

Richard Max
Richard Max & Co
87 Chancery Lane
London
WC2A 1ET

Your Ref
RM:JS:100255.0001
Our Ref
MXC/151216.0044
Date
24 December 2019

By Email richard@richardmax.co.uk

Dear Richard

Application by Highways England for a Development Consent Order - M25 Junction 10 improvement scheme

Thank you for your letter of 18 December 2019.

I appreciate that you may only have received our letter of 16 December 2019 on 18 December but it is fair to point out that we sent it by email to you on 16 December. We could not know and had no indication that you had not received it.

I note the points you make about traffic modelling information and related issues. A very substantial amount of information has been provided to you but if you or your client considers that further information is still needed for your purposes do please specify precisely what that further information should comprise.

In particular we have already provided turning movement plots for the junctions that we understood to be of most relevant to RHS, namely those in the vicinity of the gardens and as regards Ripley. If further turning movement plots are required please specify which.

Regarding Base junction models Highways England has not supplied them because it is unable to produce suitably valid models. The position is explained in the responses we provided to you on 16 December as follows:

“We acknowledge and agree that usually it is standard practice for the base/observed scenario to be suitably validated. However, validated base junction models have not been produced in this instance as the junction models are unable to replicate junction blocking which is evident in the existing highway network, and therefore these models cannot be suitably validated. The 2022 and 2037 junction models have been used as a design aid to gain an insight into how

Registered Office

50 Broadway
London
SW1H 0BL
DX 2317 Victoria

50/60 Station Road
Cambridge
CB1 2JH
DX 5814 Cambridge

The Anchorage
34 Bridge Street
Reading, RG1 2LU
DX 146420 Reading 21

Grosvenor House
Grosvenor Square
Southampton, SO15 2BE
DX 38516 Southampton 3

T +44 (0)345 222 9222

W www.bdbpitmans.com

the junction may operate in the future, with greater emphasis placed on the S-Paramics model to understand the detailed predicted operational impact in the future year scenarios. The S-Paramics model has been calibrated and validated to 2017 conditions using observed flows/journey time data (as shown in the S-Paramics LMVR) and is considered robust for undertaking future year operational assessments.”

It is not reasonable to characterise the traffic modelling work undertaken by Highways England as containing errors and omissions. However, it has been developed, calibrated and validated in accordance with best practice.

You mention in your letter that the accident information provided is not complete as regards specific accident references that Highways England consider to represent a weaving accident. Collision plots were provided with accident references. Those that refer to weaving are as follows:

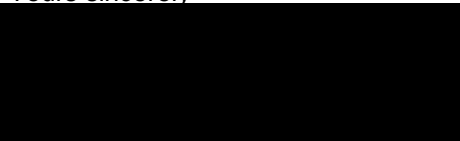
- GU91210/16 GU79375/17 GU29902/15 EL14126/16
- GU14005/18 GU68522/17 GU15654/14 GU07309/17
- GU19133/14 GU34572/18 GU76581/17 GU52994/16
- GU22103/15 GU18858/14 GU31139/15 GU34177/16
- GU37945/15 GU41745/16 GU03259/16 GU77092/18


Availability of Information to the Planning Inspectorate/Examining Authority

Highways England has made it plain that it is content for all of the traffic modelling information that has been provided to your client by Highways England to be made available to all on the national infrastructure planning website. However it is voluminous and technical in nature so instead of providing it all to PINS Highways England has stated in responding to your client’s written representations (document REP 2-104 in the examination library, see page 51, reference REP1-020-84) that all of this information is available by Highways England on request.

Highways England will continue to co-operate with your client as regards the provision of information and with a view to identifying common ground as the examining authority has requested.

Yours sincerely



Mark Challis
Partner
For and on behalf of BDB Pitmans LLP
T +44 (0)20 7783 3413
M 
E markchallis@bdbpitmans.com

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