

Our Ref: RM:JS:100255.0001

18 December 2019

Mark Challis
BDB Pitmans LLP
50 Broadway
London
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Dear Mark

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

Request for further information from the Applicant

Thank you for your letter dated 16 December 2019 which was only received by me today, Deadline 2, 18 September 2019.

We have been in correspondence for some time concerning the provision of missing technical information. My client and its highways consultants have been requesting much of this information since before the Preferred Route Announcement.

My client's highways consultants have looked at the data as best they can and, from a rapid assessment of very complex data, it appears that the information provided remains incomplete. For example, the link volume and turning movement plots as set out in item 7 of the RHS Note Relating to Traffic Information Requirements issued to you under cover of my letter of 11 December 2019. That which has been provided was not received in a timely enough fashion for us to respond to it by Deadline 2. In fact, my client feels that this late delivery is counterproductive to the DCO process that it is trying to comply with.

My client's highways consultants note that HE's position in respect of the lack of Base junction models is that these have not been provided because HE has been unable to produce suitably valid models.

Furthermore, it seems to be that the modelling used by HE's consultants to date has indeed contained both errors and omissions that have now – finally – been updated. My client's highways consultants are considering the impact of these "updates" – at present it does not seem to them that the changes are "minor".

Finally (for the present moment) they note the content of your latest response to the Additional Information Request in respect of the weaving accidents. This remains incomplete as they have requested the specific accident references which HE consider represent a weaving accident.

You say in your letter that:

“We are making all the technical information that we have provided to you available to all participants in the process in that it will be referred to in Highways England’s responses to written representations provided at Deadline 2. The amount of material is such that we are intending to make it available upon request unless the Planning Inspectorate wishes to post it on the national planning infrastructure website which it is welcome to do.”

We are copying this letter to PINs so that first, it can make the ExA aware that there are inconsistencies in the modelling work provided and that there may be technical gaps in the material provided. And secondly, so that it can highlight to the ExA that there is significant material and updated transport modelling and updated transport modelling which it has not yet seen that must be posted on the Examination Website.

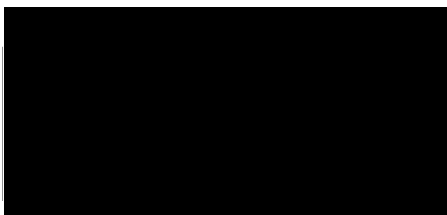
Assuming copies are provided by yourself to PINs we would be obliged if you would confirm with us what is to be supplied.

Because of the failure of HE to provide the correct and complete technical information in a timely manner, we have no choice but to reserve our position in relation to the ISH’s that are currently programmed for 14-16 January 2020 and are asking both HE and the ExA to note that, through no fault of its own, the RHS may not be ready to address all the issues it wishes to at these hearings.

My client also feels that the cost to the Charity of repeated requests and the supply of inadequate information is becoming an unreasonable and unnecessary burden, given the work the Charity itself has contributed to highways solutions for this project generally.

You raise a number of other points in your letter which I shall respond to separately as they need not concern the ExA at this stage.

Yours sincerely



RICHARD MAX

cc The Planning Inspectorate – M25junction10@planninginspectorate.gov.uk