

M25 junction 10/A3 Wisley interchange TR010030

7.1 Planning Statement and Schedule of Accordance with National Policy Statement

Regulation 5(2)(q)
Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

TR010030

M25 junction 10/A3 Wisley interchange

Development Consent Order 202[x]

7.1 PLANNING STATEMENT AND SCHEDULE OF ACCORDANCE WITH NATIONAL POLICY STATEMENT

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Executive Summary

Scheme Overview

Highways England is applying to the Secretary of State (SoS) for a Development Consent Order (DCO) under the Planning Act 2008 (“the Act”), to construct, operate and maintain changes to the M25 junction 10/A3 Wisley interchange (the Scheme).

The Scheme provides an elongated and widened roundabout at M25 junction 10 and four new dedicated free flow slip roads to enable left turning traffic to avoid traffic lights; amends and extends slip roads, widening the A3 from three to four lanes each way, and the A245 Byfleet Road from two to three lanes each way; amends local road and private accesses from the A3; and provides new and replacement over bridges, new and improved non-motorised user (NMU) routes and an extra lane on the M25 through junction 10. The authorised development comprises two nationally significant infrastructure projects as defined in sections 14 and 22 of the Act; one relating to the alteration of the M25 and the other to the alteration of the A3; and associated development as defined in section 115(2) of the Act in relation to both.

Planning Framework

The purpose of this Planning Statement is to act as the primary reference document for the assessment of the M25 junction 10/A3 Wisley interchange DCO Project against the relevant planning policy and legislative framework.

The Act is the primary legislation that establishes the legal framework for applying for, examining and determining DCO applications for nationally significant infrastructure projects (NSIPs).

The National Policy Statement for National Networks (NPS NN) (December 2014) is the primary basis for decision making for the Scheme, although local policy is also a material consideration. This Planning Statement provides a broad overview confirming the Scheme’s compliance with the NPS NN and a commentary on how each of the relevant provisions of the NPS NN Chapters 3, 4 and 5 are met.

Full details of compliance with the NPS NN are provided in Appendix A, whilst policy and legislative matters relevant to each theme are covered in more detail in the Environmental Statement.

Scheme benefits

The Scheme has the following benefits:

- Throughout the design life of the Scheme, all entries and circulatory links will operate within capacity – a contrast to the existing operation of the junction;
- Delays will reduce by 40% in the morning and evening peak hours;
- The Scheme will improve the operation of the Painshill and Ockham Park junctions compared to the without intervention scenario, which will in turn, improve traffic flow between local communities along the local roads that cross the A3 at these junctions;

- The additional highway capacity provided by the Scheme can be directly linked to the likelihood that planned growth in the area can be feasibly delivered;
- Across the whole of the affected road network, the scheme is anticipated to result in a reduction in accidents of by 30% at M25 junction 10;
- A suite of compensatory measures will offset the negative effects of the Scheme on the Thames Basin Heaths SPA, after mitigation, so that the overall coherence of the Natura 2000 Network is maintained; and
- The Scheme will provide significantly enhanced facilities for pedestrians, cyclists and horse riders through new provision and improvements to the network of PRow and local road connections and meet the key objective to incorporate safe, convenient, accessible and attractive routes.

The Scheme has been designed to ensure that the scheme objectives have been achieved and include delivering key environmental, social and economic benefits.

The planning balance and conclusions

The analysis of planning policy in this Planning Statement demonstrates that the Scheme is compliant with relevant planning policy, including the NPS NN, and explains that, in the case of its location within the Green Belt and Special Category Land there are 'special circumstances' for the location of the Scheme and compensation packages prepared to mitigate the effects of the Proposed Development.

There is a compelling need case for the Scheme and its delivery is in the public interest. There is direct support for the Scheme in the Guildford Borough Council Local Plan, which through Policy ID1 and ID2 states the infrastructure is required to support the implementation of their Local Plan.

Through public consultation and engagement, the Scheme design has been refined to mitigate the concerns of directly affected stakeholders so far as practicable and appropriate.

Adverse effects do not outweigh the benefits of the Scheme and the overall planning balance is therefore in favour of the making of the DCO for the Scheme.

1. Introduction

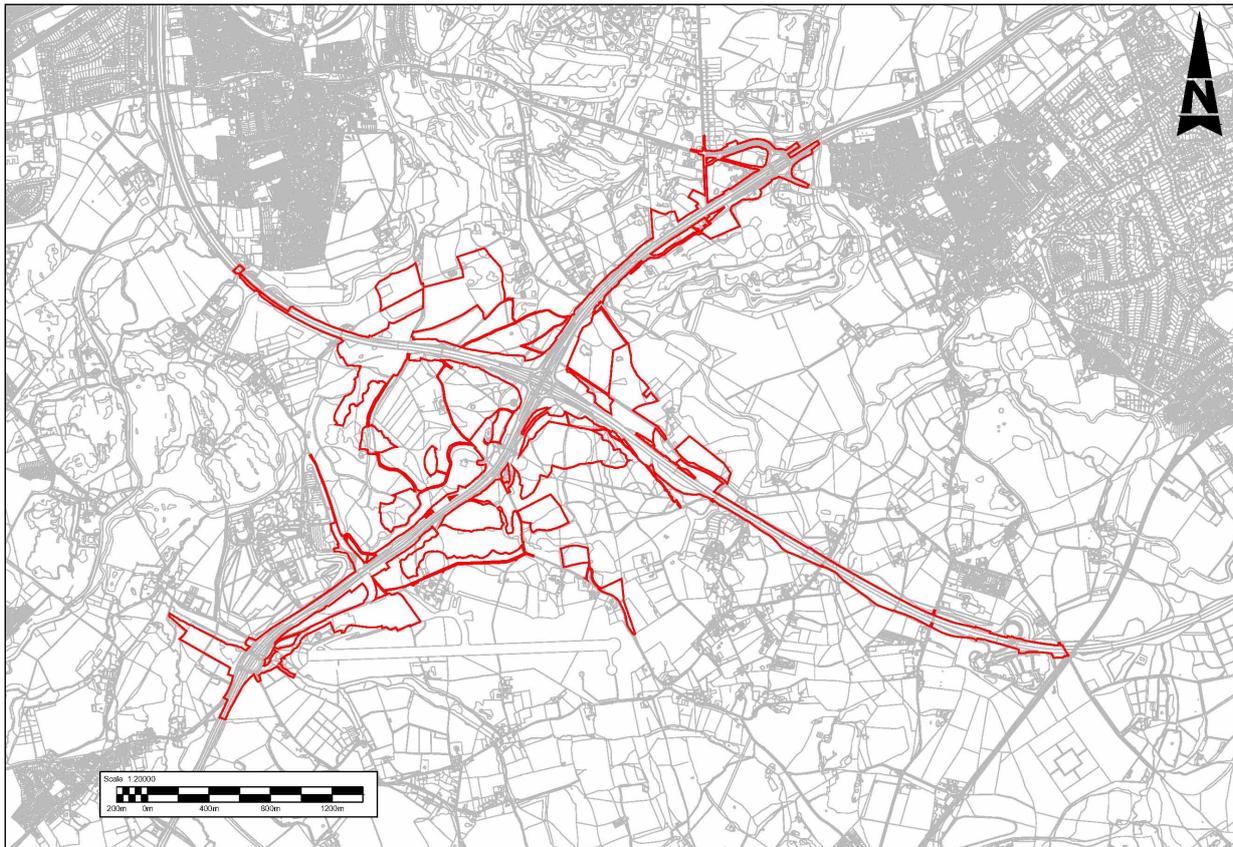
1.1 Scheme overview

- 1.1.1 This document relates to an application made by Highways England (“the Applicant”) to the Planning Inspectorate under Section 37 of the Planning Act 2008 (“the Act”). The application is for a development consent order (DCO) for the M25 junction 10/A3 Wisley interchange scheme (“the Scheme”).
- 1.1.2 The Scheme provides an elongated and widened roundabout at M25 junction 10 and four new dedicated free flow slip roads to enable left turning traffic to avoid traffic lights; amends and extends slip roads, widening the A3 from three to four lanes each way, and the A245 Byfleet Road from two to three lanes each way; amends local road and private accesses from the A3; and provides new and replacement over bridges, new and improved non-motorised user (NMU) routes and an extra lane on the M25 through junction 10. The authorised development comprises two nationally significant infrastructure projects (NSIP) as defined in sections 14(1)(h) and 22(1)(b) of the 2008 Act; one NSIP relating to the alteration of the M25 and the other NSIP to the alteration of the A3; and associated development as defined in section 115(2) of the 2008 Act in relation to both.
- 1.1.3 A fuller description of the Scheme can be found in Section 3.6 of this Planning Statement. It is provided in greater detail in the Introduction to the Application and Scheme Description (application document TR010030/APP/1.2) and Chapter 2 of the Environmental Statement (application document TR010030/APP/6.3).
- 1.1.4 Schedule 1 of the draft DCO (application document TR010030/APP/3.1) and the Works Plans (application document TR010030/APP/2.3) detail the precise works and works numbers for which development consent is sought.

Location

- 1.1.5 M25 junction 10 is in the south west quadrant of the motorway network and is of national and strategic importance. The location of the Scheme is shown on the Location Plan (application document TR010030/APP/2.1) Figure 1-1 shows the Order Limits of the Scheme. The M25 is a critical route around London and a key link between the Channel ports and much
- 1.1.6 of the mainland UK, as well as providing the main access route for Heathrow Airport. The A3, which intersects the M25 at junction 10, is a regionally important route between Portsmouth and London and provides access to major employment areas at Guildford, Brooklands and Kingston-upon-Thames.
- 1.1.7 The Scheme falls within the administrative boundaries of Surrey County Council, Guildford Borough Council and Elmbridge Borough Council.

Figure 1.1: The Order Limits



Existing land uses and character

- 1.1.8 The area immediately surrounding the Scheme is sparsely populated, with a small number of properties close to the M25 and A3. The communities of Cobham, Byfleet, Ripley, Wisley, Elm Corner, Ockham and Hatchford are nearby.
- 1.1.9 The Scheme encompasses woodland that is designated a component of the Thames Basin Heaths Special Protection Area (SPA), which is of European importance for nature conservation. This SPA designation lies within the larger Ockham and Wisley Commons Site of Special Scientific Interest (SSSI), a nationally significant conservation designation. The Thames Basin Heaths SPA is made up of 12 component SSSIs.
- 1.1.10 There are parcels of ancient woodland along the A3 and elsewhere around the Scheme, the nationally important registered parks and gardens at Painshill Park and the Royal Horticultural Society's (RHS) Garden Wisley both abut the A3. There are scheduled ancient monuments and listed buildings close to the Scheme.
- 1.1.11 Common land and public open space surround junction 10 and parts of the M25 and A3. Furthermore, the Scheme area is entirely within the Green Belt.

The applicant

- 1.1.12 Highways England is the applicant for the DCO and the strategic highways company (as defined in the Infrastructure Act 2015) with responsibility for

operating, maintaining and improving England's motorways and major (trunk) roads, which are known as the strategic road network (SRN). Formerly the Highways Agency, Highways England became a government company in April 2015.

Requirement for development consent

- 1.1.13 The Scheme lies wholly within England and involves the alteration of a highway for which the Secretary of State (SoS) is the highway authority. The authorised development comprises two NSIPs as defined in sections 14 (1)(h) and 22(1)(b) of the Planning Act 2008; one relating to the alteration of the M25 and the other to the alteration of the A3; and associated development as defined in section 115(2) of the Planning Act 2008 in relation to both. For further information regarding why the Scheme is comprised of two NSIPs, refer to the Explanatory Memorandum (application document TR010030/APP/3.2) and Statement of Reasons (application document TR010030/APP/4.1).
- 1.1.14 As the Scheme is an NSIP, an application for development consent is to be considered by an examining authority, who will make a recommendation to the Secretary of State (SoS) in accordance with Section 37 of the Act. Section 27 of the Act also governs the content of an application for a DCO, including the requirements for the necessary accompanying documents.

1.2 Order limits and limits of deviation

- 1.2.1 The Order limits (OL) as defined in the draft DCO prescribe the anticipated maximum extent of land which will be required to undertake the Scheme and are shown on the Works Plans (application document TR010030/APP/2.3) and on the Land Plans (application document TR010030/APP/2.2). The area within the OL (as shown in Figure 1-1) is 240.57ha, of which 139.17ha is required to be acquired permanently, temporary possession of 27.93ha is required, and temporary possession of 73.47ha of land is required over which permanent rights are also required.
- 1.2.2 The land required may ultimately be less than that within the OL, due to design and construction methodology of the Scheme.
- 1.2.3 If made, the DCO will give consent for the Scheme to be built including all the temporary construction works. The "limits of deviation" (LoD), as defined in the draft DCO, represent the area of land that may be used for the siting of works subject to detailed design. The LoD identify a maximum distance or measurement of variation within which the works are authorised to be constructed.

1.3 Purpose and structure of planning statement

- 1.3.1 The Planning Statement provides an accessible guide to the Scheme, Applicant and application, and it assists those considering the application documents. The purpose of the Statement is to set out the relevant planning policy context and the overall case for the Scheme and making of the DCO. The Statement draws upon the conclusions of the supporting application documents and interprets these against planning policy considerations which have relevance to the Scheme.

- 1.3.2 Although the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (“APFP 2009”) Regulations do not specifically require a Planning Statement to be provided as part of an application for development consent under the Act, this Statement has been prepared in accordance with Regulation 5(2) of the APFP 2009”.
- 1.3.3 The Statement draws upon other the following Application documents:
- Consents and Agreements Position Statement (application document TR010030/APP/3.3)
 - Consultation Report (application document TR010030/APP/5.1)
 - Draft Development Consent Order (application document TR010030/APP/3.1)
 - Environmental Statement (application document TR010030/APP/6.3)
 - Explanatory Memorandum to Draft DCO (application document TR010030/APP/3.2)
 - Flood Risk Assessment (FRA) (application document TR010030/APP/5.5)
 - Habitats Regulations Assessment (HRA) (application document TR010030/APP/5.3)
 - Land Plans (application document TR010030/APP/2.2)
 - Outline Construction Environmental Management Plan (CEMP) (application document TR010030/APP/7.2)
 - Record of Environmental Actions and Commitments (REAC) (application document TR010030/APP/7.3)
 - Statement of Reasons (application document TR010030/APP/4.1)
 - Transport Assessment (application document TR010030/APP/7.4)
 - Works Plans (application document TR010030/APP/2.3)
 - Water Framework Directive Compliance Assessment (application document TR010030/APP/5.4)
- 1.3.4 The Application documents included within the Scheme submission include those in Appendix 1 to the Inspectorate Advice Note 6: ‘Preparation and submission of application documents’ (February 2016) and reflecting those in APFP 2009 Regulation 5(2). Under the list of such ‘other documents’ listed in Advice Note 6, reference is made to ‘*any other document not listed above which the applicant chooses to support the application.*’ A Planning Statement is provided as an example of such a document.
- 1.3.5 The Application will be determined in accordance with the Planning Act 2008. Section 104 of the Act provides for the decision in cases where a national policy statement (NPS) has effect. Section 104(2) (a) states that in deciding the Application, the SoS must have regard to (among other matters) ... ‘*a relevant national policy statement*’. Section 104(3) states that, generally, the SoS must decide an application in accordance with any relevant NPS. For the Scheme the relevant NPS is the National Policy Statement for National Networks (NPS NN) (2014). As the NPS NN is (subject to section 104(4) and (8)) the primary policy

reference for the SoS, it sets out the scope of matters for this Statement to consider.

- 1.3.6 Section 104(2)(d) of the Act states that in deciding an application for development consent where an NPS is in effect, the Secretary of State must also have regard to any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision. This Statement sets out other 'important and relevant' considerations to be weighed by the Examining Authority and the SoS including national and local planning and transport policy of relevance to the Scheme. The Statement assesses the Scheme against policy and important relevant considerations, drawing on the information presented in the Environmental Statement (application document TR010030/APP/6.3) and other assessments, submitted with the Application.
- 1.3.7 This Statement has also been prepared to take account of Section 60 of the Planning Act 2008 concerning the preparation of local impact reports (LIRs) by relevant authorities who are invited to submit a LIR, to provide '*details of the likely impact of the proposed development on the authority's area*'. This is because under section 104(2)(b) of the Act, in deciding an application for development consent where an NPS is in effect, the SoS must also have regard to any LIR which has been submitted. The Planning Inspectorate Advice Note 1: Local Impact Reports suggests a list of topics which may be of assistance to a local authority in writing a LIR. This includes the following topic areas:
- a) '*Relevant development plan policies, supplementary planning guidance or documents, development briefs or approved masterplans and an appraisal of their relationship and relevance to the proposals*
- b) '*Relevant development proposals under consideration or granted permission but not commenced or completed.*'
- 1.3.8 As the above information is not addressed in other documents submitted with the Application, this Statement is also intended to assist local authorities in compiling their LIRs by providing relevant information.
- 1.3.9 The remainder of this Statement is structured as follows:
- Chapter two establishes the need for the Scheme, principally relating to the heavy congestion and poor safety record of M25 junction 10, as well as its strategic importance and contribution to economic growth. It sets out the Scheme's objectives to reduce congestion, improve safety, and support sustainable growth whilst minimising negative environmental impacts.
 - Chapter three explains how the Scheme has developed over time, detailing the options considered and how these were refined to arrive at the Scheme that is the subject of the DCO application, including through consultation and with regard to policy and legislative factors.
 - Chapter four presents the monetised and non-monetised Scheme benefits and confirms the economic case for the Scheme.
 - Chapter five provides justification of the Scheme's conformity to policy at national to local levels, focusing on the NPS NN.
 - Chapter six reaches conclusions on the overall compliance of the Scheme with planning policy; principally that contained within NPS NN, along with

other important and relevant considerations, providing a justification on the proposed weighting to be applied to each to assist the SoS in reaching a decision on the Application.

2. The Scheme

2.1 Need for the Scheme

Introduction

- 2.1.1 Paragraph 1.1 of the National Policy Statement for National Networks (NPS NN) sets out the need for, and Government policies to deliver, the development of Nationally Significant Infrastructure Projects (NSIPs) on the national road network and the following sections of this Planning Statement demonstrate the particular case for the Scheme.

Transport Issues

- 2.1.2 The M25 junction 10/A3 Wisley interchange is located on a busy and nationally important section of the strategic road network (SRN), in the county of Surrey, to the south-west of London. The section of the M25, on which junction 10 is located, is a vitally important route connecting much of the UK with access to European and international markets. It is also one of the busiest sections of road on the SRN, with two-way annual average daily traffic flows (AADT) in the range of 158,000-177,500 vehicles per day.
- 2.1.3 The A3 is a key radial route linking the M25 with London to the north-east and with the international Port of Portsmouth and the Surrey town of Guildford to the south-west. Two-way flows on this section of the A3 (AADT) range from 90,000 to 112,000 vehicles per day.
- 2.1.4 Approximately 90,000 vehicles use the M25 junction 10/A3 Wisley interchange each day, equivalent to about one third of all traffic approaching the junction from both the M25 and the A3. However, the capacity of the existing junction configuration is a significant impediment to the smooth flow of traffic through the area, with significant congestion problems evident during most peak periods.
- 2.1.5 Some peak-time journeys take more than 2.5 times longer than their off-peak equivalents, resulting in poor journey time reliability for many people using this section of the road network. The junction also has one of the highest collision rates nationally.
- 2.1.6 Pressures on the interchange are set to increase further with significant housing and economic growth forecast over the next twenty years in this part of the South-East. If no action is taken, delays could increase by as much as 40% in peak times and the junction's high collision rate will continue. In turn, this will adversely affect the performance of the local economy, access to employment opportunities and the quality of life of the local community.
- 2.1.7 A series of studies have been undertaken, dating back to 2008, to assess the problems on this section of the SRN, including at M25 junction 10. Those studies concluded that there are no feasible modal alternatives available that could deliver a significant improvement to the situation at junction 10. Accordingly, there is a compelling need to bring forward a highway scheme to address these problems and to ensure that the performance of the junction does not adversely constrain future economic growth prospects.

Growth

- 2.1.8 Significant population and household growth is expected to take place in the area over the next 10-15 years, which means that even allowing for some changes in travel behaviour or changes in car technology, the pressures on junction 10 and on the A3 are unlikely to diminish. Road improvements are essential to respond to development pressures and to accommodate the extra journeys that new residential and commercial developments will create. Further details and modelling of forecast growth can be found in the Transport Assessment (application document TR010030/APP/7.4).
- 2.1.9 The ability of Guildford Borough Council and Elmbridge Borough Council and other local authorities in the surrounding area to deliver their planned housing and economic growth is in part contingent upon finding solutions to facilitate the smooth flow of traffic through this area. Whilst the constraint on growth in event of the Scheme not going ahead cannot be precisely quantified, the Surrey Infrastructure Study, Surrey Local Strategic Statement and the Guildford Local Plan consider the Scheme necessary to enable the planning authorities to deliver their planned growth. As the economic success of Surrey is of importance to the UK as a whole, the local growth constraint of not delivering the Scheme would have national consequences.
- 2.1.10 Monetisation of benefits and economic case of the Scheme may be found in Chapter 4 of the Planning Statement.
- 2.1.11 In summary, the Scheme is needed to reduce congestion, improve safety, support planned housing and economic growth and improve walking and cycling provision.

National Transport Policies

- 2.1.12 Transport Strategies published by the Department for Transport (DfT), the Government and Highways England demonstrate the Government's commitment to investing in the SRN to meet future growth, maintain social sustainability and the operation of the UK economy, and stimulate economic growth. The Scheme, which is identified as a location for improvements to the SRN, contributes towards these national level strategic objectives.

National Infrastructure Delivery Plan – 2016 -2021

- 2.1.13 The National Infrastructure Delivery Plan (NIDP) outlines £483 billion of investment in over 600 infrastructure projects and programmes in sectors and spread across the UK to 2020-21 and beyond.
- 2.1.14 This plan includes sections on how infrastructure will support large-scale housing and regeneration projects, alongside key social infrastructure.
- 2.1.15 The NIDP sets out what will be built and where, focusing specifically on nearly £300 billion of infrastructure that will be delivered over the next 5 years to 2020-21. Chapter 3 of the NIDP sets out how the government is investing over £15 billion to support Highways England in transforming the SRN with over 100 major schemes completed or in construction by the end of 2020-21. Ministers have established a clear regulatory framework for Highways England, setting up investment periods with legally-guaranteed funding levels. The first of these, Road Period 1, runs from 2015 to 2020.

2.1.16 The goals and objectives of Road Period 1 are detailed within the Road Investment Strategy (RIS). In response to this, Highways England has published a number of strategic delivery plans, to detail how it will invest this funding, in line with the NIDP and the RIS.

Road Investment Strategy 2015 – 2020 (2016)

2.1.17 The Government sets out its long-term investment plan in the road network, and particularly the SRN, in the Road Investment Strategy 2015-2020 (RIS), which was published in December 2014 and was last updated in November 2016. The “Strategic Vision” within Part 1 of the RIS advises that it expects the Applicant (i.e. Highways England) to:

“Make the network safer and improve user satisfaction, while smoothing traffic flow and encouraging economic growth. We want to see [the Applicant] delivering better environmental outcomes and helping cyclists, walkers, and other vulnerable users of the network at the same as time as achieving real efficiency and keeping the network in good condition.”

2.1.18 The Strategic Vision (pages 12 to 16) recognises that the SRN has a vital role to play in delivering the Government’s goals for national networks as outlined in the four strategic goals of the NPS NN:

- “Providing capacity and connectivity to support national and local economic activity;
- Supporting and improving journey quality, reliability and safety;
- Joining our communities and linking effectively to each other; and
- Supporting delivery of environmental goals and the move to a low carbon economy.”

2.1.19 The Strategic Vision states that the SRN is vital to British businesses and local and national economies and that capacity problems leading to increased congestion have become a major issue. It recognises that the SRN has a good safety record and provides the lifeline for the logistics of everyday life, but that congestion is having a major effect on reliability.

2.1.20 The Strategic Vision acknowledges that the SRN links people, places, and different transport modes but that busy roads can generate noise, and sever access in towns and villages, impeding cyclists and walkers. Finally, it explains that, moving forward, the SRN needs to be designed and constructed to the highest environmental standards with low noise road surfacing to be used, where possible.

2.1.21 The Strategic Vision sets out the problems that increased congestion across the SRN would cause if action and investment are not undertaken by 2040:

- “16 hours stuck in traffic for every household each year;
- 28 million working days lost per year;
- £3.7 billion annual cost to the freight industry, which could see prices increase on the High Street and beyond;
- impeded travel between regions that hampers business;
- longer travel times that constrain possible job opportunities;

- negative impacts on efforts to spur economic growth, with enterprise zones, potential housing sites and areas of high growth held back by bottlenecks;
 - increased stress on roads to ports and airports, making it harder for British businesses to access export markets; and
 - safety and the environment suffering as congested traffic is more polluting and there is an increased risk of accidents.”
- 2.1.22 Part 2: Investment Plan of the RIS lists key investments on the SRN. A total of £15.2 billion is committed by the Government to the enhancement and long-term maintenance of the network between 2015/16 and 2020/21 including 127 major enhancements. The Scheme is recognised in the RIS as being a key investment on the SRN.
- 2.1.23 In March 2015, the RIS for the period 2015/16-2019/20 was presented to Parliament. The RIS sets out a long-term programme for motorways and major roads with funding allocated accordingly.
- 2.1.24 All committed Schemes in the RIS are intended to enter construction during the plan period; i.e. before 31 March 2020. The RIS Performance Strategy sets out eight areas to be focussed on by the Applicant (Highways England):
- Making the network safer;
 - Improving user satisfaction;
 - Supporting the smooth flow of traffic;
 - Encouraging economic growth;
 - Delivering better environmental outcomes;
 - Helping cyclists, walkers, and other vulnerable users of the network;
 - Achieving real efficiency; and
 - Keeping the network in good condition.
- 2.1.25 The Scheme is specified in the RIS. It is anticipated to be funded from sources within central government, providing that the necessary statutory approvals are granted, and the Scheme demonstrates value for public money. The Scheme also aligns with the objectives detailed within the Strategic Vision outlined within the RIS. Further details of how the Scheme be funded are provided in the Funding Statement (application document TR010030/APP/4.2).
- 2.1.26 The Scheme aligns with the RIS performance strategy as set out in 3.1.22. Further details of how the Scheme will improve provision for non-motorised users (NMUs) are provided on the Works Plans (application document TR010030/APP/2.3).

Highways England Strategic Business Plan 2015 – 2020

- 2.1.27 The Highways England’s Strategic Business Plan (SBP) (2015-2020) sets out the outcomes, Key Performance Indicators (KPIs) and associated targets for the RIS schemes. The Business Plan recognises that the SRN acts a key enabler of economic growth and prosperity and contributes significantly to people’s quality of life. Page 10 of the Business Plan states that *‘tackling congestion and delay, and providing better connections are at the forefront of our plans to provide a*

modern network that supports a modern economy' which closely aligns with the problems being addressed by the Scheme.

- 2.1.28 Appendix II – Investment Mapping (pages 48 and 49) of the Business Plan lists schemes proposed for the South-East of England and project (7) is identified as improvements to M25 junction 10/A3 Wisley interchange, albeit omitting works at Ockham Park junction. Page 21 of the Business Plan advises that Route Strategies will be published containing the delivery plans for the next five years and giving a clear indication of the priorities.

Highways England Delivery Plan 2015 – 2020

- 2.1.29 The Highways England Delivery Plan builds on the SBP and was published in response to the Government's RIS and sets out the how each of the strategic outcomes will be delivered. The strategic outcomes identified include:
- Supporting economic growth – through a modernised and reliable network that reduces delay, creates jobs and helps business compete, and opens up new areas for development;
 - Safe and serviceable network – where no one should be harmed when working or travelling on the network;
 - More free flowing network – where routine delays are more infrequent, and where journeys are safer and more reliable;
 - Improved environment – where the impact of our activities is further reduced ensuring a long-term and sustainable benefit to the environment; and
 - More accessible and integrated network – that gives people the freedom to choose their mode of transport and enable safe movement across and alongside the network;
- 2.1.30 To measure the success of these outcomes the Delivery Plan also identifies a series of KPIs and associated targets. Many of these complement the outcomes which are set out within the RIS and these have been key in the identification, development and assessment of the options for the M25 junction 10 A3 Wisley interchange improvements.
- 2.1.31 The Delivery Plan includes specific KPIs for delivering better environmental outcomes. This Scheme has looked to address and/or contribute to achieving these KPIs and related outcomes wherever possible. Some of the key environmental indicators relate to:
- Noise – 1,150 noise important areas mitigated by 31st March 2020;
 - Biodiversity - delivery of improved biodiversity, as set out in the Highways England's Biodiversity Action Plan;
 - Cyclists, walkers and other vulnerable road users - demonstrate consideration of vulnerable road users (VRUs) and incorporate measures within the Scheme for them to be able to continue to use the network as they can currently; and
 - Social and environmental objectives should form part of the design solution as required either through the Highways England licence agreement or other Government commitments.

Department for Transport Single Departmental Plan 2015 – 2020 February 2015)

2.1.32 The Department for Transport (DfT) published its single departmental plan in February 2016 (updated in May 2018) identifying the need to make journeys better, simpler, faster and more reliable and to support jobs, enable business growth, and bring the country closer together. The DfT has identified four objectives towards building better journeys:

- Boosting economic growth and opportunity;
- Building a One Nation Britain;
- Improving journeys; and
- Safe, secure and sustainable transport.

Investing in Britain's Future (June 2013)

2.1.33 Investing in Britain's Future (IBF), published by HM Treasury in June 2013, sets out the Government's intention to build a strong UK economy by delivering infrastructure that competes with the best in the world.

2.1.34 Section 2 of the document states that:

“Government intends to invest £28 billion on enhancements and maintenance of national and local roads to... build all available Highways Agency road projects, tackling the most congested parts of the network... [and] ...identify and fund solutions to tackle some of the most notorious and longstanding road hot spots in the country...[and] ...upgrade the national non-motorway network managed by the Highways Agency with a large proportion moved to dual-lane and grade separated road standard to ensure free-flowing traffic nationwide”.

Action for Roads: A network for the 21st century (July 2013)

2.1.35 Following on from IBF, this report was published in July 2013 by HM Treasury and sets out Government's plans to upgrade the UK's SRN (motorways and key A roads). In paragraph 1.5 it explains that the road network is the “life-blood of the economy” because:

“Roads provide critical connections. They link major economic centres and connect our major ports and airports. Many people use them to get to railway stations and to connect to other modes of transport.

Roads support job creation and unlock new development. They provide access to labour markets and unlock new opportunities for factories and businesses. More than 1 million jobs are associated with road transport. Factories and other businesses regularly consider access to good roads and other transport connections in making decisions about where to locate.”

2.1.36 Overall the Scheme will increase connectivity and support economic growth in the local area thereby complying with the national guidance outlined above.

2.2 Planning and Environmental Context

2.2.1 The Scheme's objectives have been influenced by the environmental context of the land surrounding M25 junction 10 and on either side of the A3. The area is of

high environmental sensitivity, with a number of international and national designations relating to biodiversity, a number of designated heritage assets of the highest level of significance and much of the area comprises common land and open space that is valued as public recreational resource. Appendix B presents the Environmental Constraints Map. An Environmental Statement (DCO Document Reference TR010030/APP/6.3) and other assessments supports the DCO application and provides an assessment of the Scheme, including the baseline environmental context. The following section highlights the key planning and environmental context.

Ecological designations

- 2.2.2 The Scheme involves the use of woodland that is designated as part of the Thames Basin Heaths Special Protection Area (SPA), which is of European importance for nature conservation. This SPA designation lies within the larger Ockham and Wisley Commons Site of Special Scientific Interest (SSSI), a nationally important conservation designation.

Landscape and designated heritage assets

- 2.2.3 Whilst none of the land in the vicinity of the Scheme is subject to any specific landscape designations, there are parcels of ancient woodland alongside the A3 and elsewhere around the Scheme. The Scheme lies entirely within the Green Belt.
- 2.2.4 The designated extent of Painshill Park occupies approximately 63ha of land to the east of the A3 and north of junction 10. Originally laid out as landscaped pleasure grounds in the mid-18th century, the major part of the park has been significantly restored since the 1980s. It is a grade I registered park and garden and a various buildings and structures within the park are listed buildings, including the grade II* listed Gothic Tower, which is situated just 45m from the A3 southbound carriageway, as well as the lodge houses and former stable block, situated to the south-east of the Painshill junction. Painshill House is also grade II* listed.
- 2.2.5 The RHS Garden Wisley is a grade II* registered park and garden. It is situated to the south of junction 10 and occupies land adjoining the west side of the A3. A laboratory building within the garden is also grade II listed. Guildford Borough Council has granted planning permission (Guildford ref. 16/P/000976 and 16/P/01080, granted 30 September 2016) for proposals to redevelop part of the RHS Garden Wisley site, to improve facilities for visitors, including increased parking provision as well as to provide new facilities for the RHS's science, research and educational activities. The first phase of this work has been completed. By 2023, the RHS is aiming to grow its annual visitor numbers to 1.4 million people, a 40% increase on 2014 levels. At present, on special event days, RHS Garden Wisley attracts up to approximately 10,000 visitors, highlighting its importance as a visitor destination.
- 2.2.6 There are a several other features of historic importance within the vicinity of M25 junction 10, notably the scheduled monuments within the woodland both to the north-east and south-west of junction 10. The bell barrow scheduled monument is situated just 45m from the A3 to the south-west of junction 10 and is one of 250 bronze-age prehistoric monuments nationally. The Hengi-Form

monument, located some 140m to the north-east of junction 10, is one of only 25 surviving examples nationally.

- 2.2.7 The Chatley Semaphore Tower, situated approximately 130m to the south of the M25 carriageway as it approaches junction 10 from the east, is a grade II* listed building. It is now the only surviving tower in what was once a line of signalling stations that stretched from London to Portsmouth. The tower is open to visitors once per month during the spring and summer.

Open space, recreation, rights of way and access

- 2.2.8 Much of the woodland and heathland surrounding junction 10 and the adjacent lengths of the M25 and A3 is accessible to the public for recreational purposes, being either common land or open space, some of which is classified as open access land under the Countryside and Rights of Way Act 2000. This accessible area includes; Wisley Common, which is common land and mostly to the west of the A3; Chatley Heath, which is common land to the east of the A3; and Ockham Common, which is open space land between the two areas of common land; Ockham Village Green, by Elm Corner; and some other smaller areas of open space. The accessible areas are subdivided by the A3 and M25, such that there is common land and open space in each of the four quadrants around junction 10.
- 2.2.9 Several public footpaths and bridleways pass through the common land and open space surrounding junction 10, however both the A3 and M25 are barriers to movement between the different areas of accessible land in each quadrant.
- 2.2.10 There are no rights to cycle on the common land or open space around junction 10, which means that cycling in the area is limited to bridleways and highway-based provision. There is a shared footpath/cycleway running along the highway verge on the east side of the A3 between Painshill and Ockham Park junctions. This is of variable quality and has little or nothing by way of protection from traffic on the A3. The Scheme will provide considerably enhanced connectivity for pedestrians, cyclists and equestrians resulting in significant benefits for these users.

Other land uses

- 2.2.11 There are relatively few residential or commercial properties in the immediate vicinity of junction 10 or alongside the A3 between Painshill and Ockham Park junctions. At Painshill, Feltonfleet School and the Hilton Hotel, are situated just to the west of the A3 and there are houses on the east side of the junction. Between Painshill junction and junction 10, there is a scattering of properties near to the A3, including New Farm and Close Court Farm to the east, Long Orchard Farm and associated houses and the grade II listed Foxwarren Cottage to the west. Between junction 10 and Ockham Park junction there is a cottage on Hut Hill to the west and, beyond the common land, the hamlet of Elm Corner to the east.
- 2.2.12 The nearest residential properties to the north of the M25 are at Park Barn Farm and Foxwarren Park to the west of junction 10 and houses at Chatley Farm to the east, one of which is near the motorway. The DCO boundary extends for some way along the M25 to the east, past Hatchford, Poynters Farm and Downside, but this is only for works to cabling and gantries within the highway boundary.

- 2.2.13 Other land uses close to the A3 between Painshill and junction 10 include the Heyswood Girl Guide Camp which is situated to the east of the A3, (within the historic designated extent of Painshill Park) and the Silvermere Golf and Leisure Complex and Silvermere Equestrian Centre (riding school) which are situated to the west of the A3 along Redhill Road. The Starbucks coffee shop and the vacant buildings of the site of the former San Domenico restaurant front on to the A3 approximately 1.2km north of junction 10. A planning application was submitted to Elmbridge Borough Council (Ref 2017/0524) for the development of a petrol filling station, convenience store and food to go outlet on the San Domenico site, with access to be taken directly from the A3, which was refused on the 15 February 2019.
- 2.2.14 There are several private accesses that connect directly to the A3 north of junction 10, including on the east side, accesses serving a National Grid pylon, New Home Farm, a gas valve compound, Court Close Farm and Painshill Park on the west side, and accesses serving the San Domenico site and Long Orchard Farm.
- 2.2.15 The site of the former Wisley Airfield lies to the south of Elm Corner and has been allocated by Guildford Borough Council, in its Local Plan, as a location for approximately 2000 new homes and associated development (Policy A35).
- 2.2.16 On the former Wisley Airfield, there is also a partially implemented extant planning permission on part of the site (ref. SCC ref: 2012/0034 / Guildford ref. 12/P/00533) for a fully enclosed in-vessel composting facility with a new vehicular/pedestrian access from the A3 Ockham roundabout.
- 2.2.17 To the west of the A3, most of the buildings in the vicinity of the road to the south of junction 10 are associated with operations at the RHS Garden Wisley. The notable exceptions are Hut Hill Cottage, which is a residential property situated within the woodland at Wisley Common, some 160m from the A3; and Pond Farm, which is located approximately 600m to the south-west of junction 10. Pond Farm is managed by the Surrey Wildlife Trust and is a visitor/educational resource as well as a farm base for the Trust's grazing stock. The Birchmere Scout Campsite is situated adjacent to Pond Farm and provides camping facilities for use by up to 100 youths during the summer season. Pond Farm, Hut Hill Cottage and the Camp Site are all accessed directly from the A3 northbound exit slip road at junction 10.
- 2.2.18 For more detail see Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3).

Topography, water resources and drainage

- 2.2.19 There are four watercourses and associated flood plains in the vicinity of the Scheme including the River Mole, which passes beneath the A3 just north of the Painshill junction, the River Wey, which passes under the M25 north of Wisley, Stratford Brook, which passes beneath the A3 just to the north of the Ockham Park junction and Guileshill Brook that is crossed by the A3 to the south of the Ockham Park junction.
- 2.2.20 Areas of surface water flood risk are also present east of junction 10 at Redhill Bottom and Sandpit Hill, as well as at Bolder Mere, adjacent to the A3 and south of junction 10. The whole area is underlain by secondary bedrock aquifers and

all of the water bodies referred to above are protected by the provisions of the Water Framework Directive.

- 2.2.21 For more detail see Chapter 8 Water of the Environmental Statement (application document TR010030/APP/6.3).

Noise and air quality

- 2.2.22 Noise Important Areas (NIAs) are defined as the locations where the 1% of the population that are affected by the highest noise levels from major roads are located. These have been identified within or adjacent to the Scheme limits at the A3/A245 Painshill junction, the A245 west of Seven Hills Road, by the A3 at the former San Domenico site and alongside the M25 to the east at The Lodge and Goose Green.
- 2.2.23 Guildford Borough Council (GBC) and Mole Valley District Council (MVDC) have not produced Air Quality Action Plans (AQAP) as there are no AQMAs within their local authority areas. Measures within the AQAP for Woking Borough Council (WBC) and Surrey Heath Borough Council (SHBC) are not considered at this stage as the AQMAs within their boroughs are not within the air quality study area.
- 2.2.24 Runnymede Borough Council, whose administrative area covers M25 junction 11, has also declared an AQMA for the M25 to the west of junction 11 on the basis of recorded exceedances of both NO₂ and fine particulate matter (PM₁₀). Elmbridge Borough Council has also declared six AQMA, of which one in Esher is also in the study area. Further detail is provided in Air Quality and Noise Chapter 5 and 6 of the Environment Statement (DCO Document Reference TR010030/APP/6.3).

2.3 Scheme Objectives

- 2.3.1 The Scheme objectives, provided in Table 2.1, have been identified to respond to the planning and environmental context and the need for the Scheme, in accordance with the Department for Transport's (DfT's) client scheme requirements (CSRs).

Table 2.1: Scheme Objectives

Requirement	Actions
Route Operation	Support any projected traffic increases from other committed schemes on the SRN and avoid or mitigate against causing adverse effects elsewhere on the Local Road Network.
Customer	Throughout the design and delivery stages, the Scheme should ensure that customers and communities are fully considered. Specifically, this should include: <ul style="list-style-type: none"> • Understanding the needs of all segments of customers (including vulnerable users), stakeholders and partners • Responding to those needs such that the end product delivers an improved customer experience • Assessing the impact of works on road users and communities, minimising disruption and delivering appropriate mitigation measure. The assessment should look at issues through customer's eyes.

Requirement	Actions
Capacity	Reduce the average delay (time lost per vehicle per mile) on the mainline A3 and on M25 through junction running.
	Smooth the flow of traffic by improving journey time reliability on the mainline A3.
Safety	Reduce annual collision frequency and severity ratio on the mainline A3, slip roads and M25 junction 10 gyratory.
Social	Support the projected population and economic growth in the area.
	Support walking and cycling by incorporating safe, convenient, accessible and attractive routes for pedestrians, cyclists and equestrians and improving crossing facilities.
	Take account of the concerns of local communities and other key stakeholders raised during consultations.
Environment	Support compliance with the UK's legally binding limits and targets on air quality and water quality status and support targets to cut greenhouse gas emissions and objectives for local air quality management areas.
	Avoid, mitigate and compensate for adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (SPA) and other statutory designated nature conservation sites and promote opportunities.
	Recognise the significance of designated heritage assets close to the route of the Scheme, including at Painshill Park and at Wisley Gardens through incorporating suitable mitigation and/or design measures to avoid or reduce significant harm.
	Improve the quality of life for nearby residents, through addressing the effects of noise on people in the declared noise important area's (NIA's) and ensuring that significant noise effects are mitigated.
	Ensure through good design, that an appropriate balance is achieved between functionality and the Scheme's contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes.

3. Scheme Development

3.1 Introduction

- 3.1.1 This chapter provides a brief summary of the option identification and option selection processes that led to the Scheme design set out within DCO application. This process was shaped significantly by consultation as well as policy and legislative considerations.
- 3.1.2 A detailed description of the development and analysis of the alternative options considered of the Scheme can be found in Chapter 3 of the Environmental Statement (Assessment of Alternatives) (application reference TR010030/APP/6.3), the Stage 3-5: Assessment of alternatives, consideration of imperative reasons of overriding public interest (IROPI) (application document TR010030/APP/5.3) and compensatory measures and the Introduction to the Application and Scheme Description (DCOdocument reference TR010030/APP/1.2).

3.2 Scheme development prior to November 2017

- 3.2.1 Prior to the SoS making the Preferred Route Announcement (PRA) in November 2017, an options selection consultation took place between 5 December 2016 and 5 February 2017, following an optioneering assessment process.
- 3.2.2 A long list of twenty-one options were developed and assessed, and reduced to the most feasible ten options. These ten options were subject to further assessment and testing to examine their viability to achieve the objectives for the Scheme. Please see Chapter 3 Assessment of Alternatives (application document TR010030/APP/6.3).
- 3.2.3 The two options which had been developed through option identification and put forward at the public consultation were:
- Option 9 – retaining the existing roundabout but adding a fourth level layout to provide free-flowing right turns from the A3 to the M25, whilst also providing dedicated free-flowing left turns; and
 - Option 14 – involving modifying the existing roundabout by elongation, with additional lanes to provide more circulatory capacity and enable more traffic to discharge the roundabout, whilst also providing dedicated free-flowing left turns.
- 3.2.4 At the start of PCF Stage 2 the assessment evidence was reviewed, and whilst only Option 16 would meet the aim of the study fully by providing the free-flowing movement in all directions, it would exceed the scheme budget and require the largest land take and have the largest impact on the SPA. The economic analysis shows that the extra expenditure, compared with Option 9, would not deliver extra benefits and therefore at non-statutory consultation a recommendation for rejecting Option 16 was sought. Feedback from consultation agreed with the recommendation, and a request to alter the wording of the RIS was made to the DfT and approved so that the client scheme requirements no longer include a requirement for free-flowing movements in all directions.

3.2.5 A 'do-nothing' option was not consulted on specifically, as there is a recognised problem that needs to be resolved. A summary of 'do-nothing' consequences was presented in the Stage 2 Scheme Assessment Report (2017)¹.

3.2.6 In addition to the improvements at junction 10, the options also includes the widening of the A3 from a dual three lane all-purpose road (D3AP) to a dual four lane all purpose (D4AP) in both directions from Ockham to junction 10 and junction 10 to Painshill. This widening will require the closure of existing direct accesses from the A3 and alternative access provision.

Legal and policy accordance matters

3.2.7 An assessment of the principal legal and policy tests in the NPS NN, together with the associated legislation and other policies referenced in the NPS NN, was undertaken to support the option selection process.

3.2.8 Paragraph 4.2 of the NPS NN establishes a presumption in favour of development for NSIPs. However, there are some specific circumstances in which the NPS NN directs that the SoS should refuse to grant development consent if a proposed scheme were to conflict with policy objectives or where the impacts of a development would outweigh its benefits. Effectively, these are the exceptions to the normal presumption in favour of national networks NSIPs established in paragraph 4.2 of the NPS NN and needed to be given exceptional weight in the assessment of the Scheme. Many of them are directly applicable to junction 10 and the surrounding area.

Tests for which the NPS NN makes no provision for exceptions

3.2.9 The NPS NN tests for which no exceptions can be made are:

- Air Quality – where failure to ensure compliance with the EU Directive limit values would represent grounds for refusal (paragraph 5.13 of the NPS NN);
- Road Safety – where failure to contribute to an overall improvement in the safety of the SRN would represent grounds for refusal (NPS NN paragraph 4.66); and
- Noise – where failure to avoid adverse impacts on health and quality of life would represent grounds for refusal (NPS NN paragraph 5.195).

3.2.10 Tests for which exceptions can be made in only very special circumstances and/or by virtue of substantial benefits outweighing adverse impacts

3.2.11 The NPS NN establishes critical policy tests where very special circumstances or very substantial benefits can be used to justify allowing development as an exception to normal policy. These tests are very high, and the level of benefits would need to be particularly great if they are to outweigh an adverse impact on the relevant policy objectives. Accordingly, they must also be given substantial weight in assessment of the Scheme. The following tests are of particular relevance:

¹ <https://highwaysengland.citizenspace.com/he/m25-junction-10-a3-wisley-interchange-improvement/results/scheme-assessment-report.pdf>

- European sites (in this case the Thames Basin Heaths Special Protection Area) – where paragraph 5.27 of the NPS NN states that these sites are the most important sites for biodiversity.
- Sites of Special Scientific Interest (in this case the Ockham and Wisley Commons SSSI) – where paragraph 5.29 of the NPS NN states that development consent should not normally be granted for a proposed development on land within or likely to have an adverse effect on an SSSI and that an exception should only be made where the benefits clearly outweigh both the impacts on the features of the site specifically affected and any broader impacts on the national network of SSSIs.
- Ancient Woodland – where paragraph 5.32 of the NPS NN directs that development consent should not be granted for works that would result in the loss of or deterioration of irreplaceable habitats, including ancient woodland and aged or veteran trees, unless the national need for and benefits of the development in that location clearly outweigh the loss.
- Designated heritage assets – where paragraph 5.133 of the NPS NN states that development consent should not be granted for works that will lead to substantial harm or total loss of significance of a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary to deliver substantial public benefits that outweigh that loss or harm.
- Green Belt – where paragraph 5.170 of the NPS NN states that inappropriate development in Green Belts should not be approved except in very special circumstances and where paragraph 5.178 acknowledges that national network infrastructure projects may comprise inappropriate development and that very special circumstances will not exist unless the harm is clearly outweighed by other considerations.

3.2.12 All the above tests are relevant to the Scheme, as the area lies entirely within the Metropolitan Green Belt and much of the woodland and heathland is designated as a Site of Special Scientific Interest, with some pockets of ancient woodland to the north and south of the junction. There are also designated heritage assets alongside the A3, including some that are of the highest level of importance or significance nationally.

3.2.13 It is noted that the NPS NN does not prescribe a specific policy test on decision making for proposals affecting international designations, such as Special Protection Areas and Special Areas of Conservation, these are instead covered by legally binding tests in the relevant Directives and transposing regulations (see Chapter 5 below for further details).

Other NPS NN presumptions against development

3.2.14 There are other circumstances in which the NPS NN directs the SoS to refuse development consent, unless it can be demonstrated that a scheme's benefits outweigh its impacts. However, in these instances, the NPS NN does not require a substantial level of benefit to be demonstrated. Those of most relevance are:

- Open space – where paragraph 5.174 of the NPS NN states that development consent should not be granted for development on existing

open space unless an independent assessment demonstrates that the space is surplus to requirements or if the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities;

- Flood Risk – where paragraph 5.108 of the NPS NN states that development in areas at risk of flooding can only be consented if the sequential and exceptions tests are satisfied and provided that the project delivers wider sustainability benefits that outweigh the flood risk and that the project will be safe for its lifetime, without increasing the risk of flooding elsewhere; and
- Water Quality – where paragraph 5.227 of the NPS NN states that schemes which give rise to adverse effects on the water environment can only be consented if all reasonable steps have been taken to resolve concerns and that the Environment Agency is satisfied with the outcome.

3.2.15 All these high-level policy tests are relevant to the Scheme. Much of the land in the vicinity of the junction is managed as recreational open space or is common land with public access. There are number of watercourses within the immediate vicinity of the Scheme, together with groundwater reserves beneath and Bolder Mere alongside the A3 to the south of junction 10.

Other Relevant Legal Considerations

3.2.16 Under Section 5 of the Infrastructure Act 2015, there is a legal duty on Highways England to have regard to the environment and to the safety of users of highways. The terms of Highways England’s operational licence also place a duty on Highways England to conform to the principles of sustainable development, including supporting national and local economic growth; protecting, managing and enhancing the environment and improving the well-being of communities affected by the SRN.

3.2.17 There are other legislative provisions which were also taken into account, as they either impose a duty on decision makers to have regard to certain matters or highlight considerations that are likely to be given great weight. For this reason, substantial weight was also given to those considerations in the option assessment and selection process. Those most applicable are:

- The duty on the SoS under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (which transposes the Habitats Directive) to make an appropriate assessment of a plan or project which is likely to have significant effects on a European site. In the light of the appropriate assessment, consent should not be granted where the plan or project will adversely affect the European site concerned, unless the derogation contained in regulation 64 (which transposes the derogation in Article 6(4)) is satisfied.
- The duty under Section 28G of the Wildlife and Countryside Act 1981, as amended by Schedule 9 of the Countryside and Rights of Way Act 2000, for public bodies to further the conservation and enhancement of Sites of Special Scientific Interest (SSSI) in exercising their functions and decision-making;

- The duty in Section 40 of the Natural Environment and Rural Communities Act 2006 for decision makers to have regard to conserving biodiversity generally and to restoring or enhancing a species population or habitat;
- The duty in Regulation 7 of the Infrastructure Planning (Decisions) Regulations 2010 which requires those making decisions on NSIPs to have regard to the international legally-binding treaty, the Convention of Biological Diversity. The objectives of the Convention most significantly include the conservation of biological diversity and the sustainable use of its components;
- The duty in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 which requires those making decisions on NSIPs to have regard to the desirability of preserving a listed building, its setting or any of the features of special architectural or historic interest that it possesses; preserving the character and appearance of a conservation area; and the desirability of preserving a scheduled ancient monument or its setting;
- The Protection of Badgers Act 1992, which makes it illegal to interfere with a badger sett for the purposes of facilitating development, unless authorised by a licence granted by Natural England;
- The Green Belt (London and Home Counties) Act 1938, which makes it unlawful to develop buildings or structures in the Green Belt around London except for the purposes of agriculture and recreation or where ancillary to the existing use of land. This means that either provision must be made within the DCO to free the land from any restriction imposed upon it by this Act or that Ministerial consent must be obtained prior to the initiation of compulsory acquisition procedures and the relevant local authorities notified (including under S.147 of the Planning Act 2008). The 1938 Act also establishes that suitable alternative land may need to be provided in exchange for any loss of Green Belt land;
- The Commons Act 2006 and Commons Registration Act 1965, together with Sections 131, 132 and 139 of the Planning Act 2008, which prevent the authorisation of a DCO involving any works that extinguish or interfere with common land or open space without a separate parliamentary procedure having been followed, unless provision is made for replacement land (no less advantageous in terms of rights and trusts) to be given in exchange; and
- Section 122 of the Planning Act 2008 requires the SoS to be satisfied that there is a compelling case in the public interest for any land to be acquired compulsorily. It also requires that the land to be acquired is required for the development to which the development consent relates, is required to facilitate or is incidental to the development or is replacement land which is given in exchange for the order land under section 131 or 132 of the Act..

3.2.18 The option selection stage ended with the following conclusion:

- Option 14 should be pursued as it provides significant traffic and safety benefits up to 2037.

- The benefits associated with Option 14 would be achieved at a lower environmental impact and cost than Option 9; including its impact on the SPA.
- This should be accompanied with widening of the A3 between Ockham interchange and Painshill interchange from D3AP to D4AP. The A3 within M25 junction 10 is to remain D2AP.

3.2.19 However, it was recognised that there would still be a significant environmental impact with Option 14, including (based on measurements of the scheme at that stage) a 3ha loss of land within the SPA, although the loss would be substantially smaller than with Option 9.

3.3 Preferred Route Announcement Scheme

Preliminary design

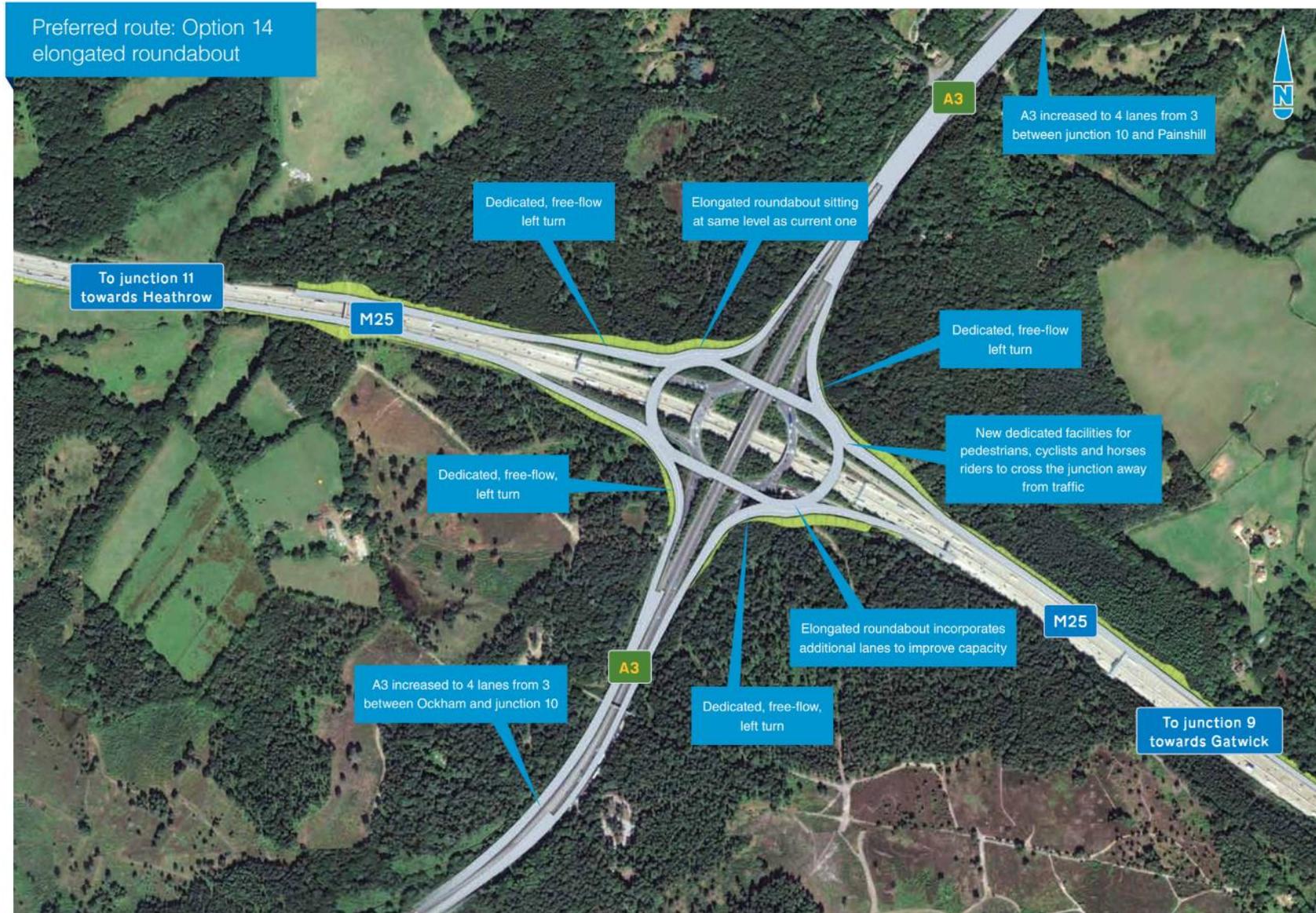
3.3.1 The SoS made the PRA for the Scheme in November 2017 and the preliminary design commenced.

3.3.2 The scope of works as published in the PRA were:

- Option 14 – The elongated roundabout;
- Wisley Lane access - Access to Wisley Lane will be via a two-way bridge over the A3 accommodating both vehicles and NMUs. There will no longer be direct access on to, or off the A3 from Wisley Lane and this new bridge will replace the existing footbridge;
- Elm Lane - Direct access to Elm Lane from the A3 will be stopped up. Instead residents will use the new road to access Old Lane and the A3 Southbound;
- Old Lane - Old Lane will be kept open, with direct access onto the A3 southbound via the slip road. There will be safety improvements to the Old Lane junction, including better sightlines and improved slip roads;
- Pond Farm/Birchmere Campsite – Access will be via a new bridge connecting the Ockham Common side of the A3 to Pond Farm and the Scout campsite (replacing the existing Cockcrow bridge). It also links the Wisley and Ockham Commons for pedestrians, cyclists and horse riders;
- A3 Northbound (M25 junction 10 to Painshill) - A new road will provide access to all properties along the northbound side of the A3 to A245/Seven Hills Road;
- A3 Southbound (Painshill to M25 junction 10) - For properties on the A3 southbound whose direct access will be stopped up, a two-way bridge over the A3 close to its slip roads to the M25 junction 10 interchange will be provided. This will accommodate both vehicles and NMUs. The bridge links to the new northbound service road; and
- Painshill junction/ Seven Hills Road - The A245 will be widened, adding an extra lane between the A3 Painshill Junction and Seven Hills Road.

3.3.3 The outline layout of the preferred Scheme at the PRA is shown in Figure 3.1 below.

Figure 3.1: Scheme layout at Preferred Route Announcement (PRA)



3.4 Consultation on the Scheme

- 3.4.1 Highways England has undertaken a comprehensive programme of consultation with the local community and wider stakeholders. The consultation process has facilitated feedback which has been considered throughout the development of the Scheme.
- 3.4.2 Engagement first commenced on the proposals in April 2016 and was undertaken with:
- Those parties who would be consulted at the formal consultation stage under Section 42 of the PA 2008, including those listed in Schedule 1 of the APFP Regulations and identified landowners; and
 - Other stakeholders incorporating: local community groups and representatives and suppliers responsible for the existing highways infrastructure.
- 3.4.3 Highways England undertook statutory consultation under section 42 of the Act (duty to consult) alongside consultations under sections 47 (duty to consult the local community) and section 48 (duty to publicise) of the Act between 9 February and 26 March 2018.
- 3.4.4 Two additional targeted non-statutory consultation were undertaken between 14 November and 14 December 2018 and 3 April 2019 and 3 May 2019 with those with an interest in land affected and prescribed consultees by the changes to the Scheme.
- 3.4.5 Full details of the consultation are included in the Consultation Report (application document TR010030/APP/5.1).

3.5 Changes to the Scheme following consultation

- 3.5.1 The Consultation Report (application document TR010030/APP/5.1) sets out how the Scheme has evolved in response to comments received during the statutory consultation periods. Within the body of the Report, topics and issues raised by consultees are considered and responded to. Within the appendices, Highways England's response is provided for each comment made, including whether that comment resulted in a change to the Scheme.

3.6 The Scheme

- 3.6.1 An explanation of the Scheme objectives and a detailed description of the Scheme proposals can be found in the 'Introduction to the Application' (Application document TR010030/APP/1.2) document and in the 'Environmental Statement' (application document reference TR010030/APP/6.3). Since Stage 1 and optioneering there have been changes to the Scheme design. A description of the Scheme which is being applied for and has resulted from the assessment process and statutory consultation is set out below:
1. alteration and upgrading of the existing M25 junction 10 roundabout, including: elongation and widening of the circulatory carriageway to increase capacity for right-turning traffic; realignment, lengthening and widening of the junction entry and exit slip roads; and demolition of redundant bridge structures;

2. provision of four new dedicated free-flow slip lanes at M25 junction 10, to enable all left-turning traffic to pass through the junction unimpeded by traffic signals;
3. conversion of the existing hard shoulders on the M25 through junction 10 to provide an additional running lane for traffic in both directions, including emergency refuge areas and associated modifications to M25 gantries, signage and road markings;
4. widening of the A3 to dual four lanes between the Ockham Park junction and the Painshill junction, except where the A3 crosses over M25 junction 10, which will remain as two lanes in each direction;
5. new sign gantries on the A3 to provide variable speed limits and lane control between Ockham Park and Painshill junctions;
6. widening of the A245 Byfleet Road to dual three lanes between the Painshill junction and the Seven Hills Road junction to the west;
7. provision of two new dedicated slip lanes at the Painshill junction, to enable traffic leaving the northbound A3 to join the westbound A245 and traffic leaving the eastbound A245 to join the northbound A3 to avoid having to use the roundabout;
8. improvement of the Ockham Park junction, including installation of traffic signals at the entries to the roundabout and for new crossing facilities for pedestrians and cyclists;
9. modification of A3 side road junctions, including: improvement of the Old Lane junction; closure of the Wisley Lane junction and construction of a new road bridging over the A3 to connect Wisley Lane directly with the A3 at Ockham Park junction; and closure of the Elm Lane junction and provision of an alternative access to Elm Corner via Old Lane and an improved section of Byway Open to All Traffic;
10. closure of private accesses from the A3 carriageways and the provision of substitute local access arrangements, including: a substitute access for properties between Redhill Road and Seven Hills Road (South) via a new road running alongside the A3 northbound carriageway; a substitute access for properties on the edge of Painshill Park via the A3 southbound on-slip; and a substitute access for properties at Wisley Common from Old Lane and crossing the A3 via the replacement Cockcrow Overbridge;
11. provision of new and improved facilities for pedestrians, cyclists and horse riders, including: a new 6.3km long route along the A3 corridor between the Ockham Park and Painshill junctions; new and replacement bridges for the benefit of non-motorised users to cross both the M25 and the A3; and new and upgraded public rights of way in the area around M25 junction 10;
12. provision of 39.8 hectares of replacement common land and open space in exchange for that needing to be acquired for the Scheme; and

13. extensive areas of habitat creation and enhancement and other environmental mitigation work including: measures to compensate for the impacts of the Scheme on the Thames Basin Heaths Special Protection Area and on Bolder Mere; the provision of a new wildlife crossing over the A3 as part of a replacement Cockcrow overbridge²; and the reinstatement of landscape and habitats on land used temporarily for Scheme construction.

² The Scheme includes a 'green bridge' extension to Cockcrow bridge. A separate designated funds application is being made by the project team to secure additional funding from Highways England for the provision of a Green Bridge, as a replacement for the demolition of the existing Footpath 17 Cockcrow overbridge. The green bridge is intended to provide an additional enhancement measure to address historic issues relating to the severance of ecological habitats by the existing A3, including habitats that form part of the Ockham and Wisley Commons Site of Special Scientific Interest.

4. Economic Case

4.1 Introduction

- 4.1.1 The impact of the scheme on the highway network and traffic flow has been assessed with the M25 junction 10 strategic highway model. This enables a comparison of traffic flows and conditions between a scenario without the scheme (Do Minimum) and a scenario with the Scheme (Do Something).
- 4.1.2 At M25 junction 10 the modelling shows that the Scheme is predicted to allow for increased throughput at the junction compared to a without scheme scenario. By 2037, with the Scheme vehicles entering the junction from the A3 over the course of a day will rise to 67,000 (14% increase from the without scheme scenario) and from the M25 will rise to 64,000 (16% increase from the without scheme scenario). In the average AM peak hour, the project will allow an additional 2,200 additional trips (a 28% increase) to travel through the junction, indicating that the project has led to a considerable improvement in capacity.
- 4.1.3 Modelling of M25 junction 10 shows that throughout the design life of the Scheme, all entries and circulatory links will operate within capacity – a contrast to the existing operation of the junction as discussed in Section 8. Delays will reduce by 40% in the morning and evening peak hours.
- 4.1.4 The Scheme will improve the operation of the Painshill and Ockham Park junctions compared to the without intervention scenario, which will in turn, improve traffic flow between local communities along the local roads that cross the A3 at these junctions.
- 4.1.5 The additional highway capacity provided by the Scheme can be directly linked to the likelihood that planned growth in the area can be feasibly delivered, as noted in the Surrey County Council Local Strategic Statement:
“securing upgrades to the A3 through Guildford and the A3/M25 junction 10 at Wisley are crucial to the future growth of the area”
- 4.1.6 An aim of the scheme is to provide additional capacity on the SRN so that, once implemented, highway users will choose the strategic routes (the M25 and A3) over local roads for a longer proportion of their journey. The highway modelling undertaken for assessing the Scheme shows that the cumulative number of kilometres travelled by vehicles on the Local Authority controlled roads (i.e. those that do not form part of the SRN) in the vicinity of the scheme will reduce following implementation of the scheme.
- 4.1.7 Furthermore, across the whole of the affected road network, the scheme is anticipated to result in a reduction in accidents of 5% compared to the without intervention scenario - an average of 10 accidents per year. At a more local level the Scheme is anticipated to have the following benefits:
- Reduce accidents among users of M25 junction 10 by 30%.
 - Reduce accidents on the A3 mainline between Painshill and Ockham Park junctions by 24%.
 - Reduce accidents on the M25 mainline by 2%.
- 4.1.8 The rest of this chapter outlines how the benefits described above translate in to the economic case for the Scheme.

4.2 The Economic Case

- 4.2.1 The economic case for the Scheme demonstrates its compliance to the NPS NN objective that strategic highway improvements benefit the economy. It assesses and monetises anticipated economic, environmental and social benefits of the Scheme based on a 60-year appraisal period, in accordance with DfT guidelines.
- 4.2.2 Monetised benefits of the Scheme, summarised in Table 4.1, were calculated using a variety of industry standard software packages.
- 4.2.3 The total Present Value Benefits for the Scheme are £388,540,000 at Level 1 and £439,885,000 at Level 2. Further details on the methodology and significance of Level 1 and Level 2 benefits are provided in this chapter.
- 4.2.4 Level 1 and Level 2 impacts are used to categorise the certainty in the monetisation calculation. These have more recently become known as 'Established Monetised Impacts' for Level 1 and 'Evolving Monetised Impacts' for Level 2. Figure 4-2 below summarises the benefits that go into each category.³

Table 4.1: Summary of Present Value Monetised Benefits

Benefits		Monetised Value, £k PV		
		Level 1	Level 2	
Environmental Benefits	Greenhouse gas emissions	-9,319	-9,319	
	Noise	711	711	
	Air quality	-344	-344	
Social / Economic Benefits	Accidents	45,354	45,354	
	Economic Efficiency of Transport System (TEE) Table	Commuting	65,947	65,947
		Other	97,504	97,504
		Business	159,452	159,452
	Wider public finances	29,235	29,235	
	Reliability benefits	--	35,400	
	Change to imperfect markets	--	15,945	
Agglomeration	--	N/A		
Total	Present Value Benefits	388,540	439,885	

- 4.2.5 The non-monetised environmental and social benefits of the Scheme are summarised in Table 4-2. The assessment of Social and Distributional Impacts has been carried out in accordance with TAG Unit A4.1 and A4.2, whereby WebTAG worksheets have been completed for all environmental indicators. Air Quality, greenhouse gases and noise impacts are already included in the monetised benefits.

Table 4.2: Summary of Non-Monetised Benefits

Benefits	Qualitative	Distributional Impact

³ (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630704/value-for-money-framework.pdf)

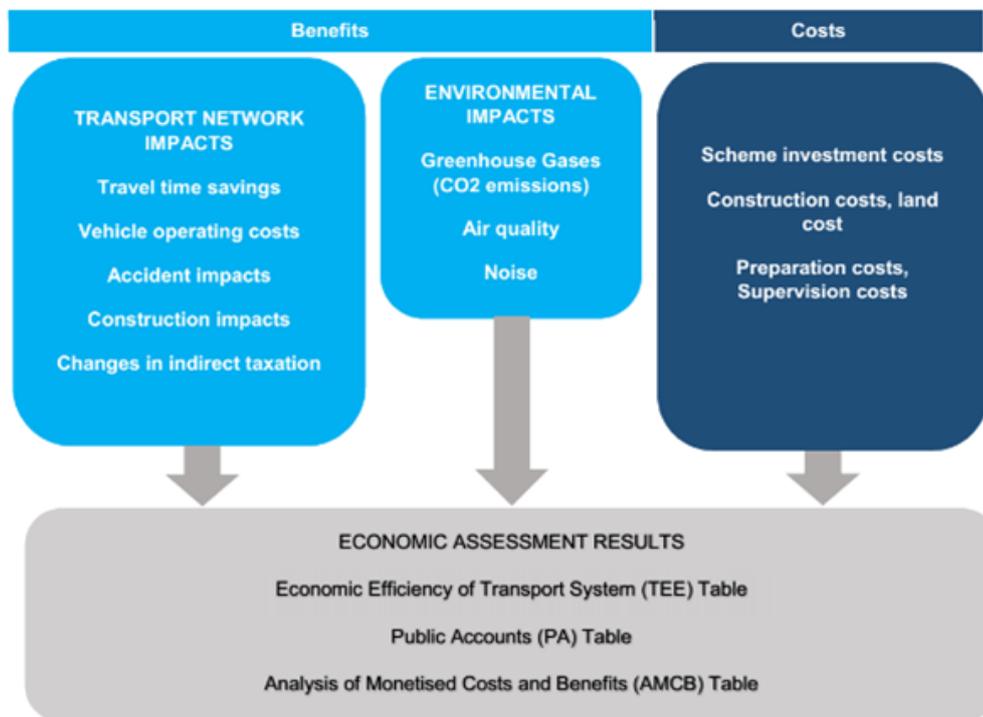
Benefits		Qualitative	Distributional Impact
Environmental Benefits	Noise	--	Slight adverse
	Air quality	--	Slight beneficial
	Landscape	Moderate adverse	--
	Historic environment	Neutral	--
	Biodiversity	Large Adverse	--
	Water environment	Moderate beneficial	--
	Townscape	--	--
Social Benefits	Physical activity	--	--
	Journey quality	Slight Beneficial	--
	Accidents	--	Moderate beneficial
	Security	--	Neutral
	Accessibility	--	--
	Affordability	--	Moderate adverse
	Severance	--	Slight beneficial
	Options and non-use values	--	--
	Commuting & other users	--	Slight beneficial

4.3 Economic Assessment Methodology

4.3.1 The Economic Assessment has been carried out using standard procedures and economic parameters as defined by TAG Unit A1- Cost Benefit Analysis, with efforts made to quantify and monetise costs and other impacts where appropriate. The following elements, shown in Figure 4-1, have been considered:

- road user journey time impacts – due to changes in travel time and vehicle operating costs;
- road user safety impacts – due to changes in the future number and/or severity of accidents;
- incident delay impacts – due to changes in journey time related to incidents;
- construction impacts – on road user travel time and vehicle operating costs;
- indirect tax revenue – due to changes in the amount of fuel and other direct vehicle operating costs purchased, and changes in transport expenditure offsetting changes in expenditure elsewhere in the economy; and
- Greenhouse gas, noise and air quality impacts.

Figure 4.1: Economic assessment components



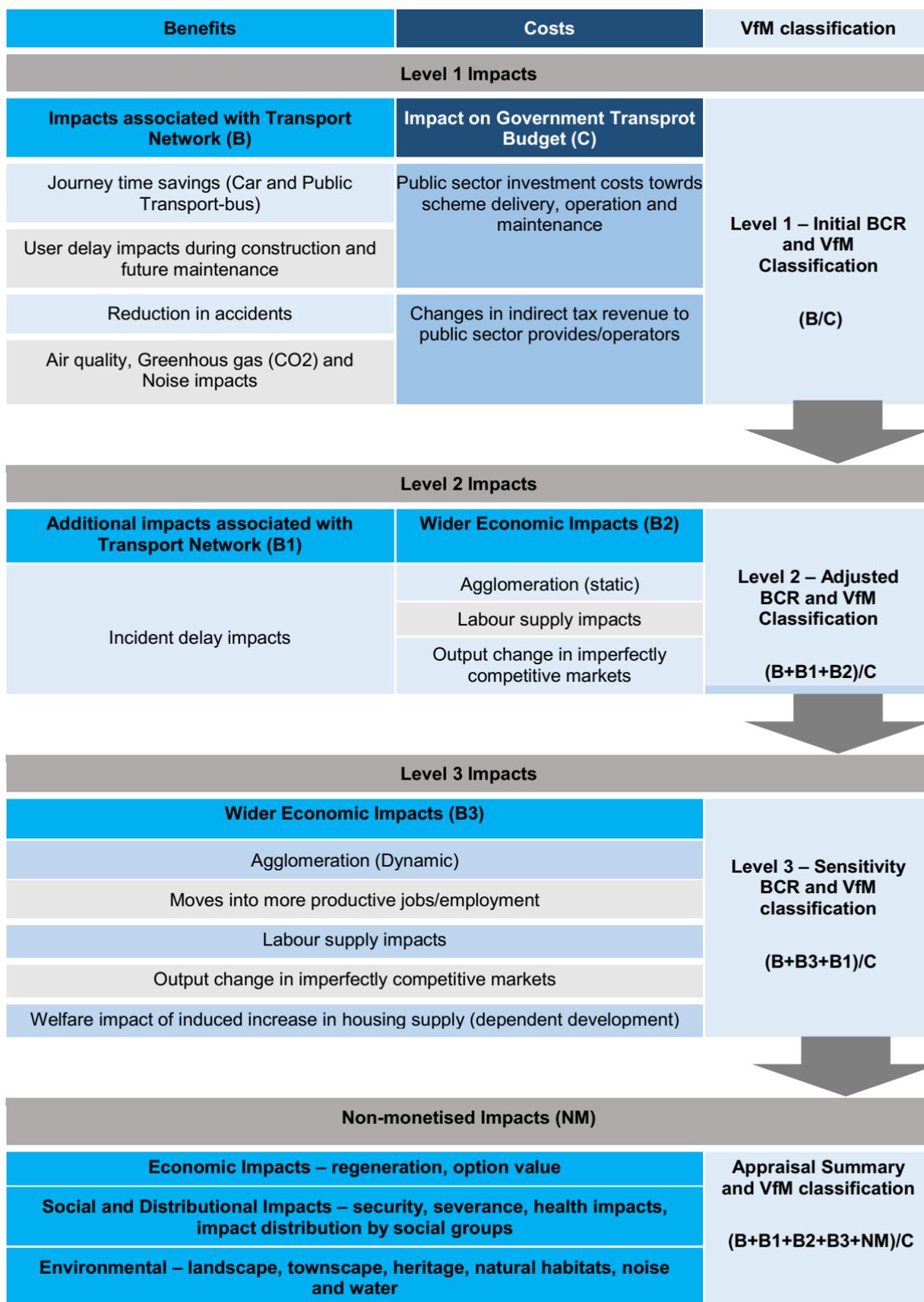
4.3.2 The latest cost estimate for the Scheme was produced in January 2019. This cost estimate was produced by Highways England in accordance with DfT guidelines. The estimate relates to the Scheme at the point of the DCO being applied for.

4.3.3 A Scheme cost was estimated in base year costs, and then inflated to produce a capital baseline (outturn) construction cost of £301.1 million.

4.3.4 These costs have then been rebased to 2010 calendar year profiles for economic calculations, using the GDP-deflator series as published in the latest TAG Data book. Then the cost is discounted to 2010 prices and converted to market costs to provide a Present Value Cost (PVC) for appraisal purposes. The economic appraisal cost of the Scheme is estimated as £197.8 million PVC.

4.3.5 The Value for Money (VfM) assessment is carried out as a staged process to ensure that a complete and robust analysis is undertaken, summarised in Figure 4.2 and described below.

Figure 4.2: Incremental value for money assessment framework



4.3.6 The VfM categories and their relationship with BCRs generated through cost-benefit analysis is presented in Table 4-3.

Table 4.3: DfT value for money categories

Benefit Cost Ratio (BCR)	Value for Money Category
Less than 1.0	Poor
1.0 to 1.5	Low
1.5 to 2.0	Medium
2.0 to 4.0	High
Greater than 4.0	Very High

4.3.7 Following the assessment of Level 2 and Level 3 benefits, such as reliability and wider economic impacts, an adjusted BCR is provided.

4.4 Monetised Benefits

Level 1 Transport User Benefits

4.4.1 The Scheme will provide additional network capacity on the SRN necessary to accommodate future development and predicted traffic growth.

4.4.2 In overall terms, business users and transport service providers would benefit from the Scheme through reduced travel times, improving access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage related depreciation. After accounting for impacts associated with delays during, the monetised value of transport user benefits for Business Users is forecast to be £164.6 million PV.

4.4.3 Commuters and other users would also benefit from the Scheme through reduced travel times, improved access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage-related depreciation. The combined monetised value of these benefits is forecast to be £169.1 million PV.

Environmental Benefits

4.4.4 The combined monetised value of the environmental benefits is forecast to be -£9.0 million PV. This value comprises savings from improvements in noise, reduced by costs associated with increases in Greenhouse gas emissions and decrease in air quality. These figures have been calculated in accordance with WebTAG guidance.

Social Benefits

4.4.5 Social benefits cover the human experience of the transport system and its impact on social factors not covered as part of the economic or environmental impacts. Monetisation of benefits has only been conducted for the change in accidents as a result of the Scheme.

4.4.6 The Scheme results in a net reduction in accidents at junction 10. The removal of traffic from the roundabout by free-flow elements greatly reduces the amount of traffic at conflict points and therefore improves safety at the roundabout. Accidents are also reduced on the A3 mainline between Ockham and Painshill due to the widening to D4AL and the closure of side roads. The Scheme results

in an overall reduction in accidents and casualties compared to the Do-Minimum scenario.

- 4.4.7 The COBA-LT analysis has shown benefits of £45.4 million PV when the Scheme is implemented. This results from an average reduction of 10.1 accidents per year over the 60-year appraisal period.

Initial BCR

- 4.4.8 The combination of monetised Level 1 transport user, environmental and social benefits provides a Present Value of Benefits (PVB) of £388.5 million PV.
- 4.4.9 When compared to the appraisal cost, the initial Net Present Value based on Level 1 benefits is £190.7 million PV and the expected initial BCR is 1.96, as presented in Table 4.4.

Table 4.4: Initial Benefit Cost Ratio

	£000s PV
Present Value Benefits	388,540
Present Value Costs	197,828
NPV	190,712
Expected Initial Benefit Cost Ratio (BCR)	1.96

Level 2 Transport User Benefits

- 4.4.10 The Scheme will help to induce investment and result in a change in the level of output. In a WebTAG compliant assessment this is captured as a change in imperfectly competitive markets and is estimated as a 10% uplift in business user transport benefits. The monetised value for these wider impacts is forecast to be £15.945 million PV.
- 4.4.11 Widening of the A3 to 4 lanes in each direction between Ockham and Painshill interchanges is anticipated to result in improvements to reliability. Assessment using the Highways England tool MyRIAD estimates the reliability benefits of the Scheme to be £35.4 million PV.

Adjusted BCR

- 4.4.12 Combining the Level 1 and Level 2 benefits produces an adjusted PVB of £439.9 million PV. This increases the Net Present Value to £242.1 million PV and provides an expected adjusted BCR of 2.22, as presented in Table 4.5. The Scheme would provide high value for money according to the DfT value for money categories.

Table 4.5: Adjusted Benefit Cost Ratio

	£000s PV
Present Value Benefits	439,885
Present Value Costs	197,828
NPV	242,057
Expected Adjusted Benefit Cost Ratio (BCR)	2.22

4.5 Non-Monetised Benefits

Social and Distributional Benefits

- 4.5.1 The Scheme delivers improvements in the local road network, better suited and improved infrastructure for NMUs and vulnerable users, greater journey time reliability and also accommodates the anticipated increase in traffic, arising from the planned growth as a result of future developments.
- 4.5.2 Qualitative, social and distributional impacts of the Scheme are:
- The appraisal considers there to be a moderate beneficial distributional impact on accidents for the Scheme;
 - Based on an assessment of driver stress, the Scheme is expected to have a slight beneficial impact on journey quality;
 - Overall, the distributional impact on air quality due to the Scheme is considered to be slight beneficial;
 - The overall assessment of affordability for the Scheme is moderate adverse;
 - Overall a slight adverse distributional impact on noise is noted for the Scheme;
 - A neutral distributional impact Personal security for the Scheme;
 - The severance impacts due to the Scheme are assessed as slight beneficial; and
 - The assessment of user benefits for the Scheme is a slight beneficial distributional impact.
- 4.5.3 The qualitative environmental impacts have been assessed as being:
- A neutral impact on the historic environment;
 - A moderate beneficial impact on Water Environment;
 - A large adverse impact on the Biodiversity adverse impact on the Biodiversity; and
 - A moderate adverse impact on Landscape.

4.6 Value for Money

- 4.6.1 A scheme's Value for Money (VfM) is assessed through consideration of all monetised economic impacts and non-monetised environmental, social and distributional impacts.
- 4.6.2 The VfM category generated through the Scheme's expected adjusted BCR of 2.22 is classified as high.
- 4.6.3 The Scheme is anticipated to produce a mix of adverse, neutral and beneficial impacts on environmental, social and distributional indicators. The longer-term operations of the Scheme will provide reduce travel times hence is value for money.

5. Planning Policy Considerations

5.1 Introduction

- 5.1.1 This chapter explains that the Scheme is in accordance with the NPS NN and other relevant and prescribed matters and demonstrates the Scheme's compliance with these policy and legislative requirements.
- 5.1.2 As the Scheme comprises two NSIPs, an application for development consent is to be considered by an examining authority appointed by the Planning Inspectorate, who through the examining authority make a recommendation to the SoS in line with Section 74 or 83 of the Act.
- 5.1.3 Paragraph 1.2 of the NPS NN explains that the SoS will use the NPS NN as the primary basis for making decisions on applications for development consent on national networks NSIPs in England.

5.2 NPS NN, Department for Transport, December 2014

- 5.2.1 The NPS NN is the primary basis for decision making for the Scheme, except where doing involves any of the following (Section 104(3-8)):
- 'the United Kingdom being in breach of any of its international obligations';*
 - 'the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment';*
 - the decision *'would be unlawful by virtue of any enactment';*
 - 'the adverse impact of the proposed development would outweigh its benefits';* and
 - 'any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met'.*
- 5.2.2 The Applicant has prepared this application with careful consideration of all legal obligations applying to it and the SoS and is therefore not aware of any respect in which deciding the application in accordance with the NPS NN would be in breach of the SoS's duties (b), would be unlawful (c) or contrary to any other condition prescribed for deciding the application (e).
- 5.2.3 Deciding the application in accordance with the NPS NN would not lead to the United Kingdom being in breach of any of its international obligations (a), nor would the adverse impact of the Scheme outweigh its benefits (d). The Scheme's conformity to these conditions is demonstrated through the assessment of the Scheme's compliance with the NPS, which is concerned with impacts on legislation, strategy and a range of environmental issues from international to local scales. The Scheme should therefore be decided in accordance with the decision-making framework set out in Paragraph 5.2.1 above.
- 5.2.4 Paragraph 1.1 of NPS NN states that the purpose of the NPS is to establish:
- 'The need for, and Government's policies to deliver, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of nationally significant infrastructure projects on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State.'*

- 5.2.5 NPS NN paragraph 2.2 recognises that there is a critical need to improve the national networks to address road congestion in order ‘...to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth.’
- 5.2.6 The RIS identifies improvements to M25 junction 10/A3 Wisley interchange as one of the key investments in the Strategic Road Network for the London and South East region. The A3 is a key radial route from London to Portsmouth that crosses the M25 orbital motorway. Both routes are at present congested, a situation which is forecast to increase with future traffic growth.
- 5.2.7 The Scheme, designed to reduce traffic congestion and delay through the provision of increased capacity at the M25 roundabout, responds to the need for development identified in the NPS NN. A more detailed description of the problems to which the Scheme responds can be found in Chapter 2 of this Planning Statement.
- 5.2.8 The Scheme objectives, which are outlined in full in Chapter 2 of this Planning Statement and span route operation, capacity, safety, social and environment - align with the Government’s strategic objectives for national networks as well as the Government’s wider policies.
- 5.2.9 This Planning Statement provides a broad overview which explains how the Scheme complies with the NPS NN and a commentary on how each of the relevant provisions of the NPS NN Chapters 3, 4 and 5 are met. Full details of compliance to the NPS NN is provided in Appendix A, whilst policy and legislative matters relevant to each theme are covered in more detail in the Environmental Statement (application document TR010030/APP/6.3).

5.3 Environmental and social impacts (NPS NN Chapter 3)

- 5.3.1 Under the umbrella of environmental and social impacts, NPS NN chapter 3 considers emissions, safety, sustainable transport and accessibility. Detail of the relevant NPS NN policy requirements is presented in Table 2 and 3 in Appendix A.
- 5.3.2 The Scheme has been designed to meet the environmental objectives contained in the Client Scheme Requirements, as set out below:
- Supporting compliance with the UK's legally binding limits and targets on air quality and water quality status and support targets to cut greenhouse gas emissions and objectives for local air quality management areas;
 - Avoid, mitigate and compensate for adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (SPA) and other statutory designated nature conservation sites and promote opportunities;
 - Recognise the significance of designated heritage assets close to the route of the Scheme, including at Painshill Park and at Wisley Gardens through incorporating suitable mitigation and/or design measures to avoid or reduce significant harm;
 - Improve the quality of life for nearby residents, through addressing the effects of noise on people in the declared noise important area's (NIA's) and ensuring that significant noise effects are mitigated; and

- Ensure through good design, that an appropriate balance is achieved between functionality and the Scheme's contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes.

- 5.3.3 A comprehensive environmental impact assessment has been carried out, together with proposals for mitigation of likely significant environmental effects arising from the Scheme. This is reported in the Environmental Statement (application document TR010030/APP/6.3).
- 5.3.4 As part of overall mitigation proposals, a Register of Environmental Actions and Commitments (REAC) within the Environmental Statement Appendices (application document TR010030/APP/7.3), which is also provided as a standalone document has been prepared. This details the environmental mitigation measures that would be implemented both during construction and operation, why they are required, who is responsible for delivering them, and any ongoing maintenance arrangements.
- 5.3.5 The Environmental Statement identifies in Chapter 5 Air Quality (application document TR010030/APP/6.3) that with the implementation of the proposed mitigation measures, such as those which would control construction activity dust generation, no significant effects are anticipated during construction. There are not expected to be any significant adverse effects on local air quality during operation.
- 5.3.6 With regards to noise and vibration, it is anticipated there will be no residual significant adverse effects from construction noise as stated in the Environmental Statement Chapter 6 Noise and vibration (application document TR010030/APP/6.3). No significant adverse effects are expected at Noise Important Areas. There will, after mitigation is implemented, be temporary significant impacts on two receptors in relation to construction vibration, noting that the level of vibration would be perceptible but below the magnitude that could result in structural damage. No significant effects were predicted in the operation phase that were directly attributable to the Scheme.
- 5.3.7 Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) identifies there are both residual beneficial significant effects for the Thames Basin qualifying SPA species and other receptors and significant adverse residual effects anticipated with mitigation in place. Due to the sensitive location of the Scheme, an integral part of the Scheme design has been to minimise impacts to biodiversity as much as possible and where this has not been possible, to provide appropriate compensation as discussed below. The compensation package has been designed and agreed with Natural England, as detailed in Annex C: HRA compensation (application document TR010030/APP/5.3). The compensation will be secured by DCO Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) in Schedule 2 of the draft DCO (application document TR010030/APP/3.1).
- 5.3.8 The compensation package will include a SPA compensation land ratio of 1:1 for permanent land take within the SPA, and a SPA enhancement area ratio of 3:1 for the permanent and temporary land take within the SPA. This is additional to the restoration of the areas of temporary land take. Full details are included in

the Habitats Regulations Assessment (application document TR010030/APP/5.3)

- 5.3.9 Chapter 7 Biodiversity also identifies a temporary and permanent loss of a small part of the Ockham and Wisley Commons SSSI. However, the provision of the SPA compensatory measures and additional habitat enhancements within replacement land areas, will result in habitats of better condition to compensate for this loss.
- 5.3.10 There will be a permanent loss of 0.2 ha of ancient woodland at Elm Corner and Heyswood, plus from the outer edge where the ancient woodland meets the A3. This is an irreplaceable habitat and will result in a permanent adverse effect.
- 5.3.11 Chapter 8 Water of the Environmental Statement (application document TR010030/APP/6.3) concludes that no significant residual effects are anticipated. The assessment has considered the impacts (both construction and operation) on water quality (both surface water and groundwater), flood risk through the means of Flood Risk Assessment (FRA) (application reference TR010030/APP/5.5). With regards to the Water Framework Directive (WFD), there will be no overall residual significant effects subject to mitigation measures (please refer to Chapter 8 of the Environmental Statement (application document TR010030/APP/6.3). being implemented and guidance on the principles of WFD compliant design being adhered to.
- 5.3.12 The embedded and additional WFD mitigation measures are detailed in the Water Framework Directive assessment report (application document TR010030/APP/5.4). None of the components that make up the Scheme are considered to cause deterioration at the water body scale and all should not prevent future attainment of good ecological status and good ecological potential.
- 5.3.13 Chapter 9 Landscape and Visual of the Environmental Statement (application document TR010030/APP/6.3) identifies residual temporary significant adverse effects on the landscape due to impacts during construction and in the opening year of the Scheme. There will be temporary residual significant adverse effects on road users and Landscape Character during construction. Once operational, effects on Landscape Character should not be significant by the design year (Year 15), as new planting will be established.
- 5.3.14 The Scheme comprises widening and enlargement of existing highway infrastructure together with new or replacement lighting, signage and gantries. Together with the loss of vegetation, these will have a significant adverse visual effect in the construction period and in the years after completion of the works. Over time these visual effects will diminish as new and replacement planting matures and screens the Scheme. It is expected that after fifteen years the visual effects of the Scheme will be not significant.
- 5.3.15 Chapter 10 Geology and Soils of the Environmental Statement (application document TR010030/APP/6.3), states that with regards to land contamination, assuming the application of the identified design and mitigation measures, the majority of potential impacts of the Scheme have been assessed as likely to have temporary, negligible, not significant effects during construction. Two moderate beneficial, and therefore significant effects have been identified associated with the remediation of contamination if encountered during the ground investigation, which would improve baseline conditions within the

Scheme for controlled water receptors within the Scheme and study area. During operation, the potential impacts are anticipated to have negligible and minor beneficial (permanent and not significant) effects, with two moderate beneficial (permanent and significant) effects identified during construction continuing to benefit the controlled water receptors during operation.

- 5.3.16 With respect to geology and geomorphology conditions, the assessment indicated that with the proposed design and mitigation measures, the overall construction phase will have a permanent negligible to minor beneficial, no significant effect and a temporary minor adverse effect (associated with soil erosion during construction) which is considered not significant. The operational phase is considered to have a negligible effect.
- 5.3.17 With regards to Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3), no residual significant adverse effects are expected from the Scheme. As shown in the assessment that there is potential for adverse effects on designated and non-designated heritage assets within the Scheme boundary and study area if there is no mitigation. These effects include a total of nine heritage assets that are likely to be subject to significant effects during construction, comprising one large adverse effect to one heritage asset and moderate adverse effects to eight heritage assets. One significant effect, a large adverse effect on the Bell Barrow on Cockcrow Hill Scheduled Monument has been identified during operation. With mitigation, this effect can be reduced to a slight adverse effect, which is not significant. With mitigation, the moderate adverse effect on the Gothic Tower can be reduced to a residual slight adverse effect, which would not be significant. Mitigation is summarised in the Outline Construction Environmental Management Plan (CEMP) (application document TR010030/APP/7.2) and Environmental Statement Appendices Register of Environmental Actions and Commitments (REAC) (application reference TR010030/APP/7.3) that includes (but is not limited to) design mitigation to address noise, visual, and atmospheric impacts that could affect the setting of the Tower.
- 5.3.18 Residual adverse significant effects are not expected in Environmental Statement Chapter 12 Materials and Waste of the Environmental Statement (application document TR010030/APP/6.3). During construction, material use is estimated to have minor impact. In addition, the quantity of construction, demolition and excavation waste generated is estimated to have a minor impact on the waste arisings baseline and a low impact on the waste capacity baseline. Hazardous waste is estimated to have a negligible impact on the waste arisings baseline and waste capacity baseline. The significance of the effect of material use and waste generation by the Scheme, on their respective baselines, is estimated to be neutral or slight (not significant).
- 5.3.19 As material use and waste generation during the operational phase of the Scheme is unlikely to have a significant impact due to the relatively small quantities, operational material use and waste generation was scoped out in the Environmental Scoping Report.
- 5.3.20 Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) identifies significant adverse residual temporary effects at Ockham Common and other open space as a result of land take. There are significant residual adverse effects on amenity for users of Feltonfleet School, and moderate residual adverse effects during construction as

a result of land take at Nutberry Fruit Farm Car Boot Sale. No significant adverse effects are anticipated during construction or operation for any designated development land. Minor adverse effects are anticipated during construction at Wisley Airfield and Feltonfleet School.

- 5.3.21 There will be a moderate adverse effect on private dwellings during construction as a result of the demolition of the vacant ancillary unit at the site of the former San Domenico restaurant site. This will be permanent but will not have residual operational effects, as the effect will be experienced within the construction phase.
- 5.3.22 No significant effects are anticipated due to land take and severance. The Scheme will involve the permanent loss to farming and land-based enterprises of 15.97 ha. Of this, 3.58 ha (22%) is of best and most versatile (BMV) land quality which is locally but not nationally significant.
- 5.3.23 Closure or temporary diversion of routes during parts of the construction period will result in temporary significant adverse effects. Overall effects on NMUs will be beneficial once the Scheme is operational.
- 5.3.24 Chapter 14 Health of the Environmental Statement (application document TR010030/APP/6.3) states the majority of adverse effects are during construction and are of negligible-slight significance after mitigation. The Assessment identifies significant beneficial residual temporary effects from positive impacts on the wider local economy and employment due to an increase in the number, quality and stability of jobs. During operation, there is expected to be an increase in air pollution and noise and this is expected to have a slight adverse effect on health. Nevertheless, the health benefits during operation include increases in physical activity from the improved and more accessible NMU routes, road safety, journey times, and connectivity (to family and friends, and local services including health, social, education and leisure, as well as employment).
- 5.3.25 With regards to Chapter 15 Climate of the Environmental Statement (application document TR010030/APP/6.3) The assessment has found no significant residual effects as embedded mitigation sufficiently adapts the design and operational processes to remove and reduce all adverse climate vulnerability impacts. In most cases, the climatic vulnerabilities in the study area would be the same with or without the Scheme. There will be an adverse impact on climate from the emission of additional greenhouse gases in construction and operation, however assessment has shown this to be insignificant due to the small magnitude of emissions compared with UK carbon budgets.
- 5.3.26 With regards to the environmental aspects of the Scheme, there will be no significant adverse operational effects for air quality, nor long term landscape and visual, geology and soils, cultural heritage, materials and waste and climate. In relation to noise, there are not direct significant effects from the Scheme but there are cumulative effects on local roads due to the Wisley Airfield Development.
- 5.3.27 The social benefits of the Scheme are the improvements to the NMU facilities and improved connectivity/accessibility, plus health benefits from increases in physical activity to be experienced through improved and more accessible NMU routes, road safety, journey times, as well as better connectivity (to family and

friends, and local services including health, social, education and leisure, as well as employment).

5.3.28 On balance, it is concluded that the Scheme complies with the key principles of NPS NN chapter 3 in relation to environmental and social benefits.

5.4 Assessment principles (NPS NN Chapter 4)

General principles of assessment

5.4.1 Chapter 4 of the NPS NN sets out the assessment principles and general policies against which applications relating to national networks infrastructure are to be determined. Detail of the relevant NPS NN policy requirements is presented in Table 2 and 3 in Appendix A.

Habitats Regulations Assessment

5.4.2 A Habitats Regulations Assessment (HRA) (application document TR010030/APP/5.3) has been undertaken, to assess potential significant effects on Natura 2000 or European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), (either in isolation or in combination with other plans and projects) . Within the vicinity of the Scheme, the Thames Basin Heaths Special Protection Area (SPA) falls under this category.

5.4.3 The HRA Stage 1: Screening report found that the Scheme is likely to have a significant effect on the Thames Basin Heaths SPA comprising habitat loss, degradation of habitats (by changes in air quality and/ or hydrology), disturbance (by changes in noise, recreational use and/ or lighting) and spread of invasive species. The conclusions of the HRA Stage 1: Screening were agreed with Natural England, Royal Society for the Protection of Birds (RSPB) and Surrey Wildlife Trust (SWT).

5.4.4 Following this, a statement to inform an Appropriate Assessment, consideration of alternative solutions and assessment of Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures (HRA Stages 2-5), have been prepared and are submitted in support of this application. Natural England have been consulted throughout this process and agreed the conclusions of the statement to inform Appropriate Assessment, as reported in the HRA Appendix (application document TR010030/APP/5.3).

5.4.5 Section 4 of the HRA Stages 3-5: Assessment of Alternatives, consideration of the IROPI and compensatory measures (application document TR010030/APP/5.3) and explains why there are IROPI such that the DCO can be made notwithstanding the adverse effect on the integrity of the SPA. In summary, the IROPI are:

- The current capacity of junction 10 and the congestion at and between the neighbouring junctions has a substantial adverse effect on the traffic flow of this part of the strategic road network (SRN) and contributes to many safety issues. Therefore, an improvement in traffic flows is a key reason for the Scheme. This would constitute a reason of both a social and an economic nature and also improve safety.
- At M25 junction 10 the traffic modelling undertaken by Highways England shows that the Scheme is predicted to allow for increased throughput at the

junction compared to a without scheme scenario. By 2037, the Scheme will allow an additional 2,200 additional trips (a 28% increase) to travel through the junction in the morning peak hour, indicating that the project will deliver a considerable improvement in capacity and aid traffic flow throughout the design life of the Scheme.

- The Scheme is projected to result in a reduction of accidents by introducing operational improvements that alleviate or reduce the conflicts or congestion that contribute to the likelihood of accidents occurring. Across the whole of the affected road network (ARN), the Scheme is anticipated to result in a reduction in accidents of 5% compared to the without intervention scenario - an average of 10 accidents per year. At a more local level the Scheme is anticipated to reduce accidents among users of M25 junction 10 by 30%.
- The Scheme will add capacity to the junction, improve the safety for road users, will be of benefit to existing and future residents and businesses and will unlock capacity for growth that would otherwise be restricted by the existing congestion and safety issues at M25 junction 10. The total monetised benefit of the Scheme has been calculated as approximately £400 million (present value) over year appraisal period.
- The principal benefits to human health will be from provision of better access to and around the areas of the Scheme for non-motorised users (NMUs) and improved access to the area of common land and open space. The Scheme will deliver a substantial improvement in the ability of NMUs to move around the locality of the scheme and along the A3 corridor, as well as improving the attractiveness of these routes and so facilitating increased use.

Alternatives

5.4.6 Chapter 3 Scheme Development of this Planning Statement and Chapter 3 Assessment of Alternatives of the Environmental Statement (application document TR010030/APP/6.3) set out the alternative options considered during development of the Scheme. Assessment of these alternatives, taking account of the environmental effects, provided the basis for arriving at the preferred option.

5.4.7 Refer to section 3 of the HRA Stages 3-5: Assessment of Alternatives, consideration of the IROPI and compensatory measures (DCO document reference TR010030/APP/5.3) an assessment of alternative options and sections 4 and 5 for the consideration of the IROPI and compensatory measures.

Good design

5.4.8 Paragraph 4.30 of the NPS NN acknowledges that due to the nature of national networks infrastructure development, there may be a limit on the extent to which it can contribute to the enhancement of the quality of an area whilst Paragraph 4.31 identifies that good design should meet the principal objectives of the Scheme by improving operational conditions and minimising adverse impacts.

5.4.9 The design has been governed by that standards set out in the Design Manual for Roads and Bridges (DMRB), but the Scheme design has also aimed to address the sensitive surroundings and proposing measures that will improve the aesthetics of the area.

5.4.10 The iterative design process has responded to the complex range of environmental and engineering constraints found within and adjacent to the M25

junction 10 and the A3 corridor. The multi-disciplinary design team have worked together to develop the Scheme, both in response to environmental context and through the ten design principles from Highways England's The Road to Good Design⁴.

- 5.4.11 The key design features of the Scheme have been developed with key stakeholders and the public. The Scheme design development and support for the proposed development are documented in the Consultation Report (application document TR010030/APP/5.1)
- 5.4.12 Highways England used a collaborative approach to having regard to the consultation responses received. A database of all Section 42 and Section 47 responses was compiled, requiring each specialist project discipline to provide commentary on each response. The commentary was shared throughout the project team and challenged by the project stakeholder team to ensure the appropriate action was taken with each. The main issues arising from the responses were then considered in detail in a workshop on 25 May 2018, and necessary changes to the design agreed in accordance with Section 49 of the Act. A summary of the design changes was circulated throughout all of the project discipline teams to ensure a full understanding of the impact of the statutory public consultation on the development of the Scheme. Annexes H and I of the Consultation Report: Main Report (application document TR010030/APP/5.1) sets out the responses received and demonstrates the regard taken to comments received.

Climate Change adaptation

- 5.4.13 Paragraph 4.40 NPS NN states:
- 'New national networks infrastructure will be typically long-term investments which will need to remain operational over many decades, in the face of a changing climate.'*
- 5.4.14 Accordingly, it advises, 'that applicants must consider the impacts of climate change when planning location, design, build and operation'.
- 5.4.15 Chapter 15 Climate Change of the Environmental Statement (application document TR010030/APP/6.3) takes account of predicted impacts of the Scheme on climate change, and the vulnerability of the Scheme to the impacts of climate change. It proposes mitigation measures for climate-related impacts.
- 5.4.16 The Flood Risk Assessment (application document TR010030/APP/5.5) also takes into account the impacts on climate change and resilience over the life time of the development.
- 5.4.17 The Scheme has taken account of vulnerability to the potential impacts of climate change, including flooding. In compliance with the NPS NN, Highways England have done this using data from the latest UK Climate Projections models. Measures proposed during construction and operation will manage climate-related risks. Nevertheless, the residual risk remains large.
- 5.4.18 Adaption measures have been identified and assessed and included in the assessment of residual effects and informed the assessment of overall effects in

⁴ The Road to Good Design, Highways England, January 2018

the Environmental Statement Chapter 15 Climate (application document TR010030/APP/6.3).

Health, safety and security

- 5.4.19 The Scheme is anticipated to result in a reduction in accidents of 5% compared to the without intervention scenario - an average of 10 accidents per year. At a more local level the Scheme is anticipated to have the following benefits:
- Reduce accidents among users of M25 junction 10 by 30%.
 - Reduce accidents on the A3 mainline between Painshill and Ockham Park junctions by 24%.
 - Reduce accidents on the M25 mainline by 2%
- 5.4.20 The safety and accessibility of the network of public rights of way and local road connections will be enhanced with dedicated infrastructure for NMUs. The improved journey times, safety and connectivity offered by the Scheme are anticipated to have beneficial health impacts on the local population. Chapter 13 of the Environmental Statement notes that no amenity impacts are expected during operation, therefore health and amenity will hence overall be improved by the Scheme.
- 5.4.21 Mitigation measures have been proposed where adverse amenity impacts are anticipated, relating to noise and vibration and construction emissions. With these in place, there are no significant noise effects post mitigation forecast to be for the users of Painshill Park and Feltonfleet School, arising from temporary construction noise and visual effects. Recommended mitigation comprises noise barriers and planting, Best Practicable Means (BPM) approach taken to daytime and night-time construction works to minimise noise, vibration and dust disposal impacts, and for construction activities to be undertaken outside of school hours and to be mindful of exam seasons.
- 5.4.22 The needs of protected characteristic groups, ascertained through targeted and inclusive consultation, has been very important to the Scheme's design and development, in line with Scheme's inclusivity objective. The Equalities Impact Assessment (EqIA) found that some impacts on those with disabilities are likely, through movement of bus stops and construction activity. Developing mitigation for these impacts is ongoing and will involve engagement with contractors and the public through targeted consultation.
- 5.4.23 Overall, the majority of adverse effects to health that are anticipated are during construction and, with mitigation measures deployed, will not be significant during construction or operation. The operation of the Scheme is anticipated to have mostly beneficial health impacts arising from improved journey times, safety and connectivity.
- 5.4.24 With regards to safety and security, safety has shaped the development of the Scheme from the outset, being a Scheme objective. No national security implications have been identified.
- 5.4.25 The Scheme has sought to minimise the risk of road casualties and contribute to an overall improvement in safety of the SRN, from its design and development through to operation in compliance with the NPS NN.

5.5 Generic Impacts (NPS NN Chapter 5)

5.5.1 Chapter 5 of the NPS NN sets out the generic impacts that should be considered. The following section looks at the Scheme against the policies, which all applications relating to national networks infrastructure should be determined against. Detail of the relevant NPS NN policy requirements is presented in Table 4 in Appendix A.

Air quality

5.5.2 The NPS NN includes tests for which no exceptions can be made. This relates to Air Quality where failure to ensure compliance with the EU Directive limit values would represent grounds for refusal (paragraph 5.13 of the NPS NN).

5.5.3 NPS NN paragraph 5.10 states:

'The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the scheme...'

5.5.4 NPS NN paragraph 5.11 advises that:

'Air quality considerations are likely to be particularly relevant where schemes are proposed:

- *within or adjacent to Air Quality Management Areas (AQMA); roads identified as being above Limit Values or nature conservation sites (including Natura 2000 sites and SSSIs, including those outside England)'*

5.5.5 It is not anticipated that there would be any significant adverse effects on air quality during the Scheme's construction or operation, provided standard construction best practice is adhered to, as detailed in Chapter 5 Air Quality of the Environmental Statement (application document TR010030/APP/6.3). Therefore, no specific mitigation measures for air quality during operation are necessary or proposed.

5.5.6 The conclusions of the Environmental Statement (application document TR010030/APP/6.3) is that overall emissions of NO_x and PM₁₀ are expected to decrease during the Scheme's development and lifetime owing to improvements in vehicle technology. The Scheme is not expected to result in a significant adverse effect on air quality, and there is not expected to be a compliance risk with regard to the UK's ability to comply with the Air Quality Directive and NPS NN paragraphs 5.6-5.9, 5.12 and 5.13.

Carbon emissions

5.5.7 Paragraph 5.17 NPS NN comments:

'It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets'

5.5.8 At all stages of the Scheme's design and development, emissions will be mitigated as far as practicable, including through measures embedded in the design of the Scheme and application of the carbon reduction hierarchy. This forms part of Highways England's commitment to reducing emissions wherever practicable and to supporting the UK Government in meeting its carbon reduction

targets. Emissions arising from the Scheme will be of an overall scale that would not materially impact on the Government meeting its carbon reduction targets. The Scheme's inclusion of NMU routes will contribute towards a more integrated and sustainable transport network.

- 5.5.9 The Scheme is not anticipated to have a significant or material impact on UK carbon reduction targets and is compliant with the NPS NN.

Biodiversity and Ecological Conservation

- 5.5.10 The NPS NN establishes a number of critical policy tests where very special circumstances or very substantial benefits can be used to justify allowing development as an exception to normal policy. These tests are very high, and the level of benefits would need to be particularly great if they are to outweigh an adverse impact on the relevant policy objectives. Accordingly, they must also be given substantial weight in assessment of the Scheme. The following tests are of particular relevance to the Scheme:

- 5.5.11 NPS NN paragraph 5.22 states that:

'Where the project is subject to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems.'

- 5.5.12 The following text has been selected from NPS NN between paragraphs 5.25 and 5.35:

5.25. 'As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.'

5.26. 'In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.'

International Sites

5.27. 'The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites[...].'

Sites of Special Scientific Interest

5.28. 'Many Sites of Special Scientific Interest (SSSIs) are also designated as sites of international importance and will be protected accordingly. Those that

are not, or those features of SSSIs not covered by an international designation, should be given a high degree of protection[...].

Regional and Local Sites

5.31. 'Sites of regional and local biodiversity and geological interest (which include Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, in contributing to the quality of life and the well-being of the community, and in supporting research and education. The Secretary of State should give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.'

Irreplaceable habitats including ancient woodland and veteran trees

5.32. 'Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.'

Protection of other habitats and species

3.35. 'Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.'

- 5.5.13 Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) considers effects on biodiversity in detail. The most important designation that the Scheme must have regard to is the Thames Basin Heaths SPA.
- 5.5.14 A Habitats Regulations Assessment (application document TR010030/APP/5.3) has been undertaken to assess potential significant effects of the Scheme on European sites and all others subject to the same policy protection. It is not possible to rule out the Scheme's adverse effect on the integrity of the Thames Basin Heaths SPA, arising from habitat losses; a conclusion which was agreed with Natural England. The Habitats Directive provides a derogation under Article 6(4) which allows the Scheme to be approved providing three tests are met:
- There are no alternative solutions that are less damaging to the SPA than the Scheme;

- There are Imperative Reasons of Overriding Public Interest (IROPI) for the Scheme to proceed;
 - All necessary compensatory measures are secured to ensure that the overall coherence of the network of European sites is maintained.
- 5.5.15 There are no alternative solutions which would lessen the adverse effect on the SPA, and there are Imperative Reasons of Overriding Public Interest (IROPI). The reasons are set out in the HRA Stages 3-5: Assessment of Alternatives, consideration of the IROPI and compensatory measures (application document TR010030/APP/5.3).
- 5.5.16 A compensation package has been developed in consultation with Natural England, which will maintain the overall coherence of the Natura 2000 Network. The compensation package is detailed in the HRA (application document TR010030/APP/5.3) and is proposed to be secured by DCO Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) in Schedule 2 of the Draft DCO and Schedules (application document TR010030/APP/3.1).
- 5.5.17 The compensation package will include SPA compensation land at a 1:1 ratio for the permanent land take within the SPA and enhancement areas at a ratio of 3:1 for both the permanent and temporary land take within the SPA. Full details are included in the Habitats Regulations Assessment (application document TR010030/APP/5.3). This suite of compensatory measures will offset the negative effects of the Scheme, after mitigation, so that the overall coherence of the Natura 2000 Network is maintained.
- 5.5.18 The loss of some irreplaceable habitats (ancient woodland and veteran trees) has been minimised as much as practicable, but some loss is unavoidable. Environmental Statement Chapter 7 Biodiversity states that retaining all veteran trees or trees with veteran features and trees with bat roost potential is a principle for the enhancement areas. In addition, the Scheme will lead to land take from designated sites and habitats of principal importance. Mitigation and compensation measures have been put in place to create new areas of habitats, enhance existing habitats and create linkages between existing woodland.
- 5.5.19 Although the loss of some irreplaceable habitats is unavoidable, the Scheme will lead to many positive habitat enhancements, including the provision of extensive SPA enhancement measures described above. Chapter 7 of the Environmental Statement identifies a full range of likely significant effects; however, the Scheme includes mitigation measures such as the outline Construction Environmental Management Plan (CEMP) used for all construction operations. Compensation measures will be implemented to create new areas of habitats, enhance existing habitats and create linkages between existing woodland.
- 5.5.20 A bat mitigation structure will be provided to mitigate the loss of bat roosts at the site of the former San Domenico restaurant. Draft licences for the closure of bat roosts and badger setts have been submitted to Natural England and letters of no impediment have been received.
- 5.5.21 The Consents and Agreements Position Statement (application document TR010030/APP/3.3) describes the additional consents, which may/or will be required for the proposed Scheme.

- 5.5.22 The Environmental Statement Appendices (TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC). This details the environmental mitigation measures that would be implemented both during construction, why they are required, who is responsible for delivering them and detailing any ongoing maintenance arrangements.
- 5.5.23 With the mitigation and compensation measures in place, no long-term residual impacts of significance are predicted for any notable species. These include:
- The Scheme has the smallest amount of land taken from the SPA and includes additional enhancement of the existing SPA;
 - Provision of publicly accessible Replacement Land outside SPA, which will draw some recreational users away from the SPA;
 - The design of the drainage system complies with all current standards and SuDS best practice techniques to ensure that sustainability is a key drainage design criterion.
 - Ponds have been incorporated into the design as combined treatment and attenuation pond, with a forebay followed by attenuation. A permanent dry weather flow channel shall be incorporated within the attenuation section of all storage ponds to assist discharge of low flows except where the ponds will have a permanently.
- 5.5.24 Effects are unlikely to be significant where features of low value or sensitivity are subject to small or short-term impacts. Overall, it is considered that the mitigation, compensation and enhancement measures proposed will allow the residual effects of the Scheme to be minimised as much as possible. During the design process and in response to consultation, some additional potential enhancement measures have been identified that have the potential to provide additional biodiversity enhancements over and above those required to mitigate or compensate for the potential impacts of the Scheme.

Waste management

- 5.5.25 Measures for managing waste and materials are proposed, alongside details of their implementation, measuring and monitoring, within Chapter 12 Materials and Waste of the Environmental Statement (application document TR010030/APP/6.3). The assessment concludes that the amount of waste generated by the Scheme will have a neutral or slight effect (not significant) on the existing waste arisings and capacity baseline.
- 5.5.26 Measures proposed to manage hazardous and non-hazardous waste are inclusive of, but not limited to, the implementation of the waste hierarchy (which minimises arisings sent to disposal), the correct management of waste both on-site and off-site and identifying the appropriate waste infrastructure for waste treatment and disposal. Where possible materials such as natural soil and concrete rubble will be reused within the Scheme as there is a net requirement for fill material. This will reduce the volume of waste arisings and waste sent to landfill.
- 5.5.27 Appendix 1.2 of the Environmental Statement Appendices (TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC). This details the waste mitigation measures that would be implemented, why they are

required, who is responsible for delivering them, and any ongoing maintenance arrangements. This can be secured within the Requirements in Schedule 2 of the draft Development Consent Order (TR010030/APP/3.1).

- 5.5.28 The waste management measures signposted to the above documents demonstrate the intention to minimise the volume of waste produced and that sent for disposal in line with NPS NN.

Dust, odour, artificial light, smoke and steam

- 5.5.29 The Statutory Nuisance Statement (application document TR010030/APP/5.2) considers matters specified in section 79 (1) of the Environmental Protection Act 1990 (1990 Act) which may, potentially, be engaged as a consequence of the authorised project. This includes such nuisance as caused by dust, odour, artificial light, smoke and steam, having regard to the findings of the Environmental Statement (application document TR010030/APP/6.3). The Environmental Statement and Statutory Nuisance Statement (application document TR010030/APP/5.2) states that there is limited potential for smoke emitted from premises and any dust, steam, smell or other effluvia as covered in section 79(1) of the 1990 Act to arise. The potential for dust nuisance is covered in the Air Quality chapter (Chapter 5) of the Environmental Statement (application reference TR010030/APP/6.3) and the mitigation needed to ensure dust generation during construction is managed. With the proposed mitigation in place, it is not expected that there would be a breach of section 79(1) of the 1990 Act during construction or operational activities.
- 5.5.30 The construction activities that have the potential to create a nuisance will be controlled through strict compliance with the implementation of the environmental measures identified in the Environmental Statement (application document TR010030/APP/6.3) and through the Outline Construction Environmental Management Plan (application document TR010030/APP/7.2) which will include measures that will minimise the potential to cause nuisance. Whilst the Environmental Statement concludes that there is no statutory nuisance the Applicant has included an article in the draft DCO which would provide a defence against cases of nuisance in order that the defence can be relied upon in circumstances where a statutory nuisance cannot be avoided.
- 5.5.31 Paragraph 5.83 of the NPS NN identifies that for NSIPs, some impact on amenity for local communities is likely to be unavoidable but that impacts should be kept to a minimum and should be at a level that is acceptable.
- 5.5.32 Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) assesses the impact on amenity for local communities. Amenity impacts may occur during operation where two or more amenity influences (air quality, noise, visual impact) are experienced by one receptor, which are considered in Environmental Statement chapter 13 Tables 13.32. Non-motorised users (NMU) impacts from the Scheme are reviewed in table 13.15 of chapter 13. It concludes that no residual significant amenity effects are anticipated for private dwellings, but significant adverse effects are forecast during construction for the users of Painshill Park and Feltonfleet School. This is due to day time and night time construction noise and visual effects at Painshill Park and day time construction noise and visual effects at Feltonfleet School.

5.5.33 The mitigation will be secured by draft DCO Requirement 3 (Construction and handover environmental management plans) in the draft DCO (application document TR010030/APP/3.1).

5.5.34 The Scheme will be compliant with the NPS NN and proposed mitigation will ensure impacts are kept to a minimum.

Civil, ancillary aviation and defence interests

5.5.35 There are no aerodromes in the vicinity or otherwise likely to be affected by the Scheme. The Scheme would not have any impact on aviation or other defence interests.

5.5.36 The Ministry of Defence and NATS En-Route (NERL) safeguarding have been consulted regarding the Scheme and confirmed that the Scheme does not conflict with civil or military aviation and/or other defence assets. There is no conflict with the NPS NN.

Flood risk

5.5.37 A Flood Risk Assessment (FRA) (application document TR010030/APP/5.5) has been undertaken for the Scheme. The FRA identifies residual risks and provides the evidence of the sequential and exceptions tests and has used data sources from the Environment Agency, Elmbridge Borough Council and Guildford Borough Council Strategic Flood Risk Assessments and Surrey County Council, in its role as lead local flood authority (LLFA).

5.5.38 As per the National Networks National Policy Statement (NPS NN) (DfT 2014) guidance and policy requirements on flood risk, the Scheme should consider the risks for the life time of the development and avoid being in areas of flood risk as quoted from the National Planning Policy Framework (DCLG, 2012) (NPPF, 2012). The FRA was carried out in accordance with the NPPF 2012 paragraphs 100 to 104 as advised in the NPS NN and its accompanying Technical Guidance (DCLG, 2014), and the Environment Agency's 'Climate change allowances for planners' NPPF supporting guidance (EA, 2013). The NPPF was updated in February 2019 and the relevant policies concerning flood risk and sequential testing are now contained in paragraphs 155-165. The FRA is also in line with HD 45/09 (Highways Agency, 2009). The FRA has considered the risk from all sources of flooding to and from the Scheme and demonstrates how the risks will be managed, taking account of climate change.

5.5.39 The Scheme constitutes an upgrade to existing infrastructure in an area at risk of flooding. Where possible, a sequential approach was taken within the study area for aspects such as locating balancing ponds and site compounds. The Scheme's adherence to the requirements of the exception test is detailed in the FRA (application document TR010030/APP/5.5).

5.5.40 All reasonable steps have been taken to avoid, limit and reduce the risk of flooding to proposed infrastructure and the surrounding area. Based on current flood risk understanding and the incorporation of specific flood risk mitigation measures for the construction and operation of the Scheme, it would constitute an acceptable level of flood risk and would not increase flood risk elsewhere. This will be the case throughout the lifetime of the Scheme, taking climate change into account.

5.5.41 Mitigation measures are identified in the outline Construction Environmental Management Plan (CEMP) and will be secured by draft DCO Requirement 3 (Construction and handover environmental management plans) in the Draft DCO and Schedules (DCO Application Reference TR010030/APP/3.1).

5.5.42 With mitigation measures, no residual impacts to flood risk are anticipated. As such, the Scheme is considered to comply with the NPS NN and NPPF in relation to flood risk.

Land Instability

5.5.43 Chapter 10 Geology and Soils of the Environmental Statement (application document TR010030/APP/6.3) assesses the potential ground stability hazards and impacts on land instability arising from the Scheme.

5.5.44 There is a localised moderate risk of compressible ground where Alluvium or Made Ground/ infilled land is present, and low risk elsewhere within the Scheme. Where compressible ground is confirmed during the proposed ground investigation, the risks to proposed engineering structures will be mitigated by design (likely either by excavation and replacement with more competent material or the use of foundations). In the scenario of the compressible ground being excavated and replaced with more competent material, the effect of the development would be permanent minor beneficial during construction and is considered to be not significant. Assuming mitigation measures have been adopted during construction, only a potential negligible magnitude will be present during operation and this corresponds to a negligible (not significant) effect.

5.5.45 There is a very low potential for collapsible ground under baseline conditions. The likely degree of change to this risk rating as a result of the Scheme is considered negligible during construction and operation and therefore the overall effect is considered to be not significant and permanent.

5.5.46 If site specific GI identifies a possible risk from landslides, running sands, aggressive ground or shrinking and swelling clay, proposed structures will be mitigated by design therefore it is considered that no change to these geological features will occur as a consequence of the development relative to the baseline. The effects during construction are considered to be permanent minor beneficial and not significant. Assuming mitigation measures have been adopted during construction, only a potential negligible magnitude will be present during operation and this corresponds to a negligible and permanent effect.

5.5.47 The Scheme is not located in an area affected by mining, based upon a review of the Coal Authority Interactive Map viewer. Hence there has been no requirement to liaise with the Coal Authority.

Historic Environment

5.5.48 In compliance with paragraphs 5.126 and 5.127 of the NPS NN, Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3) describes the heritage impacts through an assessment of effects and with information on topographical, geological and archaeological conditions, in addition data on each asset is presented in the Environmental Statement Cultural Heritage Appendices (DCO Document reference TR010030/APP/6.5).

- 5.5.49 Paragraph 5.133 of the NPS NN states that development consent should not be granted for works that will lead to substantial harm or total loss of significance of a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary in order to deliver substantial public benefits that outweigh that loss or harm.
- 5.5.50 Prior to mitigation, the Scheme will have significant effects on nine heritage assets. However, following mitigation such as landscaping and noise mitigation, none of these effects will be significant.
- 5.5.51 Archaeological mitigation and further design consultation to mitigate impacts on built heritage and its settings will be secured through the outline Construction Environment Management Plan (CEMP) through draft Requirement 3 and draft DCO Requirement 14 (Archaeology) in the draft DCO (application document TR010030/APP/3.1), which requires a written scheme of investigation to be approved by the SoS, following consultation with the relevant planning authority and County archaeologist, before the Scheme can commence.
- 5.5.52 The Scheme is compliant with the NPS NN with regards to the Historic Environment.

Landscape and visual impact

- 5.5.53 Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) considers the likely significant effects of the scheme upon the surrounding landscape character and visual receptors. It also considers the effects on landscape character and landscape designations for both the construction and operational phases of the Scheme, and the visual effects of the Scheme on local receptors during the construction and operational phases.
- 5.5.54 In accordance with the NPS NN, an assessment of any likely significant landscape and visual impacts has been undertaken and described in Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3). The landscape and visual assessment follows published guidance including Highways England's Interim Advice Note (IAN) 135/10 Landscape and Visual Effects Assessment and DMRB Volume 11, Section 3, Part 5 Landscape effects and considers the Landscape Institute's published Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd edition.
- 5.5.55 Significant adverse residual effects are expected for visual impact receptors, road users and the landscape character during construction and for visual impact receptors during operational year 1.
- 5.5.56 Landscape and visual mitigation measures are embedded in the Scheme's design; for example; providing screening with native planting characteristic of the local landscape, and aligning proposed local access roads to avoid large areas of mature vegetation and landscaping removal. There are anticipated to be moderate, significant adverse impacts during construction and during the early years of the operational phase. However, these are temporary in nature and will be mitigated once the Scheme's planting has established. Planting and landscape management within the replacement land areas will deliver some longer-term landscape and visual benefits.
- 5.5.57 The Scheme has been designed carefully to avoid adverse effects or minimise harm to the landscape including reasonable landscape mitigation planting within

the Scheme extents, in compliance with NPS NN Paragraph 5.157 and no permanent significant residual effects are anticipated.

Green Belt

- 5.5.58 Chapter 2 of this Planning Statement sets out the need case for the Scheme, as a form of linear infrastructure. The whole of the Scheme lies within the Green Belt.
- 5.5.59 Paragraph 5.178 NPS NN states:
- 'When located in the Green Belt national networks infrastructure projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The SoS will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations...'*
- 5.5.60 It is acknowledged by Highways England that the Scheme represents 'inappropriate development' within the Green Belt. However, as demonstrated below, any actual or perceived harm to the openness of the Green Belt is outweighed by other material considerations, which amount to 'very special circumstances' sufficient for the Scheme to be consented. In this regard, the relevant policy restrictions on development in the Green Belt are to be weighed against the other policy considerations, which inform the planning balance put forward in this Planning Statement.
- 5.5.61 The need for the Scheme is an important and relevant consideration that should be attributed significant weight. The rationale behind the Scheme has been set out in Chapter 2 of this Statement with reference made to the Government's support in improving journey times and safety and the need to improve capacity on the proposed route to support employment, economic development and growth opportunities within the region, which are reflected in the Scheme objectives
- 5.5.62 The Scheme has been through a rigorous assessment process and has been included in the first DfT RIS 2015-2020, published in 2014.
- 5.5.63 It would not be possible for an intervention to take place at M25 junction 10 without it being in the Green Belt and the Scheme has been designed so as to minimise potential effects on the Green Belt, through minimising land take, providing replacement land (for the areas of common land and open space required) and proposing reinstatement planting to mitigate adverse effects.
- 5.5.64 In determining the extent to which harm may be caused to the Green Belt by the Scheme, reference is made to the five purposes of the Green Belt, set out in paragraph 134 of the NPPF, as follows:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and

- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

5.5.65 Taking each in-turn, the purposes of including land within the Green Belt and the associated responses are set out below:

To check the unrestricted sprawl of large built-up areas

5.5.66 The Scheme is wholly within the Green Belt. The closest large built up areas are Cobham to the north east and Byfleet to the west and the Scheme would not be leading to an extension of those urban areas, nor further incursion into the Green Belt.

5.5.67 The Guildford Local Plan (2019) has removed the former Wisley Airfield site from the Green Belt through Policy A35.

To prevent neighbouring towns from merging into one another

5.5.68 The Scheme involves alterations to the existing junctions, stopping up side roads and providing new accesses. Work is proposed outside of the existing highway boundary within the Green Belt, but this would not be facilitating the merger of neighbouring towns. It would also not impact on or reduce the ability of the Green Belt to prevent neighbouring towns from merging.

To assist in safeguarding the countryside from encroachment

5.5.69 It is acknowledged that the Scheme represents 'inappropriate development' within the Green Belt but the encroachment into the Green Belt has been minimised as much as possible and it is not considered that the Scheme would result in further encroachment or inappropriate development. The Scheme has 'very special circumstances' and there is an identified need.

To preserve the setting and special character of historic towns

5.5.70 There is no anticipated change to the setting and character of historic towns within the Green Belt.

To assist in urban regeneration by encouraging the recycling of derelict and other urban land

5.5.71 The Scheme aims to improve journey times on the A3 junctions and M25 junction 10 in delivering capacity enhancements to support employment and residential/commercial development and growth opportunities. This is seen as having a positive effect on bringing forward development land and opportunities in the area.

Openness of Green Belt

5.5.72 Despite there being very special circumstances to allow the Scheme, it is considered the Scheme would not affect the openness of the Green Belt as set out below.

5.5.73 In the South East quadrant, the proposed Wisley Lane diversion will follow closely an already approved road alignment included in the partially implemented extant consent on part of the site (ref. SCC ref: 2012/0034 / Guildford ref. 12/P/00533) for a fully enclosed in-vessel composting facility with a new

vehicular/pedestrian access from the A3 Ockham roundabout. The precedent for development is already there and it should also be noted that the Guildford Local Plan has removed the former Wisley Airfield site from the Green Belt through Policy A35.

- 5.5.74 In the South West quadrant, there are already works consented and underway in the RHS Wisley car park (Guildford ref. 16/P/01080) and the Scheme will not have significant adverse effects on the heritage and community asset at RHS Wisley, as retaining walls are included to keep the A3 widening within the existing HE boundary and the Wisley Lane diversion works have been designed to maintain access to the garden throughout (See Chapter 11 Cultural Heritage) and Chapter 13 (People and Communities) of the Environmental Statement (Ref. TR010030/APP/6.3).
- 5.5.75 On Wisley Common, the access routes are already used for forestry and management works by Surrey Wildlife Trust and their vehicles. The leisure use at Birchmere Scout Camp will continue, which is compatible with the Green Belt designation. The replacement and upgrade of Cockcrow Bridge will be of benefit to these existing uses.
- 5.5.76 In the North East quadrant, the new private means of access (PMA) will run parallel and close to the existing A3, existing buildings and a gas compound.
- 5.5.77 The leisure uses at Heyswood Girl Guides site and at Wisley Trails will continue and the works have been designed and developed with stakeholder to minimise effects on Painshill Park.
- 5.5.78 It should also be noted that SWT regularly fell trees as part of their management works on the heathland and woodland on Wisley and Ockham Commons and Chatley Heath, meaning the landscape changes periodically. Trees were felled in the north east quadrant in 2018 for example.
- 5.5.79 In the South East, North East and North West quadrants, routes in the public access land are already used for forestry and management works by Surrey Wildlife Trust and their vehicles. The proposed Replacement Land will make more fields and woodlands accessible from which to enjoy the Green Belt.
- 5.5.80 The Replacement Land, the SPA enhancement measures and the new and upgraded PRow will enhance the experience of openness within the Green Belt. The resulting PRow network, which includes new bridges at Red Hill and Sandpit Hill, will also mean that no NMU needs to come into direct contact with the SRN, which is a benefit over the existing arrangements.
- 5.5.81 Most of the Scheme proposals are adjacent to the SRN, which is not where the openness of the Green Belt can be fully enjoyed due to the existing infrastructure detracting from the attractiveness of the area.
- 5.5.82 The proposed construction compounds, soil storage areas and other areas for construction use within areas of public access will be reinstated as areas of public access and returned to the landowners, therefore these temporary land requirements will not affect the openness of the Green Belt.
- 5.5.83 There is policy support for the Scheme and it will not detract from the fundamental purpose of the Green Belt nor its openness.

Other Land use

Open Space and Common Land

- 5.5.84 Paragraph 5.181 of the NPS NN discusses mitigation of any adverse effects on green infrastructure or open space. It states, *‘Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility.’*
- 5.5.85 Replacement land has been included in the design of the Scheme and is detailed in full in the Statement of Reasons Appendix C: Common land and Open Space Report (application document TR010030/APP/4.1). The Appendix identifies the selection process, summarises the proposed Replacement Land locations and identifies the advantages to the public.
- 5.5.86 The Appendix concludes that suitable Replacement Land can be provided in exchange for the special category land that will be required for the Scheme, which would satisfy the requirements in Section 131 and 132 of the Planning Act 2008 (as amended), Annex A of the 2013 DCLG Guidance on Compulsory Purchase and Sections 16(6) and 38(1) of the Commons Act 2006.
- 5.5.87 The project to construct this part of the M25 and junction 10 in the early 1980s entailed the compulsory acquisition of areas of common land and open space from Wisley and Ockham Commons and Chatley Heath. Exchange land was provided for this under the requirements of the Acquisition of Land Act 1981 in four locations: Clearmount, Hatchford Wood, land at Hut Hill and the Wilderness area near Hatchford End, and open public access is available to these areas. The legal vesting process for these areas has not yet been completed, which means that the common land elements have not yet been entered in the commons register at SCC. However, the vesting process is in hand, the Scheme has proceeded on the basis that these exchange land areas have acquired their correct final status as common land.
- 5.5.88 The Replacement Land provided will also provide scope for the provision of mitigation or compensatory habitats for land lost from the various ecological designations, where this is compatible with the works required to make the land equally advantageous to the public. Construction activities to improve access to the replacement land areas and enhance their scenic quality and biodiversity are included in Work No. 59.
- 5.5.89 The replacement land proposed is in accordance with the requirements of the Planning Act sections 131 and 132 regarding the acquisition of title to and rights over special category land, such that special parliamentary procedure will not be required.
- 5.5.90 Once construction of the Scheme has been completed, all temporary works would be cleared from the special category land and these areas of temporary possession restored sufficiently to be handed back to the respective owners (SCC and RHS) with public access reinstated. This could be between 2.5 and 4 years after the start of construction, depending on the degree of reinstatement and revegetation required. The resulting approximate ratios of permanent loss of special category land (excluding the areas with rights added) to provision of replacement land would then be:
- Wisley Common – 19.97ha to 6.29ha – 3.2:1

- Chatley Heath – 3.30ha to 1.10ha – 3.0:1
- Open space (including Ockham Common) – 15.76ha to 6.60ha – 2.4:1

5.5.91 This represents an approximate net increase of 15.9ha or 8.0 % in the extent of registered common land at the Wisley site and an approximate net increase of 9.2ha or 5.7% in the extent of public open space at the Wisley site.

Minerals

5.5.92 NPS NN Paragraph 5.169 identifies that applicants should safeguard any mineral resources as far as possible.

5.5.93 Environmental Statement Chapter 10 Geology and Soils (application document TR010030/APP/6.3) identifies that the Scheme is situated within sand and gravel mineral resource zones associated with the River Wey and River Mole, and that there are four Mineral Safeguard Areas (MSAs) within the study area.

5.5.94 It was confirmed during liaison with Surrey County Council that the potential impact of the Scheme on MSAs need not be covered in the EIA process as the sterilisation of small parts of the larger MSAs would be unlikely to constitute a significant effect (see Appendix 10.8 for correspondence - application document TR010030/APP/6.5). The Scheme boundary has changed since these discussions were carried out, however, given the limited alterations which have been made to the Scheme boundary and the type of proposed works in the areas where MSAs are marginally encroached upon, the conclusions made by Surrey County Council still apply.

Agricultural Land

5.5.95 NPS NN Paragraph 5.176 identifies that the decision maker should take into account the economic and other benefits of the and (BMV).

5.5.96 Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) assesses the impact of the Scheme on agricultural land, including the economic impact on farms and land-based enterprises with particular emphasis on agricultural quality of soils and BMV land.

5.5.97 The Scheme has been designed so as to minimise the permanent loss of BMV.

5.5.98 Of the 10.8 ha to be temporarily possessed for construction compounds 5.31 ha (50%) is of BMV quality. This will be restored to agricultural use at the end of the construction phase (para 13.8.70 Chapter 13).

5.5.99 The agricultural land to be used for SPA compensation is 22.05 ha of which 1.3 ha (6%) is of BMV quality. This will be managed in the future through conservation grazing and so will not be lost to agriculture.

5.5.100 The Scheme will result in a loss of 4.88 ha of BMV land, well below Natural England's 20 ha significance threshold. Measures to protect soil quality on site during construction of the Scheme will be implemented as part of the CEMP, which will be secured by draft DCO Requirement 3 (Construction and handover environmental management plans) in the draft DCO (application document TR010030/APP/3.1).

Green Infrastructure

- 5.5.101 Extensive areas of habitat creation and a new wildlife crossing (Green Bridge) over the A3 will ensure that the Scheme will maintain the integrity of the green infrastructure network. Moreover, the Replacement Land, the SPA enhancement measures and the new and upgraded PRow will enhance the experience. The resulting PRow network, which includes new bridges at Red Hill and Sandpit Hill, will also mean that no NMU needs to come into direct contact with the SRN, which is a benefit over the existing arrangements.
- 5.5.102 The Highways England Road Investment Strategy identifies improvements to M25 junction 10/A3 Wisley interchange as one of the key investments in the SRN for the London and South East region. As well as reducing delays and increasing journey time reliability of the road network, the Scheme enhances accessibility offered by the NMU network through new and upgraded routes and crossings which are integrated within the proposals.

Development land

- 5.5.103 Environmental Statement Chapter 13 People and Communities includes a Development Land assessment, which looks at future changes in land use due to new development, which would be likely to occur in the absence of a scheme, through reviewing local planning authorities planning designations and where planning permission has been granted.
- 5.5.104 The Scheme has been reviewed against the NPS NN, the NPPF (where the NPS NN directs it) and designations, site allocations and policies in the existing Development and Local Plans of Surrey County Council, Elmbridge Borough Council and Guildford Borough Council.
- 5.5.105 It is not considered that there would be residual significant adverse effects on any other Development Land and there is no conflict with proposals in the development plan for the Scheme.

Noise and vibration

- 5.5.106 In line with the NPS NN the Scheme aims to avoid significant adverse effects from noise and vibration as far as possible and to use mitigation measures to reduce significant adverse and adverse impacts. To date, this has been achieved by noise modelling different option variants of the Scheme in previous assessment stages to determine what impacts may occur and where, and which areas may require mitigation.
- 5.5.107 As the design of the preferred option has progressed, the following activities have been undertaken to meet the national policy objectives:
- Examination of locations where significant adverse impacts were previously predicted to determine the feasibility of noise mitigation options for these areas;
 - Investigation of predicted noise levels at ecological sites and locations of historical or cultural heritage to ensure that noise levels from the Scheme do not significantly deteriorate the value of these areas;

- Replacement of existing noise barriers as part of the Scheme's design to ensure that their acoustic performance is not diminished by holes or gaps that may have appeared in the existing noise barriers over time;
- Incorporation of mitigation measures in the Scheme's design to improve road traffic noise levels at Important Areas wherever possible. This has included low noise road surfacing and extending some of the existing noise barriers at junction 10;; and
- Investigation of noise mitigation measures for the Thames Basin Heath SPA.

5.5.108 It can be concluded that the Scheme is therefore in accordance with the NPS NN in respect of noise and vibration.

Impacts on transport networks

- 5.5.109 In line with the NPS NN, impacts of the Scheme on the Strategic Road Network, surrounding roads and on the NMU network (comprising Public Rights of Way, footpaths, overbridges and roads) have been considered in the Transport Assessment (application document TR010030/APP/7.4).
- 5.5.110 The Scheme's dedicated NMU features maximise the opportunity to support other transport modes and address existing severance issues.
- 5.5.111 In-built mitigation measures concerning the design, layout and operation of the Scheme promote sustainable development, through improving resilience of the road network and improving NMU accessibility.
- 5.5.112 Overall, the Scheme will improve NMU accessibility. Adverse effects during the construction phase will be mitigated through measures set out in Environmental Statement Chapter 13 People and Communities (application document TR010030/APP/6.3), but remain significant, albeit only temporary.
- 5.5.113 The Scheme was developed to be consistent with the NPS NN, and the transport strategies produced by Surrey County Council, and Guildford, Elmbridge and Woking Borough Councils. As stated in the Transport Assessment (application document TR010030/APP/7.4) With respect to the key objectives, the Scheme will improve overall journey time reliability and reduce delay on the local highway network. It is anticipated that the introduction of the Scheme will improve road safety for all users.
- 5.5.114 The Scheme will provide significantly enhanced facilities for pedestrians, cyclists and horse riders through new provision and improvements to the network of PRow and local road connections and meet the key objective to incorporate safe, convenient, accessible and attractive routes.
- 5.5.115 In terms of operational traffic impacts on the highway network, the Scheme will provide significant improvements to capacity and reduce delay at the M25 junction 10 and the Painshill and Seven Hills Road junctions. Given the overall benefits of the Scheme, its compliance with national, regional and local policies and the fact that it achieves the stated Scheme objectives, it is considered that there is no reason why the Scheme should not be approved on transport grounds.

Water quality and resources

- 5.5.116 Highways England has put in place processes for obtaining the relevant consents regarding pollution control. Highways England has sought the agreement of relevant consenting bodies to be able to include other consenting requirements within the scope of the DCO. For other consents that may need to be obtained separately from the DCO, Highways England is either seeking to obtain these in parallel with the DCO process or has sought assurances from the relevant consenting bodies that there are no impediments to such consents being given. See the Consents and Agreement Position Statement (application document TR010030/APP/3.3).
- 5.5.117 The Scheme design and development minimises the volume of waste produced and complies with the Water Framework Directive requirements (DCO Application Reference TR010030/APP/5.4). There has been ongoing consultation with the Environment Agency throughout the design process to ensure the Scheme is designed sympathetically to the water environment. In addition, the Scheme has sought to enhance water quality by attempting to cease highway runoff from entering Bolder Mere, which is a Water Framework Directive lake waterbody. This will improve the water quality of the lake and remove the risk of an acute pollution incident as a result of a spillage on the highway.
- 5.5.118 Chapter 8 Road Drainage and Water Environment of the Environmental Statement (application document TR010030/APP/6.3) includes details of mitigation measures for adverse effects on the water environment, comprising those for surface water, flood risk and Water Framework Directive elements, for both construction and operational phases of the Scheme. With the correct implementation of mitigation measures, no or neutral effects are anticipated on surface water, flood risk and WFD during construction and operation of the Scheme.
- 5.5.119 The Scheme is considered to be in conformity with the NPS NN in relation to water quality and resources.

5.6 National Planning Policy Framework

- 5.6.1 The National Planning Policy Framework (DCLG February 2019) (NPPF) was updated by the Ministry of Housing, Communities and Local Government and published in February 2019. It sets out the Government's national planning policies for England and is a material consideration in planning decisions.
- 5.6.2 The NPPF does not provide specific policies relating to NSIPs. Paragraph 1.17 of the NPS NN states that the NPS and NPPF are consistent, with paragraph 1.18, stating that the NPPF will be an important and relevant consideration '*but only to the extent relevant to [the] project*'. Therefore, it is necessary to consider the extent of any such relevance and compliance with the policies that it contains.
- 5.6.3 The NPPF is explicit about the role of NPS being the primary decision-making document for NSIPs under the Act. Paragraph 5 of the NPPF states:
"The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national

policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy and may be a material consideration in preparing plans and making decisions on planning applications.”

- 5.6.4 NPPF paragraphs 133-147 address planning policy in relation to the Green Belt. The Green Belt is addressed fully in the consideration of the NPS NN policy framework above. Development within the Green Belt is a key issue within the NPPF, and the impact of the Scheme on the Green Belt is addressed fully in the consideration of the NPS NN policy framework above. As such, the Scheme is consistent with the provisions and requirements of the NPPF.
- 5.6.5 The provision of the Scheme would support the NPPF economic objective and strategic policy to make adequate provision for transport infrastructure and support the key Scheme objective to support economic growth in the area.
- 5.6.6 The Scheme accords with the key aims of the NPPF, notably by improving the conditions in which people travel and providing improved infrastructure to support economic growth.

5.7 Local planning, minerals and transport policy

- 5.7.1 The National Policy Statements are the primary planning policy documents for decision making on NSIPs, but local planning policy is still relevant as it will be taken into account when the local authorities prepare their Local Impact Report.
- 5.7.2 This section provides a summary of the assessment of the Scheme against relevant local planning, minerals and transport policies for each of the relevant local planning authorities, which are Surrey County Council, Elmbridge Borough Council and Guildford Borough Council. It considers whether the Scheme is in accordance with the policy framework at this level, as compliance with local policy is an important and relevant consideration and is material in assessing the planning balance.

South East Plan 2009

- 5.7.3 The South East Plan was published by the SoS and adopted in May 2009 and partially revoked on 25 March 2013, but Policy NRM6, which deals with the Thames Basin Heaths Special Protection Area, remains in place.
- 5.7.4 Policy NRM6 directs that new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basic Heaths Special Protection Area (SPA) to demonstrate that adequate measures are put in place to avoid or mitigate any potential effects, or development should be directed to where potential adverse effects can be avoided without the need for mitigation measures. Where mitigation measures are required, local planning authorities, as Competent Authorities, should work in partnership to set out clearly and deliver a consistent approach to mitigation. The policy also discusses Zones of Influence, exclusion zones and Suitable Accessible Natural Greenspace (SANG).
- 5.7.5 The Environmental Statement Chapter 7 Biodiversity (DCO application reference TR010030/APP/6.3) and the HRA (DCO application reference TR010030/APP/5.3) were prepared to be in conformity with this extant regional planning policy, in addition to the NPS NN. Mitigation has been designed and

developed with Natural England and it will be secured by draft DCO Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Measures) in Schedule 2 of the Draft DCO & Schedules (application document TR010030/APP/3.1).

Surrey County Council Transport Plan, 2011-2026

Rights of Way Improvement Plan for Surrey (revised 2014)

5.7.6 The Rights of Way Improvement Plan (application document TR010030/APP/2.4) illustrates that the Scheme would be in line with five main objectives for improving the rights of way:

- to improve accessibility to services, facilities and the wider countryside along rights of way;
- to improve connectivity of rights of way and to reduce severance;
- to improve the quality of the rights of way network;
- to increase recreational enjoyment; and
- to secure coordinated implementation of the Rights of Way Improvement Plan within resources available.

Surrey Cycling Strategy 2014-2026

5.7.7 Surrey County Council have identified that they will make cycling an integral consideration within their highway's programmes, processes and projects and they will explore the opportunity to integrate cycling needs within the rights of way network

5.7.8 The Scheme addresses the rights of way and cycling objectives and that the proposed enhancements to the network have been developed with Surrey County Council.

Air Quality Strategy (2016)

5.7.9 Surrey County Council has prepared an Air Quality Strategy with the aim of improving "air quality in AQMAs on the county road network such that Surrey's borough and districts are able to undeclare these areas as soon as possible, with regard to other strategies and funding constraints".

5.7.10 There are no Guildford Borough Council AQMAs within air quality study area. Elmbridge Borough Council has declared six AQMAs within its administrative area for exceedances of the annual mean NO₂ objective, of which one, Esher AQMA, is within the study area. Runnymede Borough Council, whose administrative area covers M25 junction 11, also has an AQMA within the air quality study area, which is located along the M25 within its borough, and declared for exceedances of both annual mean NO₂ and fine particulate matter (PM₁₀). Reigate and Banstead borough council have also declared an AQMA along the M25 which is within the air quality study area, for exceedances of the annual mean NO₂ objective. In addition, the Royal Borough of Kensington has also declared a borough wide AQMA for exceeding annual mean NO₂ and fine particulate matter (PM₁₀) objectives, part of which is in the air quality study area. Environmental Statement Chapter 5 Air Quality (application document TR010030/APP/6.3) has concluded that there are no anticipated significant

residual adverse effects during construction or once the Scheme is operational, which includes on the AQMAs.

Surrey County Council Minerals and Waste Plan

Surrey Minerals Plan Core Strategy Development Plan Document 2011

- 5.7.11 Policy MC6 (Safeguarding mineral resources and development) and Policy MC7 (Aggregate minerals supply) are relevant to the Scheme.
- 5.7.12 Chapter 10 (Geology and Soils) of the Environmental Statement (document ref. TR010030/APP/6.3) identifies that mineral resources and Mineral Safeguard Area's (MSAs) are located within the study area. In compliance with Policy MC6 and MC7 of the Surrey Minerals Plan Core Strategy Development Plan Document 2011, discussions were carried out with Surrey County Council regarding the MSAs and confirmation was received (correspondence provided in Appendix 10.8 of the Environmental Statement document ref. TR010030/APP/6.3), that the Council considers the potential impact of the Scheme on MSAs need not be covered in the EIA process as the sterilisation of small parts of the larger MSAs would be unlikely to constitute a significant effect. The Scheme boundary has changed since these discussions were carried out, however, given the limited alterations which have been made to the Scheme boundary and the type of proposed works in the areas where MSAs are marginally encroached upon, the conclusions made by Surrey County Council still apply.

Surrey Waste Plan 2008

- 5.7.13 Policy WD2 (ii) of the Surrey Waste Plan (2008) identifies that planning permission will be granted for development involving recycling, storage, transfer, materials recovery and processing facilities (excluding thermal treatment) if the proposed development is at one of the sites shown on the Site Boundary Maps, which includes the land at the former airfield, Wisley.
- 5.7.14 Policy DC1 (safeguarding sites) identifies in (i) that the sites named in Policies WD1, WD2 and WD5 which may be required for waste management use will be safeguarded. This includes part of the former Wisley Airfield site.
- 5.7.15 On the former Wisley Airfield, on the part of the site which is safeguarded subject to Policy WD2, there is a partially implemented extant consent (ref. SCC ref: 2012/0034 / Guildford ref. 12/P/00533) for a fully enclosed in-vessel composting facility with a new vehicular/pedestrian access from the A3 Ockham roundabout. It was found to be legally implemented through the building of a bund on site.
- 5.7.16 The Scheme has realigned Wisley Lane so that it approximately follows the route of that proposed by the composting facility but would require the composting development to be redesigned and would be in conflict.
- 5.7.17 The Waste Plan is currently being reviewed and it is anticipated the updated plan will be adopted later in 2019. SCC state in an update on the allocated sites in the current Waste Plan 2008, that:

“Planning permission granted but facility not constructed. Landowner interest in waste uses now withdrawn as site forms part of a proposed new settlement. Hence site not taken forward in new plan.”

5.7.18 Therefore, the Scheme is not considered to be in conflict with the composting facility as it is unlikely to be implemented. The development and site allocation have been included in the Development Land assessment in Chapter 13 People and Communities (application reference TR010030/APP/6.3) but because it is unlikely to be fully implemented it wasn't included in the 'Other Development' shortlist for the Chapter 16 Cumulative Effects Assessment of the Environmental Statement (application reference TR010030/APP/6.3).

Elmbridge Core Strategy 2011

5.7.19 Policy CS13 (Thames Basin Heaths Special Protection Area) states that new residential development which is likely to have a significant effect on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA) will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects. Further information in relation to zones of influence and provision of Suitable Accessible Natural Greenspace (SANG) is included in the policy.

5.7.20 CS15 (Biodiversity) states that the Council will seek to avoid loss and contribute to a net gain in biodiversity across the region and the objective of the Surrey Biodiversity Action Plan (BAP).

5.7.21 In conformity with these policies and the NPS NN, it has been identified in Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) that the loss of some irreplaceable habitats (ancient woodland and veteran trees) has been minimised as much as practicable, but some loss is unavoidable. In addition, the Scheme will lead to land take from designated sites and habitats of principal importance. Mitigation and compensation measures have been put in place to create new areas of habitats, enhance existing habitats and create linkages between existing woodland and this has been designed and agreed with Natural England.

5.7.22 Spatial policy CS17 (Local Character, Density and Design) sets out that Elmbridge's unique environment is characterised by its green infrastructure, river corridors, historic assets and distinctive town and village settlements. It states that particular attention should be given to the design of development which could have an effect on heritage assets which include conservation areas, historic buildings, scheduled monuments, and the Borough's three historic parks and gardens.

5.7.23 As demonstrated in the Consultation Report (application document TR010030/APP/5.1), the Scheme has been designed and amended to address the potential for significant adverse effects on the Painshill Park heritage asset and consultation has been undertaken with Historic England and Painshill Park Trust (PPT).

Elmbridge Local Plan Development Management Plan 2015

5.7.24 Policy DM5 Pollution (Part c Air Quality) states that "Within designated Air Quality Management Areas, the Council will promote measures to improve air quality and will expect development proposals to avoid introducing additional sources of pollution... Planning permission will not be granted for proposals where there is a significant adverse impact upon the status of the Air Quality Management Area or where air quality may have a harmful effect on the health

of future occupiers of the development, taking into account their sensitivity to pollutants, unless the harm can be suitably mitigated”.

- 5.7.25 Environmental Statement Chapter 5 Air Quality (application document TR010030/APP/6.3) has concluded that there are no anticipated significant residual adverse effects during construction or once the Scheme is operational, which includes on the AQMAs.
- 5.7.26 Policy DM12 (Heritage) deals specifically with the historic environment and states that planning permission will be granted for developments that protect, conserve and enhance the Borough’s historic environment, which includes the following - Listed Buildings and their settings, Conservation Areas and their settings, Parks and Gardens of Special Historic Interest and their settings, Scheduled Monuments and their settings, Areas of High Archaeological Potential and County Sites of Archaeological Importance (CSAIs);
- 5.7.27 As explained above, the Scheme has been designed to address concerns regarding the potential for significant adverse effects at Painshill Park.
- 5.7.28 With mitigation in place, such as landscaping and noise mitigation, the Scheme will have no significant effects on heritage assets. Archaeological mitigation and further design consultation to mitigate impacts on built heritage and its settings will be secured through the CEMP through draft Requirement 3 and draft DCO Requirement 11 (Archaeology) in the draft DCO (application document TR010030/APP/3.1), which requires a Written Scheme of Investigation (WSI) to be approved before the Scheme can commence.
- 5.7.29 DM17 (Green Belt - development of new buildings) states that in order to uphold the fundamental aims of the Green Belt to prevent urban sprawl and to keep land within its designation permanently open, inappropriate development will not be approved unless the applicant can demonstrate very special circumstances that will clearly outweigh the harm.
- 5.7.30 Policy DM20 (Open Space and views) promotes the protection of Local Green Space (to be determined by Elmbridge Settlement ID Plans) from inappropriate development, unless there are very special circumstances that would clearly outweigh the potential harm. Development deemed to be appropriate under Green Belt policy will be permitted provided that the character of the area is protected and there is no conflict with the designation of Local Green Space.
- 5.7.31 As set out above in relation to the NPS NN, NPPF and the Green Belt, it is acknowledged that the Scheme proposes inappropriate development in the Green Belt but that there are very special circumstances justifying consent for the Scheme being given. It is not possible to undertake improvements at the junction without affecting the Green Belt, there is an identified need for the Scheme and the impacts have been mitigated as much as possible in consultation with key stakeholders.
- 5.7.32 Policy DM21 (Nature conservation and biodiversity) states that, in accordance with Core Strategy policy CS15 – (Biodiversity), all new development will be expected to preserve, manage and where possible enhance existing habitats, protected species and biodiversity features and the Council will work in partnership to explore new opportunities for habitat creation and restoration. Support will be given to proposals that enhance existing and incorporate new biodiversity features, habitats and links to habitat network into the design of the buildings themselves as well as in appropriate design and landscape schemes of

new developments with the aim of attracting wildlife and promoting biodiversity. Conditions will be used to secure the provision of mitigation measures, as appropriate. Development affecting national sites of biodiversity importance will not be permitted if it will have an adverse effect, directly or indirectly, individually or in combination, on the site or its features. In exceptional circumstances, proposals that have an adverse effect on a national site may be permitted if the benefits of the development clearly outweigh the harm. If a development is approved under these circumstances, appropriate avoidance, mitigation and compensation will be sought wherever possible.

- 5.7.33 The Environmental Statement Chapter 7 Biodiversity (DCO application reference) and the HRA (DCO application reference TR010030/APP/5.3) were prepared to be in conformity with national, regional and local planning policy. Mitigation has been designed and developed with Natural England and it will be secured by draft DCO Requirement 7 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Measures) in Schedule 2 of the Draft DCO & Schedules (application document TR010030/APP/3.1).

Guildford Local Plan (Saved Policies) 2003

- 5.7.34 As illustrated below the Guildford Local Plan was adopted in April 2019. There are a number of saved policies that are still a material consideration.
- 5.7.35 Policy HE12 (Historic Parks and Gardens) states that planning permission will not be granted for development which would detract from the character or appearance of a park or garden of special historic interest, or its setting. Permission will not be granted for unsympathetic subdivision.
- 5.7.36 The Consultation Report (application document TR010030/APP/5.1), details how the Scheme has been designed and amended to address the potential for significant adverse effects on RHS Gardens Wisley heritage asset and consultation has been undertaken with Historic England and the RHS.

Guildford Borough Local Plan: Strategy and Sites 2015-2034 (adopted April 2019)

- 5.7.37 Guildford Borough Council submitted the Guildford Submission Local Plan: Strategy and Sites December 2017 for examination by an independent inspector. Public hearings were held from 5 June to 5 July 2018, a public consultation was held between 11 September and 23 October 2018 on the main modifications to the plan and the last public hearings were held on 12 and 13 February 2019. The Local Plan was adopted on the 25th April 2019.
- 5.7.38 In their response to the Environmental Statement Scoping Report, Guildford Borough Council requested that the emerging policies (now adopted policies) be considered, in particular those which are identified below (reflecting the minor modifications).
- 5.7.39 Policy S2 (Planning for the borough - our spatial development strategy), which identifies the housing targets for the plan period and sets out in the introductory text that allocated land will need to be released for development and that the former Wisley Airfield is a strategic development site.
- 5.7.40 The former Wisley Airfield as a residential led development site for approximately 2,000 dwellings has been included in the Environmental Impact Assessment and

the Traffic Model, in recognition of the planning application (since refused and dismissed at Appeal) and the policy site allocation A35 which will be discussed below.

- 5.7.41 The Development Land assessment in Environmental Statement Chapter 13 People and Communities (application document TR010030/APP/6.3), concluded that the effects of the Scheme would be significant beneficial for the former Wisley Airfield site as the Scheme would provide the new exit from Ockham Park junction and new road alignment included in the masterplan. The operational Scheme would also add the capacity required for additional traffic which would arise from the site allocation if consented and implemented. Highways England will continue to engage with the land owners and will ensure the Schemes are compatible.
- 5.7.42 Policy P5 (Thames Basin Heaths Special Protection Area) sets out the approach to the protection of the SPA, when permission would be granted and the principles that apply.
- 5.7.43 As has applied to existing policies regarding the SPA, the Environmental Statement Chapter 7 Biodiversity (DCO application reference TR010030/APP/6.3) and the HRA (DCO application reference TR010030/APP/5.3) were prepared to be in conformity with national, regional and local planning policy. Mitigation has been designed and developed with Natural England and it will be secured by draft DCO Requirement 7 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Measures) in Schedule 2 of the Draft DCO & Schedules (application document TR010030/APP/3.1)
- 5.7.44 Policy ID1 (Infrastructure and delivery) identifies that infrastructure necessary to support new development will be provided and available when first needed to serve the development's occupants and users and/or to mitigate its otherwise adverse material impacts of the development and that to achieve this, the delivery of development may need to be phased.
- 5.7.45 The policy cross-references at point (5) the Infrastructure Schedule within the Guildford Borough Council Infrastructure Delivery Plan (December 2017) or Appendix G of the Adopted Local Plan, which references several Strategic Road Network Highways England schemes, including the Scheme, as the key infrastructure on which the delivery of the plan depends - as follows:
- SRN1 - A3 Guildford (A320 Stoke interchange junction to A31 Hog's Back junction) 'Road Investment Strategy' scheme (E31);
 - SRN2 - M25 junction 10/A3 Wisley interchange 'Road Investment Strategy' scheme (E16);
 - SRN3 - New A3/A3100 Burpham junction with relocated A3 southbound off-slip and new A3 southbound on-slip (to principally serve Gosden Hill Farm site);
 - SRN4 - M25 junctions 10-16 'Road Investment Strategy' scheme (E15);
 - SRN5 - A3 northbound off-slip lane widening at University interchange (approaching Tesco roundabout) improvement scheme;
 - SRN6 - A3 southbound off-slip lane widening to A320 Stoke interchange improvement scheme;

- SRN7 - A3 northbound on-slip at A247 Clandon Road (Burnt Common); and
- SRN8 - A3 southbound off-slip at A247 Clandon Road (Burnt Common)

5.7.46 Policy ID2 (Supporting the Department for Transport's 'Road Investment Strategy') sets out that:

“Guildford Borough Council is committed to working with Highways England to facilitate major, long-term improvements to the A3 trunk road and M25 motorway in terms of both capacity and safety, as mandated by the Department of for Transport’s “Road Investment Strategy”. As such, promoters of sites close to the A3 and M25 and strategic sites will need to take account of any emerging proposals by Highways England or any other licenced strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015.

5.7.47 The Reasoned Justification explains that the implementation of the three RIS schemes during the Plan period (which are SRN1, SRN2 and SRN4 identified above), alongside other critical infrastructure, is required in order to be able to accommodate future planned growth both outside and within the borough.

5.7.48 The direct policy support from Guildford Borough Council in Policy ID1 and Policy ID2 is welcomed by Highways England.

5.7.49 Policy ID3 (Sustainable transport for new developments) expects that new development will be required to contribute to the delivery of an integrated, accessible and safe transport system, maximising the use of the sustainable transport modes of walking, cycling and the use of public and community transport.

5.7.50 The Scheme, through the provision of new and enhanced NMU facilities and increased connectivity, is considered to be compliant with this policy.

5.7.51 Policy A35 (Former Wisley airfield, Ockham) details the allocation, requirements and opportunities on the former Wisley Airfield site. This site allocation has been considered as the Scheme has developed, the site was assessed in the Environmental Statement (DCO application reference TR010030/APP/6.3) in Chapter 13 People and Communities, which concluded that the effects of the Scheme would be significant beneficial for the former Wisley Airfield and in the cumulative effects’ assessment, summarised in Chapter 16. The site was included in the Traffic Model and therefore included in the forecasting.

5.7.52 Of the other recommended site allocation policies, the following didn’t meet the criteria for the Traffic Model or the EIA:

- Policy A37: (Land to the west of West Horsley); and
- Policy A38: Land near Horsley railway station, Ockham Road North, East Horsley).

5.7.53 The following site allocation policies were included in the cumulative effects assessment and Traffic Model:

- Policy A390 (Land to the north of West Horsley); and
- Policy A45 (Land around Burnt Common warehouse, London Road, Send).

5.7.54 The following site allocations were just included in the Traffic Model:

- Policy A41: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley; and
- Policy A42: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common.

Lovelace Neighbourhood Plan

- 5.7.55 A six-week consultation has been held on the Lovelace Neighbourhood Plan (consultation draft dated 6 September 2018) within Guildford Borough Council. The draft plan will now be updated following consultation and submitted for independent examination. Once 'made', the Neighbourhood Plan would cover the Scheme area within Guildford Borough Council, which is the Lovelace Ward.
- 5.7.56 The Neighbourhood Plan has been prepared as a response to strategic development approved or pending in the ward:
- “Lovelace faces ‘the perfect storm’ during the next 10 years due to a number of major projects either already approved or proposed and all of which will be happening at more or less the same time. Some are from government organisations such as Highways England (HE), SCC and GBC, others are private initiatives. These will impact all 2,200 Lovelace inhabitants and any newcomers.”* (Lovelace Neighbourhood Plan consultation draft 6 September 2018)
- 5.7.57 The Scheme does not conflict with the draft Lovelace Neighbourhood Plan.

6. Conclusion and the Planning Balance

6.1 Need for the Scheme

- 6.1.1 The M25 junction 10 experiences heavy congestion on a daily basis. Highways England records on traffic accidents show that M25 junction 10 has the highest number of casualties at any junction on the M25, attributable to the high levels of congestion at the junction and the side roads and private accesses which connect directly to the A3 between Painshill and Ockham.
- 6.1.2 This situation is likely to deteriorate further given traffic forecasts associated with population and economic growth in the south-east. If no action is taken there will be a significant negative impact on traffic flow, road safety, the environment, customer satisfaction and the ability of the junction to perform its role in supporting local and regional aspirations for development and growth will be compromised.
- 6.1.3 The need for the Scheme and the commitment to address the issues is articulated in government transport policy and the DfT have set Scheme objectives specific to the need for the Scheme and its context.

6.2 Development of Scheme, alternatives and consultation

- 6.2.1 An optioneering process was undertaken to identify possible solutions to address the issues at M25 junction 10. This was the basis of an Options Selection public consultation between 5 December 2016 and 5 February 2017 and resulted in the Preferred Route Announcement in November 2017.
- 6.2.2 Since the Preferred Route Announcement, the Scheme has advanced and further public consultation and stakeholder engagement has been undertaken. Statutory public consultation took place on the preferred route, including side road options, between 9 February and 26 March 2018, with a further targeted consultation 14 November and 14 December 2018 and 3 April 2019 and 3 May 2019 with directly affected landowners, those with property interests and statutory organisations on the changes to the Scheme design.
- 6.2.3 Consultation feedback received, and ongoing stakeholder engagement has led to changes to the design of the Scheme which is included in this application for development consent and is considered the best option for addressing the need for the Scheme and the Scheme objectives.

6.3 Benefits of the Scheme

- 6.3.1 Modelling shows that the Scheme is predicted to allow for increased throughput at the junction compared to a without scheme scenario. By 2037, with the Scheme vehicles entering the junction from the A3 over the course of a day will rise by 14% and from the M25 will rise by 16%. Modelling of M25 junction 10 shows that throughout the design life of the Scheme, all entries and circulatory links will operate within capacity – a contrast to the existing operation of the junction. Delays will reduce by 40% in the morning and evening peak hours.
- 6.3.2 The Scheme will improve the operation of the Painshill and Ockham Park junctions compared to the without intervention scenario, which will in turn, improve traffic flow between local communities along the local roads that cross

the A3 at these junctions.

- 6.3.3 The additional highway capacity provided by the Scheme can be directly linked to the likelihood that planned growth in the area can be feasibly delivered.
- 6.3.4 Across the whole of the affected road network, the scheme is anticipated to result in a reduction in accidents of 5% compared to the without intervention scenario - an average of 10 accidents per year. At a more local level the Scheme is anticipated to have the following benefits:
- Reduce accidents among users of M25 junction 10 by 30%.
 - Reduce accidents on the A3 mainline between Painshill and Ockham Park junctions by 24%.
 - Reduce accidents on the M25 mainline by 2%.
- 6.3.5 A suite of compensatory measures will offset the negative effects of the Scheme on the Thames Basin Heaths SPA, after mitigation, so that the overall coherence of the Natura 2000 Network is maintained. The compensation package will include SPA compensation land at a 1:1 ratio for the permanent land take within the SPA and enhancement areas within the SPA at a ratio of 3:1 for both the permanent and temporary land take within the SPA. Full details are included in the Habitats Regulations Assessment (application document TR010030/APP/5.3).
- 6.3.6 Once construction of the Scheme has been completed, all temporary works would be cleared from the special category land and these areas of temporary possession restored sufficiently to be handed back to the respective owners (SCC and RHS) with public access reinstated. The resulting permanent loss of special category land (excluding the areas with rights added) to provision of replacement land represents an approximate net increase of 15.9ha or 8.0 % in the extent of registered common land at the Wisley site and an approximate net increase of 9.2ha or 5.7% in the extent of public open space at the Wisley site.
- 6.3.7 The Scheme will provide significantly enhanced facilities for pedestrians, cyclists and horse riders through new provision and improvements to the network of PRow and local road connections and meet the key objective to incorporate safe, convenient, accessible and attractive routes. Health benefits should arise from this.
- 6.3.8 The Scheme has been designed to ensure that the scheme objectives have been achieved and include delivering key environmental, social and economic benefits.

6.4 Determining the application

- 6.4.1 The Planning Act 2008 requires that, in determining DCO applications, the SoS must have regard to the relevant NPS, the Local Impact Report, any prescribed matters and any other matters the SoS thinks are important and relevant. Paragraph 4.2 of the NPS NN confirms that there is a presumption in favour of granting development consent for national networks.
- 6.4.2 The Planning Act 2008 also states that DCO applications should be determined in accordance with the relevant NPS except in certain circumstances including where adverse impacts would outweigh benefits, or where to do so would be unlawful, in breach of duty or condition, or in breach of international obligations.

- 6.4.3 The Applicant has carefully considered legal obligations mentioned in the NPS NN, including those under the Habitats Regulations and Water Framework Directive, and wider legal obligations associated with promoting a highways scheme of this type.
- 6.4.4 The Examining Authority will consider the application for development consent and make a recommendation to the SoS, who will decide whether a development consent order for the Scheme should be made. In doing so, the SoS must decide the application in accordance with any relevant national policy statement, but other important and relevant considerations are the NPPF and development plan policies of the LPAs, together with any other important and relevant considerations

National Policy Statement for National Networks

- 6.4.5 The Scheme has been appraised against the policies contained in the NPS NN, particularly having regard to the assessment matters it identifies relating to environmental effects. The NPS NN requires there to be a compelling need for development of the national road network and acknowledges that all major infrastructure projects may have adverse impacts on the environment, which must be weighed against the need for the development. Under Section 104(3), the SoS is required to decide the application in accordance with any relevant NPS, except in certain circumstances specified in subsections (4) to (8). These include circumstances where the adverse effects of a Scheme outweigh the benefits.
- 6.4.6 As described above, the Scheme is needed in response to heavy congestion and high levels of casualties at this part of the SRN. The Scheme has been designed and mitigation has been embedded to ensure compliance with the NPS NN overarching policy themes of air quality, climate change, waste and water management risk of flooding and land stability, landscape and historic environment, and amenity, health and safety. There will be no significant adverse operational effects for air quality and noise and vibration, nor long term landscape and visual, geology and soils, cultural heritage, materials and waste and climate.
- 6.4.7 Some adverse effects that cannot be avoided will be mitigated to the greatest extent practicable. A suite of environmental works are proposed to compensate for the adverse effects on the SPA, SSSI and other designations and the local landscape and biodiversity generally, including SPA compensation land, SPA enhancement areas, reinstatement of temporary construction land and planting of new highway works. Replacement land, will be provided in accordance with the requirements of the Planning Act in exchange for the Common Land and open space lost as a result of the Scheme; works to enhance these areas will contribute to the overall landscape and biodiversity outcome. The Green Belt and Thames Basin Heaths SPA designations that are adversely affected by the Scheme are not reasons to withhold consent for the Scheme, for the reasons explained in this statement. The benefits to road user safety, reducing congestion and unlocking growth in Surrey, along with new and enhanced NMU facilities and the compensation packages that have been developed with stakeholders, will outweigh the adverse impacts identified.
- 6.4.8 There are therefore no legal reasons, international obligations, prescribed conditions or matters which would require the SoS to refuse this DCO

application. The Scheme also complies with all other relevant national planning, infrastructure and transport policies. Similarly, the Scheme accords with all other relevant and important matters that the SoS might need to take into consideration, including the adopted and emerging development plan for the local area and the NPPF, as detailed below.

- 6.4.9 This Planning Statement and detailed NPS NN Accordance Table in Appendix A demonstrate overall compliance with the NPS NN and other national, regional and local policy. The public benefits provided by the Scheme are evident and weigh in favour of the Scheme proceeding. On this basis a presumption in favour of the Scheme exists under Section 104 of The Act.

National Planning Policy Framework

- 6.4.10 The Scheme accords with the key aims of the NPPF, notably by improving the conditions in which people travel and providing improved infrastructure to support economic growth.
- 6.4.11 NPPF guidance has been reflected in the preparation of the flood risk assessment for the Scheme as advised in the NPS NN.
- 6.4.12 Development within the Green Belt is a key issue within the NPPF, and the impact of the Scheme on the Green Belt is addressed fully in the consideration of the NPS NN policy framework above. As such, the Scheme is consistent with the provisions and requirements of the NPPF.

Local Planning, Minerals and Transport Policy

- 6.4.13 On balance, the Scheme is considered by Highways England to comply with the relevant regional and local planning policies.
- 6.4.14 The Scheme will support the objectives of the Surrey Transport Plan in relation to proposed improvements to PRoW and the cycle network.
- 6.4.15 There are MSZs in the Scheme area, but Surrey County Council have confirmed they do not consider the Scheme would have an adverse effect and sterilize the designated land.
- 6.4.16 The Scheme is not considered to conflict with a designated waste site with an extant in-vessel composting facility planning consent. The Surrey Waste Plan is under review and it is stated that the designated site will not be carried forward into the next plan, in light of the aspirations for the former Wisley Airfield site as a strategic development site.
- 6.4.17 The Scheme is not expected to have residual significant adverse effects on AQMAs during construction or once the Scheme is operational. The Scheme is within the Green Belt and an assessment had been made against the policy tests in the NPS NN and the NPPF and it is concluded that 'very special circumstances' exist and that the Scheme would not conflict with the tests of openness and the five purposes of the Green Belt.
- 6.4.18 The Scheme will also result in the loss of SPA land, but a compensation package has been prepared with Natural England to mitigate and will be secured by draft DCO Requirement 7 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Measures) in Schedule 2 of the Draft DCO & Schedules (application document TR010030/APP/3.1).

- 6.4.19 Guildford Borough Council Planning Policy ID1 and ID2 in its Submission Local Plan specifically states that the delivery of the Scheme (along with other improvements to the Strategic Road Network) is integral to the delivery of their Local Plan.

The planning balance

- 6.4.20 The analysis of planning policy in this Planning Statement demonstrates that the Scheme is compliant with relevant planning policy, including the NPS NN, and explains that, in the case of its location within the Green Belt and Special Category Land there are 'special circumstances' for the location of the Scheme and compensation packages prepared to mitigate the effects of the Proposed Development.
- 6.4.21 There is a compelling need case for the Scheme and its delivery is in the public interest. There is direct support for the Scheme in the Guildford Borough Council Local Plan, which through Policy ID1 and ID2 states the infrastructure is required to support the implementation of their Local Plan.
- 6.4.22 Through public consultation and engagement, the Scheme design has been refined to mitigate the concerns of directly affected stakeholders so far as practicable and appropriate.
- 6.4.23 Adverse effects do not outweigh the benefits of the Scheme and the overall planning balance is therefore in favour of the making of the DCO for the Scheme.

Conclusions

- 6.4.24 This Planning Statement considers relevant national and local planning policies within the overarching context of NPS NN. It demonstrates that, when assessed against these relevant policies and material considerations, the M25 junction 10 / A3 Wisley interchange Scheme benefits from strong policy support and is acceptable in land use planning terms. Whilst the M25 junction 10 / A3 Wisley interchange Scheme will, in common with any national infrastructure project, result in some adverse effects to the environment and local community during construction, these (considered individually or collectively) do not outweigh the important benefits that are achieved with this Scheme creating a more effective and efficient provision of transport infrastructure.

Glossary and Abbreviations

Term	Acronym	Definition
Access Land	-	Open access land or Access land is land you can access in England without having to use paths. Access land includes mountains, moors, heaths and downs that are privately owned. It also includes common land registered with the local council and some land around the England Coast Path. Your right to access this land is called the 'right to roam', or 'freedom to roam'. Access land can be used for walking, running, watching wildlife and climbing.
Affected Road Network	-	The parts of the road network that would be affected by a change in traffic levels as the result of a transport scheme
Agricultural Land Classification	ALC	A framework for classifying land according to the extent to which its physical or chemical characteristics impose long term limitations on agricultural use. Agricultural land is classified into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land.
Appraisal Summary Table	AST	Summarises the monetised, qualitative and quantitative impacts of the Scheme as assessed in the Economic Assessment.
Air Quality Management Area	AQMA	An area identified where the National Air Quality Objectives are not likely to be achieved. The Local Authority is required to produce a Local Air Quality Action Plan to plan how air quality in the area is to be improved.
Area of Outstanding Natural Beauty	AONB	An area outside a National Park designated for conservation due to its natural beauty.
At grade	-	On the same level, for example, an at grade junction is two or more roads meeting or crossing on the same level.
Benefit Cost Ratio	BCR	Indicator used to show the relationship between the relative costs and benefits of the Scheme, expressed in monetary or qualitative terms.
Best and Most Versatile	BMV	Defined as Grades 1, 2 and 3a of the Agricultural Land Classification as land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.
Biodiversity Action Plan	BAP	An internationally recognized program addressing threatened species and habitats and is designed to protect and restore biological systems. The original impetus for these plans derives from the 1992 Convention on Biological Diversity.
Calculation of Road Traffic Noise	-	A UK Technical Memorandum for calculating road traffic noise using measurement or prediction methods for the noise index LA10, 18hours.
Client Scheme Requirements	CSR	The objectives of the M25 junction 10 Improvements Scheme.
Common land	CL	An area of unenclosed, open land registered under the Commons Registration Act 1965 or Commons Act 2006 (note: not all open areas called commons are registered)

Term	Acronym	Definition
		commons and not all registered commons are called commons).
Conservation Area	-	An area of special environmental or historic interest or importance, of which the character or appearance is protected by law against undesirable changes (Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990).
(Outline) Construction Environmental Management Plan	CEMP	A plan by the contractor describing how the environmental impacts of construction activities of a project will be minimised and mitigated.
Costs and Benefits to Accidents – Light Touch	COBA-LT	Software calculating the impact on accidents as part of an economic appraisal of a road scheme in line with transport analysis guidance.
Department for Environment, Food & Rural Affairs	Defra	Defra is the government department responsible for environmental protection, food production and standards, agriculture, fisheries and rural communities in the United Kingdom of Great Britain and Northern Ireland. Defra is a ministerial department, supported by 33 agencies and public bodies.
Decibel	dB	A unit used to measure the intensity of a sound.
Department for Transport	DfT	Government department responsible for the transport network in England, and for aspects of the transport network in the devolved administrations.
Design Manual for Roads and Bridges	DMRB	A series of 15 volumes that provide standards, advice notes and other published documents relating to the design, assessment and operation of trunk roads, including motorways in the United Kingdom, and, with some amendments, the Republic of Ireland.
Development Consent Order	DCO	The means of applying for consent to undertake a Nationally Significant Infrastructure Project (NSIP). NSIPs include, for example, major energy and transport projects.
Do Minimum	DM	Scenario for Transport Assessment, which includes only those changes unrelated to the Scheme that were considered to be in place prior to the respective future year.
Do Something	DS	Scenario for Transport Assessment, which includes the M25 junction 10 improvements Scheme.
Dual two-lane all-purpose road	D2AP	A non-motorway dual carriageway with two lanes in each direction
Dual three-lane all-purpose road	D3AP	A non-motorway dual carriageway with three lanes in each direction
Dual four-lane all-purpose road	D4AP	A non-motorway dual carriageway with four lanes in each direction
Ecological Zone of Influence	EZOI	The area encompassing all the predicted adverse ecological effects of the Scheme, including those that would occur as a result of habitat loss, increased emissions, and those that would occur through disturbance, such as noise.
Elmbridge Borough Council	EBC	Local planning authority within the DCO boundary.

Term	Acronym	Definition
Environment Agency	EA	A non-departmental public body with responsibilities relating to the protection and enhancement of the environment in England.
Environmental Impact Assessment	EIA	A process of evaluating the likely environmental impacts of a proposed development, including inter-related socio-economic, cultural and human-health impacts, both beneficial and adverse.
Environmental Statement	ES	Reports the findings of the EIA, including at least the information reasonably required to assess the likely significant environmental effects of the development.
Flood Risk Assessment	FRA	Prepared to demonstrate how the impacts of flood risk both to the Scheme and that can result from the Scheme, have been assessed and mitigation is proposed where necessary.
Gross Domestic Product	GDP	The total value of goods produced, and services provided in a country during one year.
Guildford Borough Council	GBC	Local planning authority within the DCO boundary.
Habitats of Principal Importance	-	Under Section 41 of the Natural Environment and Rural Communities (NERC) Act, the Secretary of State is required to publish a list of habitats which are of principal importance for the conservation of biodiversity in England. Fifty-six habitats of principal importance are included on the S41 list. These are all the habitats in England that were identified as requiring action in the UK Biodiversity Action Plan and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework.
Habitats Regulations Assessment	HRA	Required by Regulation 63 of the Conservation of Habitats and Species Regulations 2017 for all plans and projects which are likely to have a significant effect on a European site and are not directly connected with or necessary to the management of the European site.
Historic England	-	Publicly funded body that champions and protects England's historic places, including Stonehenge and Avebury; also known as the Historic Buildings and Monuments Commission for England.
Imperative Reasons of Overriding Public Interest	IROPI	The derogation contained within Article 6 (4) of the Habitats Directive.
Interim Advice Note	IAN	Issued by Highways England and contain specific guidance, which shall only be used in connection with works on motorways and trunk roads in England, subject to any specific implementation instructions contained within an IAN. While IANs must be read together with the DMRB and the Manual of Contract Documents for Highway Works (MCHW) for the above works and may incorporate amendments or additions to documents in these publications, they are not part of the DMRB or MCHW.
Investing in Britain's Future	IBF	A publication by HM Treasury setting out the Government's intention to build a strong UK economy by delivering infrastructure.

Term	Acronym	Definition
Key Performance Indicators	KPI	Quantifiable measures used to evaluate success, established in the Highways England Strategic Business Plan.
Lead Local Flood Authority	LLFA	Unitary authority or county council responsible for developing, maintaining and applying a strategy for local flood risk management in their area and for maintaining a register of flood risk assets.
Limits of Deviation	LoD	The area of land within the Order Limit that may be used for the siting of infrastructure subject to detailed design, thus a maximum distance or measurement of variation within which the works must be constructed.
Local Geological Site	-	Formally known as Regionally Important Geological Sites (RIGS). Sites within the county that are considered worthy of protection for their Earth Science or landscape importance but are not already protected as SSSIs.
Local Impact Report	LIR	A Report in writing giving details of the likely impact of the proposed development on the authority's area (or any part of that area). The Local Impact Report is a requirement where a Nationally Significant Infrastructure Project (NSIP) has been submitted to the Planning Inspectorate for determination and has been accepted for consideration.
Local Nature Reserve	LNR	A statutory designation made under Section 21 of the National Parks and Access to the Countryside Act 1949 and amended by Schedule 11 of the Natural Environment and Rural Communities Act 2006, by principal local authorities. A Local Nature Reserve must be of importance for wildlife, geology, education or public enjoyment.
Local Enterprise Partnership	LEP	A voluntary partnership set up between local authorities and businesses to drive local economic growth and job creation activities. There are 39 LEPs across England.
Mineral Safeguarding Area	MSA	An area designated by Minerals Planning Authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development.
National Infrastructure Delivery Plan	NIDP	Document published by the UK Government, outlining what infrastructure will be built and where.
National Infrastructure Plan	-	Document published by the UK Government, setting out its strategy for meeting the infrastructure needs of the UK economy.
National Nature Reserve	-	Reserves established to protect some of the most important habitats, species and geology in the United Kingdom, and to provide 'outdoor laboratories' for research. There are currently 224 NNRs in England with a total area of over 94,400 hectares - approximately 0.7% of the country's land surface. Natural England manages about two thirds of England's NNRs. The remaining reserves are managed by organisations approved by Natural England, for example, the National Trust, Forestry Commission, RSPB, Wildlife Trusts and local authorities.
National Planning Policy Framework	NPPF	Document by the Ministry of Housing, Communities and Local Government setting out the Government's planning

Term	Acronym	Definition
		policies for England and how these are expected to be applied.
National Planning Policy Guidance	NPPG	A web-based resource which brings together planning guidance on various topics into one place.
National Policy Statement	NPS	Government-produced document comprising objectives for the development of nationally significant infrastructure in a particular sector and state.
National Policy Statement for National Networks	NPS NN	Sets out the need for, and Government's policies to deliver, development of nationally significant infrastructure projects (NSIPs) on the national road and rail networks in England.
Nationally Significant Infrastructure Project	NSIP	A project of a type and scale defined under the Planning Act 2008 and by order of the Secretary of State relating to energy, transport, water, waste water and waste generally. These projects require a single development consent. Planning permission, listed building consent and scheduled monument consent amongst others are not required for Nationally Significant Infrastructure Projects.
National Trust	-	Charity that cares for historic houses, gardens, ancient monuments, countryside and other sites across England, Wales and Northern Ireland, including the Stonehenge landscape.
Natural England	-	Executive non-departmental public body responsible for the natural environment.
Nitrogen Oxides	NO _x	Gas emissions produced by road transport.
Nitrogen Dioxide	NO ₂	Gas emissions produced by road transport.
Non-Motorised User	NMU	Cyclists, pedestrians (including wheelchair users), and equestrians using the public highway.
Noise Important Area	NIA	Areas where the 1% of the population that are affected by the highest noise levels from major roads are located according to the results of Defra's strategic noise maps.
Open space		This is defined in sections 131 and 132 Planning Act 2008, by reference to section 19 of the Acquisition of Land Act 1981, as " <i>any land laid out as a public garden, or used for the purposes of public recreation</i> ".
Order Limit	OL	The anticipated maximum extent of land which will be required to undertake the Scheme.
Particulate matter	PM ₁₀	The concentration of particles that are less than or equal to 10 µm in diameter.
Preferred Route Announcement	PRA	The outcome of the Options Selection stage of Scheme development.
Present Value	PV	The current value of a future sum of money or stream of cash flows given a specified rate of return.
Public Right of Way	PRoW	A way over which the public have a right to pass and repass. The route may be used on foot, on (or leading) a horse, on a pedal cycle or with a motor vehicle, depending on its status. Although the land may be owned by a private individual, the public may still gain access across that land along a specific route. Public rights of way are all highways in law.

Term	Acronym	Definition
Register of Environmental Actions and Commitments	REAC	DCO submission document detailing the environmental mitigation measures that would be implemented both during construction, why they are required, who is responsible for delivering them, and any ongoing maintenance arrangements.
Replacement Land	-	Land provided in exchange for Special Category Land that is subject to compulsory acquisition or compulsory acquisition of rights, under the powers of the DCO, and which is provided in accordance with sections 131 and 132 of the Planning Act 2008.
River Basin Management Plan	RBMP	Set out how organisations, stakeholders and communities will work together to improve the water environment, supporting the Government's framework for the 25-year environment plan.
Road Investment Strategy	RIS	The long-term strategy to improve England's motorways and major A roads. The first RIS (known as RIS1) was published in 2014 and covers the period 2015-2020. A second RIS (RIS2) was published in 2015 and covers the post-2020 period.
Royal Horticultural Society	RHS	The UK's leading gardening charity dedicated to advancing horticulture and promoting gardening.
Royal Society for the Protection of Birds	RSPB	A charitable organisation that works to promote conservation and protection of birds and the wider environment through public awareness campaigns, petitions and through the operation of nature reserves throughout the UK.
Scheduled monument	-	A 'nationally important' archaeological site or historic building, given protection against unauthorised change and included in the Schedule of Monuments kept by the Secretary of State for Culture, Media and Sport. The protection given to scheduled monuments is given under the Ancient Monuments and Archaeological Areas Act 1979.
Scheme	-	The M25 junction 10 Improvements Scheme.
Secretary of State	SoS	The Cabinet minister responsible for the determination of this DCO application.
Sites of Nature Conservation Importance	SINC	Locally important sites of nature conservation adopted by local authorities for planning purposes.
Site of Special Scientific Interest	SSSI	A conservation designation denoting to a protected area in the United Kingdom. The Sites are protected by law to conserve their wildlife or geology.
Source Protection Zone	SPZ	Areas of land around over 2000 groundwater sources such as wells, boreholes and springs used for public drinking water supply. The zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. There are three main zones (inner, outer and total catchment) and a fourth zone of special interest, which is occasionally applied to a groundwater source. The zones are used in conjunction with the Groundwater Protection Policy to set up pollution prevention measures in areas which are at a higher risk, and to monitor the activities of potential polluters nearby.

Term	Acronym	Definition
Special Area of Conservation	SAC	Areas of strictly protected sites designated under the EC Habitats Directive (92/43/EEC) on the conservation of natural habitats and of wild fauna and flora. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds).
Special Category Land		Land forming part of a common, open space, National Trust land or fuel or field garden allotment.
Special Protection Area	SPA	Areas of strictly protected sites classified in accordance with Article 4 of the EC Birds Directive (2009/147/EC) on the conservation of wild birds. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.
Strategic Road Network	SRN	The network of approximately 4,300 miles of motorways and major 'trunk' A roads across England, managed by Highways England.
Strategic Business Plan	SBP	A Highways England publication setting out the outcomes, Key Performance Indicators (KPIs) and associated targets for Road Investment Strategy (RIS) schemes.
Surrey County Council	SCC	Local body responsible for transport and highway management and waste disposal.
Transport Analysis Guidance	TAG	Guidance produced by DfT on the process of appraisal of transport interventions.
Tree Preservation Order	TPO	A Tree Preservation Order is made by a Local Planning Authority to protect specific trees or a particular area, group or woodland from deliberate damage and destruction. TPOs can prevent the felling, lopping, topping, uprooting or otherwise wilful damaging of trees without the permission of the Local Planning Authority.
Unexploded Ordnance	UO	An explosive weapon (bombs, shells, grenades, land mines, naval mines, cluster munition, etc.) that did not explode when they were employed and still pose a risk of detonation, sometimes many decades after they were used or discarded.
Value for Money	VfM	Assessment of the Scheme considering all monetised economic impacts and non-monetised environmental, social and distributional impacts.
Water Framework Directive	WFD	The Water Framework Directive (2000/60/EC) is a EU directive which aims to achieve good status of all water bodies (surface waters, groundwaters and the sites that depend on them, estuaries and near-shore coastal waters) and the prevent any deterioration. It has introduced a comprehensive river basin management planning system to protect and improve the ecological quality of the water environment. It is underpinned by the use of environmental standards.
World Heritage Site	WHS	A site listed by UNESCO because of its special natural or cultural value.

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Appendices

Appendix A. National Networks

NPS Accordance Table

A.1.1 This Appendix provides an assessment of the Scheme's strategic alignment and conformity with the NPS NN. The Appendix is set out as follows:

Table 1: Scheme conformity with NPS NN Chapter 2;

Table 2: Scheme conformity with NPS NN Chapter 3;

Table 3: Scheme conformity with NPS NN Chapter 4; and

Table 4: Scheme conformity with NPS NN Chapter 5.

A.1.2 The tables signpost other relevant documentation submitted as part of the application for development consent and provides a summary of the findings where appropriate.

A.1.3 The following sources of information have been used to inform the completion of the accordance tables:

Consents and Agreement Position Statement (application document TR010030/APP/3.3);

Outline Construction Environmental Management Plan (CEMP) (application document TR010030/APP/7.2);

Consultation Report (application document TR010030/APP/5.1);

Draft Development Consent Order (application document TR010030/APP/3.1);

Drainage Strategy Report (application document TR010030/APP/6.5);

Elmbridge Borough Council Local Plan (see Bibliography);

Engineering Drawings and Sections (application document TR010030/APP/2.09);

Enterprise M3 LEP Strategy for Growth May 2013 (see Bibliography);

Environmental Statement (application document TR010030/APP/6.3);

Explanatory Memorandum (application document TR010030/APP/3.2);

Flood Risk Assessment (FRA) (application document TR010030/APP/5.5);

Guildford Borough Council Local Plan 2003 (see Bibliography);

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Proposed Scheme Layout Plans (application document TR010030/APP/2.8);

Register of Environmental Actions and Commitments (REAC) (application document TR010030/APP/7.3);

Scoping Opinion Responses (application document TR010030/APP/6.5);

Statement of Reasons (application document TR010030/APP/4.1);
Statement of Statutory Nuisances (application document TR010030/APP/5.2);
Surrey Minerals Plan Core Strategy Development Plan Document 2011 (see Bibliography);
Transport Assessment (application document TR010030/APP/7.4);
Water Framework Directive Compliance Assessment (application document TR010030/APP/5.4); and
Works Plans (application document TR010030/APP/2.3).

Table 1: National Networks National Policy Statement Chapter 2

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
Chapter 2		
Summary of need		
2.1	<p>The national road and rail networks that connect our cities, regions and international gateways play a significant part in supporting economic growth, as well as existing economic activity and productivity and in facilitating passenger, business and leisure journeys across the country. Well-connected and high-performing networks with sufficient capacity are vital to meet the country's long-term needs and support a prosperous economy.</p>	<p>The Highways England Road Investment Strategy identifies improvements to M25 junction 10/A3 Wisley interchange as one of the key investments in the SRN for the London and South East region. The local boroughs of Guildford, Elmbridge and Woking have a combined population of over 375,000, and strong and diverse economies, including offices of multi-national companies and local retail and business centres. The Enterprise M3 LEP area to the west of the M25 J10 has a population of 1.6 million and sustains 740,000 jobs. High levels of housing and employment growth are planned for this wider area – including 25,000 new jobs 2013-2020 (Enterprise M3 LEP Strategy for Growth May 2013). There is a requirement to increase traffic capacity at the junction to reduce traffic congestion and delay, which is forecast to significantly worsen in future due to traffic growth.</p> <p>The Scheme, providing increased capacity at the M25 roundabout, is in line with the strategic objectives of the NPS NN to support activity and growth through facilitating journeys. The Scheme objectives, outlined in full in this Planning Statement, of particular relevance are:</p> <ul style="list-style-type: none"> • Reducing delays and increasing journey time reliability • Supporting projected population and economic growth in the area. <p>The Environmental Statement Chapter 17: Summary (application document TR010030/APP/6.3) reviews the significant effects of the Scheme, mitigation and residual effects. To ensure the development is well managed and reduces the harm on the locality where possible.</p>
2.2	<p>There is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and</p>	<p>The Scheme objectives, outlined in full in this Planning Statement, are in line with the strategic objectives of the NPS NN to provide safe, expeditious and resilient networks; support and promote social and economic activity; and address quality of life and environmental</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth. Improvements may also be required to address the impact of the national networks on quality of life and environmental factors.	impacts. The objectives cover these points through the categories of route operation, capacity, safety, social and environment.
2.4	The pressure on our networks is expected to increase even further as the long-term drivers for demand to travel - GDP and population - are forecast to increase substantially over coming years. Under central forecasts, road traffic is forecast to increase by 30% and rail journeys by 40%, rail freight has the potential to nearly double by 2030.	Noted. The Scheme's Route Operation objective seeks to support projected traffic increases, population and economic growth. The Transport Assessment (application document TR010030/APP/7.4)) takes future increase in demand for travel into account. Its future network modelling shows that in the Scheme's opening year of 2022 there would be a predicted improvement in the average network journey time of between 10% and 46% and a predicted improvement of between 12% and 66% in 2037, the design year, within a context of increasing road traffic.
2.6	There is also a need for development on the national networks to support national and local economic growth and regeneration, particularly in the most disadvantaged areas. Improved and new transport links can facilitate economic growth by bringing businesses closer to their workers, their markets and each other. This can help rebalance the economy.	Section 4 of this Planning Statement presents the economic case for the Scheme, which includes non-monetised and monetised benefits. Overall, business users and transport service providers would benefit from the Scheme through reduced travel times, improving access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage related depreciation.
2.7	In some cases there may be a need for development to improve resilience on the networks to adapt to climate change and extreme weather events rather than just tackling a congestion problem.	The Environmental Statement (application document TR010030/APP/6.3) Chapter 15 provides an assessment of vulnerability to climate change and extreme weather events. Mitigation measures are proposed to reduce the Scheme's vulnerability to impacts of climate change during construction and operation. More information on the Scheme's design with respect to climate change is provided in paragraphs 4.38-4.47 of this Appendix.
2.9	Broader environment, safety and accessibility goals will also generate requirements for development. In particular, development will be needed to address safety problems, enhance the environment or enhance accessibility for NMUs. In their current state, without development, the national networks will act as a constraint to sustainable economic growth, quality of life and wider environmental objectives.	The Scheme objectives include improving road safety and supporting walking and cycling by incorporating safe, convenient, accessible and attractive routes for pedestrians, cyclists and equestrians and improving crossing facilities, as well as to balance functionality with the Scheme's contribution to the quality of the surrounding environment through design.

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
		<p>The Scheme is expected to reduce accidents through the removal of several conflicting movements at the junction, described in detail in the Transport Assessment (application document TR010030/APP/7.4). Across the whole of the affected road network over 60 years following implementation, the Scheme is anticipated to reduce accidents among users of M25 junction 10 by 30% and, in the affected area excluding the junction, by 6%. The Scheme will introduce signal controls to regulate traffic flow and improve road safety for vulnerable users such as cyclists, as well as introducing dedicated improvements, including new and upgraded Public Rights of Way and new and replacement crossing bridges, for the benefit of NMUs.</p> <p>The Environmental Statement (application document TR010030/APP/6.3) assesses the Scheme's impact on quality of life and wider environmental objective and proposes opportunities for mitigation of negative impacts or implementation of environmental enhancements where possible.</p>
2.10	<p>The Government has therefore concluded that at a strategic level there is a compelling need for development of the national networks - both as individual networks and as an integrated system. The Examining Authority and the Secretary of State should therefore start their assessment of applications for infrastructure covered by this NPS on that basis.</p>	<p>The Highways England RIS identifies improvements to M25 junction 10/A3 Wisley interchange as one of the key investments in the Strategic Road Network for the London and South East region. The A3 is a key radial route from London to Portsmouth that crosses the M25 orbital motorway. As well as contributing to the local and regional road network, the Scheme will introduce improvements to the NMU network in the form of new and upgraded routes and crossings, and the local green infrastructure network through extensive areas of habitat creation and a new wildlife crossing over the A3.</p>
The need for development of the national road network		
2.12	<p>Roads are the most heavily used mode of transport in England and a crucial part of the transport network. By volume roads account for 90% of passenger miles and two thirds of freight. Every year road users travel more than 431 billion miles by road in Great Britain.</p>	<p>Noted. The Scheme's Route Operation objective seeks to support projected traffic increases, population and economic growth. The Transport Assessment (application document TR010030/APP/7.4) takes future increase in demand for travel into account. The Scheme is</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
		<p>expected to reduce accidents through the removal of several conflicting movements at the junction, described in detail in the Transport Assessment.</p> <p>The Environmental Statement (application document TR010030/APP/6.3) considers how the proposal's operation may change over time.</p>
2.13	<p>The Strategic Road Network provides critical links between cities, joins up communities, connects our major ports, airports and rail terminals. It provides a vital role in people's journeys, and drives prosperity by supporting new and existing development, encouraging trade and attracting investment. A well-functioning Strategic Road Network is critical in enabling safe and reliable journeys and the movement of goods in support of the national and regional economies.</p>	<p>The Scheme principally concerns the A3, a key radial route from London to Portsmouth, and the M25 London orbital route. Paragraph 2.1 of this Appendix provides further information on the economic context of the Scheme. In improving the performance of the Strategic Road Network in this area, the Scheme will benefit the national and regional economy.</p>
2.14	<p>The Strategic Road Network, although only making up 2% of roads in England, carries a third of all road traffic and two thirds of freight traffic. Some 85% of the public use the network as drivers or passengers in any 12-month period. Even those that never drive on the Strategic Road Network are reliant on it to deliver many of the goods that they need.</p>	<p>The importance of the affected roads to the local and national economies and population centres is described in paragraph 2.1 of this Appendix.</p>
2.16	<p>Traffic congestion constrains the economy and impacts negatively on quality of life by:</p> <ul style="list-style-type: none"> • Constraining existing economic activity as well as economic growth, by increasing costs to businesses, damaging their competitiveness and making it harder for them to access export markets. Businesses regularly consider access to good roads and other transport connections as key criteria in making decisions about where to locate. • Leading to a marked deterioration in the experience of road users. For some, particularly those with time pressured journeys, congestion can cause frustration and stress, as well as inconvenience, reducing quality of life. 	<p>The A3 and M25 roads are at present congested, quantified in the Transport Assessment (application document TR010030/APP/7.4), and Painshill junction is a recognised pinch point. The Scheme will provide additional network capacity on the Strategic Road Network necessary to accommodate future development and predicted traffic growth.</p> <p>As outlined in chapter 4 of this Planning Statement, business users and transport service providers would benefit from the Scheme through reduced travel times, improving access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage related depreciation. After accounting for impacts associated</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	<ul style="list-style-type: none"> • Constraining job opportunities as workers have more difficulty accessing labour markets. • Causing more environmental problems, with more emissions per vehicle and greater problems of blight and intrusion for people nearby. This is especially true where traffic is routed through small communities or sensitive environmental areas. 	<p>with delays during, the monetised value of transport user benefits for Business Users is forecast to be £164.6 million PV.</p> <p>Commuters and other users would also benefit from the Scheme through reduced travel times, improved access to suppliers or customers, and reduced vehicle operating costs, such as fuel, vehicle maintenance and mileage-related depreciation. The combined monetised value of these benefits is forecast to be £169.1 million PV.</p> <p>The combined monetised value of the environmental benefits is forecast to be -£9.0 million PV. This value comprises savings from improvements in noise, reduced by costs associated with increases in Greenhouse gas emissions and decrease in air quality.</p> <p>The qualitative impacts of the Scheme on relieving traffic congestion on road users (including drivers and NMUs), the local population and the environment are assessed in the Environmental Statement (application document TR010030/APP/6.3), which proposes mitigation measures to limit negative impacts and, where possible, enhance social and environmental outcomes.</p> <p>The Environmental Statement (application document TR010030/APP/6.3) Chapter 13 assesses the effects upon people and communities and Chapter 16 provides an assessment of the cumulative effects of the Scheme.</p>
2.17	<p>The national road network is already under significant pressure. It is estimated that around 16% of all travel time in 2010 was spent delayed in traffic, and that congestion has significant economic costs: in 2010 the direct costs of congestion on the Strategic Road Network in England were estimated at £1.9 billion per annum.</p>	<p>The Economic Assessment of the Scheme, presented in chapter 4 of this Planning Statement, includes costs arising from congestion ('road user journey time impacts'). Estimated benefits of the Scheme compared with a do-nothing scenario are quantified as per paragraph 2.16 of this Appendix.</p>
2.18	<p>The pressure on the road network is forecast to increase with economic growth, substantial increases in population and a fall in the</p>	<p>The Transport Assessment for the Scheme (application document TR010030/APP/7.4) modelled future network performance in 2022 and</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	<p>cost of car travel from fuel efficiency improvements. Under the Department's 2014 estimates, it is forecast that a quarter of travel time will be spent delayed in traffic by 2040, with direct costs rising to £9.8 billion per annum by 2040 on the Strategic Road Network in England, without any intervention. Under our low and high demand scenarios, the proportion of travel time spent delayed in traffic could range between 12.1% and 21.8% on the Strategic Road Network. When considering all the roads within England, our central estimates would amount to:</p> <ul style="list-style-type: none"> • A 71% increase in the number of hours households spend delayed in traffic each year, from 45 hours in 2010 to 76 hours in 2040 • A 150% increase in the number of working days lost to congestion each year (from 42 million in 2010 to 106 million in 2040). 	<p>2037 using the SERTM SATURN strategic highway network assignment model for both 'Do Minimum' (DM) and 'Do Something' (DS) scenarios.</p> <p>In providing increased junction capacity, the Scheme will reduce congestion and delays and improve reliability of journeys. The Scheme would offer significant improvements to capacity compared with a do-nothing scenario and ensure that, with a few exceptions, affected junctions operate within capacity both in the 2022⁵ opening year and 2037 design year.</p> <p>In the Scheme opening year of 2022 there is a predicted improvement in the average network journey time of between 10% and 46%, and a predicted improvement of between 12% and 66% in 2037, the design year.</p>
2.20	<p>Annex B sets out the Department's latest road traffic forecasts for all roads and the Strategic Road Network. Traffic forecasts are not a policy goal and do not in themselves generate a need for development - the need for development arises from the pressures created by increases in traffic. Increased traffic without sufficient capacity will result in more congestion, greater delays and more unpredictable journeys. As with the congestion forecasts, these traffic forecasts will change over time as our understanding improves and circumstances change. Updated forecasts will be published, generally on an annual basis. Local forecasts will be used for the assessment of any specific road Scheme being assessed under the NPS NN.</p>	<p>Noted. The Scheme's Route Operation objective seeks to support projected traffic increases, population and economic growth. The Transport Assessment (application document TR010030/APP/7.4) takes future increase in demand for travel into account. The Scheme is expected to reduce accidents through the removal of several conflicting movements at the junction, described in detail in the Transport Assessment.</p>
2.21	<p>There is a range of options to address the identified need. These options are described in more detail below. However, relying solely on alternatives (or a combination of alternatives as set out below) is not viable or desirable as a means of managing need.</p>	<p>The Scheme is principally a capacity upgrade at the junction which tackles existing and future pressures on the network, enhances capacity and unlocks economic growth. However, viewed in the context of the Strategic Road Network as an asset, it contributes overall to maintenance and management, through alleviating pinch points and</p>

⁵ The forecast year scenarios are based on an opening year of 2022 and a design year of 2037. However, it is noted that Highways England expects construction of the scheme to commence in winter 2020 with the opening year anticipated to be 2023.

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	<p>Maintenance and asset management</p> <p>A well maintained and managed national road network makes for safer roads with less congestion and ensures value for money on whole life costs. Maintenance and asset management are a high priority for funding and investment plans. However, they will do nothing to enhance capacity, tackle existing and future pressures on the network or unlock economic development and housing.</p> <p>Demand management</p> <p>Non-fiscal measures to influence the use of the national road network for journeys, including provision of information and traffic management are important. New technologies can also help improve and make more efficient use of capacity. However, demand management and technology can only contribute to alleviating the damaging effects of congestion across the network. Some areas have undertaken significant demand constraint measures or used smarter choices to reduce car use, which has resulted in reductions in urban traffic. However, this has not translated into significantly less pressure on the Strategic Road Network. The Government has ruled out the introduction of national road pricing to manage demand on the Strategic Road Network on deliverability and public acceptability grounds.</p> <p>Modal Shift</p> <p>Across Government, policies are being implemented and considered which encourage sustainable transport modes including public transport, significant improvements to rail capacity and quality, cycling and walking. However, it is not realistic for public transport, walking or cycling to represent a viable alternative to the private car for all journeys, particularly in rural areas and for some longer or multi-leg journeys. In general, the nature of some journeys on the Strategic Road Network means that there will tend to be less scope for the use of alternative transport modes. If rail use was to increase by 50% (in terms of passenger kilometres) this would only be equivalent to a reduction of 5% in all road use. If freight carried by rail was to</p>	<p>smoothing traffic flows, which will affect a wider area than the Scheme itself. This is discussed further in the Transport Assessment (application document TR010030/APP/7.4).</p> <p>The Scheme also promotes modal shift through dedicated improvements to NMU facilities and safety, as described in paragraph 2.9 of this Appendix.</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	increase by 50% (in terms of tonne kilometres) this would only be equivalent to a reduction of around 7% in goods carried by road.	
2.22	Without improving the road network, including its performance, it will be difficult to support further economic development, employment and housing and this will impede economic growth and reduce people's quality of life. The Government has therefore concluded that at strategic level there is a compelling need for development of the national road network.	The Scheme's contribution to economic growth and quality of life at local and regional levels is described in paragraphs 2.1, 2.2 and 2.9 of this Appendix.
2.23	<p>The Government's wider policy is to bring forward improvements and enhancements to the existing Strategic Road Network to address the needs set out earlier. Enhancements to the existing national road network will include:</p> <ul style="list-style-type: none"> • junction improvements, new slip roads and upgraded technology to address congestion and improve performance and resilience at junctions, which are a major source of congestion; • implementing "smart motorways" (also known as "managed motorways") to increase capacity and improve performance; • improvements to trunk roads, in particular dualling of single carriageway strategic trunk roads and additional lanes on existing dual carriageways to increase capacity and to improve performance and resilience. 	<p>The Scheme is a junction improvement, with the following key features:</p> <ul style="list-style-type: none"> - Upgrading of existing roundabout and slip roads - Upgrading of other junctions in the vicinity - Provision of new slip lanes - Addition of lanes to carriageways through the junction and in the vicinity.
2.24	The Government's policy on development of the Strategic Road Network is not that of predicting traffic growth and then providing for that growth regardless. Individual Schemes will be brought forward to tackle specific issues, including those of safety, rather than to meet unconstrained traffic growth (i.e. 'predict and provide').	The Scheme specifically seeks to address congestion and pinch points affecting the M25 and A3 and roads in the vicinity of junction 10, as described in paragraph 2.16 of this Appendix.
2.25	On the road network different approaches and measures will be appropriate for different places. This reflects differences in local preferences and choices and differing scope for alternatives to road travel. The network must also offer a coherent mode of transport for national journeys and must combine to form a single, usable network. In general, the nature of some journeys on the Strategic Road	Different approaches to resolving the problems identified on the local and Strategic Road Network were assessed during the development of the Scheme, with the preferred option being that deemed most appropriate in the local context. The options considered, and method of assessment are described in chapter 3 of this Planning Statement.

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	Network mean that there will tend to be less scope for the use of alternative transport modes.	As described in paragraph 2.21 of this Appendix, the Scheme promotes alternative transport modes through NMU provision.
2.27	In some cases, to meet the need set out in section 2.1 to 2.11, it will not be sufficient to simply expand capacity on the existing network. In those circumstances new road alignments and corresponding links, including alignments which cross a river or estuary, may be needed to support increased capacity and connectivity.	Expanding capacity through elongating the existing roundabout, providing additional lanes and improving signalling has been assessed as sufficient to meet current and future network demand, as detailed in the Transport Assessment for the Scheme (application document TR010030/APP/7.4).

Table 2: National Networks National Policy Statement Chapter 3: Wider government policy on the national networks

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
Chapter 3 Wider government policy on the national networks		
Environmental and social impacts		
3.2	The Government recognises that for development of the national road and rail networks to be sustainable these should be designed to minimize social and environmental impacts and improve quality of life.	<p>The Scheme has been designed to meet the following Environmental objectives which are outlined in this Planning Statement:</p> <ul style="list-style-type: none"> • Supporting compliance with the UK's legally binding limits and targets on air quality and water quality status and support targets to cut greenhouse gas emissions and objectives for local air quality management areas. • Avoid, mitigate and compensate for adverse effects on the integrity of the Thames Basin Heaths Special Protection Area (SPA) and other statutory designated nature conservation sites and promote opportunities. • Recognise the significance of designated heritage assets close to the route of the Scheme, including at Painshill Park and at Wisley Gardens through incorporating suitable mitigation and/or design measures to avoid or reduce significant harm. • Improve the quality of life for nearby residents, through addressing the effects of noise on people in the declared noise

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		<p>important area's (NIA's) and ensuring that significant noise effects are mitigated.</p> <ul style="list-style-type: none"> • Ensure through good design, that an appropriate balance is achieved between functionality and the Scheme's contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes. <p>A comprehensive Environmental Statement has been prepared, together with proposals for mitigation of likely significant environmental effects arising from the Scheme. This is reported in the Environmental Statement (application document TR010030/APP/6.3), prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment (EIA) Regulations 2017 (SI No.572). The environmental aspects covered are:</p> <ul style="list-style-type: none"> • Chapters 1-4 (which includes major accidents and disasters) • Chapter 5 Air Quality • Chapter 6 Noise and Vibration • Chapter 7 Biodiversity • Chapter 8 Road Drainage and the Water Environment • Chapter 9 Landscape • Chapter 10 Geology and Soils • Chapter 11 Cultural Heritage • Chapter 12 Materials and Waste • Chapter 13 People and Communities • Chapter 14 Health • Chapter 15 Climate • Chapter 16 Cumulative Effects <p>A summary of the chapters listed above is in Chapter 17. As part of overall mitigation proposals, a Register of Environmental Actions and Commitments (REAC) within the Environmental Statement Appendices (application document TR010030/APP/6.5 or TR010030/APP/7.3) has been prepared. This details the</p>

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		environmental mitigation measures that would be implemented both during construction, why they are required, who is responsible for delivering them, and any ongoing maintenance arrangements.
3.3	In delivering new Schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance. Applicants should also provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of Schemes.	Each chapter of the Environmental Statement (application document TR010030/APP/6.3) demonstrates how environmental and social impacts have been assessed and mitigated in line with the relevant planning policies and guidance and, where possible, details how the design of the Scheme and mitigation measures provide opportunities to deliver environmental and social enhancements. Identifying further opportunities for environmental and social benefit will be an aim of the detailed design process.
3.4	The Appraisal of Sustainability accompanying this NPS recognises that some developments will have some adverse local impacts on noise, emissions, landscape/visual amenity, biodiversity, cultural heritage and water resources. The significance of these effects and the effectiveness of mitigation is uncertain at the strategic and non-locationally specific level of this NPS. Therefore, whilst applicants should deliver developments in accordance with Government policy and in an environmentally sensitive way, including considering opportunities to deliver environmental benefits, some adverse local effects of development may remain.	The Environmental Statement (application document TR010030/APP/6.3) described in paragraph 3.2 of this Appendix has considered the significance of all environmental effects at the local level and proposes mitigation measures where necessary.
3.5	Outside the nationally significant infrastructure project regime, Government policy is to bring forward targeted works to address existing environmental problems on the Strategic Road Network and improve the performance of the network. This includes reconnecting habitats and ecosystems, enhancing the settings of historic and cultural heritage features, respecting and enhancing landscape character, improving water quality and reducing flood risk, avoiding significant adverse impacts from noise and vibration and addressing areas of poor air quality.	Wider Government policy in relation to specific environmental topics is addressed in the relevant chapters of the Environmental Statement (application document TR010030/APP/6.3), which are: <ul style="list-style-type: none"> • Chapter 5 Air Quality; • Chapter 6 Noise and Vibration • Chapter 7 Biodiversity • Chapter 8 Road Drainage and the Water Environment. • Chapter 9 Landscape • Chapter 11 Cultural Heritage • Chapter 12 Materials and Waste • Chapter 13 People and Communities • Chapter 14 Health • Chapter 15 Climate

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
		<ul style="list-style-type: none"> Chapter 16 Cumulative Effects <p>As per paragraph 3.3 of this Appendix, the Environmental Statement chapters include consideration of opportunities offered by the Scheme to improve the environmental performance of the network.</p>
Emissions		
3.6	<p>Transport will play an important part in meeting the Government's legally binding carbon targets and other environmental targets. As part of this there is a need to shift to greener technologies and fuels, and to promote lower carbon transport choices. Over the next decade, the biggest reduction in emissions from domestic transport is likely to come from efficiency improvements in conventional vehicles, specifically cars and vans, driven primarily by EU targets for new vehicle CO2 performance. Electrification of the railway will also support reductions in carbon.</p>	<p>Chapter 14 Climate of the Environmental Statement (application document TR010030/APP/6.3) provides an assessment of carbon emissions arising from the construction and operation of the Scheme, which informs identification of appropriate mitigation measures. The assessment notes that transport became the largest emitting section of UK greenhouse gas emissions in 2016. Applying the carbon reduction hierarchy described in the chapter will reduce the GHG emissions from the Scheme and therefore the effects on climate. Mitigation of the Scheme's in-use emissions will be explored based on examination of traffic management scenarios over the network. Inclusion of NMU routes encourage the utilisation of alternative means of transport and help to achieve the goal of creating a more integrated and sustainable transport network, whilst reducing GHG emissions.</p>
3.8	<p>The impact of road development on aggregate levels of emissions is likely to be very small. Impacts of road development need to be seen against significant projected reductions in carbon emissions and improvements in air quality as a result of current and future policies to meet the Government's legally binding carbon budgets and the European Union's air quality limit values. For example:</p> <ul style="list-style-type: none"> Carbon - the annual CO2 impacts from delivering a programme of investment on the Strategic Road Network of the scale envisaged in Investing in Britain's Future amount to well below 0.1% of average annual carbon emissions allowed in the fourth carbon budget. This would be outweighed by additional support for ULEVs also identified as overall policy. 	<p>Chapter 15 Climate of the Environmental Statement (application document TR010030/APP/6.3) indicates that GHG emissions arising from the construction phase and opening year of the Scheme together contribute 0.004% of the UK's carbon budget for that period. The GHG emissions arising as a result of the Scheme would not have a material impact on the Government meeting its carbon reduction targets. In addition, the assessment concludes that no significant cumulative effects with other schemes are anticipated.</p> <p>Chapter 5 Air Quality of the Environmental Statement considers impacts of the Scheme on PM10 and NOx pollutants at the regional level. Emissions of NOx and PM10 are expected to decrease</p>

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	<ul style="list-style-type: none"> Air quality - aggregate air quality impacts from delivering a programme of investment on the Strategic Road Network of the scale envisaged in Investing in Britain's Future are small. Total PM10 and NOx might be expected to increase slightly, but this needs to be seen in the context of projected reductions in emissions over time. PM10 and NOx are expected to decrease over the next decade or so as a result of tighter vehicle emission standards, then flatten, with further falls over time due to greater levels of electric and other ultra-low emission vehicles. 	<p>overall from the base year by both the 2022 opening year and 2037 design year, despite an increase in total vehicle kilometres travelled, because of improvements in vehicle technology.</p>
Safety		
3.10	<p>The Government's overall vision and approach on road safety is set out in the Strategic Framework for Road Safety. It is a vision in which Britain remains a world leader in road safety; where highway authorities are empowered to take informed decisions within their area; where driver and rider training gives learners the skills they need to be safe on our roads; and where tough measures are taken against the minority of offenders who deliberately choose to drive dangerously. As set out in paragraphs to 4.66, Scheme promoters are expected to take opportunities to improve road safety, including introducing the most modern and effective safety measures where proportionate.</p>	<p>The Scheme seeks, through its objectives set out in this Planning Statement, to reduce annual collision frequency and severity ratio on the mainline A3, slip roads and M25 junction 10 gyratory.</p> <p>The Transport Assessment (application document TR010030/APP/7.4) models the impact of the proposed Scheme on road safety to find that the Scheme improvements are expected to reduce accidents through the removal of several conflicting movements at the junctions. It is anticipated to result in a reduction in accidents among users of the M25 junction 10 by 30%, and by 6% among users of the affected road network excluding junction 10. Further details on safety features are provided in paragraph 2.9 of this Appendix.</p>
Sustainable transport		
3.15	<p>The Government is committed to providing people with options to choose sustainable modes and making door-to-door journeys by sustainable means an attractive and convenient option. This is essential to reducing carbon emissions from transport.</p>	<p>The Scheme objectives set out in this Planning Statement include supporting walking and cycling by incorporating safe, convenient, accessible and attractive routes for pedestrians, cyclists and equestrians and improving crossing facilities.</p> <p>The Transport Assessment for the Scheme (application document TR010030/APP/7.4) finds that the network of PRow and local road connections provided by the Scheme will achieve this objective, by providing the following facilities for pedestrians, equestrians and cyclists:</p>

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		<ul style="list-style-type: none"> - A discrete route along the A3 - Four new or replacement road crossing bridges - Improved crossing facilities at the A3 Ockham Park junction and at Wisley Lane - A connected PRow network across common land and open space. <p>Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/7.4) provides details of the enhanced PRow and proposed overbridges (on the A3 and M25) included in the Scheme, which will improve connectivity and amenity for walkers, cyclists and equestrians.</p>
3.16	As part of the Government's commitment to sustainable travel it is investing in developing a high-quality cycling and walking environment to bring about a step change in cycling and walking across the country.	As in Paragraph 3.15 of this Appendix.
3.17	There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new Schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.	As in Paragraph 3.15 of this Appendix.
Accessibility		
3.19	The Government is committed to creating a more accessible and inclusive transport network that provides a range of opportunities and choices for people to connect with jobs, services and friends and family.	<p>The Scheme objectives, set out in this Planning Statement include to incorporate safe, convenient, accessible and attractive walking, cycling and equestrian routes and improve crossing facilities.</p> <p>The Scheme has been subject to an Equality Impact Assessment (EqIA) to assess whether the Scheme impacts (and specifically whether it disproportionately impacts) on protected characteristic groups (PCGs). This includes consideration of highway users, public transport and walking / cycling routes, along with assessing</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
		impact on accessibility to the amenities surrounding the Scheme area. The Assessment has been informed by targeted and inclusive consultation.
3.20	<p>The Government's strategy for improving accessibility for disabled people is set out in Transport for Everyone: an action plan to improve accessibility for all. In particular:</p> <ul style="list-style-type: none"> • The Government will continue to work to ensure that the bus and train fleets comply with modern access standards by 2020, and to improve rail station access for passengers with reduced mobility. The private car will continue to play an important role, providing disabled people with independence where other forms of transport are not accessible or available. • The Government expects applicants to improve access, wherever possible, on and around the national networks by designing and delivering Schemes that take account of the accessibility requirements of all those who use, or are affected by, national networks infrastructure, including disabled users. All reasonable opportunities to deliver improvements in accessibility on and to the existing national road network should also be taken wherever appropriate. 	<p>The EqlA for the Scheme includes consideration of those with disabilities, and covers accessibility in varying forms including physical accessibility, access to amenity, and access to information. The EqlA concluded that scheme will maintain transport accessibility by highway, public transport and walking/cycling routes. Some impacts on those with disabilities are likely though, through movement of bus stops (at this stage, the final location of these stops is undefined), the need for clear information on the Scheme (including changes to services/highway, temporary access arrangements during construction) and the impact of construction activity. Developing mitigation for these impacts is ongoing and will involve engagement with contractors and the public through targeted consultation.</p>
3.21	<p>Applicants are reminded of their duty to promote equality and to consider the needs of disabled people as part of their normal practice. Applicants are expected to comply with any obligations under the Equalities Act 2010.</p>	<p>An EqlA was prepared for the Scheme and meets the requirements of the Equalities Act 2010. This includes an assessment of potential impacts on the range of PCGs covered by the Act, including those with disabilities. The EqlA was embedded within the project to ensure the needs of these groups were central to Scheme development, including in the Scheme design, communication and engagement strategy, and any required mitigation development.</p>
3.22	<p>Severance can be a problem in some locations. Where appropriate applicants should seek to deliver improvements that reduce community severance and improve accessibility.</p>	<p>Chapter 13 People and Communities of the Environmental Statement (document reference TR010030/APP/6.3) assesses the impacts of the Scheme on community severance and accessibility. The Scheme is anticipated to maintain the connectivity offered by recreational routes for NMUs and will include new, altered and improved PRoW and overbridges which will improve conditions and accessibility for NMUs.</p>

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		<p>Significant adverse residual effects are anticipated for designated and non-designated PRow during construction but once operational, significant beneficial effects are forecast due to with increased bridleway routes available, the A3 pedestrian and cycle route will see significant improvements in its new location and be upgraded to a restricted byway that is set back from the A3, the Scheme will provide overbridges across the A3 and M25 negating the need for at grade crossings.</p> <p>Large beneficial effects once the Scheme is operational are also forecast at the new pedestrian crossings. For more information refer to Chapter 13 of the Environmental Statement People and Communities.</p> <p>The exception is the Cockcrow Hill permissive equestrian route which is to be stopped up.</p>

Table 3: National Networks National Policy Statement Chapter 4: Assessment Principles

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
Chapter 4 Assessment Principles		
General principles of assessment		
4.3	<p>In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:</p> <ul style="list-style-type: none"> its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement, and any long-term or wider benefits its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts. 	<p>This Planning Statement sets out the Scheme's objectives, which include:</p> <ul style="list-style-type: none"> Supporting projected population and economic growth in the area Reducing delay and smoothing traffic flow, which will have knock-on economic benefits Supporting targets to cut greenhouse gas emissions and objectives for local air quality management areas

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		<ul style="list-style-type: none"> Improving quality of life for nearby residents by addressing noise effects Ensuring that, through good design, an appropriate balance is achieved between functionality and the Scheme's contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes. <p>Chapter 4 Economic Case overview of this Planning Statement provides an overview of the economic, social and environmental benefits associated with the Scheme.</p> <p>Chapter 16 Cumulative Effects of the Environmental Statement (application document TR010030/APP/6.3) identifies that the in-combination effects during the construction period are principally related to noise, landscape and visual effects, and land take. These construction effects are mainly temporary in nature and localised in their geographical extent. The overall in-combination effect is considered to be moderate adverse in relation to residential, community and business receptors, and driver and non-motorised travellers, and neutral for all other types of receptor.</p> <p>The in-combination adverse effects during operation are principally related to noise and landscape and visual effects. There will also be beneficial in-combination effects related to establishment of improved driver and NMU routes in the Scheme design. The overall in-combination effect during operation is considered to be slight adverse in relation to residential, community and business receptors, and neutral for all other types of receptor.</p>
4.4	In this context, environmental, safety, social and economic benefits and adverse impacts, should be considered at national, regional and local levels. These may be identified in this NPS, or elsewhere.	The Environmental Statement (application document TR010030/APP/6.3) reports on the Environmental Impact

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
		Assessment, which has been carried out with consideration for potential effects at national, regional and local levels.
4.5	<p>Applications for road and rail projects (with the exception of those for SRFIs, for which the position is covered in paragraph 4.8 below) will normally be supported by a business case prepared in accordance with Treasury Green Book principles. This business case provides the basis for investment decisions on road and rail projects. The business case will normally be developed based on the Department's Transport Business Case guidance and WebTAG guidance. The economic case prepared for a transport business case will assess the economic, environmental and social impacts of a development. The information provided will be proportionate to the development. This information will be important for the Examining Authority and the Secretary of State's consideration of the adverse impacts and benefits of a proposed development. It is expected that NSIP Schemes brought forward through the development consent order process by virtue of Section 35 of the Planning Act 2008, should also meet this requirement.</p>	<p>The assessment and monetisation of anticipated economic, environmental and social benefits associated with the Scheme has been undertaken in accordance with DfT guidelines, using a 60-year appraisal period. The assessment has been carried out using standard procedures and economic parameters as defined by TAG Unit A1- Cost Benefit Analysis, with efforts made to quantify and monetise costs and other impacts where appropriate.</p> <p>Monetised scheme benefits were calculated using a variety of industry standard software packages. The assessment of Social and Distributional Impacts has been carried out in accordance with TAG Unit A4.1 and A4.2. WebTAG worksheets have been completed for all environmental indicators, however Air Quality, Greenhouse Gases and Noise impacts are already included in the monetised benefits.</p> <p>The Scheme's Value for Money, assessed through consideration of all monetised economic impacts and non-monetised environmental, social and distributional impacts, is 2.22, which is classified as High.</p>
4.6	<p>Applications for road and rail projects should usually be supported by a local transport model to provide sufficiently accurate detail of the impacts of a project. The modelling will usually include national level factors around the key drivers of transport demand such as economic growth, demographic change, travel costs and labour market participation, as well as local factors. The Examining Authority and the Secretary of State do not need to be concerned with the national methodology and national assumptions around the key drivers of transport demand. We do encourage an assessment of the benefits and costs of Schemes under high and low growth scenarios, in addition to the core case. The modelling should be proportionate to the scale of the Scheme and include</p>	<p>Strategic and local transport modelling has been undertaken in line with Department for Transport guidelines. Details are provided in the Transport Assessment (application document TR010030/APP/7.4).</p>

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	appropriate sensitivity analysis to consider the impact of uncertainty on project impacts.	
4.9	The Examining Authority should only recommend, and the Secretary of State should only impose, requirements in relation to a development consent, that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects. Guidance on the use of planning conditions or any successor to it, should be taken into account where requirements are proposed.	The draft Development Consent Order (application document TR010030/APP/3.1) includes the draft requirements which are considered necessary and relevant in Schedule 2. The Explanatory Memorandum (application document TR010030/APP/3.2) explains the purpose and effect of each provision in the draft order.
4.10	Planning obligations should only be sought where they are necessary to make the development acceptable in planning terms, directly related to the proposed development and fairly and reasonably related in scale and kind to the development.	In the event that planning obligations will be required, the terms of any such obligation will comply with paragraph 4.10
Linear infrastructure		
4.13	This NPS does not identify locations at which development of the road and rail networks should be brought forward. However, the road and rail networks provide access for people, business and goods between places and so the location of development will usually be determined by economic activity and population and the location of existing transport networks.	The Scheme constitutes an upgrade to existing transport infrastructure. It is hence located on the existing transport network. As set out in this Planning Statement, the M25 junction 10/A3 interchange is positioned on a critical section of the Strategic Road Network and acts as a nationally important link for much of the UK to global markets through connections to the channel ports, and links London with the major employment centre of Guildford.
Environmental Impact Assessment		
4.15	All proposals for projects that are subject to the European Union's Environmental Impact Assessment (EIA) Directive and are likely to have significant effects on the environment, must be accompanied by an environmental statement, describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically requires an EIA to identify, describe and assess effects on human beings, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. Schedule 4 of the Infrastructure Planning (EIA) Regulations 2009 sets out the information	The DCO is accompanied by an Environmental Statement (application document TR010030/APP/6.3), which details the significant effects on the environment and, where necessary, mitigation measures to reduce any residual effects of the Scheme. This meets the requirements of the European Union's Environmental Impact Assessment Directive as transposed into UK legislation in May 2017 as the IP (EIA) Regulations 2017.

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	<p>that should be included in the environmental statement including a description of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects. Further guidance can be found in the online planning portal. In this NPS, the terms 'effects', 'impacts' or 'benefits' should accordingly be understood to mean likely significant effects, impacts or benefits.</p>	
4.16	<p>When considering significant cumulative effects, any environmental statement should provide information on how the effects of the Applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been granted, as well as those already in existence).</p>	<p>Chapter 16 Cumulative Effects of the Environmental Statement (application document TR010030/APP/6.3) provides an assessment of the likely significant effects of the Scheme in combination with other past, present and reasonably foreseeable development, as well as impact interactions. Past and present developments are considered as part of the baseline and in some cases reflects the sensitivity of the receptors assessed. The developments considered in the assessment were identified using local knowledge, published information and consultation with the local planning authorities, and fall under the following categories:</p> <ul style="list-style-type: none"> - Trunk road and motorway projects which have been confirmed - Development projects with valid planning permissions as granted by the local planning authority and for which formal EIA is a requirement or for which non-statutory EIA has been undertaken - Applications for consent which have been made but have not yet been determined - Allocated sites in emerging or adopted Local Plans - Other types of application which could have implications for the Scheme.
4.17	<p>The Examining Authority should consider how significant cumulative effects and the interrelationship between effects might as a whole affect</p>	<p>Assessment of cumulative effects can be found in Chapter 16 Cumulative Effects of the Environmental Statement (application document TR010030/APP/6.3).</p>

NPS NN Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS
	the environment, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	
4.18	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	<p>Detail of the Scheme design is shown on the Engineering Drawings and Sections (application document TR010030/APP/2.09), Scheme Layout Plan (application document TR010030/APP/2.8) and Works Plans (application document TR010030/APP/2.3).</p> <p>This Planning Statement explains above in Chapter 1 that the DCO would secure consent for the Scheme to be undertaken within Order Limits (subject to DCO requirements) including all the temporary construction works. The Limits of Deviation within the Order Limits represent the area of land that may be used for the siting of infrastructure. The Limits of Deviation thus identify a maximum distance or measurement of variation within which the works must be constructed. This and other parameters are secured in the draft DCO (application document TR010030/APP/3.1).</p>
4.19	Where some details are still to be finalised, applicants are advised to set out in the environmental statement, to the best of their knowledge, what the maximum extent of the proposed development may be (for example in terms of site area) and assess the potential adverse effects which the project could have to ensure that the impacts of the project as it may be constructed have been properly assessed.	The realistic worst case scenario has been considered, where applicable, in the Environment Statement. The Environmental Statement assesses the likely significant effects of the Scheme.
4.20	Should the Secretary of State decide to grant development consent for an application where details are still to be finalised, this will need to be reflected in appropriate development consent requirements in the development consent order. If development consent is granted for a proposal and at a later stage the applicant wishes for technical or commercial reasons to construct it in such a way that it is outside the terms of what has been consented, for example because its extent will be greater than has been provided for in terms of the consent, it will be necessary to apply for a change to be made to the development consent. The application to change the consent may need to be accompanied by	The draft requirements 5 (Detailed Design and 6 (Landscaping) contained in the draft Development Consent Order (application document TR010030/APP/3.1) make provision where appropriate for consideration of elements of the detailed design of the Scheme.

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	environmental information to supplement that which was included in the original environmental statement.	
4.21	In cases where the EIA Directive does not apply to a project, and an environmental statement is not therefore required, the applicant should instead provide information proportionate to the project on the likely environmental, social and economic effects.	Not relevant; the Scheme requires a comprehensive Environmental Impact Assessment that has been undertaken to support this DCO submission. The Environmental Statement (application document TR010030/APP/6.3) reports the findings.
Habitats Regulations Assessment		
4.22	The applicant should seek the advice of Natural England and, where appropriate, for cross-boundary impacts, Natural Resources Wales and Scottish Natural Heritage to ensure that impacts on European sites in Wales and Scotland are adequately considered.	<p>A Habitats Regulations Assessment (application document TR010030/APP/5.3) has been undertaken, to assess potential significant effects of the Scheme on European sites and all others subject to the same policy protection. Within the vicinity of the Scheme, the Thames Basin Heaths Special Protection Area (SPA) falls under this category.</p> <p>The HRA Stage 1: Screening report found that the Scheme is likely to have a significant effect on the Thames Basin Heaths SPA comprising habitat loss, degradation of habitats and disturbance. The conclusions of the HRA Stage 1: Screening were agreed with Natural England.</p> <p>Following this, a statement to inform Appropriate Assessment (HRA Stage 2), consideration of alternative solutions and assessment of Imperative Reasons of Overriding Public Interest (IROPI) and compensatory measures (HRA Stages 3-5), have been prepared and are submitted in support of this application. Natural England have been consulted throughout this process and agreed the conclusions of the statement to inform Appropriate Assessment, as reported in the HRA Appendix.</p>

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		See also paragraphs 5.13-5.15, 5.20 and 5.38 of this Appendix.
4.23	Applicants are required to provide sufficient information with their applications for development consent to enable the Secretary of State to carry out an Appropriate Assessment if required. This information should include details of any measures that are proposed to minimise or avoid any likely significant effects on a European site. The information provided may also assist the Secretary of State in concluding that an Appropriate Assessment is not required because significant effects on European sites are sufficiently unlikely that they can be excluded.	A statement to inform the Secretary of State's Appropriate Assessment has been prepared for the Scheme (application document TR010030/APP/5.3), as reported in paragraph 4.22 of this Appendix.
4.24	If a proposed national network development makes it impossible to rule out an adverse effect on the integrity of a European site, it is possible to apply for derogation from the Habitats Directive, subject to the proposal meeting three tests. These tests are that no feasible, less damaging alternatives should exist, that there are imperative reasons of overriding public interest for the proposal going ahead, and that adequate and timely compensation measures will be put in place to ensure the overall coherence of the network of protected sites is maintained.	The HRA report (application document TR010030/APP/5.3) statement to inform Appropriate Assessment concludes that it is not possible to rule out an adverse effect on the integrity of the Thames Basin Heaths SPA arising from habitat losses. The HRA Stage 3 consideration of alternatives explains that there are no feasible alternative solutions which were identified during option appraisal and design evolution which would lessen the adverse effect on the SPA. To assist in determining whether there are imperative reasons of overriding public interest which would make the Scheme eligible for an application for derogation from the Habitats Directive, a Stage 4 assessment of Imperative Reasons of Overriding Public Interest (IROPI) has been prepared and is provided in the HRA report. The assessment concludes that there are imperative reasons of overriding public interest to justify the Scheme, which are principally related to the improvement in traffic flows and road safety. A compensation package has been developed under consultation with Natural England, which will maintain the overall coherence of the Natura 2000 Network and will be secured by draft DCO Requirements 7, 8 and 9, detailed in the Draft DCO & Schedules (application document TR010030/APP/3.1).
4.25	Where a development may negatively affect any priority habitat or species on a site for which they are a protected feature, any Imperative Reasons of Overriding Public Interest (IROPI) case would need to be established solely on one or more of the grounds relating to human health, public	The qualifying features of the Thames Basin Heaths SPA are not priority habitats or species, so this limitation does not apply to the decision regarding this Scheme.

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	safety or beneficial consequences of primary importance to the environment.	There are no priority habitats or species within the Ockham and Wisley Commons SSSI component of the Thames Basin Heaths SPA. Therefore, the IROPI can include consideration of social or economic benefit provided by the Scheme.
Alternatives		
4.26	<p>Applicants should comply with all legal requirements and any policy requirements set out in this NPS on the assessment of alternatives. In particular:</p> <ul style="list-style-type: none"> • The EIA Directive requires projects with significant environmental effects to include an outline of the main alternatives studied by the applicant and an indication of the main reasons for the applicant's choice, taking into account the environmental effects. • There may also be other specific legal requirements for the consideration of alternatives, for example, under the Habitats and Water Framework Directives. • There may also be policy requirements in this NPS, for example the flood risks sequential test and the assessment of alternatives for developments in National Parks, the Broads and Areas of Outstanding Natural Beauty (AONB). 	<p>Chapter 3 Scheme Development of this Planning Statement and Chapter 3 Assessment of Alternatives of the Environmental Statement (application document TR010030/APP/6.3) set out the alternative options considered during development of the Scheme. Assessment of these alternatives, taking account of the environmental effects, provided the basis for arriving at the preferred option.</p> <p>Other specific legal and policy requirements for the consideration of alternatives are covered by relevant sections in Table 5 of this Appendix. The tests of most relevance to consideration of options for the Scheme were:</p> <ul style="list-style-type: none"> • The European Directive 2008/50/EC, Ambient Air Quality and Cleaner Air for Europe, transposed in to UK legislation by the Air Quality Standards Regulations 2010 • The European Directive 2000/60/EC, Establishing a Framework for the Community Action in the Field of Water Policy, transposed in to UK legislation by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 and the Water Industry Act 1991 (Amendment) (England) Regulations 2009 • The European Directives 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna and 2009/147/EC on the Conservation of Wild Birds, which are transposed in to UK legislation by the Conservation of Habitats and Species Regulations 2010 (as amended by the Conservation of Habitats and Species (Amendment) Regulations 2012)

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		<ul style="list-style-type: none"> • The European Habitats Directive 92/43/EEC and Habitats Regulations 2017 • The Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way Act 2000
4.27	<p>All projects should be subject to an options appraisal. The appraisal should consider viable modal alternatives and may also consider other options (in light of the paragraphs 3.23 to 3.27 of this NPS). Where projects have been subject to full options appraisal in achieving their status within Road or Rail Investment Strategies or other appropriate policies or investment plans, option testing need not be considered by the examining authority or the decision maker. For national road and rail Schemes, proportionate option consideration of alternatives will have been undertaken as part of the investment decision making process. It is not necessary for the Examining Authority and the decision maker to reconsider this process, but they should be satisfied that this assessment has been undertaken.</p>	Options were appraised as per paragraph 4.26 of this Appendix.
Criteria for 'good design' for national network infrastructure		
4.28-4.29	<p>Applicants should include design as an integral consideration from the outset of a proposal. Visual appearance should be a key factor in considering the design of new infrastructure, as well as functionality, fitness for purpose, sustainability and cost. Applying "good design" to national network projects should therefore produce sustainable infrastructure sensitive to place, efficient in the use of natural resources and energy used in their construction, matched by an appearance that demonstrates good aesthetics as far as possible.</p>	<p>The Scheme objectives, provided in Chapter 2 of this Planning Statement include using good design to ensure that an appropriate balance is achieved between functionality and the Scheme's contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes.</p> <p>The Planning Statement sets out in Chapter 3 how the design evolved, including the options considered and changes carried out as a result of consultation. The Consultation Report Main Report (application document TR010030/APP/5.1) explains the consultation undertaken and how it has influenced the development of the Scheme.</p>

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4.30	It is acknowledged however, that given the nature of much national network infrastructure development, particularly SRFIs, there may be a limit on the extent to which it can contribute to the enhancement of the quality of the area.	Noted. The Scheme nevertheless seeks to incorporate suitable mitigation and/or design measures to avoid or reduce significant harm to designated heritage assets, to take into account the concerns of local communities and promote opportunities to deliver positive environmental outcomes, as described in the Scheme objectives found in this Planning Statement and the Environmental Statement (application document TR010030/APP/6.3)
4.31	A good design should meet the principal objectives of the Scheme by eliminating or substantially mitigating the identified problems by improving operational conditions and simultaneously minimising adverse impacts. It should also mitigate any existing adverse impacts wherever possible, for example, in relation to safety or the environment. A good design will also be one that sustains the improvements to operational efficiency for as many years as is practicable, taking into account capital cost, economics and environmental impacts.	<p>The Scheme objectives are listed in Section 3 of this Planning Statement. The Objectives are related to Route Operation, Customer, Capacity, Safety, Social and Environment.</p> <p>The Environmental Statement (application document TR010030/APP/6.3) sets out how significant adverse impacts will be mitigated to ensure that the Scheme meet these objectives.</p> <p>It is expected that construction will last for two years, Construction of the Scheme is planned to commence in winter 2020, with the Scheme planned to be open for traffic in summer 2023.</p>
4.32	Scheme design will be a material consideration in decision making. The Secretary of State needs to be satisfied that national networks infrastructure projects are sustainable and as aesthetically sensitive, durable, adaptable and resilient as they can reasonably be (having regard to regulatory and other constraints and including accounting for natural hazards such as flooding).	As per paragraphs 4.28-31 of this Appendix.
4.33	The applicant should therefore take into account, as far as possible, both functionality (including fitness for purpose and sustainability) and aesthetics (including the Scheme's contribution to the quality of the area in which it would be located). Applicants will want to consider the role of technology in delivering new national networks projects. The use of professional, independent advice on the design aspects of a proposal should be considered, to ensure good design principles are embedded into infrastructure proposals.	See Scheme objectives referred to in paragraphs 4.28-4.30.
4.34	Whilst the applicant may only have limited choice in the physical appearance of some national networks infrastructure, there may be	The following chapters of the Environmental Statement (application document TR010030/APP/6.3) identify embedded and additional

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	opportunities for the applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform and vegetation.	<p>mitigation measures, where necessary, in relation to existing landscape, historical character and function, landscape permeability, landform and vegetation:</p> <ul style="list-style-type: none"> • Chapter 9 Landscape details how selection and refinement of the preferred Scheme option has reduced potential impacts on loss of trees, hedgerows and woodland; that slip road and overbridge profiles will be modelled to fit the local landscape character; and planting and use of appropriate materials should be considered to further reduce visual and landscape impacts; • Chapter 11 Cultural Heritage provides details of the existing historic environment and how the design mitigation for landscape and visual impacts (in Chapter 9) will serve to protect this; and • Chapter 13 People and Communities establishes how Scheme design will reduce severance and improve accessibility of local routes to NMUs. <p>The Consultation Report (application document TR010030/APP/5.1) sets out further design changes carried out as a result of consultation.</p>
4.35	Applicants should be able to demonstrate in their application how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected....	Options appraisal and development of the Scheme design are covered in paragraphs 4.26-31 of this appendix. The Consultation Report Main Report (application document TR010030/APP/5.1) explains the consultation undertaken and how it has influenced the development of the Scheme.
Climate change adaptation		
4.38	Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be	Chapter 15 Climate Change of the Environmental Statement (application document TR010030/APP/6.3) takes account of predicted impacts of the Scheme on climate change, and the

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	managed through suitable adaptation measures, including through the provision of green infrastructure.	<p>vulnerability of the Scheme to the impacts of climate change. It proposes mitigation measures for climate-related impacts.</p> <p>The Flood Risk Assessment (application document TR010030/APP/5.5) also takes into account the impacts on climate change and resilience over the life time of the development.</p> <p>Mitigation measures are proposed to reduce the Scheme's vulnerability to impacts of climate change during construction and operation. These measures will manage the risks.</p>
4.40	New national networks infrastructure will be typically long-term investments which will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning location, design, build and operation. Any accompanying environment statement should set out how the proposal will take account of the projected impacts of climate change.	As per paragraph 4.38 of this Appendix.
4.41	Where transport infrastructure has safety-critical elements and the design life of the asset is 60 years or greater, the applicant should apply the UK Climate Projections 2009 (UKCOP09) high emissions scenario (high impact, low likelihood) against the 2080 projections at the 50% probability level.	Chapter 15, Climate Change of the Environmental Statement (application document TR010030/APP/6.3) is based on an assessment that uses the latest UKCOP data. The analysis of projections for the Scheme location has been completed under the 50th percentile of the high emissions scenario (RCP8.5). These projections cover the estimated lifetime of the Scheme.
4.42	The applicant should take into account the potential impacts of climate change using the latest UK Climate Projections available at the time and ensure any environment statement that is prepared identifies appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure.	As per paragraph 4.41 of this Appendix.
4.43	The applicant should demonstrate that there are no critical features of the design of new national networks infrastructure which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections. Any potential critical features should be assessed taking account of the latest credible scientific evidence on, for example, sea level rise (e.g. by referring to additional maximum	Chapter 15 Climate of the Environmental Statement (application document TR010030/APP/6.3) discusses the impacts of consequence based on the probabilistic nature of the projections. The analysis of projections for the Scheme location is done under the 50th percentile of the high emissions scenario, and the study area's future climate is considered with regard to average and

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	credible scenarios such as from the Intergovernmental Panel on Climate Change or Environment Agency) and on the basis that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime through potential further mitigation or adaptation.	extreme weather variables, to reach the conclusions summarised in paragraph 4.38 of this Appendix.
4.44	Any adaptation measures should be based on the latest set of UK Climate Projections, the Government's national Climate Change Risk Assessment and consultation with statutory consultation bodies. Any adaptation measures must themselves also be assessed as part of any environmental impact assessment and included in the environment statement, which should set out how and where such measures are proposed to be secured.	Adaptation measures have been derived and assessed as per paragraphs 4.36-4.41 of this Appendix. See Chapter 15 Climate of the Environmental Statement (application document TR010030/APP/6.3).
4.45	If any proposed adaptation measures themselves give rise to consequential impacts the Secretary of State should consider the impact in relation to the application as a whole and the impacts guidance set out in this part of this NPS (e.g. on flooding, water resources, biodiversity, landscape and coastal change).	The impacts of proposed adaptation measures have been included in the assessments of residual effects in each Environmental Statement topic chapter (application document TR010030/APP/6.3) and have informed the assessment of overall effects of the Scheme.
4.46	Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so.	Chapter 15 of the Environmental Statement (application document TR010030/APP/6.3) discusses how adaptation measures would be implemented at the time of construction as appropriate/ necessary to do so.
4.47	Where adaptation measures are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (e.g. coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (e.g. reserving land for future extension, increasing the height of an existing sea wall, or requiring a new sea wall).	Adaptation measures and their impacts are addressed in paragraph 4.45 of this Appendix.
Pollution control and other environmental protection regimes		
4.50	In deciding an application, the Examining Authority and the Secretary of State should focus on whether the development itself is an acceptable use	Chapter 5 Scheme Conformity with National and Local Planning Policy of this Planning Statement sets out how the Scheme

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	<p>of the land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. They should assess the potential impacts of processes, emissions or discharges to inform decision making, but should work on the assumption that in terms of the control and enforcement, the relevant pollution control regime will be properly applied and enforced. Decisions under the Planning Act should complement but not duplicate those taken under the relevant pollution control regime.</p>	<p>conforms to planning policy and is an acceptable use of the land. The impacts of that use are considered throughout the Environmental Statement (application document TR010030/APP/6.3).</p> <p>Where feasible and expedient for the project, Highways England has sought the agreement of relevant consenting bodies to be able to include other consenting requirements within the scope of the DCO. Agreement is being sought from the Environment Agency and from Surrey County Council (as lead local flood authority) to disapply the requirement to obtain any flood risk activity permit under the Environmental Permitting Regulations (England and Wales) Regulations 2016 or any land drainage consent under the Land Drainage Act 1991. Highways England has incorporated protective provisions within the DCO for the benefit of the Environment Agency and Surrey County Council.</p> <p>For other consents that may need to be obtained separately from the DCO, Highways England is either seeking to obtain these in parallel with the DCO process or has sought assurances from the relevant consenting bodies that such consents will not be unreasonably withheld later.</p> <p>At this stage in the project, it is not feasible or practicable to obtain all consents that may be needed, either because they relate to matters which can only be addressed at the detailed design stage or because they relate to matters that can only be determined once Highways England's construction contractor is appointed. None of these matters are likely to affect the acceptability of the Scheme in principle as they generally relate to the methodologies for some of the activities or operations or are matters of finer detail.</p>

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		Further details are provided in the Consents and Agreements Position Statement (application document TR010030/APP/3.3).
4.52	There is a statutory duty on applicants to consult the Marine Management Organisation (MMO) on nationally significant projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act (as amended by section 23 of the Marine and Coastal Access Act 2009).	Not relevant to this Scheme.
4.53	When an applicant applies for an Environmental Permit, the relevant regulator (the Environment Agency) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permit requirements.	As per paragraph 4.50 of this Appendix.
4.54	Applicants are encouraged to begin preapplication discussions with the Environment Agency as early as possible. It is however expected that an applicant will have first thought through the requirements as a starting point for discussion. Some consents require a significant amount of preparation; as an example, the Environment Agency suggests that applicants should start work towards submitting the permit application at least 6 months prior to the submission of an application for a Development Consent Order, where they wish to parallel track the applications. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Examining Authority.	Continued consultation with the Environment Agency has been underway since the Option Selection Stage, commenced in October 2016. Further details are provided in the Consultation Report (application document TR010030/APP/5.1). This process has enabled decision-making and preparation relating to the relevant environmental consents described in paragraph 4.50 of this Appendix. For other environmental consents please see the Consents and Agreements Position Statement (application document TR010030/APP/3.3). There will be ongoing discussions with the Environment Agency as the Scheme continues to develop through the detailed design stage, and will include the appointed contractor, as agreed in the process described in paragraph 4.53 of this Appendix.
4.55	The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts. This will require close cooperation with the Environment Agency and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England,	Noted. The Environment Agency and other relevant bodies have been consulted since 2016, as detailed in the Consultation Report (application document TR010030/APP/5.1).

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	Drainage Boards, and water and sewerage undertakers, to ensure that in the case of potentially polluting developments: <ul style="list-style-type: none"> the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and the effects of existing sources of pollution in and around the project are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits. 	
Common law nuisance and statutory nuisance		
4.58	It is very important that during the examination of a nationally significant infrastructure project, possible sources of nuisance under section 79(1) of the 1990 Act, and how they may be mitigated or limited are considered by the Examining Authority, so they can recommend appropriate requirements that the Secretary of State might include in any subsequent order granting development consent. More information on the consideration of possible sources of nuisance is at paragraphs 5.81-5.89.	Consideration of the possible sources of nuisance relating to the Scheme is covered in the Statutory Nuisance Statement (application document TR010030/APP/5.2). The Environmental Statement Appendices (application document TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC) which details the environmental mitigation measures that should be implemented, how they mitigate or limit nuisance and who is responsible for delivering them, as well as any ongoing maintenance arrangements. This will be secured as part of the draft DCO requirements, reported in the draft DCO (application document TR010030/APP/3.1).
Safety		
4.61	The applicant should undertake an objective assessment of the impact of the proposed development on safety including the impact of any mitigation measures. This should use the methodology outlined in the guidance from DfT (WebTAG) and from the Highways Agency.	The Transport Assessment (application document TR010030/APP/7.4). provides an assessment of overall impact of the Scheme on road safety, in accordance with webTAG and Highways England (formerly Highways Agency) guidance. It concludes that the operational improvements provided by the Scheme will have a beneficial impact on all road users, in terms of reducing traffic accidents (further details of which are reported in paragraph 3.10 of this Appendix) as well on the safety of NMUs, as reported in Chapter 13 People and Communities of the Environmental Statement (application document

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		TR010030/APP/6.3). No mitigation measures to improve safety additional to those already included in the Scheme will be required.
4.62	They should also put in place arrangements for undertaking the road safety audit process. Road safety audits are a mandatory requirement for all trunk road highway improvement Schemes in the UK (including motorways).	A Stage 1 Road Safety Audit will be carried out for the Scheme. This will be the first stage in an ongoing audit to be progressed at a later stage of design, as per DfT and Highways England guidance.
4.64	<p>The applicant should be able to demonstrate that their Scheme is consistent with the Highways Agency's Safety Framework for the Strategic Road Network and with the National Strategic Framework for Road Safety. Applicants will wish to show that they have taken all steps that are reasonably required to:</p> <ul style="list-style-type: none"> • minimise the risk of death and injury arising from their development; • contribute to an overall reduction in road casualties; • contribute to an overall reduction in the number of unplanned incidents; and • contribute to improvements in road safety for walkers and cyclists. 	<p>Measures to minimise the risk of death and injury arising from the construction of the Scheme are specified within the outline CEMP in the Environmental Statement Appendices (application document TR010030/APP/7.2).</p> <p>The Scheme's contribution to reducing road casualties and improving safety for walkers and cyclists during its operation is addressed in paragraphs 4.61, 2.9 and 3.10 of this Appendix. This includes the provision of dedicated NMU facilities (footways, crossings, Public Rights of Way and overbridges) and upgraded signalling which improves safety. The Transport Assessment (application document TR010030/APP/7.4) provides details of the conversion of the existing hard shoulders to provide an additional running lane for traffic in both directions and emergency refuge areas, which will improve resilience to unplanned incidents. Safety improvements are also expected as a result of stopping up several local access roads onto the A3 carriageway, reducing potential conflicts and risk of collision.</p>
4.65	<p>They will also wish to demonstrate that:</p> <ul style="list-style-type: none"> • they have considered the safety implications of their project from the outset; and they are putting in place rigorous processes for monitoring and evaluating safety. 	<p>Safety is a key objective of the Scheme, as per paragraph 3.10 of this Appendix. The Planning Statement demonstrates how safety has shaped the development of the Scheme from the outset. The poor safety record at M25 junction 10 underpins the need for the Scheme, along with congestion.</p> <p>The process for monitoring and evaluating safety has been commenced with a Stage 1 Road Safety Audit, detailed in paragraph 4.62 of this Appendix.</p>

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4.66	<p>The Secretary of State should not grant development consent unless satisfied that all reasonable steps have been taken and will be taken to:</p> <ul style="list-style-type: none"> • minimise the risk of road casualties arising from the Scheme; and • contribute to an overall improvement in the safety of the Strategic Road Network. 	<p>Paragraphs 3.10 and 4.61-65 of this Appendix provide details on how the Scheme has sought to minimise the risk of road casualties and contribute to an overall improvement in safety of the Strategic Road Network, from its design and development through to operation.</p>
Security considerations		
4.76-77	<p>Where national security implications have been identified, the applicant should consult with relevant security experts from CPNI [Centre for the Protection of National Infrastructure] and the Department for Transport, to ensure that physical, procedural and personnel security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. If CPNI and the Department for Transport (as appropriate) are satisfied that security issues have been adequately addressed in the project when the application is submitted, they will provide confirmation of this to the Secretary of State, and the Examining Authority should not need to give any further consideration to the details of the security measures during the examination. The applicant should only include such information in the application as is necessary to enable the Examining Authority to examine the development consent issues and make a properly informed recommendation on the application.</p>	<p>No national security implications have been identified. As such, it has not been necessary to consult CPNI.</p>
Health		
4.81-82	<p>As described in the relevant sections of this NPS, where the proposed project has likely significant environmental impacts that would have an effect on human beings, any environmental statement should identify and set out the assessment of any likely significant adverse health impacts.</p> <p>The applicant should identify measures to avoid, reduce or compensate for adverse health impacts as appropriate. These impacts may affect people simultaneously, so the applicant, and the Secretary of State (in determining an application for development consent) should consider the cumulative impact on health.</p>	<p>The Environmental Statement Chapter 14 Health Impacts (application document TR010030/APP/6.3) considers the likely effects of the Scheme on human population health and wellbeing, including the cumulative effects on health and wellbeing arising from air quality, noise and people and communities impacts and from other developments (following the cumulative effects methodology referred to in paragraph 4.16 of this Appendix). The assessment identifies mitigation measures for the construction and operation of the Scheme to avoid, reduce or compensate for</p>

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		<p>adverse effects, as well as enhancement measures by which the Scheme can provide an opportunity to improve human health. Overall, the majority of adverse effects to health that are anticipated are during construction and, provided mitigation measures are deployed, will not be significant during construction. The operation of the Scheme is anticipated to have a slight adverse effect from increases in air pollution and slight-moderate beneficial health effects from improved journey times, safety and connectivity.</p>

Table 4: National Networks National Policy Statement Chapter 5: Generic Impacts

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Chapter 5 Generic Impacts		
Air quality		
5.6 – 5.9	<p>Where the impacts of the project (both on and off Scheme) are likely to have significant air quality effects in relation to meeting EIA requirements and / or affect the UK's ability to comply with the Air Quality Directive, the applicant should undertake an assessment of the impacts of the proposed project as part of the environmental statement. The environmental statement should describe:</p> <ul style="list-style-type: none"> • <i>existing air quality levels;</i> • <i>forecasts of air quality at the time of opening, assuming that the Scheme is not built (the future baseline) and taking account of the impact of the Scheme; and</i> • <i>any significant air quality effects, their mitigation and any residual effects, distinguishing between the construction and operation stages and taking account of the impact of road traffic generated by the project.</i> • <i>Defra publishes future national projections of air quality based on evidence of future emissions, traffic and vehicle fleet. Projections are updated as the evidence base changes. Applicant's assessment should be consistent with this but may include more detailed modelling to</i> 	<p>Chapter 5 Air Quality of the Environmental Statement (application document TR010030/APP/6.3) assesses the Scheme's compliance with Air Quality Regulations (The Air Quality Standards Regulations 2010 (SI 2010/1001) for EU limit values and the Air Quality (England) Regulations (SI 2000/928) as amended (2002/3043) for national objectives). The assessment includes:</p> <ul style="list-style-type: none"> • Analysis of existing air quality levels ('baseline conditions'); • Assessment of air quality for the following scenarios: base year (2015), opening year (2022) without the Scheme, opening year (2022) with the Scheme; • Identification of significant air quality effects, mitigation and residual effects arising from construction traffic and activities and operational road traffic of the Scheme <p>The assessment is consistent with the Defra approach, but also includes more detailed modelling to assess impacts at the local level. Details can be found in the Air Quality chapter.</p>

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	<p><i>demonstrate local impacts. In addition to information on the likely significant effects of a project in relation to EIA, the Secretary of State must be provided with a judgement on the risk as to whether the project would affect the UK's ability to comply with the Air Quality Directive.</i></p>	<p>The assessment concludes that the Scheme is not expected to result in a significant adverse effect on air quality, and there is not expected to be a compliance risk as regards the UK's ability to comply with the EU Air Quality Directive.</p>
5.10	<p>The Secretary of State should consider air quality impacts over the wider area likely to be affected, as well as in the near vicinity of the Scheme. In all cases the Secretary of State must take account of relevant statutory air quality thresholds set out in domestic and European legislation. Where a project is likely to lead to a breach of the air quality thresholds, the applicant should work with the relevant authorities to secure appropriate mitigation measures with a view to ensuring so far as possible that those thresholds are not breached.</p>	<p>The local and wider study are for the air quality assessment is detailed in Chapter 5 Air Quality of the Environmental Statement (application document TR010030/APP/6.3). The assessment concludes that the Scheme is not anticipated to have a significant adverse effect on air quality, and there is not expected to be a compliance risk as regards the UK's ability to comply with the EU Air Quality Directive.</p>
5.12	<p>The Secretary of State must give air quality considerations substantial weight where, after taking into account mitigation, a project would lead to a significant air quality impact in relation to EIA and / or where they lead to a deterioration in air quality in a zone/agglomeration.</p>	<p>As per paragraph 5.10 of this Appendix.</p>
5.13	<p>The Secretary of State should refuse consent where, after taking into account mitigation, the air quality impacts of the Scheme will:</p> <ul style="list-style-type: none"> • <i>result in a zone/agglomeration which is currently reported as being compliant with the Air Quality Directive becoming non-compliant; or</i> • <i>affect the ability of a non-compliant area to achieve compliance within the most recent timescales reported to the European Commission at the time of the decision.</i> 	<p>As per paragraph 5.10 of this Appendix.</p>
5.14-15	<p>The Secretary of State should consider whether mitigation measures put forward by the applicant are acceptable. A management plan may help codify mitigation at this stage. The proposed mitigation measures should ensure that the net impact of a project does not delay the point at which a zone will meet compliance timescales. Mitigation measures may affect the project design, layout, construction, operation and/or may comprise measures to improve air quality in pollution hotspots beyond the immediate locality of the Scheme. Measures could include, but are not</p>	<p>It is not anticipated that there would be any significant adverse effects on air quality during the Scheme's construction or operation, provided standard construction best practice is adhered to, as detailed in Chapter 5 Air Quality of the Environmental Statement (application document TR010030/APP/6.3). Hence no specific mitigation measures for air quality are proposed.</p>

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	limited to, changes to the route of the new Scheme, changes to the proximity of vehicles to local receptors in the existing route, physical means including barriers to trap or better disperse emissions and speed control. The implementation of mitigation measures may require working with partners to support their delivery.	
Carbon emissions		
5.16	The Government has a legally binding framework to cut greenhouse gas emissions by at least 80% by 2050. As stated above, the impact of road development on aggregate levels of emissions is likely to be very small. Emission reductions will be delivered through a system of five-year carbon budgets that set a trajectory to 2050. Carbon budgets and plans will include policies to reduce transport emissions, taking into account the impact of the Government's overall programme of new infrastructure as part of that.	The Environmental Statement Chapter 15 Climate (application document TR010030/APP/6.3) considers the impact of the Scheme on emissions, as detailed in paragraph 3.6 of this Appendix. At all stages of the Scheme's design and development, emissions will be mitigated as far as possible, as Highways England is committed to reducing emissions wherever practicable and to support the UK Government in meeting its carbon reduction targets.
5.17	Carbon impacts will be considered as part of the appraisal of Scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.	As per paragraphs 3.6 and 3.8 of this Appendix.
5.18	The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. The Government is legally required to meet this plan. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the	As per paragraphs 3.6 and 3.8 of this Appendix, the Scheme is not anticipated to have a significant or material impact on carbon reduction targets.

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	increase in carbon emissions resulting from the proposed Scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets.	
5.19	Evidence of appropriate mitigation measures (incorporating engineering plans on configuration and layout and use of materials) in both design and construction should be presented. The Secretary of State will consider the effectiveness of such mitigation measures in order to ensure that, in relation to design and construction, the carbon footprint is not unnecessarily high. The Secretary of State's view of the adequacy of the mitigation measures relating to design and construction will be a material factor in the decision-making process.	<p>Design measures for carbon reduction are embedded in the design of the Scheme. Appropriate construction phase mitigation measures for the Scheme's carbon emissions are set out in the REAC and outline CEMP for the Scheme (application reference TR010030/APP/7.3 and TR010030/APP/7.2, respectively).</p> <p>Reduction of materials consumption will be carried out in accordance with the mitigation measures outlined in the Environmental Statement Chapter 12 Materials and Waste (application document TR010030/APP/6.3). These sets of measures, alongside embedded design features of the Scheme, will ensure that the Scheme's carbon footprint is minimised.</p>
Biodiversity and ecological conservation		
5.20	Biodiversity is the variety of life in all its forms and encompasses all species of plants and animals and the complex ecosystems of which they are a part. Government policy for the natural environment is set out in the Natural Environment White Paper (NEWP). The NEWP sets out a vision of moving progressively from net biodiversity loss to net gain , by supporting healthy, well-functioning ecosystems and establishing more coherent ecological networks that are more resilient to current and future pressures. Geological conservation relates to the sites that are designated for their geology and/or their geomorphological importance.	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) considers effects on biodiversity in detail.</p> <p>The loss of some irreplaceable habitats (ancient woodland and veteran trees) has been minimised as much as practicable, but some loss is unavoidable. In addition, the Scheme will lead to land take from designated sites and habitats of principal importance. Mitigation and compensation measures have been put in place to create new areas of habitats, enhance existing habitats and create linkages between existing woodland.</p> <p>Although the loss of irreplaceable habitats is unavoidable, the Scheme will lead to many positive habitat enhancements.</p>

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5.22-23	<p>Where the project is subject to EIA the applicant should ensure that the environmental statement clearly sets out any likely significant effects on internationally, nationally and locally designated sites of ecological or geological conservation importance (including those outside England) on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity and that the statement considers the full range of potential impacts on ecosystems. The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.</p>	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) outlines the effects on sites, habitats and species. Chapter 7 of the Environmental Statement identifies a full range of likely significant effects; however, the Scheme will include mitigation measures such as the CEMP used for all construction operations. Compensation measures will be implemented to create new areas of habitats, enhance existing habitats and create linkages between existing woodland.</p> <p>A bat mitigation structure will be provided to mitigate the loss of bat roosts at the Eurogarages site. This will be secured under draft DCO Requirement 12 (Protected Species), reported in the draft DCO (application document TR010030/APP/3.1).</p> <p>Draft licences for bat roost and badger sett closures have been submitted to Natural England and letters of no impediment have been received.</p>
5.25	<p>As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.</p>	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) outlines the effects on sites, habitats and species.</p> <p>With the mitigation and compensation measures in place, no long-term residual impacts of significance are predicted for any notable species. Effects are unlikely to be significant where features of low value or sensitivity are subject to small or short-term impacts.</p> <p>A summary of the impact significance assuming the successful implementation of mitigation/enhancement measures and adherence to best practice working methods is provided in Chapter 7 Biodiversity.</p>

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5.26	<p>In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national and local importance, protected species, habitats and other species of principal importance for the conservation of biodiversity, and to biodiversity and geological interests within the wider environment.</p>	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) outlines the assessment approach for this topic chapter. An HRA has also been undertaken with respect to the international biodiversity designation (Thames Basin Heaths SPA), in consultation with Natural England. This is reported in paragraph 4.22 of this Appendix.</p> <p>A summary of the impact significance assuming the successful implementation of mitigation/enhancement measures and adherence to best practice working methods is provided in Chapter 7.</p> <p>Chapter 10 Geology and Soils of the Environmental Statement (application document TR010030/APP/6.3) outlines the assessment approach identify the likely effects with respect to geology and soils.</p>
5.27	<p>The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for European sites (see also paragraphs 4.22 to 4.25). The National Planning Policy Framework states that the following wildlife sites should have the same protection as European sites:</p> <ul style="list-style-type: none"> • Potential Special Protection Areas and possible Special Areas of Conservation; • listed or proposed Ramsar sites; and • sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites. 	<p>As per NPS NN paragraph 4.22 of this Appendix, illustrates how impacts on the Thames Basin Heaths SPA have been assessed and a package of compensation measures agreed with Natural England.</p>
5.28	<p>Many Sites of Special Scientific Interest (SSSIs) are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international</p>	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) outlines the assessment approach</p>

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	designation, should be given a high degree of protection. All National Nature Reserves are notified as SSSIs.	for this topic chapter, including consideration of any SSSIs and features of ecological value in the baseline.
5.29	Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect on the site's notified special interest features is likely, an exception should be made only where the benefits of the development at this site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs. The Secretary of State should ensure that the applicant's proposals to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest, are acceptable. Where necessary, requirements and/or planning obligations should be used to ensure these proposals are delivered.	As per NPS NN paragraph 5.28 of this Appendix. Ockham Common and Wisley Commons SSSI falls partly within the DCO boundary. Other SSSIs within the Ecological Zone of Influence are Thames Basin Heaths, Colony Bog and Bagshot Heath, Chobham Common, Esher Commons, Sheepleas, and Mole Gap to Reigate Escarpment SSSI. With the package of compensation measures agreed in consultation with Natural England, no adverse impacts are anticipated on the SSSIs.
5.31	Sites of regional and local biodiversity and geological interest (which include Local Geological Sites, Local Nature Reserves and Local Wildlife Sites and Nature Improvement Areas) have a fundamental role to play in meeting overall national biodiversity targets, in contributing to the quality of life and the wellbeing of the community, and in supporting research and education. The Secretary of State should give due consideration to such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.	The Assessment approach and method section in Chapter 9 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3), takes into account the relative importance of receptors having different designations in its assessment of biodiversity impacts. Receptors potentially affected by the Scheme include Ockham and Wisley Local Nature Reserve (LNR), Elm Corner Woods, Wisley Airfield and Hunts Copse SNCIs, and four conservation verges within 2km of DCO boundary.
5.32	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such	The Summary of residual impacts after mitigation, enhancement and compensation measures in Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) lists the loss of ancient woodland and veteran trees and recognises that these are irreplaceable. Where possible, these have been retained, and general compensation measures include creation of woodland, enhancement of existing woodland

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	trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this.	and the creation of woodland linkages connecting other areas of woodland and ancient woodland.
5.33	Development proposals potentially provide many opportunities for building in beneficial biodiversity or geological features as part of good design. When considering proposals, the Secretary of State should consider whether the applicant has maximised such opportunities in and around developments. The Secretary of State may use requirements or planning obligations where appropriate in order to ensure that such beneficial features are delivered.	Consultation with the statutory stakeholder for biodiversity issues (Natural England) has enabled agreement of a package of measures to minimise, mitigate and compensate for the Scheme's biodiversity impacts wherever possible, as described in paragraph 4.22 of this Appendix.
5.35	Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and therefore requiring conservation action. The Secretary of State should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of development. Where appropriate, requirements or planning obligations may be used in order to deliver this protection. The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits of the development (including need) clearly outweigh that harm.	<p>Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) considers all ecological features; identifies those that are of principal importance and assesses the residual effect appropriately.</p> <p>Ecology and nature conservation has been assessed in accordance with relevant sections of the Design Manual for Roads and Bridges (DMRB - as updated by Interim Advice Note 130/10). Information was obtained from previous biological records, consultation with relevant organisations, and field surveys completed in 2016 - 2018.</p> <p>The Scheme would result in some loss of habitats within the landscape. Wildlife would be at risk of direct mortality and pollution, disturbance as well as fragmentation and isolation of their habitat. However, compensation measures would reduce adverse effects through the planting of woodland habitats, and the creation of wood pasture and reedbed areas. Mitigation and compensation measures, and their impact to reduce the ecological effects, will be proposed once the final Environmental Statement assessment is complete.</p>

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		<p>The Environmental Statement Appendices (application document TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC). This details the environmental mitigation measures that would be implemented both during construction, why they are required, who is responsible for delivering them and detailing any ongoing maintenance arrangements.</p>
5.36	<p>Applicants should include appropriate mitigation measures as an integral part of their proposed development, including identifying where and how that:</p> <ul style="list-style-type: none"> • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • during construction and operation, best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised (including as a consequence of transport access arrangements); • habitats will, where practicable, be restored after construction works have finished; • developments will be designed and landscaped to provide green corridors and minimise habitat fragmentation where reasonable; • opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge. 	<p>As per NPS NN paragraph 5.35 of this Appendix.</p>
5.37	<p>The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into in order to ensure that mitigation measures are delivered.</p>	<p>The Consents and Agreement Position Statement (application document TR010030/APP/3.3) describes the permits and other consents that would be required for the construction and operation of the proposed Scheme.</p>

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		<p>The Environmental Statement Appendices (application reference TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC). This details the environmental mitigation measures that would be implemented both during construction, why they are required, who is responsible for delivering them and detailing any ongoing maintenance arrangements. This will be secured by draft DCO Requirement 3 (Construction and handover environmental management plans), reported in the draft DCO (application document TR010030/APP/3.1).</p>
Waste management		
5.42	<p>The applicant should set out the arrangements that are proposed for managing any waste produced. The arrangements described should include information on the proposed waste recovery and disposal system for all waste generated by the development. The applicant should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that the alternative is the best overall environmental outcome.</p>	<p>Measures for managing waste and materials are proposed, alongside details of their implementation, measuring and monitoring, within Chapter 12 Materials and Waste of the Environmental Statement (application document TR010030/APP/6.3).</p> <p>Appendix 4.1 of the Environmental Statement Appendices and the standalone document (application document TR010030/APP/7.3) contains a Register of Environmental Actions and Commitments (REAC). This details the waste mitigation measures that would be implemented, why they are required, who is responsible for delivering them, and any ongoing maintenance arrangements. This will be secured as part of the draft DCO requirements, reported in the draft DCO (application document TR010030/APP/3.1).</p>
5.43	<p>The Secretary of State should consider the extent to which the applicant has proposed an effective process that will be followed to ensure effective management of hazardous and non-hazardous waste arising from the construction and operation of the proposed development. The Secretary of State should be satisfied that the process sets out:</p> <ul style="list-style-type: none"> • <i>any such waste will be properly managed, both on-site and off-site</i> 	<p>The material and waste assessment in Chapter 12 Materials and Waste of the Environmental Statement (application document TR010030/APP/6.3) finds that the amount of waste generated by the Scheme will have neutral to slight impact on the existing waste arisings and capacity baseline.</p>

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	<ul style="list-style-type: none"> <i>the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arising's should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arising's in the area; and</i> <i>adequate steps have been taken to minimise the volume of waste arising's, and of the volume of waste arising's sent to disposal, except where an alternative is the most sustainable outcome overall.</i> 	<p>Measures proposed to manage hazardous and non-hazardous waste are inclusive of, but not limited to, the implementation of the waste hierarchy (which minimises arisings sent to disposal), the correct management of waste both on-site and off-site and identifying the appropriate waste infrastructure for waste treatment and disposal. Where possible materials such as natural soil and concrete rubble will be reused within the Scheme as there is a net requirement for fill material. This will reduce the volume of waste arisings and waste sent to landfill.</p>
5.44	<p>Where necessary, the Secretary of State should use requirements or planning obligations to ensure that appropriate measures for waste management are applied.</p>	<p>Waste management requirements can be secured within the Requirements in Schedule 2 of the draft Development Consent Order (application document TR010030/APP/3.1).</p>
5.45	<p>Where the project will be subject to the Environment Agency's environmental permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in paragraphs 4.48 to 4.56 will apply.</p>	<p>Any necessary waste management permits will be obtained as set out in the Outline Construction Environmental Management Plan (application document TR010030/APP/7.2) and the Consents and Agreements Position Statement (application document TR010030/APP/3.3).</p>
<p>Civil and military aviation and defence interests</p>		
5.49	<p>The certified safeguarding maps depicting the OLS and other criteria (e.g. to minimise "birdstrike" hazards) are deposited with the relevant local planning authorities. Circular 1/200384 provides advice to planning authorities on the official safeguarding of aerodromes and includes a list of the aerodromes which are officially safeguarded. The Circular and CAA guidance also recommends that the operators of aerodromes which are not officially safeguarded should take steps to protect their aerodrome from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities.</p>	<p>There are no aerodromes in the vicinity or otherwise likely to be affected by the Scheme. It is not considered that the development would have any impact on aviation or other defence interests.</p>
5.55-58	<p>Where the proposed development may have an effect on civil or military aviation and/or other defence assets, an assessment of potential effects should be carried out. The applicant should consult the MoD, CAA,</p>	<p>The MoD and NATS En-Route (NERL) safeguarding have been consulted regarding the Scheme and confirmed that the Scheme</p>

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	National Air Traffic Services (NATS) and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation or other defence interests. Any assessment on aviation or other defence interests should include potential impacts during construction and operation of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures. If any relevant changes are made to proposals for an NSIP during the pre-application period or before the end of the examination of an application, it is the responsibility of the applicant to ensure that the relevant aviation and defence consultees are informed as soon as reasonably possible.	does not conflict with civil or military aviation and/or other defence assets.
5.59	The Secretary of State should be satisfied that effects on civil and military aviation and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or defence interests has been carried out. In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes to operational procedures. The Secretary of State will have regard to the necessity, acceptability and reasonableness of operational changes to aerodromes, and the risks or harm of such changes when taking decisions. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security.	As per paragraphs 5.49 and 5.55-58 of this Appendix.
5.60	If there are conflicts between the Government's national networks policies and military interests in relation to the application, the Secretary of State expects the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible.	There are no known conflicts with military interests in relation to the Scheme. The MoD has confirmed that the Scheme lies outside any of their safeguarding areas.
5.61	There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that go beyond statutory requirements by any of the relevant aviation and defence consultees, the	The Scheme does not include any tall structures that require lighting under statutory requirements.

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	Secretary of State should be satisfied of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape, local residents and ecology may be a relevant consideration, depending on the particular circumstances be a relevant consideration.	
5.62	<p>Where, after reasonable mitigation, operational changes and planning obligations and requirements have been proposed, development consent should not be granted if the Secretary of State considers that:</p> <ul style="list-style-type: none"> • <i>a development would prevent a licensed aerodrome from maintaining its licence;</i> • <i>the benefits of the proposed development are outweighed by the harm to aerodromes serving business, training or emergency service needs; or</i> • <i>the development would significantly impede or compromise the safe and effective use of defence assets or significantly limit military training.</i> 	There is no potential for impacts on aerodromes, the safe and effective use of defence assets, or on military training as a result of the Scheme.
Dust, odour, artificial light, smoke, steam		
5.82	Because of the potential effects of these emissions and in view of the availability of the defence of statutory authority against nuisance claims s.104 of the Planning Act 2008 described previously, it is important that the potential for these impacts is considered by the applicant in their application, by the Examining Authority in examining applications and by the Secretary of State in taking decisions on development consents.	<p>The Statement of Statutory Nuisances (application document TR010030/APP/5.2) considers nuisance caused by dust, odour, artificial light, smoke and steam, the Environmental Statement Chapter 5 Air Quality (application document TR010030/APP/6.3) considered air quality related issues. With the proposed mitigation in place, it is not expected that there would be a breach of section 79(1) of the EPA 1990 during construction or operational activities.</p> <p>The construction activities that have the potential to create a nuisance will be controlled through strict compliance with the implementation of the environmental measures identified in the Environmental Statement (application document TR010030/APP/6.3) and through the CEMP which will include measures that will minimise the potential to cause nuisance.</p>

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		<p>Whilst the Statement concludes that no statutory nuisance is likely to occur, the Applicant has included in the draft DCO an article which would provide a defence against cases of nuisance in order that the defence can be relied upon in circumstances where a statutory nuisance cannot be avoided.</p>
5.83	<p>For nationally significant infrastructure projects of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. Impacts should be kept to a minimum and should be at a level that is acceptable.</p>	<p>Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) assesses the impact on amenity for local communities. It concludes that no residual significant amenity effects are anticipated for private dwellings, there are no significant noise effects post mitigation at Painshill Park and at Feltonfleet School. This is due to day time and night time construction noise and visual effects at Painshill Park and day time construction noise and visual effects at Feltonfleet School. Amenity impacts may occur during operation where two or more amenity influences (air quality, noise, visual impact) are experienced by one receptor, which are considered in Environmental Statement chapter 13.</p> <p>Recommended mitigation includes noise barriers and planting to minimise noise and visual impacts on local communities, Best Practicable Means (BPM) approach taken to daytime and night-time construction works to minimise noise, vibration and dust disposal impacts at residential and community receptors and construction activities to be preferably undertaken outside of school hours at school locations and to be mindful of exam seasons to avoid amenity impacts. This will be secured as part of the draft DCO requirements, reported in the draft DCO (application document TR010030/APP/3.1).</p>
5.84-86	<p>Where the development is subject to an EIA, the applicant should assess any likely significant effects on amenity from emissions of odour, dust, steam, smoke and artificial light and describe these in the Environmental</p>	<p>The cumulative effects on amenity from emissions arising from the construction and operation of the Scheme have been covered in the</p>

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	<p>Statement. In particular, the assessment provided by the applicant should describe:</p> <ul style="list-style-type: none"> • <i>the type and quantity of emissions;</i> • <i>aspects of the development which may give rise to emissions during construction, operation and decommissioning;</i> • <i>premises or locations that may be affected by the emissions;</i> • <i>effects of the emission on identified premises or locations; and</i> • <i>measures to be employed in preventing or mitigating the emissions.</i> <p>The applicant is advised to consult the relevant local planning authority and, where appropriate, the Environment Agency about the scope and methodology of the assessment.</p>	<p>People and Communities chapter of the Environmental Statement, as per paragraph 5.83 of this Appendix.</p> <p>Further information and more detailed assessment of the type and, where relevant, the quantity of emissions likely to arise from the construction or operation of the Scheme, the locations or receptors affected, and any necessary mitigation measures can be found in the following chapters:</p> <ul style="list-style-type: none"> • Chapter 5 Air Quality • Chapter 9 Landscape <p>The scope of environmental impact assessment was agreed with the relevant Local Planning Authorities and the Environment Agency. Details are provided in the Environmental Statement (application document TR010030/APP/6.3). Also see the Scoping Opinion Responses (application document TR010030/APP/6.5).</p> <p>With the implementation of the proposed mitigation measures, any adverse effects resulting from dust generation during construction works would be minimised such that there would not be any significant residual effect anticipated.</p>
5.87	<p>The Secretary of State should be satisfied that all reasonable steps have been taken, and will be taken, to minimise any detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light. This includes the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.</p>	<p>As per paragraphs 5.84-86 of this Appendix, mitigation is proposed to ensure that there will be no significant detrimental impact on amenity from emissions of odour, dust, steam, smoke and artificial light.'</p>
5.88	<p>If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) being covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, then the defence should be</p>	<p>The draft Development Consent Order (application document TR010030/APP/3.1) does not disapply the defence of statutory authority against nuisance claims. The Applicant does not believe that there is any need or justification for doing so.</p>

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	disapplied, in whole or in part, through a provision in the Development Consent Order.	
5.89	The Secretary of State should ensure the applicant has provided sufficient information to show that any necessary mitigation will be put into place. In particular, the Secretary of State should consider whether to require the applicant to abide by a Scheme of management and mitigation concerning emissions of odour, dust, steam, smoke, artificial light from the development to reduce any loss to amenity which might arise during the construction and operation of the development. A construction management plan may help codify mitigation.	Mitigation has been proposed as per paragraphs 5.84-86 of this Appendix. Mitigation measures will be secured through a CEMP, and a Register of Environmental Actions and Commitments. (REAC) within the Environmental Statement Appendices (application document TR010030/APP/7.3) details the environmental mitigation measures that would be implemented both during construction and operation, why they are required, who is responsible for delivering them, and any ongoing maintenance arrangements.
Flood risk		
5.91	The National Planning Policy Framework 2012 (paragraphs 100 to 104) makes clear that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. But where development is necessary, it should be made safe without increasing flood risk elsewhere. The guidance supporting the National Planning Policy Framework explains that essential transport infrastructure (including mass evacuation routes), which has to cross the area at risk, is permissible in areas of high flood risk, subject to the requirements of the Exception Test.	The FRA (application document TR010030/APP/5.5) describes how the Scheme is considered to be essential infrastructure. Where possible, a sequential approach was taken within the study area for aspects such as locating balancing ponds and site compounds. The Scheme's adherence to the requirements of the Exception Test is detailed in the FRA. The FRA concludes that based on current flood risk understanding and the incorporation of specific flood risk mitigation measures and considerations, the Scheme would be at an acceptable level of flood risk and would not increase flood risk elsewhere. This conclusion remains true, both now and over the lifetime of the Scheme taking climate change into consideration.
5.92-93	Applications for projects in the following locations should be accompanied by a flood risk assessment (FRA): <ul style="list-style-type: none"> • <i>Flood Zones 2 and 3, medium and high probability of river and sea flooding;</i> 	The FRA was carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG, 2019) and its accompanying Technical Guidance (DCLG, 2014), and the Environment Agency's 'Climate change allowances for planners' NPPF supporting guidance (EA, 2013). The FRA is also in line with

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	<ul style="list-style-type: none"> <i>Flood Zone 1 (low probability of river and sea flooding) for projects of 1 hectare or greater, projects which may be subject to other sources of flooding (local watercourses, surface water, groundwater or reservoirs), or where the Environment Agency has notified the local planning authority that there are critical drainage problems.</i> <p>This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.</p>	<p>HD 45/09 (HA, 2009). The FRA has considered the risk from all sources of flooding to and from the Scheme and demonstrates how the risks will be managed, taking account of climate change. With mitigation measures, no residual impacts to flood risk are anticipated.</p>
5.94	<p>In preparing an FRA the applicant should:</p> <ul style="list-style-type: none"> <i>consider the risk of all forms of flooding arising from the project (including in adjacent parts of the United Kingdom), in addition to the risk of flooding to the project, and demonstrate how these risks will be managed and, where relevant, mitigated, so that the development remains safe throughout its lifetime;</i> <i>take the impacts of climate change into account, clearly stating the development lifetime over which the assessment has been made;</i> <i>consider the vulnerability of those using the infrastructure including arrangements for safe access and exit;</i> <i>include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project;</i> <i>consider if there is a need to remain operational during a worst case flood event over the development's lifetime;</i> <i>provide the evidence for the Secretary of State to apply the Sequential Test and Exception Test, as appropriate.</i> 	<p>As per paragraph 5.92-93 of this Appendix.</p>
5.96	<p>Applicants for projects which may be affected by, or may add to, flood risk are advised to seek sufficiently early pre-application discussions with the Environment Agency, and, where relevant, other flood risk management bodies such as lead local flood authorities, Internal Drainage Boards, sewerage undertakers, highways authorities and reservoir owners and</p>	<p>Discussion with stakeholders, including the EA, has taken place regarding the FRA.</p> <p>The Environment Agency has reviewed the hydraulic modelling associated with the proposed bridge over Stratford Brook and the</p>

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	<p>operators. Such discussions can be used to identify the likelihood and possible extent and nature of the flood risk, to help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application once it has been submitted and examined. If the Environment Agency has concerns about the proposal on flood risk grounds, the applicant is encouraged to discuss these concerns with the Environment Agency and look to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns, preferably before the application for development consent is submitted.</p>	<p>FRA and is in agreement with conclusions presented in these documents. Correspondence with the Environment Agency confirming this is provided in the Appendix of the FRA.</p>
5.97	<p>For local flood risk (surface water, groundwater and ordinary watercourse flooding), local flood risk management strategies and surface water management plans provide useful sources of information for consideration in Flood Risk Assessments. Surface water flood issues need to be understood and then account of these issues can be taken, for example flow routes should be clearly identified and managed.</p>	<p>The FRA, referred to in paragraph 5.92-93 of this Appendix, has been informed by the Surrey Local Flood Risk Management Strategy. The FRA has considered surface water, groundwater and ordinary watercourse (fluvial) flood risk.</p> <p>Concerning surface water flood risk, a baseline has been derived from Environment Agency mapping. Notable areas at risk of surface water flooding not associated with watercourses are: surrounding Wisley Common, the northern extent of the Scheme (including a flow route to a series of lakes associated with the River Mole), south of Downside (where there is a potential overland flow route), Ockham Common (with flow route to Bolder Mere Lake), and A3 adjacent to Bolder Mere lake.</p> <p>The proposed drainage design will ensure that the Scheme is at an acceptable risk from surface water flooding and will not increase flood risk elsewhere, for the present day as well as over the lifetime of the development taking climate change into account. During the construction phase, the CEMP will identify surface water flood risks and put in place necessary mitigation measures to prevent a temporary increase in risk on site and elsewhere.</p>

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5.98	<p>Where flood risk is a factor in determining an application for development consent, the Secretary of State should be satisfied that, where relevant:</p> <ul style="list-style-type: none"> • <i>the application is supported by an appropriate FRA;</i> • <i>the Sequential Test (see the National Planning Policy Framework) has been applied as part of site selection and, if required, the Exception Test (see the National Planning Policy Framework).</i> 	As per paragraph 5.91 of this Appendix.
5.99	<p>When determining an application, the Secretary of State should be satisfied that flood risk will not be increased elsewhere and only consider development appropriate in areas at risk of flooding where (informed by a flood risk assessment, following the Sequential Test and, if required, the Exception Test), it can be demonstrated that:</p> <ul style="list-style-type: none"> • <i>within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and</i> • <i>development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and</i> <p>priority is given to the use of sustainable drainage systems.</p>	<p>The Scheme's adherence to the requirements of the Exception Test is detailed in the FRA (application document TR010030/APP/5.5). The FRA concludes that based on current flood risk understanding and the incorporation of specific flood risk mitigation measures and considerations, the Scheme would be at an acceptable level of flood risk and would not increase flood risk elsewhere. This conclusion remains true, both now and over the lifetime of the Scheme taking climate change into consideration.</p> <p>It is not possible to alter the location of the Scheme, as it constitutes an upgrade to existing infrastructure (as reported in paragraphs 5.91-93 of this Appendix). Nevertheless, the FRA reports that fluvial flood risk mapping indicates that the vast majority of the Scheme red line boundary is within Flood Zone 1 i.e. at low risk from fluvial flooding. The northern, eastern and western extents of the Scheme, and areas for land compensation or replacement fall within Flood Zone 2 or 3, but no works that would impact on flood risk are proposed within these areas and flood risk mitigation is not required. The drainage design of the Scheme – to be completed in line with planning policy requirements - will prevent an increase in surface water flood risk and, where necessary, design and construction phase measures will mitigate the flood risk from all other sources.</p>
5.100	For construction work which has drainage implications, approval for the project's drainage system will form part of any development consent	The FRA (application document TR010030/APP/5.5) reports that the drainage system will be designed in line with current Highways

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	<p>issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under Paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.93 In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any Sustainable Drainage Systems (SuDS), including any necessary access rights to property. The Secretary of State, should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body such as the Internal Drainage Board.</p>	<p>England standards (DMRB) to ensure that runoff from the new impermeable area does not exceed the greenfield rate up to the 1 in 100 (1%) annual probability event taking into account climate change. The Scheme design has incorporated a drainage strategy that centres on the application of SuDS, appropriate to local conditions, to manage surface water runoff, as detailed in Chapter 8 Road Drainage and the Water Environment of the Environmental Statement (application document TR010030/APP/6.3). The proposed drainage system involves a variety of drainage ditches and attenuation basins. Further details associated with the drainage design are included within the Drainage Strategy Report (application document TR010030/APP/6.5). The Applicant will be responsible (as necessary) for maintenance of these features. The draft Development Consent Order (application document TR010030/APP/3.1) includes in the Requirement (Schedule 2) draft requirements in respect of drainage.</p>
<ul style="list-style-type: none"> • 5.102 	<p>The Secretary of State should expect that reasonable steps have been taken to avoid, limit and reduce the risk of flooding to the proposed infrastructure and others. However, the nature of linear infrastructure means that there will be cases where:</p> <ul style="list-style-type: none"> • <i>upgrades are made to existing infrastructure in an area at risk of flooding;</i> • <i>infrastructure in a flood risk area is being replaced;</i> • <i>infrastructure is being provided to serve a flood risk area; and</i> • <i>infrastructure is being provided connecting two points that are not in flood risk areas, but where the most viable route between the two passes through such an area.</i> 	<p>The Scheme constitutes an upgrade to existing infrastructure in an area at risk of flooding. Nevertheless, all reasonable steps have been taken to avoid, limit and reduce the risk of flooding to proposed infrastructure and others, as detailed in paragraph 5.99 of this Appendix.</p>
<p>5.103</p>	<p>The design of linear infrastructure and the use of embankments in particular, may mean that linear infrastructure can reduce the risk of flooding for the surrounding area. In such cases the Secretary of State</p>	<p>The Scheme will not increase risk of flooding in the surrounding area, as reported in the FRA (application document TR010030/APP/5.5), nor will it decrease risk.</p>

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	should take account of any positive benefit to placing linear infrastructure in a flood risk area.	
5.104	Where linear infrastructure has been proposed in a flood risk area, the Secretary of State should expect reasonable mitigation measures to have been made, to ensure that the infrastructure remains functional in the event of predicted flooding.	The Scheme is within fluvial Flood Zone 3; however, the design avoids impacts on the fluvial environment. Mitigation measures have been included to appropriately manage the surface water drainage. Chapter 15 Climate of the Environmental Statement (application document TR010030/APP/6.3) assesses vulnerability of the Scheme to the impacts of climate change, including heavier rainfall. A 20% climate change allowance has been used for the preliminary design as per HD33/16 and as discussed with the HE drainage Safety Engineering and Standards (see Drainage Strategy Report, application document TR010030/APP/6.5). Higher values of 40% allowance for climate change will be assessed at later stages of design once further information is available. In addition, during extreme weather variable road speed limits can be set accordingly. This mitigation will ensure drainage is sufficient to avoid unacceptable adverse road safety impacts.
5.109	In addition, any project that is classified as 'essential infrastructure' and proposed to be located in Flood Zone 3a or b should be designed and constructed to remain operational and safe for users in times of flood; and any project in Zone 3b should result in no net loss of floodplain storage and not impede water flows.	The Scheme crosses Flood Zone 3b of the Stratford Brook, however the crossing spans the full width of the floodplain. The FRA (application document TR010030/APP/5.5) reports that the Scheme will not affect floodplain storage nor impede water flows. The habitat replacement area within the River Mole floodplain (Flood Zone 3) will not result in a change of ground levels and will not affect floodplain storage nor overland flow paths.
5.112-115	<p>Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.</p> <p>The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are</p>	<p>Design of the Scheme to ensure that surface water runoff is not affected by the Scheme is detailed in paragraph 5.100 of this Appendix.</p> <p>Details of the sequential approach applied to the Scheme and location of vulnerable uses are provided in paragraphs 5.91 and 5.99 of this Appendix, respectively.</p>

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	<p>no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.</p> <p>It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation. The sequential approach should be applied to the layout and design of the project. Vulnerable uses should be located on parts of the site at lower probability and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities can be taken to lower flood risk by improving flow routes, flood storage capacity and using SuDS.</p>	<p>Details of the surface water drainage system are provided in the Drainage Strategy Report (application document TR010030/APP/6.5).</p>
Land instability		
5.116	<p>The effects of land instability may result in landslides, subsidence or ground heave. Failing to deal with this issue could cause harm to human health, local property and associated infrastructure, and the wider environment. They occur in different circumstances for different reasons and vary in their predictability and in their effect on development.</p>	<p>Addressed in paragraphs 5.117-118 of this Appendix.</p>
5.117-118	<p>Where necessary, land stability should be considered in respect of new development, as set out in the National Planning Policy Framework and supporting planning guidance. Specifically, proposals should be appropriate for the location, including preventing unacceptable risks from land instability. If land stability could be an issue, applicants should seek appropriate technical and environmental expert advice to assess the likely consequences of proposed developments on sites where subsidence, landslides and ground compression is known or suspected. Applicants should liaise with the Coal Authority if necessary.</p>	<p>Chapter 10 Geology and Soils of the Environmental Statement (application document TR010030/APP/6.3) assesses the potential ground stability hazards and impacts on land instability arising from the Scheme.</p> <p>There is a localised moderate risk of compressible ground where Alluvium or Made Ground/ infilled land is present, and low risk elsewhere within the Scheme. Where compressible ground is confirmed during the site specific GI, the risks to proposed engineering structures will be mitigated by design (likely either by</p>

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	<p>A preliminary assessment of ground instability should be carried out at the earliest possible stage before a detailed application for development consent is prepared. Applicants should ensure that any necessary investigations are undertaken to ascertain that their sites are and will remain stable or can be made so as part of the development. The site needs to be assessed in context of surrounding areas where subsidence, landslides and land compression could threaten the development during its anticipated life or damage neighbouring land or property. This could be in the form of a land stability or slope stability risk assessment report.</p>	<p>excavation and replacement with more competent material or the use of foundations). In the scenario of the compressible ground being excavated and replaced with more competent material, the effect of the development would be permanent minor beneficial during construction and is considered to be not significant. Assuming mitigation measures have been adopted during construction, only a potential negligible magnitude will be present during operation and this corresponds to a negligible (not significant) effect.</p> <ul style="list-style-type: none"> • There is a very low potential for collapsible ground under baseline conditions. The likely degree of change to this risk rating as a result of the Scheme is considered negligible during construction and operation and therefore the overall effect is considered to be not significant and permanent. <p>If the site specific GI identifies a possible risk from landslides, running sands, aggressive ground or shrinking and swelling clay, proposed structures will be mitigated by design therefore it is considered that no change to these geological features will occur as a consequence of the development relative to the baseline. The effects during construction are considered to be permanent minor beneficial and not significant. Assuming mitigation measures have been adopted during construction, only a potential negligible magnitude will be present during operation and this corresponds to a negligible and permanent effect.</p> <p>The Scheme is not located in an area affected by mining, based upon a review of the Coal Authority Interactive Map viewer. Hence there has been no requirement to liaise with the Coal Authority.</p>
5.119	<p>Applicants have a range of mechanisms available to mitigate and minimise risks of land instability. These include:</p> <ul style="list-style-type: none"> • <i>Establishing the principle and layout of new development, for example avoiding mine entries and other hazards.</i> 	<p>Addressed in paragraphs 5.117-118 of this Appendix.</p>

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	<ul style="list-style-type: none"> • Ensuring proper design of structures to cope with any movement expected, and other hazards such as mine and/or ground gases; or • Requiring ground improvement techniques, usually involving the removal of poor material and its replacement with suitable inert and stable material. For development on land previously affected by mining activity, this may mean prior extraction of any remaining mineral resource. 	
The historic environment		
5.124	<p>Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments, should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance.</p>	<p>All known cultural heritage assets have been described in Chapter 11 of the Environmental Statement (application document TR010030/APP/6.3), inter alia non-designated buildings/structures, locally Listed Buildings and archaeological sites, which have been considered as per DMRB guidance.</p> <p>This also includes non-designated heritage assets, which have been assessed on their importance and value based on their rarity and historic significance. This can be seen in the methodology section in the Cultural Heritage chapter.</p>
5.125	<p>The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan process by local authorities, including 'local listing', or through the nationally significant infrastructure project examination and decision making process) on the basis of clear evidence that the assets have a significance that merit consideration in that process, even though those assets are of lesser value than designated heritage assets.</p>	<p>Known non-designated assets have been scoped into Chapter 11 of the Environmental Statement (application document TR010030/APP/6.3), which provides a methodology for assessing effects on the historic environment and the assets. Non-designated heritage assets are determined by identifying an asset's value and assessing the degree of change that the Scheme would have on a heritage asset (the likely impact). This is in line with the guidance provided in DMRB HA 208/07, Annex 5.</p> <p>Local development plans have been consulted in regards to local listed heritage assets and these have also been taken into consideration for direct and non-direct impacts.</p>

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5.126-7	<p>Where the development is subject to EIA the applicant should undertake an assessment of any likely significant heritage impacts of the proposed project as part of the EIA and describe these in the environmental statement.</p> <p>The applicant should describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</p> <p>As a minimum the relevant Historic Environment Record should have been consulted and the heritage assets assessed using appropriate expertise. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, the applicant should include an appropriate desk-based assessment and, where necessary, a field evaluation.</p>	<p>To address this Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3) describes the heritage impacts through an assessment of effects and with information on topographical, geological and archaeological conditions, in addition data on each asset is presented in the Environmental Statement Cultural Heritage Appendices (DCO Document reference TR010030/APP/6.5). The response to the potential impact is proportionate to the value of the heritage asset.</p> <p>By adopting an assessment criteria in accordance with DMRB, which includes the identification of all heritage assets likely to be affected by the proposal project and assessing the value of heritage assets. In addition, it describes the significance of each heritage asset including the contribution made by their setting and how this will be impacted (if at all)</p> <p>Historic Environment Record has been consulted, and a desk-based assessment has been conducted to examine the known and potential heritage assets of archaeological interest.</p> <p>In addition to the Historic Environment Record, a variety of other sources were consulted to establish the baseline for cultural heritage assessments. These include archival materials, historic mapping, reports of previous investigations within the study area, and site visits to assess the conditions and settings of heritage assets.</p>
5.128	<p>In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (including by development affecting the setting of a heritage asset), taking account of the available evidence and any necessary expertise from:</p>	<p>To address this, Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3) assesses the particular significance of heritage assets, which includes identifying the value of heritage assets.</p>

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	<ul style="list-style-type: none"> • relevant information provided with the application and, where applicable, relevant information submitted during examination of the application; • any designation records; • the relevant Historic Environment Record(s), and similar sources of information; • representations made by interested parties during the examination; and • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it. 	<p>Historic Environment Record has been consulted along with other sources including the National Heritage List, published and unpublished papers.</p> <p>Consultation was undertaken with Historic England and Painshill Park Trust (PPT).</p>
5.129	<p>In considering the impact of a proposed development on any heritage assets, the Secretary of State should take into account the particular nature of the significance of the heritage asset and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.</p>	<p>Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3) describes the value/significance of each heritage asset in reference to the NPPG as: <i>'The value of a heritage asset to this and future generations because of its heritage interest. A setting assessment of any heritage assets impacted by development has been considered in the Environmental Assessments as well as the supplementary Statements of Significance (Appendix 11.3).</i></p>
5.130	<p>The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities - including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height; massing, alignment, materials, use and landscaping (for example, screen planting).</p>	<p>Chapter 11 of the Environmental Statement (application document TR010030/APP/6.3) identifies 'Design, mitigation and enhancement measures' as well as assessing how the design could contribute to the distinctive character of the historic environment.</p>
5.131	<p>When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. Once lost, heritage assets cannot be replaced, and their loss has a cultural, environmental, economic and</p>	<p>Chapter 11 Cultural Heritage of the Environmental Statement (application document TR010030/APP/6.3) sets out the assessment methodology for this topic, which includes weighting of assets' significance.</p>

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	<p>social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Given that heritage assets are irreplaceable, harm or loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including World Heritage Sites, Scheduled Monuments, grade I and II* Listed Buildings, Registered Battlefields, and grade I and II* Registered Parks and Gardens should be wholly exceptional.</p>	<p>Environmental Statement Chapter 11 Cultural Heritage describes the Scheme's impact without mitigation, refers to the heritage impact during construction and indicates that where buried archaeological remains are directly affected by construction, they will be preserved by record this would be subsequently excavated and recorded. The CEMP will also describe measures to reduce or avoid impacts of construction activities on the settings of heritage assets. The mitigation would ensure that there would be no residual impacts as the impacted portions of the assets will be completely removed and recorded during the archaeological mitigation fieldwork.</p> <p>Environmental Statement Chapter 11 Cultural Heritage describes the Scheme's residual effects following the implementation of mitigation. Chapter 11 Cultural Heritage indicate that residual effects have been identified on seven heritage assets, none of which are significant.</p>
5.132	<p>Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss.</p>	<p>As per NPS NN paragraph 5.131 of this Appendix.</p>
5.133	<p>Where the proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm, or alternatively that all of the following apply:</p> <ul style="list-style-type: none"> • <i>the nature of the heritage asset prevents all reasonable uses of the site;</i> and 	<p>As per NPS NN paragraph 5.131 of this Appendix</p>

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	<ul style="list-style-type: none"> • <i>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and</i> • <i>conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and</i> • <i>the harm or loss is outweighed by the benefit of bringing the site back into use.</i> 	
5.134	Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.	As per NPS NN paragraph 5.131 of this Appendix.
5.135	Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The Secretary of State should treat the loss of a building (or other element) that makes a positive contribution to the site's significance either as substantial harm or less than substantial harm, as appropriate, taking into account the relative significance of the elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.	There are no World Heritage Sites in the vicinity of the Scheme. There are two Conservation Areas within the greater study area (500m-1km from the Scheme footprint) considered at an earlier design stage, but the Cultural Heritage assessment referred to in paragraphs 5.124-131 of this Appendix determined that there will be no impact on these designations.
5.136	Where the loss of significance of any heritage asset has been justified by the applicant based on the merits of the new development and the significance of the asset in question, the Secretary of State should consider imposing a requirement that the applicant will prevent the loss occurring until the relevant development or part of development has commenced.	Archaeological mitigation and further design consultation to mitigate impacts on built heritage and its setting are considered in line with the Outline Construction Environment Management Plan (CEMP) application document TR010030/APP/7.2).
5.137	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.	As per NPS NN NN paragraph 5.135 of this Appendix.

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5.138	Where there is evidence of deliberate neglect of or damage to a heritage asset the Secretary of State should not take its deteriorated state into account in any decision.	There will be no deliberate neglect or damage by the Applicant.
Landscape and visual impacts		
5.144-146	<p>Where the development is subject to EIA the applicant should undertake an assessment of any likely significant landscape and visual impacts in the EIA and describe these in the environmental assessment. A number of guides have been produced to assist in addressing landscape issues. The landscape and visual assessment should include reference to any landscape character assessment and associated studies, as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England.</p> <p>The applicant's assessment should include any significant effects during construction of the project and/or the significant effects of the completed development and its operation on landscape components and landscape character (including historic landscape characterisation).</p> <p>The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include any noise and light pollution effects, including on local amenity, tranquillity and nature conservation.</p>	<p>Chapter 9 Landscape of the Environmental Statement Environmental Statement (application document TR010030/APP/6.3) considers the likely significant effects of the Scheme upon the surrounding landscape character and visual receptors.</p> <p>The landscape and visual assessment was carried out following published guidance including Highways England's Interim Advice Note (IAN) 135/10 Landscape and Visual Effects Assessment and DMRB Volume 11, Section 3, Part 5 Landscape effects but also with a consideration to the Landscape Institute's published Guidelines for Landscape and Visual Impact Assessment (GLVIA) 3rd edition. The assessment used a range of sources to establish the baseline for landscape and visual amenity, including Surrey Landscape Character Assessment (2015), Guildford Borough Council Landscape Character Assessment (2007), and the relevant local authorities' planning policy documents.</p> <p>Chapter 9 Landscape of the Environmental Statement identifies the effects on landscape character and landscape designations for both the construction and operational phases of the Scheme, and the visual effects of the Scheme on local receptors during construction and operation.</p>
5.147-148	Any statutory undertaker commissioning or undertaking works in relation to, or so as to affect land in a National Park or Areas of Outstanding Natural Beauty, would need to comply with the respective duties in section	Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) notes that there are no National

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	<p>11A of the National Parks and Access to Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000.</p> <p>For significant road widening or the building of new roads in National Parks and the Broads applicants also need to fulfil the requirements set out in Defra’s English national parks and the broads: UK government vision and circular 2010 or successor documents. These requirements should also be complied with for significant road widening or the building of new roads in Areas of Outstanding Natural Beauty.</p>	<p>Parks or Areas of Outstanding Natural Beauty within the study area, hence none will be affected by the Scheme.</p> <p>The Scheme does not involve significant road widening or building of new roads in National Parks or the Broads.</p>
5.149	<p>Landscape effects depend on the nature of the existing landscape likely to be affected and nature of the effect likely to occur. Both of these factors need to be considered in judging the impact of a project on landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to avoid or minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.</p>	<p>Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) describes the mitigation and enhancement measures, with design measures confirming that proposed local access roads would be designed so as to minimise both landscape and visual impacts by avoiding routes that would remove excessive amounts of vegetation and unnecessary landscaping features.</p> <p>In order to enable the proposed planting regime to establish and mature to fulfil its environmental, landscape and visual function it is necessary to ensure that an appropriate management regime is undertaken. The specification for this Scheme identifies a 5-year maintenance regime to ensure the establishment and maintenance of the Scheme. Details would be contained within a Landscape and Ecological Management Plan (LEMP) in Appendix 7.20 and in the SPA Management and Monitoring Plan Appendix 7.19. A Handover Environmental Management Plan (HEMP) would also be required after the establishment period to identify and stipulate the correct long-term maintenance goals and requirements for the planting strategy to reach its full potential. The HEMP is secured by DCO requirement 3.</p>

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		With mitigation measures in place, there should be no residual impacts upon landscape receptors during the operational phase of the Scheme.
5.156	Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England has policies based on landscape character assessment, these should be given particular consideration. However, local landscape designations should not be used in themselves as reasons to refuse consent, as this may unduly restrict acceptable development.	<p>Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) considers the effects of the proposed Scheme on local landscape, with additional Scheme Layout Plans that focus on mitigation measures for screening, consisting of native tree and shrub planting which is characteristic of the local landscape.</p> <p>The local landscape character units are listed and identified and described in Appendix 9.1 Landscape character assessment of the Environmental Statement Appendices (application document TR010030/APP/6.5).</p>
5.157	In taking decisions, the Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to avoid adverse effects on landscape or to minimise harm to the landscape, including by reasonable mitigation.	Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) details the landscape mitigation provided as part of the Scheme.
5.158	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the development. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast, especially those defined as Heritage Coast.	<p>Chapter 9 Landscape of the Environmental Statement (application document TR010030/APP/6.3) details significant visual effects during construction and operation.</p> <p>There would be moderate adverse effects (significant) during construction and slight to moderate adverse effects (significant) during operation. However, these effects would reduce in significance to neutral to slight adverse (not significant) once planting has established in future years.</p>

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5.161	Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site, although if such landscaping was proposed to be consented by the development consent order, it would have to be included within the order limits for that application. For example, filling in gaps in existing tree and hedge lines would mitigate the impact when viewed from a more distant vista	The proposed planting mitigation illustrated in the Proposed Scheme Layout Plans (application document TR010030/APP/2.8) is considered to be adequate, and it is not considered that additional off-site planting is necessary to mitigate visual and landscape impacts.
Land use		
5.165-167	The applicant should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate. Existing open space, sports and recreational buildings and land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Applicants considering proposals which would involve developing such land should have regard to any local authority's assessment of need for such types of land and buildings. During any pre-application discussions with the applicant, the local planning authority should identify any concerns it has about the impacts of the application on land-use, having regard to the development plan and relevant applications, and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements. These are also matters that local authorities may wish to include in their Local Impact Report which can be submitted after an application for development consent has been accepted.	<p>Chapter 13 People and Communities in the Environmental Statement (application document TR010030/APP/6.3) identifies existing and proposed land uses in the vicinity of the Scheme. The chapter covers the potential effects of the Scheme on existing land uses, development land and planning applications.</p> <p>With regards to the Local Businesses assessment, moderate residual adverse effects during construction are anticipated due to land take from the site of the former San Domenico restaurant and the Nutberry Fruit Farm.</p> <p>The Development Land assessment has identified that significant residual adverse effects are anticipated during construction for the site of the former San Domenico restaurant. During construction, any development on the former San Domenico site would be substantially hindered by the use of the site as a satellite compound and through the building of the PMA and there would be significant adverse effects. That site is due to be used as a satellite construction compound and the permanent stopping up of direct A3 access during construction and operation would prevent access. New access via the A245, Seven Hills Road and a new local access road will be provided as part of the Scheme.</p>

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		<p>Chapter 13 identifies that the Scheme is likely to temporarily or permanently affect areas of common land and open space where members of the public are free to roam (Special Category Land). This land is not surplus to requirement and therefore proposed Replacement Land is required and has been identified.</p> <p>The key requirement is that appropriate locations for use as Replacement Land must satisfy the definition given in s.131(12) and s132(12) of the 2008 Planning Act:</p> <p>s131(12) - “<i>replacement land</i>” means land which is not less in area than the order land and which is no less advantageous to the persons, if any, entitled to rights of common or other rights, and to the public.”</p> <p>s132(12) - • “<i>replacement land</i>” means land which will be adequate to compensate the following persons for the disadvantages which result from the compulsory acquisition of the order right—</p> <p>(a) <i>the persons in whom the order land is vested,</i></p> <p>(b) <i>the persons, if any, entitled to rights of common or other rights over the order land, and</i></p> <p>(c) <i>the public.</i>”</p> <p>In line with the DMRB (Vol 11, Section 3 Part 6 Land Use), common land and open space user surveys were undertaken in September 2017, comprising one weekend day (Sunday 24 September 2017) and one mid-week day (Wednesday 27 September 2017) and the findings helped to inform the selection of the proposed replacement land.</p>

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		<p>The proposed replacement locations are discussed in detail in the Statement of Reasons Appendix C: Common land and open space, (application document TR010030/APP/4.1) which concludes that:</p> <p><i>“...suitable Replacement Land can be provided in exchange for the special category land that will be required for the Scheme, which will satisfy the relevant statutory tests in Sections 131 and 132 of the Planning Act 2008 (as amended), as well as Annex A of the 2013 DCLG Guidance on Compulsory Purchase and Sections 16(6) and 38(1) of the Commons Act 2006.”</i></p> <p>It is acknowledged that the areas proposed as Replacement Land vary in character and condition and in their similarity to the respective Order land; hence all be managed in accordance with the LEMP to bring them into a suitable condition and secured by draft DCO Requirement 6 (Landscaping) in the Draft DCO & Schedules (application document TR010030/APP/3.1).</p>
5.168	<p>Applicants should take into account the economic and other benefits of the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification). Where significant development of agricultural land is demonstrated to be necessary, applicants should seek to use areas of poorer quality land in preference to that of a higher quality. Applicants should also identify any effects, and seek to minimise impacts, on soil quality, taking into account any mitigation measures proposed. Where possible, developments should be on previously developed (brownfield) sites provided that it is not of high environmental value. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.</p>	<p>Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) assesses the impact of the Scheme on agricultural land, including the economic impact on farms and land-based enterprises with particular emphasis on agricultural quality of soils and best and most versatile (BMV) land.</p> <p>The Scheme has been designed so as to minimise the permanent loss of BMV.</p> <p>Of the 10.8 ha to be temporarily possessed for construction compounds 5.31 ha (50%) is of BMV quality. This will be restored to agricultural use at the end of the construction phase.</p> <p>The agricultural land to be used for SPA compensation is 22.05 ha is not considered lost to agriculture as conservation grazing will</p>

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		<p>take place here. This will be managed in the future through conservation grazing and so will not be lost to agriculture.</p> <p>The Scheme will result in a loss of 4.88 ha of BMV land, well below Natural England's 20 ha significance threshold.</p> <p>Measures to protect soil quality on site during construction of the Scheme will be implemented as part of the Construction Environmental Management Plan (CEMP) to be based upon the Outline CEMP (application document TR010030/APP/7.2)</p> <p>Chapter 10 Geology and Soils of the Environmental Statement (application document TR010030/APP/6.3) considers the potential impacts of the Scheme on land contamination, and a full contaminated land risk assessment is provided in the Environmental Statement Appendix. With the design and mitigation measures proposed in the chapter, the resultant effects are considered to be negligible to moderate beneficial.</p>
5.169	Applicants should safeguard any mineral resources on the proposed site as far as possible.	Environmental Statement Chapter 10 Geology and Soils (application document TR010030/APP/6.3) identifies that the Scheme is situated within sand and gravel mineral resource zones associated with the River Wey and River Mole, and that there are four Mineral Safeguard Areas within the study area. Discussions with Surrey County Council confirmed that there is little to no risk of sterilisation of minerals arising from the development, and no further assessment of impact is required.
5.170-171	The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an	The M25 junction 10 A3 Wisley interchange and the proposed Scheme are located wholly in the Green Belt.

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	<p>established Green Belt and, if so, whether their proposal may be considered inappropriate development within the meaning of Green Belt policy. Metropolitan Open Land, and land designated as Local Green Space in a local or neighbourhood plan, are subject to the same policies of protection as Green Belt, and inappropriate development should not be approved except in very special circumstances. Linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land. The identification of a policy need for linear infrastructure will take account of the fact that there will be an impact on the Green Belt and as far as possible, of the need to contribute to the achievement of the objectives for the use of land in Green Belts.</p>	<p>In addition to the NPS NN, the National Planning Policy Framework (NPPF) 2018 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open (Paragraph 133).</p> <p>NPPF Policy 146 sets out where development in the Green Belt may not be considered inappropriate “<i>provided they preserve its openness and do not conflict with the purposes of including land within it</i>”. Part b) covers “<i>engineering operations</i>” and part c) covers “<i>local transport infrastructure which can demonstrate a requirement for a Green Belt location</i>”.</p> <p>There is a demonstrated need for the Scheme as set out in Section 2 of the Planning Statement. It would not be possible for an intervention to take place at M25 junction 10 without it being in the Green Belt and the Scheme has been designed so as to minimise potential effects on the Green Belt, through minimising land take, providing replacement land (for the areas of common land and open space required) and proposing reinstatement planting to mitigate adverse effects.</p> <p>Most of the Scheme proposals are adjacent to the SRN, which is not where the openness of the Green Belt can be fully enjoyed due to the infrastructure detracting from the attractiveness of the area.</p> <p>In the South East quadrant, the proposed Wisley Lane diversion will follow closely an already approved road alignment included in the partially implemented extant consent on part of the site ref. SCC ref: 2012/0034 / Guildford ref. 12/P/00533) for a fully enclosed in-vessel composting facility with a new vehicular/pedestrian access from the A3 Ockham roundabout. The precedent for development is already there and it should also be noted that the Guildford Local</p>

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		<p>Plan removed the former Wisley Airfield site from the Green Belt through Policy A35.</p> <p>In the South West quadrant, there are already works consented and underway in the RHS Wisley car park (Guildford ref. 16/P/01080). The Scheme will not have significant adverse effects on the heritage and community asset at RHS Wisley. The retaining walls for the A3 widening would not constitute significant encroachment harming the character or openness of the Green Belt, as they would be within the existing HE boundary and the Wisley Lane diversion works have been designed to maintain access to the garden throughout (See Chapter 11 Cultural Heritage) and Chapter 13 (People and Communities) of the Environmental Statement (DCO reference number ef. TR010030/APP/6.3). On Wisley Common, the access routes are already used for forestry/management works by Surrey Wildlife Trust and their vehicles. The leisure use at Birchmere Scout Camp will continue, which is compatible with the Green Belt designation. The replacement and upgrade of Cockcrow Bridge will be of benefit to these existing uses.</p> <p>The leisure uses at Heyswood Girl Guides site will continue and the works have been designed and developed with stakeholder to minimise effects on Painshill Park.</p> <p>It should also be noted that SWT regularly fell trees as part of their management works on the heathland and woodland on Wisley and Ockham Commons and Chatley Heath, meaning the landscape changes periodically. Trees were felled in the north east quadrant in 2018 for example.</p>

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		<p>In the South East, North East and North West quadrants, the proposed Replacement Land will make more fields and woodlands accessible from which to enjoy the Green Belt.</p> <p>The Replacement Land, the SPA enhancement measures and the new and upgraded PRow will enhance the experience of openness within the Green Belt. The resulting PRow network, which includes new bridges at Red Hill and Sandpit Hill, will also mean that no NMU need to come into direct contact with the SRN, which is a benefit over the existing arrangements.</p> <p>The proposed construction compounds, soil storage areas and other areas for construction use will be reinstated as areas of public access and returned to the landowners, therefore these temporary land requirements will not affect the openness of the Green Belt.</p> <p>It is considered that there is demonstrated policy support for the transport infrastructure Scheme and that the proposals will not detract from the fundamental purpose of the Green belt nor its openness.</p>
5.173	<p>Where the project conflicts with a proposal in a development plan, the Secretary of State should take account of the stage which the development plan document has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented or precluded. The closer the development plan document is to being adopted by the local plan, the greater the weight which can be attached to the impact of the proposal on the plan.</p>	<p>The Scheme has been reviewed against the NPS NN, the NPPF (2018) (where the NPS NN directs it) and designations, site allocations and policies in the existing Development Plans of Surrey County Council, Elmbridge Borough Council and Guildford Borough Council.</p> <p>The assessment for each authority is as follows:</p> <ul style="list-style-type: none"> • Surrey County Council <p>Chapter 10 (Geology and Soils) of the Environmental Statement (document ref. TR010030/APP/6.3) identifies that mineral resources and Mineral Safeguard Areas (MSAs) are located within the study</p>

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		<p>area. In compliance with Policy MC6 and MC7 of the Surrey Minerals Plan Core Strategy Development Plan Document 2011, discussions were carried out with Surrey County Council regarding the MSAs and confirmation was received from a Surrey County Council representative that there is little to no risk of sterilization of minerals and that further assessment under the EIA process is not required.</p> <p>The northernmost part of the former Wisley Airfield site was designated as a Waste Site in the Surrey Waste Plan, May 2008. On this site there is a partially implemented extant consent (ref. SCC ref: 2012/0034 / Guildford ref. 12/P/00533) for construction of a fully enclosed in-vessel composting facility for the reception and processing of green, kitchen and animal wastes on a site of approximately 16.75ha, comprising a composting building, control office, car parking facilities, landscaping, internal access roads, rainwater storage tank, leachate storage tank, package sewage treatment, diesel storage tank, attenuation pond, perimeter fencing, and new access off the A3 Ockham roundabout.</p> <p>The consent was legally implemented through the construction of a bund on the site. The Scheme realigned Wisley Lane so that it approximately follows the route of that proposed by the composting facility but would require the composting development to be redesigned and would be in conflict.</p> <p>The Waste Plan is currently being reviewed and it is anticipated the updated plan will be adopted later in 2019. SCC state in an update on the allocated sites in the current Waste Plan 2008, that: <i>“Planning permission granted but facility not constructed. Landowner interest in waste uses now withdrawn as site forms part</i></p>

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		<p><i>of a proposed new settlement. Hence site not taken forward in new plan.”</i></p> <p>Therefore, the Scheme is not considered to conflict with the composting facility as it is unlikely to be implemented. The development and site allocation was included in the Development Land assessment in Chapter 13 People and Communities but because it is unlikely to be fully implemented it wasn't included in the 'Other Development' shortlist for the Chapter 16 Cumulative Effects Assessment of the Environmental Statement (application reference TR010030/APP/6.3).</p> <ul style="list-style-type: none"> • Guildford Borough Council <p>There are no conflicts with the proposals in the adopted Guildford Borough Council Local Plan (April 2018).</p> <p>The Land at the former Wisley Airfield is included in the adopted Local Plan: as Site Allocation A35. The details are:</p> <p><i>“A residential led mixed use development, allocated for: Approximately 2000 homes (C3), including some specialist housing and self-build plots, approximately 100 sheltered/extra care homes (C3 use), 8 Traveller pitches, approximately 1,800 m2 of employment floor space (B1a), approximately 2,500 m2 of employment floor space (B2/B8), approximately 500 m2 of comparison retail (A1), approximately 600 m2 of convenience retail (A1), approximately 550 m2 services in a new local centre (A2 -A5), approximately 500 m2 of community uses in a new local centre (D1), a two form entry primary school (D1), and a secondary school (D1) (four form entry, of which two forms are needed for the housing on the site and two for the wider area).”</i></p>

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		<p>Highways England have designed the realigned Wisley Lane in discussion with the landowners Wisley Property Investment Limited (WPIL) to ensure that the design would not be in conflict with their plans for the site.</p> <p>Site Allocation A35 Land at the former Wisley Airfield was included in the Development Land assessment in Chapter 13 People and Communities of the Environmental Statement. It is considered that the construction effects of the Scheme would be medium adverse, but once the Scheme is operational it is considered the effects of the Scheme would be medium beneficial as the Scheme would provide the new exit from Ockham Park junction and new road alignment included in the masterplan. The operational Scheme would also add the capacity required for additional traffic which would arise from the site allocation if consented and implemented.</p> <p>Other site allocation policies in the Guildford Borough Council Local Plan are not within the order limits of the Scheme and it is not considered that there will be conflict.</p> <p>The Scheme is not in conflict with the Guildford Borough Council Local Plan 2003 (saved), or the newly adopted Local Plan (April 2019).</p> <p>A six-week consultation has been held on the Lovelace Neighbourhood Plan (consultation draft dated 6 September 2018). It will be updated following consultation and submitted for independent examination. Once adopted, the Neighbourhood Plan would cover the Scheme area within Guildford Borough Council, which is in Lovelace Ward. The Neighbourhood Plan has been</p>

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		<p>prepared as a response to strategic development approved or pending in the ward:</p> <p><i>“Lovelace faces ‘the perfect storm’ during the next 10 years due to a number of major projects either already approved or proposed and all of which will be happening at more or less the same time. Some are from government organisations such as Highways England (HE), SCC and GBC, others are private initiatives. These will impact all 2,200 Lovelace inhabitants and any newcomers.”</i> (Lovelace Neighbourhood Plan consultation draft 6 September 2018)</p> <p>The Scheme does not conflict with the draft Lovelace Neighbourhood Plan policies.</p> <p>There are no conflicts with any site allocations designated in the Elmbridge Borough Council Local Plan.</p>
5.174	<p>The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land, including playing fields, unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements, or the Secretary of State determines that the benefits of the project (including need) outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.</p>	<p>As per paragraph 5.165-167 of this Appendix. Given the compensatory (replacement) land, and the wider transport, economic and environmental benefits arising from the Scheme as set out in this document, it is considered that the loss of the small amount of open space lost would be outweighed by the benefits which the Scheme would deliver.</p>
5.175	<p>Where networks of green infrastructure have been identified in development plans, they should normally be protected from development, and, where possible, strengthened by or integrated within it. The value of linear infrastructure and its footprint in supporting biodiversity and ecosystems should also be taken into account when assessing the impact on green infrastructure.</p>	<p>The Biodiversity chapter 7 of the Environmental Statement (application document TR010030/APP/6.3) provides details of the ecological designations potentially affected by the Scheme, which include the Thames Basin Heaths Special Protection Area (SPA), Ockham and Wisley Commons SSSI and Ockham and Wisley LNR, which partially fall within the Scheme DCO boundary. Also, partially within the Scheme boundary are two parcels of ancient woodland and two SNCIs. Mitigation and compensation options are proposed to conserve and advance this infrastructure as well as the</p>

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		<p>biodiversity and ecosystems which it supports, such as the creation of habitat linkages between heathland areas and the creation of new areas of connected habitats, including heathland and woodland. Mitigation and compensation measures, and their impact to reduce the ecological effects, will be proposed once the final Environmental Statement assessment is complete. Further details are provided in paragraphs 5.20-5.38 of this Appendix.</p> <p>Green infrastructure falling under open space/recreational use and agricultural use is covered in paragraphs 5.165-167 and 5.168, respectively.</p>
5.176	<p>The decision-maker should take into account the economic and other benefits of the best and most versatile agricultural land. The decision maker should give little weight to the loss of agricultural land in grades 3b, 4 and 5, except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.</p>	<p>As reported in NPS NN paragraph 5.168, most of the agricultural land take will not be BMV land. Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3) considers the impact of overall agricultural land loss on farms and other land-based enterprises. Seven holdings will permanently lose land, with only two of these anticipated to be significantly adversely impacted.</p>
5.178	<p>When located in the Green Belt national networks infrastructure projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt and there is a presumption against it except in very special circumstances. The Secretary of State will need to assess whether there are very special circumstances to justify inappropriate development. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt, when considering any application for such development.</p>	<p>As per Paragraphs 5.170-171 of this Appendix.</p>
5.180	<p>Where green infrastructure is affected, applicants should aim to ensure the functionality and connectivity of the green infrastructure network is</p>	<p>The functionality and connectivity of the green infrastructure network will be maintained, with adverse impacts mitigated where</p>

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	maintained and any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space, including appropriate access to new coastal access routes, National Trails and other public rights of way.	possible, through measures outlined in Biodiversity Chapter 7 of the Environmental Statement (application document TR010030/APP/6.3) and paragraph 5.175. Paragraph 3.15 summarises the improvements to accessibility to public rights of way and open space which are included in the Scheme design.
5.181	The Secretary of State should also consider whether mitigation of any adverse effects on green infrastructure or open space is adequately provided for by means of any planning obligations, for example, to provide exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness, quality and accessibility. Alternatively, where Sections 131 and 132 of the Planning Act 2008 apply, any replacement land provided under those sections will need to conform to the requirements of those sections.	As per paragraphs 5.165-167 of this Appendix. Replacement land has been included in the design of the Scheme and is detailed in full in the Statement of Reasons Appendix C: Common land and Open Space Report (application document TR010030/APP/4.1)
5.182	Where a proposed development has an impact on a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to safeguard mineral resources.	No mitigation measures are required as no impact has been identified, as per paragraph 5.169 of this Appendix.
5.184	Public rights of way, National Trails, and other rights of access to land (e.g. open access land) are important recreational facilities for walkers, cyclists and equestrians. Applicants are expected to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other public rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve access. In considering revisions to an existing right of way consideration needs to be given to the use, character, attractiveness and convenience of the right of way. The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements in respect of these measures might be attached to any grant of development consent.	The Environmental Statement (application document TR010030/APP/6.3) Chapter 13 People and Communities provides details of the impact of the Scheme on walkers, cyclists and equestrians - including changes to severance, accessibility, journey amenity and length. It sets out, where necessary, specific mitigation measures to address significant adverse effects on routes and access during construction and operation of the Scheme. The Scheme also contains in-built enhancements for connectivity and amenity of NMUs. Chapter 9 Landscape and Visual Impact of the Environmental Statement provides details of embedded and additional mitigation

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		<p>measures, such as screening and use of sympathetic materials, to maintain the visual amenity experienced by users of rights of way.</p> <p>The Outline Construction Environmental Management Plan (application document TR010030/APP/7.2) codifies the mitigation measures that would be implemented during the construction of the Scheme. The Construction Environmental Management Plan is secured within the Requirements in Schedule 2 of the draft Development Consent Order (application document TR010030/APP/3.1).</p>
Noise and vibration		
5.187	<p>Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed in accordance with the Biodiversity and Geological Conservation section of this NPS.</p>	<p>Ecological receptors that are noise-sensitive and could be affected by changes to noise and vibration are considered in the assessment. The impacts to ecological receptors from noise have been assessed in Chapter 7 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3).</p>
5.189	<p>Where a development is subject to EIA and significant noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment, which should form part of the environment statement:</p> <ul style="list-style-type: none"> • <i>a description of the noise sources including likely usage in terms of number of movements, fleet mix and diurnal pattern. For any associated fixed structures, such as ventilation fans for tunnels, information about the noise sources including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise.</i> • <i>identification of noise sensitive premises and noise sensitive areas that may be affected.</i> • <i>the characteristics of the existing noise environment.</i> 	<p>Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) considers the potential impacts of the Scheme on noise and vibration.</p> <p>The size of the study area and locations of noise sensitive receptors are stated Chapter 6 of the Environmental Statement. The noise-sensitive receptors include residential buildings, schools, a care home, sites of historic and cultural heritage, the Thames Basin Heath SPA, and Noise Important Areas.</p> <p>The assessment considers three types of noise sources associated with the Scheme: construction activities, construction traffic, and road traffic during the operation phase. No permanent items of fixed mechanical plant are proposed, therefore a BS 4142:2014 assessment is not required for the Scheme. However, the construction noise assessment identifies items of plant or</p>

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	<ul style="list-style-type: none"> • <i>a prediction on how the noise environment will change with the proposed development:</i> <ul style="list-style-type: none"> ○ In the shorter term such as during the construction period; ○ in the longer term during the operating life of the infrastructure; ○ at particular times of the day, evening and night as appropriate. <p>an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas.</p> • measures to be employed in mitigating the effects of noise. Applicants should consider using best available techniques to reduce noise impacts. • <i>the nature and extent of the noise assessment should be proportionate to the likely noise impact.</i> 	<p>equipment that have the potential to give rise to a noise impact and an assessment has been undertaken in accordance with BS 5228:2009 +A1:2014 Part 1 for daytime and night-time works.</p> <p>An appraisal of the impacts of road traffic noise during the construction and operation phases has also been completed following the guidance stated in the DMRB, HD213/11 which covers the various aspects required by NPS NN paragraph 5.189. These assessments follow the Calculation of Road Traffic Noise (1988) prediction methodology.</p> <p>Mitigation measures to reduce noise and vibration levels during the construction and operation phases, such as use of noise barriers, are detailed in Chapter 6 of the Environmental Statement.</p>
5.190	The potential noise impact elsewhere that is directly associated with the development, such as changes in road and rail traffic movements elsewhere on the national networks, should be considered as appropriate.	As the Scheme proposes road improvements, a Detailed Assessment has been undertaken to determine the changes to road traffic noise as a result of the Scheme and natural traffic growth without the Scheme. The assessment was undertaken following the guidance provided in the Design Manual for Roads and Bridges (DMRB HD 213/11) and Highways England guidance, and comprised an appraisal of impacts inside the study area and in the wider area outside of the study area. The assessment is available in Sections 6.8 to 6.10 of Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3).
5.191	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. The prediction of road traffic noise should be based on the method described in Calculation of Road Traffic Noise. For the prediction, assessment and management of construction noise, reference should be	Chapter 6 of the Environmental Statement (application document TR010030/APP/6.3) details the assessment methodologies used for determining the noise and vibration impacts resulting from construction noise and vibration, construction traffic and operational traffic. These assessments have been undertaken in accordance to

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	made to any relevant British Standards and other guidance which also give examples of mitigation strategies.	the relevant British Standards and technical guidance, including Calculation of Road Traffic Noise (1988), DMRB HD 213/11, and BS 5228:2009 + A1:2014. Other relevant guidance has been used in order to set threshold noise levels for identifying the lowest observed adverse effect level and the significant observed adverse effect level for compliance with the Noise Policy Statement for England 2010 and requirements set out in the National Planning Policy Framework 2019.
5.192	The applicant should consult Natural England with regard to assessment of noise on designated nature conservation sites, protected landscapes, protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.	The introduction of Chapter 9 Biodiversity of the Environmental Statement (application document TR010030/APP/6.3) states that Natural England were consulted with regards to option selection and design, Habitats Regulations Assessment, valuations, potential mitigation and compensation features, and species survey methodologies.
5.193	Developments must be undertaken in accordance with statutory requirements for noise. Due regard must have been given to the relevant sections of the Noise Policy Statement for England, National Planning Policy Framework and the Government's associated planning guidance on noise.	Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) identifies the legislation, policy, regulations, guidance and standards that are relevant to this assessment, including the Noise Policy Statement for England.
5.194	The project should demonstrate good design through optimisation of Scheme layout to minimise noise emissions and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission. The project should also consider the need for the mitigation of impacts elsewhere on the road and rail networks that have been identified as arising from the development, according to Government policy.	<p>Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) details the mitigation measures such as noise barriers, low noise surfacing and anti-dazzle fencing that would be included as part of the Scheme.</p> <p>Chapter 9 Landscape of the Environmental Statement identifies the Proposed Scheme Layout and illustrates mitigation measures for screening, consisting of native planting which is characteristic of the local landscape; and the introduction of new vegetation that will consist mainly of woodland planting, hedgerows with trees and standard hedgerows that will help to absorb the appearance of the junction into the landscape.</p>

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5.195	<p>The Secretary of State should not grant development consent unless satisfied that the proposals will meet, the following aims, within the context of Government policy on sustainable development:</p> <ul style="list-style-type: none"> • <i>avoid significant adverse impacts on health and quality of life from noise as a result of the new development;</i> • <i>mitigate and minimise other adverse impacts on health and quality of life from noise from the new development; and</i> • <i>contribute to improvements to health and quality of life through the effective management and control of noise, where possible.</i> 	<p>As per NPS NN paragraph 5.189 of this Appendix.</p> <p>The Executive Summary of Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) states that no significant adverse effects were predicated as a result of construction traffic. Noise decreases of up to 3 dB were predicted in the opening year with the greatest reductions close to the A3.</p> <p>With the implementation of suggested mitigation measures, and the application of a Construction Environmental Management Plan, any impact will be minimised. However, despite this, it is possible that significant construction noise levels will result for short durations.</p>
5.196	<p>In determining an application, the Secretary of State should consider whether requirements are needed which specify that the mitigation measures put forward by the applicant are put in place to ensure that the noise levels from the project do not exceed those described in the assessment or any other estimates on which the decision was based.</p>	<p>Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) covers noise impacts during construction and operation and identifies appropriate mitigation where necessary.</p>
5.197	<p>The Examining Authority and the Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. The Secretary of State may wish to impose requirements to ensure delivery of all mitigation measures.</p>	<p>As per NPS NN paragraph 5.196 of this Appendix</p>
5.198	<p>Mitigation measures for the project should be proportionate and reasonable and may include one or more of the following:</p> <ul style="list-style-type: none"> • <i>engineering: containment of noise generated;</i> • <i>materials: use of materials that reduce noise, (for example low noise road surfacing);</i> 	<p>As per NPS NN paragraph 5.196 of this Appendix</p>

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	<ul style="list-style-type: none"> • <i>lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural or purpose built barriers;</i> • <i>administration: specifying acceptable noise limits or times of use (e.g., in the case of railway station PA systems).</i> 	
5.199	<p>For most national network projects, the relevant Noise Insulation Regulations will apply. These place a duty on and provide powers to the relevant authority to offer noise mitigation through improved sound insulation to dwellings, with associated ventilation to deal with both construction and operational noise. An indication of the likely eligibility for such compensation should be included in the assessment. In extreme cases, the applicant may consider it appropriate to provide noise mitigation through the compulsory acquisition of affected properties in order to gain consent for what might otherwise be unacceptable development. Where mitigation is proposed to be dealt with through compulsory acquisition, such properties would have to be included within the development consent order land in relation to which compulsory acquisition powers are being sought.</p>	<p>Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3) covers noise impacts during construction and operation.</p> <p>The chapter confirms that an assessment has been carried out with due regard to the Noise Insulation Regulations and a detailed noise modelling has been undertaken based on traffic projections from the South East Regional Traffic Model (SERTM). The detailed noise modelling included noise mitigation measures that will be introduced, retained or replaced by the Scheme.</p>
5.200	<p>Applicants should consider opportunities to address the noise issues associated with the Important Areas as identified through the noise action planning process.</p>	<p>No significant adverse effects were predicted at Noise Important Areas nonetheless mitigation measures have been included in the design of the Scheme as demonstrated in Table 6.21 of Chapter 6 Noise and Vibration of the Environmental Statement (application document TR010030/APP/6.3).</p>
Impacts on transport networks		
5.202	<p>Development of national networks can have a variety of impacts on the surrounding transport infrastructure including connecting transport networks. Impacts may include economic, social and environmental effects. The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development.</p>	<p>Impacts of the Scheme on the Strategic Road Network, surrounding roads and on the NMU network (comprising Public Rights of Way, footpaths, overbridges and roads) have been considered in the Transport Assessment (application document TR010030/APP/7.4). The effects on these networks are described in paragraphs 2.9-2.24 of this Appendix</p>

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5.203-205	<p>Applicants should have regard to the policies set out in local plans, for example, policies on demand management being undertaken at the local level.</p> <p>Applicants should consult the relevant highway authority, and local planning authority, as appropriate, on the assessment of transport impacts.</p> <p>Applicants should consider reasonable opportunities to support other transport modes in developing infrastructure. As part of this, consistent with paragraph 3.19-3.22 above, the applicant should provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to NMUs.</p>	<p>The Scheme's dedicated non-motorised user features maximise the opportunity to support other transport modes and address existing severance issues, as described in paragraph 3.22 of this Appendix.</p>
5.206	<p>For road and rail developments, if a development is subject to EIA and is likely to have significant environmental impacts arising from impacts on transport networks, the applicant's environmental statement should describe those impacts and mitigating commitments. In all other cases the applicant's assessment should include a proportionate assessment of the transport impacts on other networks as part of the application.</p>	<p>The Environmental Statement for the Scheme (application document TR010030/APP/6.3) assesses the likely significant environmental impacts arising from the Scheme, including those arising from impacts on transport networks where relevant. In particular, Chapter 13 People and Communities on the Environmental Statement assesses the impact on NMUs.</p>
5.211	<p>The Examining Authority and the Secretary of State should give due consideration to impacts on local transport networks and policies set out in local plans, for example, policies on demand management being undertaken at the local level.</p>	<p>Impacts of the Scheme on local transport networks and local policies have been in the Transport Assessment (application document TR010030/APP/7.4). These include transport strategies produced by Surrey County Council, and Guildford, Elmbridge and Woking Borough Councils. The Scheme is compliant with national, regional and local policies. The provision of the Scheme would support the NPPF economic objective and strategic policy to make sufficient provision for transport infrastructure whilst providing the opportunity to promote sustainable transport through the provision of new and improved walking and cycling routes within the extents of the Scheme. Local planning policies support the implementation of enhancements to the M25 and A3 to accommodate future planned growth, tackle congestion and improve road safety, which are consistent with the Scheme objectives.</p>

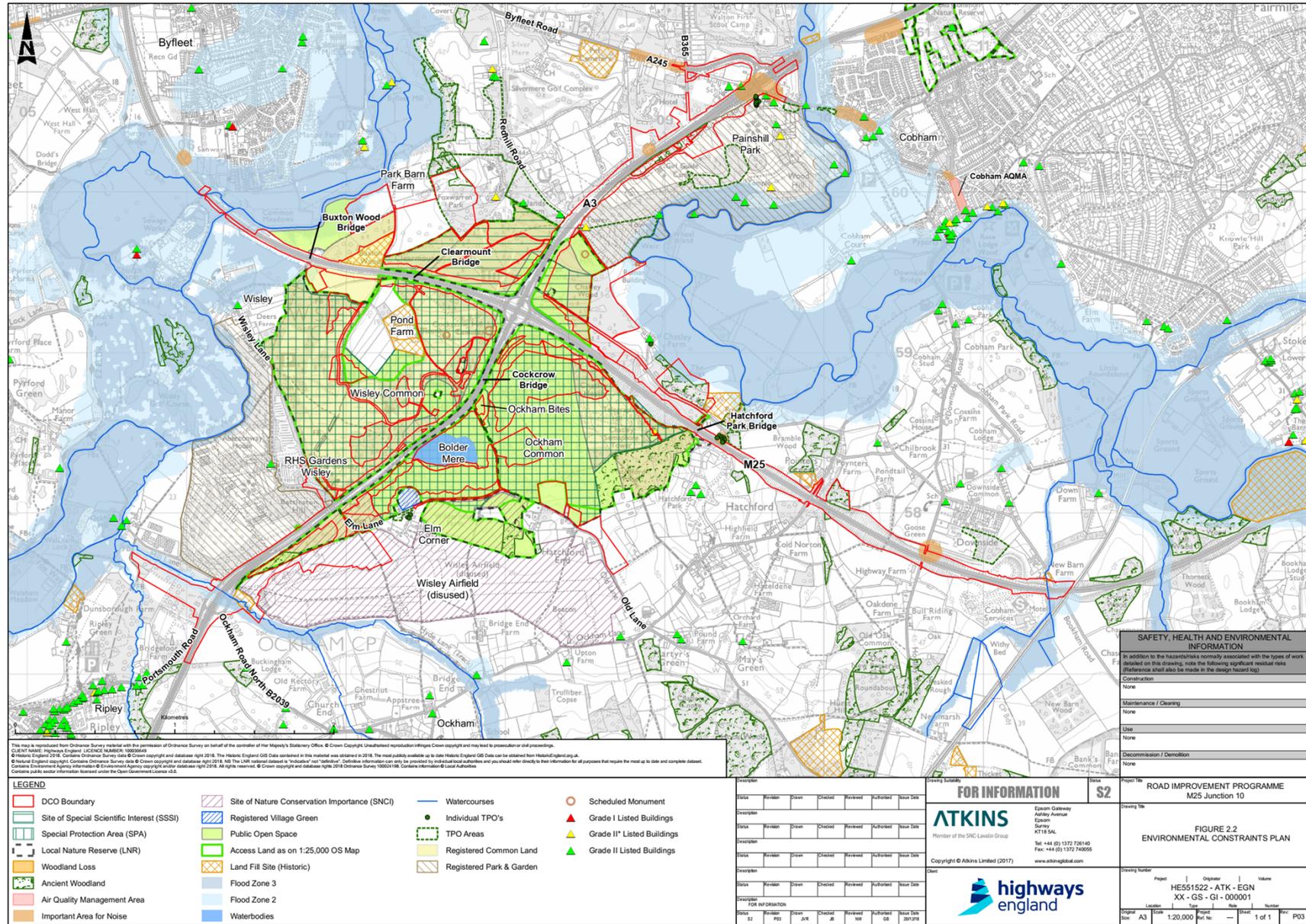
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5.212	Schemes should be developed, and options considered in the light of relevant local policies and local plans, taking into account local models where appropriate, however the Scheme must be decided in accordance with the NPS except to the extent that one or more of sub-sections 104(4) to 104(8) of the Planning Act 2008 applies.	As per paragraph 5.211 of this Appendix.
5.215	Mitigation measures for Schemes should be proportionate and reasonable, focussed on promoting sustainable development.	In-built mitigation measures concerning the design, layout and operation of the Scheme promote sustainable development, through improving resilience of the road network and improving NMU accessibility.
5.216	Where development would worsen accessibility, such impacts should be mitigated so far as reasonably possible. There is a very strong expectation that impacts on accessibility for NMUs should be mitigated.	Overall, the Scheme will improve NMU accessibility as per paragraph 3.22 of this Appendix. Adverse effects during the construction phase will be mitigated through measures set out in Chapter 13 People and Communities of the Environmental Statement (application document TR010030/APP/6.3), but remain significant, albeit only temporary.
5.217	Mitigation measures may relate to the design, layout or operation of the Scheme.	As per paragraph 5.217 of this Appendix.
Water quality and resources		
5.220	... Where applicable, an application for a development consent order has to contain a plan with accompanying information identifying water bodies in a River Basin Management Plan.	Figure 4.1 in the Water Framework Directive Compliance Assessment (application document TR010030/APP/5.4) shows the water bodies in the Thames River Basin Management Plan.
5.221	Applicants should make early contact with the relevant regulators, including the Environment Agency, for abstraction licensing and with water supply companies likely to supply the water. Where a development is subject to EIA and the development is likely to have significant adverse effects on the water environment, the applicant should ascertain the existing status of, and carry out an assessment of the impacts of the	There has been ongoing consultation with the Environment Agency throughout the design process to ensure the proposed Scheme is designed sympathetically to the water environment. Chapter 8 Road Drainage and the Water Environment of the Environmental Statement (application document

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	proposed project on water quality, water resources and physical characteristics as part of the environmental statement.	TR010030/APP/6.3) ascertains the existing status of, and assesses the impacts of the proposed project on, water quality, water resources and physical characteristics. The key conclusions of the assessment are that there would be no significant effects with the mitigation proposed for the Scheme.
5.222	For those projects that are improvements to the existing infrastructure, such as road widening, opportunities should be taken, where feasible, to improve upon the quality of existing discharges where these are identified and shown to contribute towards Water Framework Directive commitments.	The Scheme complies with the Water Framework Directive requirements as described in paragraph 5.221 of this Appendix. As documented in the Water Framework Directive Compliance Assessment (application document TR010030/APP/5.4) the Scheme will attempt to cease highway runoff from entering Bolder Mere which is a Water Framework Directive lake waterbody. This will improve the water quality of the lake and remove the risk of an acute pollution incident as a result of a spillage on the highway.
5.223	<p>Any environmental statement should describe:</p> <ul style="list-style-type: none"> • the existing quality of waters affected by the proposed project; • existing water resources affected by the proposed project and the impacts of the proposed project on water resources; • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project, and any impact of physical modifications to these characteristics; • any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions; and • any cumulative effects. 	Chapter 8 Road Drainage and Water Environment of the Environmental Statement (application document TR010030/APP/6.3) describes all relevant features of the water environment within 1km of the Scheme and assesses impacts of the Scheme in accordance with guidance provided in the DMRB Volume 11, Section 3, Part 10 HD 45/09 Road Drainage and the Water Environment. The water environment assessment includes consideration of water quality (both surface water and groundwater), the Water Framework Directive (WFD) and flood risk.
5.224	Activities that discharge to the water environment are subject to pollution control. The considerations set out in paragraphs 4.48-4.56 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water	Highways outfalls are exempt from permitting. However, best practice guidance and use of sustainable drainage will ensure that any pollution is controlled to acceptable levels.

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	environment, and to the control regimes relating to works to, and structures in, on, or under a controlled water.	
5.225	The Secretary of State will generally need to give impacts on the water environment more weight where a project would have adverse effects on the achievement of the environmental objectives established under the Water Framework Directive.	As per paragraph 5.221, the Scheme complies with Water Framework Directive requirements and would not have adverse effects on the achievement of Water Framework Directive objectives.
5.226	The Secretary of State should be satisfied that a proposal has had regard to the River Basin Management Plans and the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. In terms of Water Framework Directive compliance, the overall aim of projects should be no deterioration of ecological status in watercourses, ensuring that Article 4.7 of the Water Framework Directive Regulations does not need to be applied.	As per paragraphs 5.221 and 5.223 of this Appendix.
5.227	The Examining Authority and the Secretary of State should consider proposals put forward by the applicant to mitigate adverse effects on the water environment and whether appropriate requirements should be attached to any development consent and/or planning obligations. If the Environment Agency continues to have concerns and objects to the grant of development consent on the grounds of impacts on water quality/resources, the Secretary of State can grant consent, but will need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the Environment Agency to try to resolve the concerns, and that the Environment Agency is satisfied with the outcome.	<p>Chapter 8 Road Drainage and Water Environment of the Environmental Statement (application document TR010030/APP/6.3) includes details of mitigation measures for adverse effects on the water environment, comprising those for surface water, groundwater, flood risk and Water Framework Directive elements, for both construction and operational phases of the Scheme. With the implementation of mitigation measures, no or neutral effects are anticipated on surface water, flood risk and WFD during construction and operation of the Scheme.</p> <p>The Environment Agency has been consulted on the Water Framework Directive Compliance Assessment (application document TR010030/APP/5.4), the hydraulic modelling associated with Stratford Brook and the water quality assessment included within Chapter 8 Road Drainage and the Water Environment of the Environmental Statement and is in agreement with the outcomes.</p>
5.229	The Secretary of State should consider whether the mitigation measures put forward by the applicant which are needed for operation and	As per paragraph 5.227 of this Appendix, mitigation measures have been proposed spanning construction and operation. The Outline

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	<p>construction (and which are over and above any which may form part of the project application) are acceptable. A construction management plan may help codify mitigation.</p>	<p>Construction Environmental Management Plan (CEMP) (application document TR010030/APP/7.2) details the measures during construction, and who would be responsible for implementing these.</p>
5.230	<p>The project should adhere to any National Standards for sustainable drainage systems (SuDs), which will introduce a hierarchical approach to drainage design that promotes the most sustainable approach but recognises feasibility and use of conventional drainage systems as part of a sustainable solution for any given site given its constraints.</p>	<p>As per paragraph 5.100 of this Appendix.</p>

Appendix B. Environmental Constraints Plan



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