Dear Mr Gash,

M25 Junction 10/A3 Wisley Interchange Improvement Scheme

Thank you for the opportunity for Elmbridge Borough Council to comment on the M25 junction 10/A3 interchange improvement scheme. We have consulted with our Cabinet Members for Highways & Transport and Planning Services, other members and internally within the Services Directorate. Presented below is the Council’s formal response.

The overarching objective

The Council supports the overarching objectives to address safety issues at the M25 J10 interchange with the A3 and, congestion problems on the strategic road network including the stretch of the A3 up to the Painshill Park / Seven Hills Road roundabout and onto the A245 Byfleet Road. These are key access points into / out of the Borough and are particularly important to the Brooklands Business Park, a sub regionally strategic employment area home to international headquarters, warehousing and light industrial buildings. The Brooklands area is occupied by around 200 companies and forms part of an economic cluster supporting approximately 17,000 jobs. There is capacity to unlock further ‘A’ grade office space however, access and congestion issues act as barriers to growth.

Congestion issues at the A3 Painshill junction and A3 Painshill to M25 are highlighted in the Council’s 2014 Transport Strategy, with problems only going to increase with future development planned within the Borough and in neighbouring authorities. The Council therefore welcomes discussions on seeking a solution.
Under-estimation of potential growth

In estimating growth within Elmbridge and neighbouring Boroughs, the Council recognises that Highways England is limited through scheme development guidance as to the weight that can be given to allocations and potential future housing growth trajectory increases beyond the adopted Local Plan trajectories.

Although the figures used by Highways England will have been sensitivity tested through modelling, the Council would like to register its concern around the potential extent of the underestimate. In the case of Elmbridge Borough, it is understood that the figures used are from the Elmbridge Core Strategy 2011. This Plan does not identify a target for the number of jobs to be created within the Borough but provides for an increase of 225 dwellings per annum between 2011 and 2026.

Highways England will however be aware that the Council is in the process of preparing a new Local Plan which seeks to meet its development needs. Whilst the provision of new homes needs to be balanced against other considerations, including for example environmental designations such as Green Belt and issues of infrastructure capacity, the Council’s latest assessment of housing need is for 474 dwellings per annum between 2015 and 2035. In addition, the Government’s proposed standard methodology identifies that the Council should deliver 612 dwellings per annum over a 10-year period of 2016 to 2026.

Whilst the Council appreciates the level of certainty upon which estimates of growth and development are based, it is essential that planned and potential housing growth within the surrounding local authorities is fully taken into account within Highways England’s modelling and assessment.

The Council therefore welcomes the on-going discussions on this issue and is committed to continue to engage with Highways England as part of its Local Plan preparation; providing updates on housing numbers and employment growth projections, including the location of proposed developments so that any potential additional pressure on the interchange can be fully considered.

The impact on the local road network & mitigation proposed

The Borough Council has been in discussions with Surrey County Council, as the Highways Authority, to understand the potential impacts of the intended scheme and mitigation measure proposed.

From these discussions, the Council shares the County Council’s concern as to:
- Increase queuing on the approaches to the A245 / Seven Hills Road junction and how this could lead to increased driver frustration and a consequent reduction in safety;

- Potential increase in congestion on the local road network, particularly on the approach from Painshill and on Seven Hills Road south and the lack of quantified evidence that has been presented to substantiate the claim that journey time reliability will be improved;

- The scheme appearing to relocate congestion from the strategic road network onto the local road network e.g. page 6 of the statutory consultation brochure, in the table summarising the scheme objectives and benefits, it is stated that the scheme, “… will accommodate an extra 5% of traffic through the Painshill interchange …”

- The evidence showing the benefits arising from the proposed “improved phasing of traffic signals” as shown on Map 4 of the statutory consultation brochure. The Council notes the proposed jet lane at the Painshill interchange from the northbound A3 to the A245 Byfleet Road and how this will remove the gating effect of the existing signals, meaning that the first junction encountered by vehicles making this movement will be on Surrey’s network. However, in terms of improving the phasing of signals, the Council understands that the two sets of lights of the junctions of Painshill and Seven Hills Road are not linked and thus requires further investigation as to whether this can be successfully achieved.

- While the Council acknowledges that the scheme provides better access arrangements to Feltonfleet school, it has concerns that there will be extra congestion and queuing on Seven Hills Road south.

- A free flow left-hand slip lane at the Painshill junction on to the northbound A3 is shown on Map 4 of the statutory consultation brochure. However, the Council understands that this is not identified in the modelling. Confirmation as to the proposal is therefore required.

- The potential displacement and dispersal of HGVs from the southern stretch of the A3 onto the local road network and into residential areas. It is acknowledged that the expansion of the lorry parking at Cobham Services could accommodate some of the HGV’s displaced from the A3 but the Council also maintains that HGV parking should be retained in the final scheme.

In responding to these concerns the Council would welcome further discussions alongside the County Council to ensure that the full impact on the local road network is assessed, impact is minimised and wider accessibility issues are managed. The
Painshill Park

The Council has previously inputted into the original consultation on the various options and Environmental Impact Assessment Scoping Opinion. Our response highlighted that Grade 1 and II* Registered Parks and Listed Buildings were considered of High Value compared to Grade II Listed Buildings and Conservation Areas which were considered of Medium Value. Also the different effects of the various options where Option 14 was assessed as having the least and only temporary effects, with Option 9 the raised flyover as having some temporary and permanent effects (particularly to Painshill Park and the Gothic Tower).

The current proposals have developed from Option 14 partially because it had less environmental impacts than Option 9. The Council had noted the associated A3 upgrade works for the Options would also have slight or moderate effects on a number of assets, although these are mainly assessed as being temporary. However the latest scheme involves widening the A3 to 4 lanes and a new road to provide access to all properties on the southbound side of the A3 to the A245 / Seven Hills Road South which will require some land-take.

Painshill Park is Grade I on the Historic Parks and Gardens Register and the Gothic Tower is a Grade II* Listed Building which is located on the edge of the current estate and is adjacent to the A3. The tower was built in its elevated position as a landscape folly to be seen from various viewpoints and is unoccupied, there are partial glimpses of it from the A3 southbound carriageway. The extent of the land-take from the Painshill Park and the effect on this and the setting of the Gothic Tower, and any other heritage assets such as Ancient and Veteran trees, is unclear. To date there has been no confirmation as to the potential possible scale or process that will be followed.

The Council understands that the issue of land-take as a result of the proposed scheme and, as part of the construction phase, is a concern shared by the Painshill Park Trust. It is also understood that the Trust has raised concerns as to the accuracy of the information that was included in the scoping assessment and the justification for the selected option for the side road options around Painshill Park.

As landowner and, in support of the Trust, the Council requests that the information included within the Environmental Statement which, will form part of the Development Consent Order (DCO) application, is up to date insofar as the heritage assets and Painshill Park. In terms of the side road, the Council understands that the details for the selected option were included in the Prelim Environmental Information Report.
(PEIR) (pages 30-31). Nevertheless, in seeking to address the concerns of the Trust it is strongly suggested that further dialogue around the key considerations and decision making around side road options is undertaken.

The Council must therefore register its concern both as a landowner and local planning authority on these issues. Further discussions between all interested parties would therefore be welcomed. In particular, the Council would welcome involvement in future impact studies and landscape mitigation measures that are likely to be proposed in the vicinity.

Thames Basin Heaths Special Protection Area (SPA) & Suitable Alternative Natural Greenspace (SANG)

Given the environmentally sensitive nature of the surrounding area, the Council obviously has concerns about the impact on the Special Protection Area (SPA) and Sites of Special Scientific Interest (SSSI). This includes the issues of land-take and how the works will create many points of severed access hence the continued need to consider habitat connectivity.

The Council therefore welcomes reference to ecological mitigation measures in the Environmental Study Report, including maintenance and where possible enhancement of habitat connectivity.

The Council would however, welcome further details on the proposed replacement land. It is understood that this will be included in a separate report to be included as an annex to the Environmental Statement. However, the Council requests early dialogue and confirmation that no replacement SPA land is to be located in Elmbridge Borough. This is an important consideration for the Council on the basis of the impact on our Local Plan preparation. Additional land designated as SPA could impact the buffer zones within which mitigation is required for new development. This mitigation takes the form of provision of SANG land and any requirement for additional SANG land will be an important consideration to the Council.

Currently the Scheme Plan shows the replacement land located within the Borough is replacement Common Land. Early confirmation of this is requested.

Air & noise quality

The Council welcomes the sections of the PEIR that incorporate comments made during the Scoping Statement Consultation for example, comments on additional noise receptors. The Council is aware that there are further comments that will need to be included in the Environmental Statement to accompany the DCO application and would welcome further discussions on these.
Impacts during construction

Lastly, the Council is concerned as to the potential impact of the construction phase on the local road network and our residents. The Council insists that construction vehicles must access development / storage areas from the strategic network rather than the local road network. Also, adequate signage, advertising of forewarning of works / closures and continued and close monitoring of the situation must be installed / implemented.

As set out in this response, it will also be important to understand the amount and location of temporary land-take needed during the construction of the project and the temporary and longer term impacts this may have.

Continued engagement

The Council welcomes the engagement undertaken with its Officers and Councillors to date. To address the concerns raised in this response and as the scheme develops, continued and early dialogue will be necessary with all interested parties.

If any points raised in this response requires clarification please do not hesitate to contact Suzanne Parkes, Planning Policy Manager (sparkes@elmbridge.gov.uk / 01372 474810).

Yours faithfully,

Councillor Karen Randolph
Portfolio Holder for Planning Services

Councillor Andrew Davis
Portfolio Holder for Highways and Transport