Application by Highways England for an Order Granting Development Consent for the M25 Junction 10/A3 Wisley interchange improvement project

Written Representation submitted by Harry Eve (Respondent number 20022863) 26 November 2019

Air Quality and Emissions

Adequacy of baseline Assessments

The development will make it easier for journeys by private car to take place on the strategic road network in the region and history shows that this will generate additional traffic over and above that created through planned growth. This will have adverse impacts well beyond the close proximity of the DCO site area. (HCE 1)

The Guildford Local Plan includes a desire for north-facing slip roads on the A3 at Burnt Common. If these slip roads are constructed they will impose a significant increase in emissions and reduction in air quality through the villages of West Clandon and Send. This will include vehicles tailing back from traffic lights, in Send, past the entrance to the Send C of E Primary School. Drivers queuing for traffic lights do not usually turn their engines off due to the need, and desire, to respond quickly to a green signal. The proposal for the slip roads will lead to extended periods of stationary vehicles, with engines running, beside the school. I believe this goes against government policy and any attempt to seek inclusion or agreement to these slip roads as part of the DCO should be resisted. (HCE 2)

It may be argued that future emissions per vehicle will reduce but my understanding is that such reductions should not be allowed for because there is no guarantee that they will be realised. In particular, the main prospect of a significant increase in electric vehicles is questionable due to the environmental issues arising over increasing battery production – including destructive seabed mining. If you take the alternative view then you should also consider that the anticipated switch to autonomous vehicles (at least on the SRN) will greatly improve safety thus removing one of the drivers for the project as alternative approaches could be adopted to bridge the gap. (HCE 3)

For these reasons I disagree with the current assessment.

Biodiversity

I thank Highways England for the additional measures proposed in their letter of 4 November 2019 – to widen the Cockrow green bridge and provide toad crossings. (HCE 4)

There is an opportunity, that could be taken under this project, to go further in establishing biodiversity network connectivity (nature recovery networks are part of the current environment bill) by developing the proposals for NMU crossings at junction 10 as green bridges or underpasses of sufficient width to enable wildlife movement. (HCE 5)

I agree with the additional measures but more could be done.

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Climate Change Implications

The proposed development will generate additional private car traffic, through easier journeys on the SRN, and this effectively ignores the Climate Change Emergency which has been declared during the progress of this project. The project does not encourage drivers to abandon their cars and contribute to Modal Shift. If we are to take the Climate Change Emergency seriously the project should either be abandoned altogether or undergo significant modifications that retain the benefits to existing NMUs and potential benefits for nature recovery networks. The modifications could remove the need for land take while introducing traffic control measures that have the potential to greatly improve road safety. (HCE 6)

The carbon cost of the construction phase will be huge. This cost should take account of all aspects, from the concrete and other materials used, to the manufacture and use of the construction vehicles. The carbon cost of the additional traffic generated should be added to the result – also allowing for the manufacture of additional vehicles and the negative impact on modal shift. (HCE 7)

For these reasons I disagree with the current project solution.

Economic and Social Effects

Alternatives

A 40 or 50 mph speed limit (enforced with speed camera and ANPR technology) on the A3 through the slip road areas would increase safety, reduce emissions, and improve flow without the damaging effects of the current project. Considering northbound A3 traffic the limited area should commence south of the Ockham Park Roundabout. (HCE 8)

The Wisley Lane exit could be retained with removal of part of the physical island (separating the layby from the main road) to provide a longer, and hence safer, merge distance. (HCE 9)

Ghost islands could be incorporated to help deter late lane changes with minimal, or no, road widening. (HCE 10)

A further possibility would be to prevent traffic leaving, or joining, A3 lane 1 northbound from a point somewhere before the existing access from Wisley Lane and possibly before the access from the Ockham Park Junction. This would reduce the number of lane changes – effectively meaning that traffic in this lane would need to use the junction 10 roundabout to continue rather than straight through on the A3. The intention would be to prevent drivers attempting to access lane 1 from a slip road and from lane 2 at the same time. There could also be a solution involving the use of lane 2 for access to junction 10 as well as straight on. (HCE 11)

Similar consideration would need to be given to northbound traffic beyond junction 10 and southbound traffic through the project area. (HCE 12)

Another possibility would involve Highways England developing new means of lane change control that could be used here and elsewhere. (HCE 13)

If the proposed NMU crossings are retained as part of a revised project it would still be possible to provide jet lanes to improve flow. (HCE 14)

I disagree with the current proposal and believe that alternative, simpler and less costly solutions should be investigated. …….>

Planning Policy

National and local planning policy has, at the time of writing, failed to catch up with the Climate Change Emergency and planning is one of the key areas where change is essential. (HCE 15)

The Guildford Local Plan is still subject to judicial review at the time of writing. The Local Plan had a significant political impact locally and residents expect an urgent review whatever the outcome of the Judicial Review. This should lead to major changes that have not been taken into account in the modelling. (HCE 16)

I consider the evidence backing the current proposal to be unrealistic in view of significant changes to national and local planning policy that I anticipate will be necssary.

Transportation and Traffic

The following references are to the Transport Assessment Report (TR010030/APP/7.4) except where stated.

The Local Model Validation Report (HE551522-ATK-GEN-XX_Z-RP-TR-000003 – Table 6.2 – kindly provided to me by Highways England) shows poor validation results overall for Flow and GEH which should achieve > 85% if my understanding of the WebTAG criteria is correct. Taking the Local Road Network (LRN) in isolation the model clearly does not validate for the PM period. Validation data is shown for 18 LRN Links and only 14 of these (78%) pass the GEH test . Also, for a number of the LRN links only one direction is considered (the direction is not indicated but I think the inflow to the junctions is included while the outflow is excluded for certain junctions). The question arises – why were the other directions not included in the validation ? (HCE 17)

I think the data in Table 7.13 (Ockham Park Junction) for 2015 should agree with the data for 2015 in Tables C8 & C.9. I cannot think of any explanation for this other than model versions or perhaps averaging. I note that the difference for A3 SB Off-slip (PM) is in the opposite sign to the others which seems to rule out averaging. There may be a similar issue for the other junctions. (HCE 18)

There seem to be discrepancies in the figures presented in Table 7.5 and Table E16/E17. Example Through J10 on M25 AM 2037DM : From Table E16 I think this should be 7696-1109-1382+7479-1072-400 = 11212. The equivalent figure in Table 7.5 is 9490. Is there an obvious explanation for this (the discrepancies are all one-way) ? (HCE 19)

7.5.18 suggests that Newark Lane flow reductions indicated in the model will result from rerouting along Wisley Lane, A245 Byfleet Road and M25 Junction 11. In other words traffic may prefer to take a longer route to its destination due to congestion on its preferred route. However, there is no evidence in this traffic assessment that the completion of those journeys on the LRN beyond the detailed modelling area is actually modelled to a satisfactory standard. Since journeys do not begin and end on the M25 or A3 the rerouting must depend on the LRN. Hence we need to be able to verify how well the model validates for all the roads that could be used under rerouting – including those beyond the Area of Detailed Modelling. We also need to understand the detailed junction treatment and completeness of the LRN, as included in the strategic model, as this affects the behaviour of the model when growth is allowed for. This information is not provided. (HCE 20)

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The transport model (Strategic Highway Assessment Report 2016) used for the Guildford Local Plan was subject to criticism by Highways England in a letter to Guildford Council dated 18 July 2016. The intention to provide an improved model (Sintram 7), to address serious problems, such as the lack of dealing with the effect of backblocking and the use of averaging, was promised during the Local Plan Examination. I was advised that work on this ceased when the Local Plan passed examination. In my letter to the Local Plan Inspector I pointed out severe deficiencies in the detail of the modelling for the area to the south of Ockham Park Junction and these deficiencies may be replicated elsewhere. The realistic roads infrastructure deficit that will be generated by the Local Plan developments, and this project, is unknown and underestimated. If the proposed increase in traffic takes place the remedies that will be needed on the LRN will be severe in terms of land take and impact on local businesses, residents and the environment. The cost will be immense and will not be recognised until after the developments have taken place with the consequence that it will fall on taxpayers rather than those who profited from each development. (HCE 21)

3.1.4 indicates that SERTM also uses averaging. While the effect of averaging is greater for the LRN it also obscures the effect that queuing may have on the baseline data for the SRN. Averaging is the opposite to stress-testing. (HCE 22)

Table 3.2 assumes A3 will be widened through Guildford by 2037 in DM (i.e.minimum) but this will be a very difficult project to deliver and will bring traffic noise and pollution closer to residents and businesses where it passes through the urban area. It is questionable whether it is feasible in terms of cost or desirable from the point of view of social impact. However, it appears that it is assumed to be delivered by 2037 in the model. (HCE 23)

I did not find any mention of the additional traffic in respect of the large Howard Of Effingham housing development that was approved on appeal despite not being a Local Plan site so it would appear that this has been excluded from the modelling work. It will add to Old Lane traffic and this could have the effect of rerouting some traffic to the Ockham Park Junction (HCE 24)

The figures in 6.3.1 (AADT) relate to 2017 and are significantly lower than the 2015 baseline figures in Table 7.5 for daily flows involving the A3. It is not clear how this pattern of flow reduction is reflected in the peak hour periods, why it has occurred, or whether there is any associated change in the split of vehicle types. The answer might be found by analysing the Webtris data. (HCE 25)

These points suggest to me that the evidence is not sufficient to support the current proposal.

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Ockham Park Junction

Two of the NMU crossings at Ockham Park Junction are uncontrolled according to Figure 1.3. They are the exits to the proposed Wisley Lane access and to Ockham Road North. It is easy to see why these crossings have been left uncontrolled as the controlled crossings can for the most part fit in with a traffic signal cycle without impacting the flow on the roundabout. If these crossings were controlled they would lead to queues and sudden flow disruption in an area where three traffic arms join the roundabout in close proximity and drivers are seeking the correct lane for their journey. They could also add to the risk of tailbacks on the slip road to the southbound A3. However, the close proximity of the traffic arms, and uncertainty over the direction that drivers are taking will make these two crossings dangerous for NMUs. It seems that traffic flow is being given precedence over NMU safety at this location and this goes against the efforts to achieve modal shift. It also supports the view that the current solution for the Wisley Lane access is not satisfactory. (HCE 26)

There are suggestions that south-facing slip roads should be included at Ockham Park Junction but I think this would also lead to too many junction arms in close proximity. (HCE 27)

7.6.1 Mentions signals for the A3 off-slip in 2037(DM) and it is not clear whether this means a controlled NMU crossing or controlled traffic. If it means traffic control then there would need to be corresponding signals on the roundabout to hold traffic while the off-slip has priority. This would mean that traffic attempting to exit the Wisley Lane access and Ockham Road North would be at a significant disadvantage. This is made clear in Table G.55 where the MMQ figures are 138.9 (Wisley) and 91.9 (Ockham Road North) and in 7.6.10 . It is worth remembering that MMQ is only a mean value over a fixed period. Allowing for each PCU taking up 20 feet the MMQ figure for the proposed Wisley Lane access road is equivalent to a queue of over half a mile. (HCE 28)

It seems clear to me, from the data presented for the DS Scenario, that the signalised junction will be vulnerable to backblocking, due to queues on the circulatory, with only a small increase in traffic above the modelled flows (including variation of the flow rates within the peak period). (HCE 29)

I disagree with the current solution for the Wisley Lane Access and Ockham Park Junction.