

Our ref: HE551522-ATK-GEN-J10-LN-ZM-00003

Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

For the attention of: Ms Natasha Kopala, Head of
Transport Infrastructure Planning Unit

Highways England
Bridge House
1 Walnut Tree Close
Guildford
Surrey
GU1 4LZ

1 September 2021

By email to: transportinfrastructure@dft.gov.uk and
m25junction10@planninginspectorate.gov.uk

Dear Ms Kopala,

M25 junction 10/A3 Wisley interchange scheme (the Scheme)

Planning Inspectorate reference: TR010030

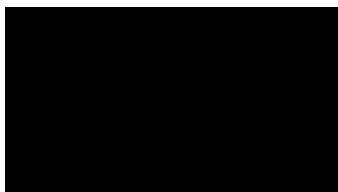
Applicant's response to Department for Transport consultation letter dated 16 August 2021

Please find enclosed the response of the Applicant, Highways England, to the Department for Transport's consultation letter dated 16 August 2021 in respect of the above application.

The Applicant's submission comprises the enclosed document in addition to this letter.

I should be grateful if you would acknowledge safe receipt of this letter and arrange for a copy of it and its enclosures to be placed before the Secretary of State.

Yours sincerely,



Jonathan Wade

Project Manager, Regional Investment Programme (South East)
Highways England
Enc.

M25 junction 10/A3 Wisley interchange

TR010030

9.163 Applicant's response to Secretary of State request for comment dated 16 August 2021

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

August 2021

Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

M25 junction 10/A3 Wisley interchange

Development Consent Order 202[x]

9.163 Applicant's response to Secretary of State request for comment dated 16 August 2021

Planning Inspectorate Scheme Reference	TR010030
Application Document Reference	TR010030/APP/9.163
Author:	M25 junction 10/A3 Wisley interchange project team, Highways England and Atkins

Version	Date	Status of Version
0	6 September 2021	Response to DfT letter dated 16 August 2021

Table of contents

Chapter	Pages
1. Introduction	4
2. SoS request for additional information	4

1. Introduction

- 1.1.1 This document sets out Highways England's response to the Department for Transport's letter dated 16 August 2021 containing a request by the Secretary of State (SoS) for additional information from Highways England.

2. SoS request for additional information

Secretary of State's request:

Following Elmbridge Council's response to the Secretary of State dated 6 August 2021, which included a link to their 2020 Air Quality Annual Status report, the Secretary of State requests comments from the Applicant in response to this, including whether any update is required to the air quality assessment undertaken as reported in Chapter 5 of the Applicant's Environmental Statement. The Secretary of State draws the Applicant's attention in particular to the discussion of potential Air Quality Management Areas in Appendix I to the 2020 Air Quality Annual Status report, but welcomes consideration of all relevant sections of Elmbridge Borough Council's response.

Highways England's response

- 2.1.1 Elmbridge Borough Council (the Council) provided a letter to the SoS on 18 November 2020 in which the Council noted that additional monitoring of nitrogen dioxide (NO₂) had commenced in January 2020 at locations around the Cobham Painshill roundabout area. The data provided for these locations as set out in that letter were uncorrected, and the Council noted that corrected data would be available in 2021, once the national and local bias adjustment factors were calculated.
- 2.1.2 Highways England's understanding is that these are the monitoring locations referred to in Appendix I of the Council's 2020 Air Quality Annual Status Report (ASR) (page 62 – or page 221 of the document in PDF form), where paragraph 3.4 states that "Further monitoring is therefore required in order to determine whether or not the predicted exceedances of the annual and hourly mean NO₂ objectives actually occur at these locations"; the relevant locations to the air quality assessment of the scheme being the locations A3.1, A3.2 and A3.3 on the A3 at the A245 Portsmouth Road junction, as identified in the table after paragraph 4.1 and in Figure 1.
- 2.1.3 The 2020 ASR also states at page vi that "Following the review of CERC¹ modelling data carried out by Stantec, an additional eight diffusion tube monitoring sites were deployed in January 2020, the monitoring results from which will be reported in the 2021 ASR." The final adjusted data from the additional monitoring sites are therefore not yet available on which to comment. As noted previously in Highways England's response of 7 December 2020 to the SoS's Letter – 27 November 2020 Section 4, there is only one monitoring site, Cob 11 ("Lampost outside West Lodge, Portsmouth Road, Cobham"),

¹ Cambridge Environmental Research Consultants

understood to be the same location as site A3.3, which recorded uncorrected monthly concentrations above the annual average objective value of $40 \mu\text{g}/\text{m}^3$ on more than one occasion, and which could potentially indicate an exceedance of the objective. However, as diffusion tubes typically overread concentrations, the individual monthly concentrations should not be compared directly with the annual average objective, but should be averaged over a calendar year, and adjusted for bias. Once adjusted, the average concentration also needs to be corrected for distance to the nearest residential property, as concentrations fall with increased distance from the road, and the objective applies at locations of relevant exposure. Any potential exceedance of the annual average NO_2 objective at this roadside location does not necessarily mean that there is an exceedance at the nearby residential properties, or a requirement to declare an Air Quality Management Area (AQMA).

- 2.1.4 It is also worth noting that the Council consider that NO_2 concentrations are decreasing within the borough (see page vi of the 2020 ASR), and that the Cobham High Street AQMA was revoked on 28 October 2020 (see the final paragraph of the 18 November 2020 letter).
- 2.1.5 In any case, the air quality assessment has shown that the effect of the scheme overall on local air quality is not expected to be significant and that changes in NO_2 concentrations with the scheme in proximity to Painshill roundabout are small or imperceptible. The updated monitoring results would not be expected to change the conclusions of the air quality assessment presented in the Environmental Statement Chapter 5.
- 2.1.6 Regarding the pre-construction monitoring to obtain baseline data, a monitoring survey has been undertaken by Highways England in consultation with the Council, and the final report has been shared with environmental health officers within the Council. The results will also be included within the CEMP to be provided to the Secretary of State for his approval under Requirement 3 of the DCO.
- 2.1.7 Although the Council's Head of Planning services states in her letter of 6 August 2021 that the Council's team anticipate needing to respond to complaints of excessive dust, during construction there should not be any excessive dust emissions with the application of appropriate mitigation measures secured in the CEMP. However, should the scheme receive consent to proceed, the Council will again be consulted on the proposed methods and locations of any monitoring within Elmbridge during construction.

© Crown copyright (2021).

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/

write to the Information Policy Team, The National Archives, Kew, London TW9 4DU,
or email psi@nationalarchives.gsi.gov.uk.

Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

Highways England Company Limited registered in England and Wales number 09346363

