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4th February 2020

Dear Jonathan

M25 JUNCTION 10/A3 WISLEY INTERCHANGE IMPROVEMENT SCHEME

PLANNING INSPECTORATE REFERENCE: TROI 0030

TARGETED CONSULTATION ON PROPOSED CHANGES TO THE SCHEME - PRESCRIBED BODIES, LAND OWNERS AND PERSONS WITH INTEREST IN LAND

Thank you for your letter dated 6th January 2020 inviting Surrey County Council (SCC) to respond to your additional non-statutory targeted consultation on proposed changes to the Scheme.

We have consulted with specialist teams within SCC and by way of this letter are providing our formal response to this consultation.

We note that the brochure differs to the details set out in Highways England's letter to the Planning Inspectorate dated 4th November 2019 (examination library ref AS-023) in that Change 5 and Change 6 in the brochure is transposed from that stated in AS-023. In addition there is a Change 7 stated in AS-023 - Adjustments to the vertical limits of deviation in the dDCO (article 7(b) of the dDCO - that is not stated in the brochure/current consultation.

SCC's previously submitted Written Representation refers to details in document AS-023 whereas we have presented this response referring to the information set out in letter dated 6th January 2020 and accompanying brochure, land schedule and drawings.

We would also ask that this response be read in conjunction with the comments made in our responses to the Statutory Consultation (dated 23rd March 2018) and previous Non-statutory targeted consultations (dated 13th December 2018 and 7th May 2019) and SCC's Relevant Representation (RR-004), Written Representations (REP1-020) and Local Impact Report (REP2-047), submitted to the Planning Inspectorate on 6th September, 26th November and 18th December 2019 respectively, as comments contained therein would also still apply, where not covered in this response.

1. SCC's RESPONSE TO CHANGES

Our response in relation to the information contain in your letter and accompanying brochure is as set out below:

Change 1- Extension of the proposed green element on Cockcrow Bridge

- 1.1 SCC supports the proposal to widen the green verge of the proposed Cockcrow Green Bridge from 10m to 25m as we consider that it is more likely to function as a green bridge, i.e. as a conduit for wildlife across the A3. This will in part help compensate for the fragmentation of habitats and isolation of species that has occurred as a result of the construction of the M25 and the widening of the A3.
- 1.2 SCC would wish to be involved in the detailed design, if this is approved through the Designated Funds process, and would wish to be satisfied that such a structure would not create highways risks e.g. the risk of surface materials being washed onto the highway below and provision of suitable high parapets/fencing to protect any species crossing the bridge and to reduce the impact from lighting and headlights below.
- 1.3 SCC understand that Highways England are to fund the additional maintenance of the green element of the bridge as is the case for the associated green spaces that it links. If it is proposed that SCC are to maintain the green element of the bridge, then the management required to function as a green bridge would need to be agreed along with the appropriate commuted sum to cover maintenance.
- 1.4 SCC note from the accompanying drawing Amended Land Requirements – Proposed dDCO changes – Cockcrow Overbridge Verge Widening (drg no HE551522-ATK-EAC-J10-DR-LM-000001 rev 3.0) that there are changes to the impacts on SCC's land holdings including additional permanent title acquisition. As such SCC would require suitable financial compensation for the acquisition of SCC affected land.
- 1.5 SCC note that the widened approach ramps will slightly increase the risk of potential buried archeology being encountered. SCC has not yet seen the detail of a written scheme for the investigation and mitigation of areas of archaeological interest and request confirmation of the timescales for finalisation of this material. SCC understand that Highways England are preparing a consultancy brief for this material and so would ask that a copy of this brief be sent to SCC for comment and potential input.
- 1.6 It would be helpful if a photomontage of the bridge could be produced for key viewpoints to understand how the green bridge would fit within the existing landscape.
- 1.7 As previously stated by SCC the Cockcrow Bridge will impact on the Ockham Bites site (see SCC Local Impact Report para 8.3) that will require accommodation works that is currently shown outside of the dDCO Red Line Boundary. As such SCC will require these accommodation works to either be undertaken by Highways England or a suitable level of funding provided to SCC by Highways England for SCC to undertake these works.

Change 2 - Incorporation of two toad underpasses at Old Lane and other mitigation measures

- 2.1 As set out in SCC's Written Representation and the Deadline 3 submission (submission of oral statements at ISH2) - SCC welcomes the proposed revisions to the dDCO to include toad tunnels on Old Lane. Useful discussions have recently taken place with Surrey Amphibian and Reptile Group and Highways England, it has, however, been suggested that the proposed toad tunnel locations and fencing could be better located and that additional underpasses are required to be more effective. SCC would welcome confirmation from Highways England as to how the necessary provision can be best secured to the satisfaction of SCC and the Surrey Amphibian and Reptile Group.

- 2.2 Whilst providing comment on the Old Lane/Elm Lane junction SCC would wish to raise comments regarding Highways England's consideration of road safety at this location. As the scheme proposes to close off the western end of Elm Lane, traffic accessing Elm Lane would have to do so from its junction with Old Lane. SCC would ask if drawings can be provided to show that the required forward visibility can be provided within the red line boundary for both vehicles travelling south along Old Lane to a stationary car waiting to turn into Elm Lane and the forward visibility for a stationary car waiting to turn into Elm Lane towards Old Lane northbound traffic.

Change 3 - Removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions

- 3.1 Following receipt of Highways England consultation letter and brochure on 6th January 2020 SCC noted that Page 10 of the brochure refers to further traffic modelling to predict traffic flows at this junction. SCC subsequently asked to be sent a copy of this traffic modelling information and a Road Safety Audit to cover the proposed changes. An "*A245 Eastbound Design Changes Technical Note*" was subsequently received on 10th January 2020 summarising the traffic modelling associated with this change. At the time of writing, however, a Road Safety Audit (RSA) has not been received covering this proposed change.
- 3.2 The RSA is required so that SCC can understand how Highways England have assessed the potential safety implications of this proposed change. In addition, as set out in SCC's letter dated 7th May 2019 we note that an access road to the drainage pond is shown perpendicular to the A245. SCC need to see the RSA to show how vehicles can safely access this pond from the A245 to avoid such risks as rear shunts. In addition if the access road to be gated would the location of this gate allow safe access/egress and avoid such issues as fly tipping. Consideration of these issues would provide reassurance that these items have been considered and any required changes can be accommodated within the red line boundary.

As regards the layout and traffic implications of the proposed change SCC wish to make a number of comments in relation to the capacity and operation of the junction under this proposed revision to the dDCO.

- 3.3 The drawing contained in the brochure does not contain sufficient clarity to define the details at the A245/B265 junction clearly, specifically the A245 eastbound approach into the Seven Hills Road junction; from the drawing it appears as though the nearside lane is left & straight ahead. SCC would therefore like confirmation on both what the original (current) scheme shows and the layout proposed in the revision.
- 3.4 SCC has concerns around the very short three lane section on the A245 eastbound on the downstream (east) side of the junction. As a rule, SCC are trying to remove these downstream merges as they can cause driver conflict. In addition, SCC would tend to have the merge on the offside so traffic in the right hand lane merges into the middle lane: we do not like it when nearside traffic merges with offside traffic as it can push vehicles further to the right and potentially into the on-coming stream (or in this case into the right hand lane). As such we would expect the merge as proposed would be acceptable.
- 3.5 The main point, however, is that merges on the downstream side of the junction, unless somewhat distant from the junction and with a gradual merge (see next point below), can cause delay which impacts upon the flow through the junction. In such cases, appropriate underutilised green time in the relevant stage should have been incorporated in the LinSig model to reflect a reduced saturation flow due to issues on the downstream side affecting flow through the junction. It is not possible for SCC to verify this without access to the traffic model. SCC's specific concern is that any reduction in capacity on the eastbound approach to this junction will have impacts on the congestion experienced by drivers travelling eastbound on the A245 from the Brooklands area.

- 3.6 The length of taper on the downstream of the junction should be at least 100m from the downstream edge of the junction intervisibility zone as stated in DMRB CD 123 (August 2019). It is not possible for SCC to check this on the drawing provided in the brochure, but it appears as though the merge is considerably shorter than 100m.
- 3.7 Table 1 of the A245 Eastbound Design Changes Technical Note indicates there will be some re-routing, although minimal and in turn, the LinSig results will also be affected by slightly reduced flows negotiating the junction. The technical note states on page 6 that the main increases in delay and journey time are for vehicles travelling eastbound on the A245 towards the Painshill junction, particularly those subsequently turning left onto the A3 northbound on-slip. It is difficult for SCC to understand what that impact is as only summary tables have been provided. SCC request further detail on:
- Changes to potential queuing on the A245 back from the Painshill junction
 - The change in journey time for the various movements on the A245 eastbound: e.g. left turn onto A3 northbound slip, straight ahead onto the junction circulatory carriageway and u-turners.
- 3.8 In summary, the level of detail provided is insufficient for SCC to fully comment on the proposed revision. In addition to the modelling requests made above, SCC also require a copy of the RSA along with more detailed drawings in order to fully understand the lane details at the A245/B265 junction specifically.

Change 4 - Amendments to Saturday construction working hours

- 4.1 As set out in dDCO Volume 9.37 Highways England Statement of Common Ground with Surrey County Council - SCC support the principle of reducing the overall time period for construction of the project.
- 4.2 As set out in Joint Authorities Local Impact report, however, this is dependent upon Highways England's agreement that the M25 junction 10 Scheme should be subject to the South East Permit Scheme (SEPS). SEPS, in accordance with the Traffic Management Act 2004, provides for highway authorities to co-ordinate works affecting the highway, discharging the duty to maintain the highway network under the New Roads and Street Works Act 1991. Those wishing to undertake works affecting the highway are required to obtain a permit before carrying them out.
- 4.3 SCC would ask that Highways England consider the potential impact on local residents and businesses and how this would be mitigated?

Change 5 - Amendment to the speed limit at Elm Lane (and including Byway 525 – Byway Open to All Traffic).

Stated as Change 6 in Highways England letter dated 4th November 2019 doc AS-023

- 5.1 As set out in para 7.8 of Joint Authorities Local Impact report SCC welcomes the proposed change to dDCO submitted on 4th November 2019 (Change 6 of AS-023) that amends the speed limit to 20mph on Elm Lane.
- 5.2 SCC would welcome comments from Highways England as to how actual speeds along Elm Lane would meet the amended/posted speed limit to reduce the impact on amphibians crossing the new section of Elm Lane.
- 5.3 See also SCC comments made in para 2.2 of this letter.

Change 6 - Adjustments to the Order limits in the draft development consent order to accommodate the diversion of a gas main.

Stated as Change 5 in Highways England letter dated 4th November 2019 doc AS-023)

- 6.1 SCC note from the accompanying drawing Amended Land Requirements – Proposed dDCO changes – Medium Pressure SGN Main M25 Crossing East of Junction 10 (drg no HE551522-ATK-EAC-J10-DR-LM-000003 rev 3.0) that there are changes to the impacts on SCC's land holdings including additional land to be used temporarily and rights to be acquired permanently. As such SCC would require suitable financial compensation for the impact upon SCC affected land.
- 6.2 In respect of biodiversity impacts SCC recommend this additional work is covered by a method statement covering both working and reinstatement subject to the consent from Natural England.

Thank you for providing the opportunity for Surrey County Council to comment.

We would ask if you could please acknowledge receipt of this letter.

Yours sincerely



Caroline Smith – Surrey County Council Head of Planning

Cc Mr Jones – Planning Inspectorate