

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) 27 January 2020

Transport and Traffic

With regard to my previous representations concerning the operation of Ockham Park Junction it seems that Highways England have avoided the specific points that I make in HCE 26 (NMU crossings absent for two exits) and HCE 28 (excessive queuing on Ockham Road North and the Wisley Lane Access indicated by the modelling). I do not necessarily agree with all the other responses but I am not pursuing them further here. (Reference : TR010030-000502-TR010030_Volume_9.19 - Applicant's Comments on Written Representations).

Climate Change Implications

I acknowledge the work carried out to assess the carbon equivalent cost of this project but I have some concerns.

The relevant documents are :

Climate (TR010030-000156-TR010030_6.3_environmental_statement_ch15_c...) and,

Carbon Tool (TR010030-000226-TR010030_6.5_environmental_statement_appendix15.2_c....)

I suggest that the results obtained in the Carbon Tool and shown in the Climate document give an impression of accuracy that is not borne out by the level of assumptions that were necessary in arriving at them (but I am not suggesting that they should be rounded). However, taking the figures as they stand, it is clear that there is no payback in CO₂e emissions because the slight claimed initial reduction becomes a small increase over the period considered and the construction emissions are never offset. In other words the project makes a very significant, effectively permanent, addition to CO₂e emissions. (HCE 30)

There are also a number of reasons why, in my opinion, the approach taken to assess the CO₂e cost of the project is understated. I am aware that the Government is relying on hoped-for carbon capture solutions to become reality in order to offset this type of project of which there will be a great many. However, each such project will be regarded by its promoters as being insignificant in terms of its climate change implications. (HCE 31)

The carbon factors used in the carbon tool are for fuel use and it was, helpfully, confirmed in the hearing on 16th January that they do not allow for a proportion of the emissions arising from the manufacture, distribution, maintenance and recycling of vehicles (embedded emissions). This source of emissions should be allowed for as the life of each construction vehicle will be used up to some degree. This source of emissions also applies to electric (and other low emission) vehicles and to road users. (HCE 32)

Increasing road space will encourage more journeys by private car (including longer distance trips) when we should be encouraging a shift to public transport or other means of avoiding private car travel. Traffic growth in general will add to congestion (and CO2e emissions) beyond the project area. Any perceived initial emissions savings through improved flow in the vicinity of Junction 10 will be lost where the increased flow arrives at existing queues into destinations such as the heavily populated areas of Guildford, Woking, West Byfleet and Tolworth. An assessment of the effect of induced traffic should be included in the estimate of future CO2e emissions. (HCE 33)

In the hearing on 16th January Highways England referred to the 2008 Climate Act being the relevant legislation. The Government committed to a new carbon reduction target in June 2019. Whether the revised target is sufficiently ambitious given the acknowledged climate emergency is, of course, a live topic for debate. (HCE 34)

Alternative approaches have been suggested by myself and others. In particular, I suggest that an enforced speed reduction (fixed or variable) on the A3 through the area would reduce fuel consumption and emissions, increase safety, and improve flow by reducing speed differential. It was stated by Highways England in the hearing on 16th January that a permanent speed limit of 50mph would be seen as having negative economic consequences. I consider that doubtful and unquantified and that, surely, safety and reduced emissions should be the higher priority. (HCE 35)

I am well aware that the answer to some of the points that I make will be that they are outside the scope of this project due to timing, or matters of Government policy, but I consider it important that they are made.