TDC LOCAL PLAN

South Godstone Garden Community SCG01

Observations regarding INFE29

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1 Introduction

1.1 For completeness I set out the timetable of events that has led to the need to provide this additional document.

1.2 On Day 1 of the examination a new document was issued being SDTCE 23 dated 8th October 2019 a SOCG between TDC and Highways England (HE) within the SOCG reference was made to a feasibility study. Upon enquiring what this document was it was first alleged that it had always been on the TDC website. It transpired this was wrong and the document now referred to as INFE29 produced by TDC consultant DHA was uploaded to the Examination Library on Day 3. It should be overlooked that this document was 340 pages in length.

1.3 It should be noted that Day 3 was dated 10th October, the next sitting day of the Examination was Day 4 the date 22nd October, when the garden community was to be dealt with. Thus, the document was relevant to the next programmed sitting day.

1.4 As it transpired due to unforeseen circumstances the programme of the Examination changed but at the time of loading INFE29 no one was aware of the date slippage. An assumption that might be drawn from the late submission of the SOCG TDC and HE and then the posting of INFE29 was to give participants as little time as possible to look at the document.

1.5 Given INFE29 was dated March 2019 it would suggest there was absolutely no reason to withhold the document.

1.6 Consequently, it seems more than reasonable that parties should now be able to comment on this document given the significance of the location it deals with, the significance and scale of the allocation it is associated with and the importance that TDC has put on improving Junction 6 of M25.

1.7 The matter was under the full control of TDC and it is TDC who has led to the submission of additional documents as INFE 29 was submitted after the commencement of the Examination.

1.8 It is noteworthy that a similar occurrence has happened namely the introduction on Day 8 of INFE 31 an Executive Summary prepared by WSP regarding the A22/A264 Felbridge junction. This junction was raised at the Examination on Day 8 and no mention was made by TDC that this additional document was going to be made available. Given the examination has now ceased this again means no comments can be made.

1.9 I have “no axe to grind” for any site and all that I seek is an honest and fair representation of the case being put forward by TDC and to be able to consider and comment upon the documents within the Examination library.

1.10 Given we are often told as residents that it is a “plan led system” if no comments are received on certain matters it could be assumed that there are no objections.
2 Comments on INFE29

Preamble

2.1 The Inspector in his guidance notes for all participants advised that they are familiar with the document “Procedure Guide for local plan examinations evidential requirements.” At para 1.11of that document it states that data that is two or more years old may be overtaken by events.

2.2 Also, the Government document entitled “Transport evidence bases in plan making and decision taking”, states the first step in quantifying the impact of the proposed land allocation is to provide an estimate of person trips. Also, that for the transport assessment of the local plan proposals to be robust, baseline conditions need to be established, accurately, to fully understand the local plan proposals.

2.3 The traffic model data is discussed in the SCC doc Inf 28 dated 2015. It states at 2.21 that the model is to be updated as it is dated 2009. Consequently, this base data is old and its reliability is questionable. This means it will impact on any results and decisions made using it. Furthermore, the model takes an average morning peak hour flow using the hours 0700-1000, rather than assessing the greater peak hour flow and it does not assess an evening peak. Thus, the flow used is not robust. This point was also made in the Inspectors report OTHE 14, dated 9th July 2019 regarding the Reigate and Banstead development management plan para 111. The concern about the assessment hours being endorsed by Highways England.

Base data

2.4 INFE 29 refers to model data provided by Surrey County Council. The model references they have made do not appear to correspond with Inf 28, dated 2015 referred to above. Consequently, it is not clear whether the flows that have been applied are peak hour average morning peak flows or exactly what they are. This self-evidently impacts on the outputs that have used those flows.

2.5 As mentioned above in 2.1 and by reference to Government Guidance notes the first step in quantifying impact it is necessary to prepare an estimate of person trips. No such information has been provided.

2.6 Other matters for example are, what assumptions have been made for the Garden Community modal split, i.e. train use, bus use. What level of employment space has been assumed and for each period assessed has the full development been assessed or just a build rate to a design year.

2.7 Until those matters have been considered no safe assumptions can be taken as to the impact of the proposed allocation; -

i) whether it is cost effective; -

ii) deliverable; and; -

iii) the assessment undertaken produces reliable outputs.

2.8 Self-evidently if higher figures have to be used it will have the following consequences: -

iv) the junction capacity assessed may be worse than predicted; or

v) the amount of development proposed would have to reduce to get the capacity back to an acceptable level.
2.9 **INFE 29** states at para. 1.3.2 that a traffic survey was undertaken on 16th October 2018. This was a one day count and it would appear that no validation has been undertaken regarding this one day survey to ensure the flow recorded is within the expected levels.

2.10 It should be emphasised that Junction 6 and the County roads that feed into junction 6 are all susceptible to occurrences on the M25 that can lead to transfer of traffic on the A22 feeding into junction 6 in the morning and the reverse situation in the evening.

2.11 I am surprised that there is no reference to any validation being a requirement by both HE and SCC.

2.12 It is no excuse in my judgement to say that this proposal is at the early stages. As I have shown above this type of information is required. It gives a level of comfort to know there is a workable solution that is deliverable and affordable.

**Junction Assessment**

2.13 LINSIG assessments have been undertaken for various scenarios. The assessment requires inputs that impact upon the results. I have commented above about the validation of traffic flows.

2.14 Saturation flows are applied to each traffic lane and in this case an across the board figure of 2100 pcu (passenger car units) per lane has been used. In my judgement and experience an across the board application of a saturation flow is unusual and would not be representative of the situation on site.

2.15 The saturation flows are at least 10% to high and reference to previous TRL reports regarding signal control roundabouts have suggested that approach saturation flows be 1750 pcu with circulating saturation flows 1650 pcu.

2.16 Given the junction is already traffic signal controlled it would be entirely possible to measure the existing saturation flows. By applying a single saturation flow as undertaken by DHA ignores that some of the lanes are very short and should be treated as a flare to acknowledge that a full saturation flow could not be achieved.

2.17 I have asked the Council through the programme officer to be supplied with copies of the junction layout plans provided in **INFE 29** the DHA report at Appendix I and K, I specifically requested a copy that is to scale.

2.18 I received plans that did not have the title block completed, they were not to scale and despite TDC stating they had a topographical survey undertaken, which I know they have. It is not clear the plans are based on a topographical survey.

2.19 As TDC has a topographical survey why have they not provided the layout based on that information. To do this would answer the question raised by others about lane widths and other relevant matters.

2.20 It appears that TDC are taking the public as fools. Either the information they have is useable I mean you can scale from the plans or not. It leaves matters of detail hanging in the air leading to a possible conclusion there is an issue.
3. Summary and Conclusion

3.1 In summary TDC should have put the document now referred to as INFE 29 on the original Examination Library which by the date of it, March 2019 they could have done. They choose not to make it public until after the commencement of the Examination meaning it was as late as it could be to provide the information mentioned in the SOCG, SDTCE 23.

3.2 Now that the report is available TDC seem unwilling to provide the junction solutions on a reasonable base that can be scaled.

3.3 The data that has been used for the assessment is lacking in detail and does not meet with expected requirements, first, by The Planning Inspectorate Procedure Guidelines for Local Plan Examinations that requires base data to be up to date. Second, the requirement of Government Guidelines to first quantify the number of person trips to the intended land allocation.

3.5 To confirm that either validated peak hour flows have been provided or an average of peak hours 0700-1000 has been used.

3.6 It will not be acceptable for any public body to respond to my note that these matters are details. It is quite clear this detail is required to enable all parties to state with confidence that the junction proposal can be delivered, the proposals will be affordable and they will provide the capacity benefits to deal with the severe impact that has been recognised by HE.

3.7 Until this additional information is available it is difficult to see how any satisfactory conclusion can be reached regarding the transport impact of the Garden Community at junction 6, a location that has it has been stated will experience a severe transport impact.