6th November 2019

TDC Local Plan - Inspector Consultation for Participants at the SCG01 sessions.

Sir,
As an ordinary resident I will not attempt to join the technical debate between the various highways experts on on the design of the M25 J6 improvements. Instead I would like to point out one omission from the DHA report INFE29 – the lack of provision of cycle lanes - and comment on its implications.

Text
You will be aware that one of the items in TDC's Infrastructure plan (INF1) is “A22 – Off Road Cycle Route”. Its cost is currently unsized. TDC place reliance on these cycle routes for the sustainability of the Garden Community. Indeed in the discussion of site HSG18 they were specifically referenced as a means for Warlingham residents to access the 3G pitches in South Godstone that replaced those lost to development locally.

DHA's Option 2 plan includes the provision of a pedestrian underpass through the gyratory roughly following the existing pedestrian route from the B2235 South of J6 to the A22 North of the junction (the route is shown in yellow on the plan – attached for convenience). It does not serve the South side of the A22 at all. It is also not clear that the underpass is costed to a size that would allow two way cycle and pedestrian traffic (a 5 meter width?).

The provision of the A22 cycle routes will require either additional tunnelling (and therefore cost) or overground crossing points (causing additional queuing and delay for traffic). It is concerning that DHA do not appear to have taken on board all the requirements of the local plan in their design.

As an aside I also find it concerning that DHA make no mention of the the stream flowing in the SE corner of the gyratory (photo attached). Any tunnelling in that area will need to allow for this.

I understand of course that the issue of whether the existing width of the J6 underpass will support the projected traffic estimates (all based on just one day's flow measurements made in October!) is of much greater concern. However I also observe from page 30 of the GVA viability report (INF2) that £10M of early cost to the Garden Community project equates to 1% IRR for a developer. Relatively small increases in early cost can have a big impact on viability.

The DHA design has already increased the J6 modification estimates from the £20M used in the GVA viability study to £46M + VAT i.e. to over £50M - up to a 3% IRR impact. Additional costs for the currently unsized cycle routes can only worsen the projected IRR.

I find it perplexing that GVA did not include a sensitivity analysis on variances in infrastructure cost (or build cost) in their report. I note they used lower estimates compared to the IDP for other significant infrastructure items such as the 100 hectares Green space (£13.5M variance), footpath/water quality (£15M) and the Felbridge junction (£3.5M) … summing to another possible 3% reduction in IRR.
These scales of reductions in IRR would render all of the scenarios in the GVA report unviable.

The omission of the cycle paths reflects badly on the quality of the DHA report - they do not appear to have taken on board all the requirements of the local plan in their design. The omission of a cost sensitivity analysis from the GVA viability study means it cannot be relied upon.

I hope these brief comments are of assistance.

Yours faithfully

A.J.Osmond
Photo of land within South East corner of the M25 J6 Gyratory System (through which any tunnelling for A22 cycle routes would have to pass?)