Dear Mr Banks

Examination into the Tandridge District Local Plan - Matter 6, South Godstone Garden Community

Vision Transport Planning (VTP) has been commissioned by Land Logic (Godstone) Limited, in respect to the promotion of a Garden Village on land to the north of the rail line at South Godstone, to assist with the delivery of Tandridge Borough Council’s future housing needs (up to 2033).

This letter has been prepared on behalf of Land Logic (Godstone) Limited and sets out representations (on their behalf) in respect to the Tandridge Local Plan Examination, Matter 6 – South Godstone Garden Community, specifically, a review of the following documents that were discussed at the Local Plan’s Examination on 26 November 2019:


In summary, the DHA report presents a technical assessment (in terms of highway capacity benefits and cost implications) of potential highway mitigation measures at Junction 6 of the M25, which have been designed to accommodate future growth including a garden village community at South Godstone. The WSP report sets out a critical review of the DHA technical report.

This letter sets out a number of relevant points for the Local Plan Inspector’s consideration, which have arisen following a review of the above documents. The remainder of this letter sets out a commentary on a number of aspects that have been raised within the WSP report. For ease of reference the headings below refer to the respective headings within the WSP report. All comments relate to DHA’s ‘Option 2’ design solution.
Design – Width of Overbridge Portals

The WSP report sets out comments in relation to the width of the overbridge portals. In commenting on the design by DHA, WSP state “It appears that DHA have relied solely upon measurements from inaccurate Ordnance Survey (OS) mapping which suggests that the clear opening width of the portals is circa 14m4 [sic]. On this basis the achievability of the design has not been verified.”

VTP has liaised with DHA with regard to this point and the use of topographical survey data to inform the highway design. It is understood that the design work carried out by DHA has indeed been based on, and verified through the use of, a topographical survey; and VTP has received a copy of the design based on this topographical survey to verify this point. The assertion by WSP that the design has only been based on OS mapping is therefore incorrect and misleading. Given that accurate topographical survey information has been utilised it is our contention that the mitigation measures, as set out as Option 2 within the DHA report are deliverable.

WSP set out commentary on lane widths and design guidance. Whilst this is noted there is, naturally, scope to agree departures from standards and/or relaxations (as set out within the Design Manual for Roads and Bridges), particularly when considering constraints to a scheme that is designed to improve conditions at an existing junction.

The WSP report also refers to the need for swept path analysis to demonstrate that vehicles (HGVs) are able to safely negotiate the junction without straying into neighbouring lanes. This is agreed; and it is common for swept path analysis to enable a degree of design flexibility, whilst accurately modelling the swept path of large vehicles, to assist with further design iterations.

Visibility and Stopping Distances

The WSP report refers to SSDs based on a 60 mph speed limit. It should be noted that the geometric design of Junction 6 will result in restrained vehicle speeds that may enable reduced SSDs to be utilised. Furthermore, as the scheme design develops, it is possible that the roundabout could be subject to a reduced speed limit, say 50 mph, which would enable reduced SSDs to be utilised. Clearly, it is the role of the designer and the relevant Authorities to consider technical solutions to any issues raised through what is likely to be a lengthy design process.

It is clear that the current design is at an early stage and will naturally evolve and be refined. In this respect, there may be fairly straightforward solutions that would address matters relating to design aspects, such as forward visibility. The WSP report fails to consider, or highlight, that such solutions may naturally form part of an evolving design.

Safety

The WSP report notes that “There is no Stage 1 RSA included within the DHA report and safety for both vehicle users and pedestrians/cyclists has not been properly considered.”

It is understood that the design presented by DHA represents a Stage 1 Design and the relevant Highway Authority will of course require the design to be subject to appropriate road safety audit procedures as it evolves. It is misleading to state that safety for both vehicle users and pedestrian cyclists has not been properly considered – indeed, the design considers such matters (in the
context of a Stage 1 Design); and it is anticipated that road safety audits will in due course set out recommendations to address any identified concerns, which can then be incorporated within design revisions. This is a typical process when designing items of major highway infrastructure.

**Development Trips**

Reference has been made to the use of the SCC SINTRAM72 strategic model which has been used by DHA to quantify vehicular trips and distribution. This is appropriate. Whilst the WSP report sets out criticisms of the way the model distributes traffic, no alternative solution has been suggested by WSP. Indeed, most modelling methods for such complex scenarios will have some drawbacks or limitations.

The WSP report sets out that "As a result of the use of the SINTRAM72 2033 scenarios as described above, the trip rate for the development is extremely low. Dividing the total development trips heading northbound in the AM peak by 4,000 residential units presents a trip rate of 0.14 trips per housing unit. Similarly, for southbound trips in the PM peak with a rate of 0.13 trips per housing unit. Even allowing for trips heading south out of the development or along rural routes (i.e. not to M25 J6), these trip rates are extremely low for a development that will be car-centric as a result of the locational characteristics and lack of realistic sustainable travel opportunities for future residents."

Referring to the proposed South Godstone Garden Community as ‘car centric’ is misleading. The South Godstone Garden Community will be ideally located to build on existing public transport infrastructure to deliver a highly sustainable development. The South Godstone Garden Community provides an opportunity to create a development that maximises use of sustainable travel but also to enhance sustainable travel choices for existing residents/businesses within South Godstone and the surrounding area, reducing the need to travel by private car.

Furthermore, the trip rate conclusions set out by WSP are simplistic. As part of our own assessment of the South Godstone Garden Community, VTP has carried out a TRICS based assessment to quantify the level of residential trips resulting from a development of 4000 dwellings at South Godstone. Detailed TRICS analyses were undertaken as part of this process, including an assessment based on TRICS’ ‘mixed private/affordable housing’ category and separate analyses based on an individual assessment of private/affordable dwellings and flats and houses.

Our analysis concluded that the am peak departures resulting from the development would amount to 0.264 vehicular trips per dwelling (based on mixed private/affordable housing) or 0.304 vehicular trips (departures) per dwelling (based on an individual assessment of private/affordable houses and flats). For robustness, we used the higher trip rate figure when assessing wider transport impacts associated with the Garden Community; and when allowing for the internalisation of trips (i.e. to schools, retail, employment, rail station etc.) and the distribution of external trips onto the highway network (in accordance with accepted methodologies), this trip rate resulted in circa 400 northbound departures, when assessed on the A22 northbound approach to the M25 junction, during the am peak period.
In summary, our analyses indicated a departure trip rate of just 0.1 per dwelling on the A22 northbound approach to the M25. We are therefore content that contrary to the claims made by WSP, the trip implications of the South Godstone Garden Community have been robustly assessed by DHA, who may have in fact overestimated the level of trips from the proposal that would impact upon M25 junction 6.

Summary

It is noted that as set out within the SoCG agreed between the District Council and Highways England, the latter are "content that the design work for a proposed M25 Junction 6 (A22) junction improvement (prepared by DHA), as set out in the documents referenced above, demonstrates an improvement scheme that will mitigate the traffic impact of the Local Plan on the junction."

Based on available evidence and VTP's own assessment of transport impacts, we support this position. Crucially, it is apparent that the design of the junction improvement scheme (Option 2) for Junction 6 of the M25 has been verified utilising topographical survey data; and it should be recognised that a junction improvement scheme of this complexity will naturally evolve to address design factors, constraints and matters arising from future road safety audits etc.

Accordingly, VTP support the conclusion reached by DHA, within their Technical Note, that the Option 2 design will enable Junction 6 to operate within capacity during both the AM and PM peak periods over the course of the Local Plan period.

I would be grateful if you could pass a copy of this letter to the Inspector presiding over the Local Plan's Examination. Otherwise, please contact me if you have any queries, or if I can assist you or the Inspector further.

Yours sincerely

Steve Parsons
Director