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Dear Sir/Madam

M25 junction 10/A3 Wisley interchange improvement DCO Written representations on behalf of Extra MSA Cobham Limited

This written representation is made on behalf of Extra MSA Cobham Limited (“Extra”) which is the owner, developer and operator of M25 Cobham Motorway Service Area (“Cobham Services”) located between M25 junctions 9 and 10. A Relevant Representation on behalf of Extra has previously been submitted to the DCO Examination on 7th August 2019.

Under the proposed Scheme, the M25 Motorway and the only access and egress to Cobham services would be subject to temporary possession in the Development Consent Order (“DCO”) affecting the effective operation of the site. In addition, ancillary infrastructure associated with Cobham Services – in the form of an Advanced Direction Sign on the Eastbound carriageway – would be directly affected by the DCO Scheme and the proposed replacement is not apparent from the DCO Application documents.

Extra does not object in principle to the Scheme but has concerns relating to the extent of the proposed land acquisition, and the way in which the Scheme would impact on its operations, both during construction and following completion of the Scheme.

Extra’s concerns are set out in detail in this written representation and are summarised as follows:

- The temporary impact of the Scheme during the construction phase on the continuous operation of Cobham Services which provides an important road safety and welfare facility for the travelling public on the M25;
- The permanent impact of the Scheme on the provision of the existing 1.5 mile Advanced Direction Sign located on the M25 immediately east of Junction 10 which falls within the DCO limits.

1. Introduction

- 1.1. This written representation is provided on behalf of Extra MSA Cobham Limited (“Extra”).
- 1.2. Extra is the owner, developer and operator of an existing Motorway Service Area (MSA) known as Cobham Services. Cobham Services is located on the M25 London Orbital Motorway approximately 2km east of M25 junction 10/A3 Wisley interchange.
- 1.3. Cobham Services was constructed between 2010 and 2012 and provides an important road user safety and welfare function on the Motorway network, meeting the requirements of Department for Transport Circular 02/2013 for a Motorway Service Area.
- 1.4. Motorway Service Areas are recognised as playing an important role in addressing hazards posed by driver fatigue and provide a facility for drivers to take rest, have a hot drink and meal and to fill their vehicle with fuel.
- 1.5. Cobham Services is very popular with road users to the extent that the car and lorry parking facilities are often full at peak times. Extra has recently completed an extension to the lorry parking facility to double the number of available spaces in response to demand from road users.
- 1.6. The continued and safe operation of Cobham Services is therefore important to the safe operation of the M25 Motorway south-west quadrant.
- 1.7. To date, Highways England (the “Applicant”) have not held any discussions with Extra regarding the proposed M25 junction 10/A3 Wisley interchange improvement (the “Scheme”).
- 1.8. Extra is the freehold owner of land adjacent to land plot 17/2 which provides for all vehicular access to the MSA from the M25. There is no pedestrian or vehicle access to Cobham Services from the local highway network and therefore the operation of the MSA relies on the availability of access from the M25 via the dedicated access junction into the MSA for all public, employee, servicing and delivery vehicle movements.
- 1.9. At the time of opening Cobham Services in 2012, Extra invested in improved traffic signs on the Motorway network to introduce the new MSA development on Advanced Direction Signs and other Service Area signing. The 1.5 mile Advance Direction Sign on the anti-clockwise M25 carriageway is located within the Order limits, close to marker post M25/B/71.8 which is within land plot 13/3. This land plot is to be permanently acquired by the Scheme.
- 1.10. Extra does not object in principle to the Scheme but has concerns about the impact on their existing infrastructure and the way in which the Scheme will impact on its land interests and operations, both during construction and after completion of the Scheme.

2. Impact on MSA

- 2.1. The Order limit extends from M25 Junction 10 to Bookham Road underbridge. The land identified on the Land Plans is to be permanently acquired by the Scheme. This includes the land along the M25 Motorway passing Cobham Services, and land affecting the access and egress from the Motorway Service Area.
- 2.2. The Scheme Layout Plans and Engineering Drawings provided by the Applicant show that the only permanent works in the vicinity of the Motorway Service Area is to upgrade an existing gantry at Chainage 8+155 and gantry signs to be relocated at Chainage 8+817.
- 2.3. The Temporary Works Plans provided by the Applicant show that no temporary works are proposed in the vicinity of the Motorway Service Area.
- 2.4. It is therefore unclear why the Order limits extend to Bookham Road underbridge and whether the extend of land to be acquired is justified.
- 2.5. Extra request further clarity on the reasons for the extent of land included in the DCO limit. The Applicant should confirm the construction works to be performed in the vicinity of Cobham Services, the timing and duration of the works and the details of any temporary traffic management measures involved.
- 2.6. Measures to maintain full access and egress to Cobham Services from both carriageways at all times should be included in the Scheme proposals.

3. Highways Impact

- 3.1. The existing 1.5 mile Advanced Direction Sign for Cobham Services is located in the M25 Eastbound verge at approximate Scheme chainage 10+975.



Figure 1: Photo of the existing sign (© Google Streetview)

- 3.2. The sign is a branded Extra sign including panels for six tenants operating at the MSA. Erection of the sign in 2012 was funded by Extra under a Section 278 Agreement with the Secretary of State for Transport. In addition, Extra paid a

Commuted Lump Sum totalling £40,000 to Highways England to fund future maintenance of the sign.

- 3.3. The sign is also subject to a Strategic Highways Traffic Signs Agreement (“SHTSA”) between Extra and Highways England dated 25 April 2019, setting out the respective responsibilities of the parties. Under the TSA, Extra agree to maintain the standards required for a Motorway Service Area and Highways England agree to maintain the branded traffic signs for Cobham Services.
- 3.4. The sign provides road users with information about the availability of the MSA and the attractive offer available. Advanced signing is particularly important on the M25 due to the four lane layout, the short distance between Junction 10 and Cobham Services, the presence of weaving traffic and the high traffic flows on this section of Motorway. In short, drivers need this information to be able to change lanes and access the MSA safely.
- 3.5. The Scheme Layout Plans show an environmental barrier in the M25 Eastbound verge at this location which seems to clash with the existing sign.
- 3.6. No details for the retention or proposed relocation of the sign have been set out in the draft DCO.
- 3.7. The loss of the sign would increase the risk associated with drivers making unsafe lane changes closer to the MSA access as drivers try to enter Cobham Services with less advanced notice, leading to increased occurrence of collisions.
- 3.8. Extra requests that the Applicant confirms their proposals to retain or relocate their sign and that the proposals should be agreed with Extra as part of the Scheme development.

4. Conclusions

- 4.1. The Scheme would impact on the operation of Cobham Services which provides an important road user safety and welfare function on the M25 Motorway.
- 4.2. Extra request further information from Highways England to address their concerns about the relationship between the proposed Scheme and Cobham Services.

Yours faithfully


Tom Corke
Associate