wentworth Residents Association (representor ID 1998) in relation to the examination into the Runnymede Borough Local Plan 2030. It responds to the Stage 2 Hearing Sessions, Matter 6, Policy SL9 – Virginia Water North (VWN) and in particular the letter dated 18 February 2019 from Colliers International on which the Inspector has invited comments.

First, we find it extraordinary that this is the first occasion on which any statement of support for “SL9 – VWN” has been said to be forthcoming from any other than the owners of Merlewood out of the at least 15 different land owners (seven in “Kenwolde” and eight across the rest of VWN) whose interests are required to be brought together in order to deliver this allocation. We also note that some of the site is comprised of the back gardens of properties with the Wentworth Estate (see map in Appendix 2 of our Hearing Statement, p45) and that nothing at all is said about the properties to the east who remain resolutely silent about their intentions and are plainly not party to the apparently proposed (but unsigned) collaboration agreement.

Second, we append for the Inspector’s assistance our plan of the various land interests in question derived from Land Registry searches and we note that the only party which has actively promoted its land as part of this allocation is the owner of Merlewood. As already noted, it is clear from Colliers’ letter that there is no collaboration or equalisation agreement in place with the many different owners of the now extensively sub-divided Kenwolde estate and certainly none in relation to the back gardens of properties with the Wentworth Estate nor the properties to the East. The many parties in question own their interests as family homes (each of very high value) and our questions about the viability and deliverability of the whole exercise remain unanswered – especially when the whole allocation and Green Belt release is unlikely to deliver more than 2 dwellings per ha (see our Matter 6 Hearing Statement).
Finally, we note that these points sit alongside many others which we do not repeat in full but which are set out in our representations and in our Matter 6 Hearing Statement on VWN and its Appendices (prepared by highly regarded experts such as Hankinson Duckett). This material reveals the historic, landscape, arboricultural and ecological significance of the land covered by the SL9 VWN proposed allocation – and comment further on the completely inadequate access and the unadopted nature of the bridleway known as Hollow Lane for the proposed intensification. These points all remain to be considered. We note that no highways analysis has been produced by SCC to rebut the points we have raised – certainly not the desktop “Highways Review” referred to in the Colliers’ letter. If these points are not addressed and the allocation is confirmed with a woefully unsatisfactory access, local residents and equestrians using Hollow Lane will simply be left to pick up the pieces.

We hope that you will draw this letter to the Inspector’s attention. We also respectfully request that if there is any further update on the matters set out in Colliers’ letter that we are notified of this an given an opportunity to respond.

If you have any queries please do not hesitate to contact me.

Yours sincerely

Robert Shrimplin
Director

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Dear Ms Glancy

RUNNYMEDE LOCAL PLAN EXAMINATION, MATTER 5: POLICY SD10 – LONGROSS GARDEN VILLAGE (REPRESENTOR ID 1998)

We refer to our letter of 4 March, 2019 and ask that the Inspector might re-read this letter. It draws attention to the manifest deficiencies in sustainable access provision from which the Longcross site suffers and the importance which we believe should be attached to the inclusion of a cast iron commitment in the Plan to the provision of an attractive station at Longcross, served by a good range of rail services.

Since writing that letter, we have been waiting to see whether the promoters of Longcross would submit their long-awaited application for Longcross South, so that we could examine in detail the scale of the infrastructure provision intended to accompany this strategic scale settlement, which, as the Inspector will know, is presently entirely unserved by the normal range of services and facilities which would be expected for a community of this scale at a comparatively isolated location in the countryside. Contrary to our expectations, this has not happened and so we are obliged to fall back upon the information which we have been able to glean from the meetings of the LGV Steering Group earlier in the year.


At this Forum, the developer made clear its intention not to provide a secondary school on site and also not to provide a doctor’s surgery on site and instead make financial contributions to facilities elsewhere. This is totally inadequate as it will create unsustainable patterns of travel, entirely contrary to national and local planning policy.

“Question: What education facilities will be provided on site?
Answer: The school provided will be a primary school, as Surrey County Council requires, with contributions being made towards the expansion of surrounding
secondary schools. The statements made by members of the steering group regarding the need for a new secondary school were noted and these will be raised with Surrey County Council as the local education authority at the next meeting with them. Crest Nicholson will not be granted planning consent until the education authority is satisfied that the needs of all of the children who will live at Longcross have been met.” (top of p4)

“**Question:** Will there be a doctors’ surgery or health centre on site?  
**Answer:** Crest has been investigating the possibility of health provision on site with the CCG. However, their recommendation is that contributions should be made to surrounding surgeries. Crest will continue dialogue with the CCG, LPA and other stakeholders to explore opportunities on site.” (top of p5)

The discussion at the Forum also highlighted the continuing lack of delivery of the improvements to Longcross Station. This was highlighted in our representations to the draft Local Plan, in our submissions to the Local Plan Examination and in our letter of 4 March referred to above. The delivery of improvements to the station is central to ensuring the sustainability of the future settlement and yet there is absolutely no certainty regarding scale or timetabling of provision. Moreover, since we last wrote in March, we understand that the level of rail service from Longcross has not been materially increased and remains very infrequent, no convenient parking has been provided and the only means of access is via a lengthy and isolated footpath. The Council seems to have done nothing whatsoever to address this completely unsatisfactory state of affairs, notwithstanding the growing population at Longcross North.

**Minutes for Wentworth Residents Association Executive Committee (12th March 2019)**

The meeting was attended by Cllr Nick Prescott, Leader of Runnymede Borough Council, who stated that the Council wish to see Longcross Film Studio remain in operation both now and in the future as an important local employer:

> “Longcross Film Studio was an important consideration, and RBC is keen for the studio to remain in operation, rather than being converted or demolished in favour of new office buildings, due to a number of “box buster” films being produced there, and hopefully more films in the future...” (paragraph 6, p3).

However, the buildings occupied by the Film Studio are exactly where the new station car park and ticket office are supposed to be located. This also clearly throws into doubt the deliverability of those facilities which are of course key to the effective operation of Longcross Station. We retain real doubts that, unless the plan is modified to require the early provision of an attractive station facility and services at Longcross, there will be no such provision and Longcross will operate predominantly as a car-based new community, adding materially to congestion on the road network and flying in the face of the climate change emergency.
We trust that this important additional information will be considered by the Inspector conducting the public examination of the Runnymede Plan and can confirm that the contents of this letter have been approved by our appointed Counsel, Thomas Hill QC.

If you have any queries please do not hesitate to contact me.

Yours sincerely

Robert Shrimplin
Director