

WEST CLANDON PARISH COUNCIL

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Clerk:

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18th March 2018

Dear Sir/Madam

M25 Junction 10/A3 Wisley Junction improvement

I am writing on behalf of West Clandon Parish Council in response to the 2018 consultation on Highways England proposals to improve the M25/A3 junction at Wisley.

West Clandon lies approximately 5 miles to the South West of the Junction itself. The Council and the community it represents have a significant interest in the potential contribution to mitigating exiting and projected traffic problems in the wider area and in particular the impact on the A247 (Clandon Road/The Street) which passes through the village.

The A247 is the only route available for road traffic through the village. It includes the only crossing of the railway without a height restriction in the area and is therefore the only available North-South route locally for large vehicles. Much of the road, however, is too narrow for heavy vehicles to pass. The pavement alternates between the East and West side of the road and is in places too narrow for wheelchair users. The Parish Council receives frequent reports of near misses between vehicles and pedestrians caused by traffic mounting the pavement to avoid collisions on the narrower stretches of the road. A high priority scheme to introduce traffic calming measures in the village has been shelved by Surrey County Council due to budget difficulties.

During peak periods there is significant pedestrian traffic including children making their way to the village school at the southern end of the village and commuters walking to the busy railway station at the centre of the village, itself connected to The Street by a dangerous blind junction.

Should the Guildford Local Plan be implemented in its current form the Village is in the eye of a maelstrom of development. Of these Wisley Airfield to the North is specifically referenced in your consultation. Others which are not, include those at Gosden Hill, Slyfield, and Burnt Common. All of the above rely on significant capacity improvements on the stretch of the A3 and associated junctions between the A31 and the M25. Highways England had objected to the draft local plan but subsequently withdrew its objection (Letter from Patrick Blake 5th Oct 2016) on condition that 'development does not come forward in advance of critical infrastructure'. It is clear therefore that the majority of the 693 housing starts which underpin the Guildford Local Plan are entirely dependent on effective and meaningful solutions to the problems which already exist on the A3.

The same letter also stated Highways England policy on the Burnt Common Slip Roads (aka Land at Garlick's Arch) proposed both in the Local Plan and by the developers at Wisley Airfield. It states, "It remains unclear if these proposals are deliverable and what the condition requirements are to enable to proposals to progress."

The position has been reiterated as recently as 13 Oct 2017. Highways England's note on conditions and planning obligations published as part of the Wisley Airfield Appeal. (APP/Y36159894) calls for any reference to the A3 slips at Burnt Common to be removed and/or 'the inspector should give no weight to them.' The note goes on to explain that 'the inspector cannot conclude on the evidence presented that those measures would be effective to mitigate the effects of development.'

On 10th July 2016 I wrote to Highways England to express our concerns on the Burnt Common A3 slips and requested that West Clandon Parish Council were consulted if any proposals were under consideration. I received a positive response.

Since no such proposals have been received I can only assume that as of today Highways England's position on this junction remains unchanged from that given in evidence to the Wisley Airfield Planning Enquiry.

It is therefore surprising to see proposals for the A3 slips offered prominently in the M25/A3 junction statutory consultation (revised 12.02.18) p6 as mitigation for the 4% traffic growth through Ripley as a result of the section of Option 14.

Although you state that this is not a Highways England scheme in reality the scheme will not progress without Highways England approval and support. Just as you advised the Planning Inspector at Wisley they could not rely on schemes which have not been developed and subjected to proper consultation it is not appropriate to present this as a potential mitigation for the effects of your preferred option in this way. You should not rely on it until an appropriate scheme has been published, assessed and consulted upon. In view of the contradictory statements made we request that Highways England clarify its position on the Burnt Common slip roads as a matter of urgency. West Clandon Parish Council is opposed to the opening up of the slip roads at least until the impact of such a scheme on the A247 has been properly evaluated, credible mitigation measures adopted and alternatives assessed.

Our second area of objection centres on a lack of confidence that the option proposed will provide a long-term solution to the problems experienced by traffic travelling north along the A3 towards J10. As the consultation notes traffic frequently tails back along the Ripley by-pass and locally we observe routine queues beyond the Burnt Common (A247) exit. Traffic is therefore encouraged to leave the A3 and rat run through Ripley. Congestion through Ripley soon eliminates any savings in journey time. The growth in the use of intelligent Sat Navs will encourage a wider search for quicker routes. Google maps data suggest the route from Burnt Common to the Leatherhead Junction of the M25 via the A247 and A246 is only 7 mins slower than the A3-M25 route. Delays in excess of this will therefore encourage increasing volumes of traffic to divert through the village at peak times.

As the current situation is already unacceptable the figures provided suggest that the option proposed will provide negligible benefit by 2037 in the crucial AM2 period just when children are making their way to school through the village. Eg table 6.1 in the Scheme Assessment Report suggests delays in 2022 will amount to 357 vehicle hours. Your modelling suggests the delays under the chosen option will be 346 hours in 2027, a reduction of only 4%. With the 5% annual traffic growth you suggest from current levels to 2022 we can expect no relief from the scheme towards the end of the period. The scheme is therefore unlikely to meet its objectives in this important respect.

The document admits that lane discipline is likely to be issue with the model selected. Local observation on the approaches to the current J10-roundabout suggest this is likely to be a significant problem exacerbated by the mix of free flow left turning lanes and light controlled right turns on the approach to the roundabout. This will increase the levels of uncertainty inherent in traffic modelling. The lack of real world examples of motorway junctions with this geometry, variable 4/5 lane width, complexity of turning movements and traffic volumes of this magnitude will increase the uncertainty still further.

With such marginal improvement on current levels projected on some key movements Highways England should undertake an analysis of the uncertainty in their traffic forecasts to justify whether the option proposed provides a reasonable level of assurance that the improvements projected will be provided.

We have further concerns on the accident levels at this junction which is described by you as one of the most dangerous on the network with accident levels more than double the average. It is unclear whether the option proposed will improve matters to an acceptable degree. Different measures of accident reduction are quoted throughout the document making comparisons difficult but p57 of the 2017 Scheme Assessment Report refers to an average of 30 personal injury accidents per year. The table on p50 suggest a 29% saving for option 14 and 46% for option 9. This suggest that under the chosen option the accident rate will remain above average for the network and will not meet the overall network target for a 40% reduction. This is a very poor outcome for such an expensive major redesign in such a key location and undermines your claim that 'Safety is the number one priority.' High accident rates of course will impact on traffic flow and reduce the ability of the scheme to meet its objectives.

In summary while the scheme provides some much-needed benefits there is little confidence locally that the option selected will provide an acceptable level of benefit to traffic flow and safety resulting in increasing pressure on unsuitable local roads. In West Clandon this situation will be exacerbated should the Burnt Common slip roads be opened.

The scheme falls far short of the 'free flow in all direction' originally announced by the Minister. This is important as a significant proportion of the delivery of Guildford's Local plan is dependent on credible delivery of congestion relieving schemes by Highways England and an unconvincing scheme at Wisley will increase doubts that A3 and M25 widening (already late) will be delivered satisfactorily. These issues will doubtless be explored in the forthcoming public enquiry on the Guildford Local Plan.

We accept that the location is sensitive but the overall impression is that this minimalist solution in trying to avoid controversy has given insufficient weight to considerations of traffic flow and safety balanced by the development of alternative mitigation strategies. We suggest that in developing the scheme further consideration should be given to improvement the performance for key turning movements at one of the most important junctions in the South West Quadrant.

Yours sincerely,

John Stone Clerk

West Clandon Parish Council