Key points in response to the Inspector’s Initial Matters, Issues and Questions, in regard to the Tandridge District Council Local Plan Examination

Matter 6.7: Any necessary improvements to Junction 6 of the M25

- Reference is made to the Briefing Note prepared by DHA, dated December 2018;
- Discussions between Tandridge District Council (TDC), Surrey County Council (SCC) and Highways England (HE) indicate that M25 Junction 6 (J6) would be operating at capacity by 2020 in the absence of Local Plan development (i.e.: this assumes natural growth only on M25). In this regard, there are no schemes planned by HE to improve M25 J6 as part of the Roads Investment Strategy 2 (RIS2) planned within Roads Period 2 (RP2) 2020-25;
- TDC have proposed various options to improve M25 J6 in support of their Regulation 19 Submission draft Plan. The Duty to Cooperate Report of July 2018 identified Option 2 as the preferred option for further feasibility studies. The DHA note of Dec 2018 indicates that additional capacity could be created by widening the gyratory and providing an additional lane, however it acknowledges that there is “insufficient width to create an additional lane whilst also maintaining a safe clearance and protection to the bridge structures”;
- The DHA note suggests the widening of the anticlockwise M25 ‘on slip’ which we believe would require the potential acquisition of third party land outwith the control of TDC and Highways England. In addition, there is no evidence to confirm the adequacy of the merge and diverge capacity with the M25 mainline;
- The DHA note also indicates that following the receipt of a topographical survey, a shortlist of options would be identified. The DHA note indicates that subject to economic appraisal, a preferred option would be selected. In this regard, TDC has failed to present any further data and relevant information;
- Therefore, a safe and deliverable preferred scheme has not been proposed by TDC nor agreed by Highway England, and there is no indication that the necessary finance has been secured for further planning, design and implementation;
- SCC acknowledge the problem of locating a Garden Community at South Godstone and the implications for M25 J6 in paragraph 2.5.5 of their report of August 2017. SCC indicate that an intervention of “considerable size” would be required and that a development the size of South Godstone is unlikely to be able to finance such a large-scale improvement to M25 J6;
- SCC have raised concerns regarding the appropriateness of the scale and kind of the improvements to M25 J6 required to be provided by the South Godstone Garden Village as acknowledged in the SoCG with TDC;
- WSP has completed an independent review of the potential impact a Garden Community at South Godstone would have on M25 J6 using Highways England’s approved M23 Smart Motorway Model (M23SMM). In this regard, A22, A25 and M25 J6 would suffer from significant increases in peak hour traffic and congestion;

1 SCC, August 2017, Transport & Accessibility Assessment of Potential Garden Village Locations 2017, para 2.5.5
2 TDC, 2018, Duty to Cooperate Statement Update, Appendix B
3 DHA, December 2018, Briefing Note – M25 J6, Godstone, Surrey (PL/13304)
4 TDC, December 2018, Statement of Common Ground with Surrey County Council, para 3.18
5 WSP, September 2018, TDC Regulation 19 Consultation – TN12 Transport Evidence Base Review, Section 4
WSP’s assessment suggests that the resulting congestion at M25 J6 in 2033 would force traffic to displace onto the local rural road network, including Tilburstow Hill Road, Tandridge Lane, Outwood Lane and also M23 accessed at junction 9;

In the absence of this re-distributing effect, M25 J6 would see an increase in traffic of some 23% and would be significantly over capacity in 2033, thereby exacerbating delays and increasing congestion. In this regard, the forecast level of residual cumulative impact would be severe contrary to paragraph 109 of the National Planning Policy Framework (NPPF).

**Matter 6.7: Any necessary improvements to the A22**

- SCC’s assessment of mitigation to support a Garden Community at South Godstone is documented in their report ‘Strategic Highway Assessment: Mitigation 2018’. That report identifies where mitigation is required along A22 and other key local roads and junctions. WSP has reviewed that report and documented various key concerns where the mitigation proposed fails to relieve congestion;
- SCC’s ‘Annexe to Strategic Highway Assessment. October 2018’ reviews the sensitivity of various junctions E, G and H with and without the proposed mitigation. In 2033, SCC forecast A22 to operate with a Level of Service (LOS) that is unstable during the peak AM period (ref: Figure 2.2);
- Link flow analysis suggests in Fig 2.1 that in the absence of appropriate and deliverable mitigation, A22 would in parts continue to operate over capacity in 2033, with congestion identified at key junctions E, G and H and on local roads east of A22;
- Based on SCC’s assessment, TDC has failed to adequately identify a clear plan to mitigate the impact of traffic during peak demand periods along key routes including A22, A264, A25 and surrounding local roads;
- Paragraph 3.2.6 suggests that additional work should be undertaken to assess junctions E and H, however, Tandridge District Council (TDC) has failed to present any evidence to clearly demonstrate what mitigation would be appropriate/deliverable;
- The critical nature of the Felbridge junction (A22/A264) has been acknowledged by TDC, with an options feasibility study commissioned for publication before the end of 2018 to feed into the HIF bid in March 2019. No such study has been provided as evidence by TDC to confirm that the impact of the Local Plan on that junction is acceptable;
- TDC has included a report by consultant Systra dated December 2018, to consider the operation of the Copthorne Hotel junction (A264) taking regard of the Local Plan housing allocations;
- Scheme options to improve the junction have been considered and fail to provide the desired Level of Service in 2033. The Systra report indicates that it is for ‘interim guidance only’ and that further assessments are required. In this regard, TDC has failed to present any evidence how the Copthorne Hotel junction would safely accommodate the cumulative impact of traffic.

**Matter 6.7: Any necessary improvements to South Godstone Railway Station**

- The options for sustainable travel to and from South Godstone are currently poor, with little opportunity for enhancement. Paragraph 32.11 of the Regulation 19 draft Plan recognises

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6 WSP, September 2018, TDC Regulation 19 Consultation – TN12 Transport Evidence Base Review, para 4.5.1
7 WSP, September 2018, TDC Regulation 19 Consultation – TN12 Transport Evidence Base Review
8 TDC, December 2018, Felbridge Junction Feasibility Assessment Note
that the frequency of rail services from Godstone station is limited and that a significant upgrade would be required to the station infrastructure and train service frequency to support a Garden Community at South Godstone;

- Currently it is not possible to get a direct service from Godstone station directly to London. Commuters are required to use an hourly service via the Tonbridge line to connect with the main line service at Redhill. The overall attractiveness of the route for commuters is low, with currently only 7-13% of people from South Godstone using rail as a form of transport to commute to work⁹;
- There is no scheme identified by TDC to demonstrate what improvements would be necessary, feasible and deliverable to improve Godstone station to serve the proposed Garden Community. In addition, the frequency of rail services would need to be significantly enhanced to improve patronage which also raises a question over the longer-term viability of the development.

**Matter 6.7: Whether the infrastructure requirements have been sufficiently considered and costed so as to inform the high level viability of the proposal**

- The TDC Infrastructure Delivery Plan (IDP) of January 2019 sets out the requirements for the proposed Garden Community and further afield across the wider district. The quoted costs for transport infrastructure are not supported by specific scheme options and in many cases, the estimated costs have been omitted;
- Under District Wide Requirements (pages 25-27) of the IDP £1m, is included for ‘Improvement to bus network’. It is unclear whether this includes service enhancement which would require significant investment over the Plan period and beyond to accommodate sustainable travel opportunities at South Godstone;
- Page 26 of the IDP identifies a cost of £20m for improvements to M25 Junction 6 (M25 J6) that are required to accommodate the proposed Garden Community; TDC previously quoted a cost of some £200m in their IDP of July 2018;
- TDC has failed to promote a feasible and viable scheme that has been approved by Highways England to upgrade M25 J6. £20m significantly underestimates the cost for upgrading the junction which is also likely to require the acquisition of third party land, improvements to M25 slip roads and possibly the mainline. Other district wide highway improvements are required, but TDC has failed to promote specific scheme improvements. Any improvements to M25 J6 and district wide roads should be considered as essential infrastructure to support the proposed development;
- The IDP indicates further transport requirements for the proposed Garden Community. £15m is quoted by TDC for improving Godstone rail station (Page 30 of the IDP). In this regard, there is no indication how this sum has been derived and whether provision has been made for changes to service frequencies and track/signalling infrastructure;
- Given the poor sustainability characteristics of South Godstone, it is essential that station improvements and also service enhancement are implemented on commencement of the development to influence travel behaviour;
- The Garden Community will require the provision of a new Spine Road which is essential infrastructure to support the proposed development. TDC has failed to consider the cost of the Spine Road which is likely to be significant.

⁹ 2011 Census data
SCC have raised concerns\(^{10}\) about the deliverability, fairness and appropriateness of the infrastructure requirements for the Local Plan, as required by the NPPF\(^{11}\) paragraph 204. TDC have hitherto failed to satisfactorily explain how they intend to meet these tests.

**Matter 6.7: Whether there are any infrastructure requirements which would mean that the site could not be viably developed at the point envisaged**

- Many of the transport infrastructure requirements are reliant on a Housing Infrastructure Fund (HIF) grant and other public/private sector funding. In this regard, the IDP fails to address the level of infrastructure spend at key stages of the development and therefore, the phased viability must be questionable;
- Improvements to Godstone rail station, M25 J6, the numerous highway junctions and the implementation of sustainable travel options are considered essential infrastructure requirements. In this regard, the TDC IDP fails to demonstrate how the development would remain viable at key stages given the need for significant ‘up front’ investment.

\(^{10}\) TDC, December 2018, Statement of Common Ground with Surrey County Council, para 3.2 and 3.3
\(^{11}\) NPPF, March 2012 (and paragraph 56 of July 2018/February 2019)