

27th August 2021

Dear Inspector,

I am writing to inform you that the Council has received a further update from our consultants stating that the traffic modelling reports for the M25 Junction 6 will not now be ready until November at the earliest. The reasons for this latest delay are set out below. Understandably, this is extremely unwelcome news and I ask that you consider the mitigating factors I have set out in this letter.

Having considered the latest position, if you are minded to continue the Examination, then the Council will continue working with our external consultants and with Highways England and Surrey County Council to achieve a solution as early as possible.

In light of your comments regarding the end of August in ID18 we would also like to introduce, without prejudice, what may be a pragmatic alternative option that could potentially move the Plan forward. This option is set out in the second part of my letter.

Update on Transport Modelling

As you are aware, the Council's consultants DHA have been working with Surrey County Council and Highways England to initially develop an interim scheme for Junction 6. As previously communicated to you, this has resulted in the successful identification of a scheme which would improve capacity at the junction, and which is positive in terms of a safety assessment.

However, carrying out this work has revealed two other issues which could not have been foreseen by any of the parties when we embarked upon this approach.

- The strategic model used has produced some anomalous figures which both the Council's consultants and Highways England query. For example, some flows through the junction are higher without the Local Plan development included than with it.
- Highways England is concerned that while the gyratory at the improved junction performs satisfactorily, the interim upgrades to the merge/diverge arrangements on the slip roads will be adequate for only a finite amount of development and may not accommodate all Local Plan growth.

Clearly these are problematical points. To address these issues with Surrey County Council and Highways England we are proposing the following actions:

- The Council's consultants will carry out manual assignment of traffic flows, agreeing each step of the methodology with Highways England. This will provide more transparent and reliable results which will demonstrate how much development can be accommodated in the junction and the slip roads before the interim scheme and merge/diverge upgrades are required.
- Longer term the Council recognizes the need for a more substantial upgrade to Junction 6 and to raise this strategic issue.

Inevitably the first action set out above will result in a further delay. An initial assessment of the timescale by our consultants is set out below.

The key milestones allow for Surrey County Council / Highways England review time but are subject to agreement with those bodies: -

- Project Steering Group meeting to agree principles of assessment methodology – w/c 23rd August (completed);
- Full assessment methodology issued to HE and SCC – w/c 6th September, followed by 10 working day review period;
- Draft trip distribution/assignment issued to HE and SCC – w/c 4th October, followed by 10 working day review period;
- Completion of junction capacity and merge/diverge assessments and issue of Technical Note – w/c 25th October, followed by 10 working day review period;
- Project Steering Group meeting to discuss findings and implications – w/c 15th November;
- Completion of Stage 1 Road Safety Audit and Designer's and Overseeing Organisation's responses – by w/c 13th December.
- Review of Road Safety Audit by Highways England (c 3 weeks).

I am conscious that this further delay will be unwelcome and that you may consider it unacceptable. However, I ask you to give it serious consideration, for the following reasons.

Firstly, the Government's requirement for councils to have a plan in place by 2023 will not be met if the Local Plan fails. In effect the Council would have to start again on plan preparation, with the outstanding issue of strategic highways constraints unresolved and consequent impacts on the important objective of housing provision, particularly in an area of South East England with strong national policy and environmental constraints, to say nothing of the lack of a five-year housing land supply. The fact that 94% of Tandridge is classified as Green Belt puts an obvious constraint on development.

The second is a recognition of the amount of positive joint working and commitment, as well as resources, put into developing a suitable interim scheme to date. In effect we believe that it is possible to identify how much development can be brought forward before junction and slip upgrades are required, which will assist in the achievement of the Government's objectives described above.

I am aware that you have raised other issues concerning the soundness of the Local Plan, but this strategic infrastructure issue appears to be key and I would welcome your thoughts.

Alternative Option – Presented Without Prejudice

The emergence of this alternative option was prompted by the ongoing delay to the traffic modelling and your comments in ID18 regarding the August timeframe. The alternative option would:

- Amend the Plan period so that the revised Plan period would be over fifteen years, from 2013-2028.
- Include amended site policies that would make as many of the allocated sites as possible sound in accordance with your comments. We envisage that modifications might be made to site policies, addressing your comments in ID-16 paragraph 50-65, and including other site policy amendments agreed at the Examination Hearings. This would allow the allocated sites to come forward as soon as practically possible.
- Introduce a five-year review policy. We believe that shortening the Plan period and adding a five year review policy are both necessary in order to indicate the Council's commitment to continuing to explore all strategic options, including joint working, while also not undermining the adopted Plan. The introduction of a five year review policy would also be consistent with comments you and others made during the Examination Hearings.
- Structure the Plan to facilitate possible future joint working on strategic matters while also retaining continuity at the local development management level. The delay to the Council's Local Plan means that the the window of opportunity for joint working with neighbouring authorities is re-opening and so it is important that the Plan does not preclude possible future joint working at a strategic level.
- Address any remaining questions/concerns you might have in the context of the revised Plan.

We conclude by reiterating that should you be minded to wait for the traffic modelling then we will continue to work with the consultants and partners to deliver in accordance with the amended schedule. We also welcome any questions or comments you may have regarding the alternative option.

Yours sincerely,

David Ford

Chief Executive