

M25 junction 10/A3 Wisley interchange

ELM CORNER

This submission was compiled by Elm Corner residents working together to present a collective response for all 16 properties. We hope the examiner will therefore forgive its length.

Elm Corner is a cul-de-sac and a historical hamlet comprising 16 properties. The only viable vehicular access to Elm Corner is via Elm Lane directly onto to the southbound A3 south of the M25 junction 10. Highways England propose widening the A3 to four lanes at this point and to close the existing access to Elm Corner, constructing an alternative access road via BOAT 525.

All sixteen affected households worked together to compromise and agree access via BOAT 525 and the conditions to giving that agreement. Provision by HE of those conditions / mitigations are therefore very significant to residents' agreement to the proposals, in particular those who would prefer the access to remain unchanged if the mitigations are not provided.

The scope of this response is limited to the direct impact the plans will have for Elm Corner. Residents reserve the right individually to object to other aspects of the proposal which are outside the specific scope of this response.

ELM CORNER ACCESS VIA BOAT 525

All sixteen affected households:

1. Accept the new access to be **via BOAT 525 to Old Lane**. This is accepted by HE.
2. Reject all of other access options.
3. Agree the new road (new Elm Lane) via the BOAT to Old Lane would need to be a single track with passing places to minimise land take and to remain in keeping with the existing access road.

On condition that:

1. A safe junction must be delivered where BOAT 525 joins Old Lane, which is a local accident hotspot due to the adverse camber. Detailed plans for this junction are not available in the DCO plans.
2. 'Old' Elm Lane (from Orchard Cottage to the A3) APP-007 TR010030/APP/2.3 work no.34 and APP-026 p81 must be returned to woodland, with a footpath/ bridleway to join up with the new NMU route to RHS Wisley, with mitigation of antisocial behavior a key design consideration. This does not appear to be delivered by the plans.

ECONOMIC AND SOCIAL EFFECTS

Elm Lane between Orchard Cottage and the A3 (old Elm Lane)

Should the road between Orchard Cottage and the A3 be retained as a surfaced road, ECRG are very concerned about the impact this will have on perceived personal safety and enjoyment of our properties.

Elm Lane is currently used by residents to access their properties, yet endures fly tipping, lewd and antisocial behaviour, and illegal parking of vans unloading motorbikes to be ridden on NMU routes and common land.

Once new Elm Lane is built and the A3 access closed, the section of Elm Lane between Orchard Cottage and the A3 (old Elm Lane), where most of the activity currently occurs, becomes an unlit, secluded dead end with no through traffic, thereby increasing its appeal to those engaging in unwanted behaviours. This will be exacerbated by New Elm Lane joining Old Lane adjacent to the Ockham Common car parks, a local hotspot for lewd activity and night visitors. Concerns of these behaviours spilling into Elm Corner are shared by both SCC APP-026 p78, and SWT APP-026 p82-83.

ECRG have made repeated requests to HE, to return this area to woodland. Despite amending the DCO boundary to include this section of road at our request, the current plans APP-007 TR010030/APP/2.3 work no.34 and APP-026 p81 suggest that they will instead retain the paving of the road for occasional access to drainage attenuation ponds. If this has been correctly understood, the plan to retain a surface on Old Elm Lane is unacceptable to residents due to the social effects set out below.

Stopping up old Elm Lane by Orchard Cottage and returning the redundant paved section of road to nature as an *unpaved* NMU route will discourage antisocial behavior, whilst also reducing upkeep costs for local authorities and minimising habitat fragmentation.

In summary, the social impact of the current design as understood, is disproportionate to the proposed use and benefit of retaining this section of road - alternative options for occasional maintenance access, with due design consideration for reducing unwanted behaviours, should be adopted.

Hammerhead turn and other design considerations

We are not able to ascertain any detail about the hammerhead turn proposed for Elm Lane.

What land is intended to be taken, when and for how long?

How will Elm Corner residents access their properties during the construction phase of the hammer head? [Plan Ref 24/1; BoR p430].

The hammerhead / turning circle should be designed specifically for vehicular manoeuvre and in such a way that it does not encourage parking or anti-social activity for the reasons set out above. Plans for the construction stage suggest a temporary turning circle in the land to the East of Orchard Cottage by the sub-station. An email from HE to the owners of Orchard Cottage suggests this would be adopted as a permanent turning circle for the operational stage. We would like to see this sensible and agreeable solution drawn into the plans in addition to stopping up Old Elm Lane immediately beyond the drive to Orchard Cottage on the west side. The Orchard Cottage driveway should under no circumstances be used for turning. We request that Elm Lane residents, such as Orchard Cottage, 2012 and 1 & 2

Fellside Cottages are consulted about the precise location and design of the turning circle and/ or hammer head turn and working space proposed for the tie-in of Elm Lane with Elm Corner [Plan Ref 24/1].

Essential mitigation required:

- Dig up old Elm Lane between Orchard Cottage and the A3 to remove the paved road, and;
- Stop up old Elm Lane between Orchard Cottage and the A3 (for example with a permanent fallen tree), and;
- Provide a permanent turning circle next to the substation East of Orchard Cottage so that there is no secluded dead end / parking opportunity beyond residential properties, and;
- Ensure New Elm Lane is limited to a single track of 3.5m width with passing places as represented in the current plan, to avoid opportunities for parking, minimise land take, and be in keeping with the retained sections of Elm Lane. [Plan Ref 24/2 and 23/7]

Additional mitigation requested:

- Consider additional design options for the junction of BOAT 525 with Old Lane to make clear this is a residential road in frequent use, such as gated control as suggested by SWT APP-026 p82-83.

AIR QUALITY AND EMISSIONS

Construction compound APP-002 25.2.9/10

One of the construction compounds is located immediately adjacent to Elm Corner properties on the Former Wisley Airfield (Three Farms Meadow). Air quality and emissions will deteriorate causing harmful effects to residents during construction due to the number of construction vehicles on site and compacting of redundant materials.

APP-002 advises within 25.2.9/10 of the construction compound on TFM immediately adjacent to several Elm Corner properties despite the availability of other large areas of hard standing.

Essential mitigation required:

- We request that the compound is moved further away from properties to a location that will cause less disruption, disturbance and pollution to residents, and that adequate fencing will be provided around the site to reduce noise, dust and nighttime light pollution.

RHS Wisley over bridge

RHS plans for visitor numbers to increase by up to 50% following their current site redevelopment, exceed the provision of parking in their growth plans. This is widely anticipated to result in queuing traffic on the proposed over bridge. This elevated section of road is to the south west of Elm Corner and the SPA. The prevailing winds will reduce air quality in Elm Corner and in the woodland between Elm Corner and the A3, which is contiguous to the Thames Basin Heath SPA. The CO2 emissions from the overbridge will be exacerbated by slow moving cars, coaches and lorries.

Essential mitigation required:

- We are not sure this can be mitigated and do not agree with plans for the RHS over bridge, which may be better solved with a park and ride solution or an access road alongside the northbound A3 as was an alternative in the original scheme consultation (WIS 01A).

CLIMATE CHANGE IMPLICATIONS.

The science on which the baseline assumptions about climate change in document AP-060 are based has been shown to be outdated by the 2018 Intergovernmental Panel on Climate Change report, and 2019 UN Environment Programme report. UK Parliament, Guildford Borough Council and Surrey County Council have each declared a Climate Emergency. This term also captures the ecological emergency. The European Union is expected to declare a climate emergency at the UN summit in Madrid early December. Imminent emergency legislative, regulatory and policy changes should therefore be anticipated, including amendments to the 3rd, 4th and 5th carbon budgets, to reflect the science as stated in these reports which urge governments to act urgently. In this context, the consideration of climate and ecological impacts, must be framed around both stewardship of the natural environment and carbon reductions at a scale not previously envisaged: of at least 80% by 2030, and not 57% as per the current version of the 5th carbon budget.

NOISE, VIBRATION AND LIGHTING

Some properties in the historic hamlet of Elm Corner are around 200 years old. The tenure of many residents predates the M25, when the A3 could be crossed on foot. Residents of Elm Corner currently experience noise, light and air pollution from the A3 which will be exacerbated by the completed scheme. Monitoring of air pollution and noise, for future increases to 2037 of these metrics against statutory thresholds must be set against the history of no mitigation, rather than simply increases from current levels.

Elm Corner properties qualify both as 'isolated residential properties' and Elm Corner collectively as a 'local community' for 'enhancement measures over and above normal mitigation', both in terms of the construction and operational stages of the works.

APP-054 contains the summary of significant visual effects during construction. The tenth item in table 9.12 of visual receptors on p38 relates to Elm Corner. The visual effects of the works seem to have been underestimated, in particular the lack of scrub cover in and the potential for this wooded heathland to be improved for biodiversity. No account of the effects of the construction compound adjacent to properties, are included.

Elm Corner is separated from the A3 by a narrow strip of dry woodland on Thames Basin Heathland, currently dominated by invasive pioneer silver birch and scots pine of similar age class, with the canopy too high to provide effective screening, and little low level scrub due to the shade cast by the scots pine. The trunks of the trees and occasional rhododendron (periodically cleared by SWT) do provide some

screening, along with some A3 verge side brambles growing on a low bund, but headlights and overhead street lighting are nevertheless visible.

Large areas of vegetation are expected to be lost to accommodate the widening of the A3, further narrowing of the strip of woodland between the A3 and Elm Corner.

Currently the plans for a roadside fence do not include the entire section on the southbound stretch of the A3 where needed to provide screening, between the RHS over bridge and Old Lane. Plans APP-042 4.3.7 are for mitigation by vegetation screening only. Vegetation would be unlikely to succeed in current conditions due to the shade of the scots pine. Further, the woodland here suffers extremes of dryness and wetness likely to be exacerbated by climate change, rendering it unsuitable for many species.

Essential mitigation required:

- Whether or not plans for habitat enhancement proceed in this area, the impact of A3 widening and the associated woodland removal between Elm Corner and the A3 will be stark for residents and must therefore be mitigated with a light and noise attenuation feature of either an earth bund or fence, of adequate height, along the entire southbound stretch of the A3 from Old Lane to the RHS over bridge.

One of the construction compounds is located immediately adjacent to properties on Elm Corner. Noise, vibration and light from the works, the compound, and access between the two, are expected to be a nuisance to residents throughout the long duration of the construction works expected to include night works and many heavy vehicles over a period of two to three years. The working hours stated for the construction period suggest normal working hours of Monday to Saturday lunchtime. There will be the need for overnight works to take place on the M25/A3.

Screening between the proposed compound and residential properties is comprised of only some deciduous trees.

Essential mitigation required:

- We request the construction compound is located further away from residential properties.

Timing of works and potential seasonal effects;

The longevity of the works, expected to be two to three years, will particularly impact Elm Corner residents due to our proximity to the A3 and proposed RHS Wisley Bridge. Two to three years of construction will increase noise and visual impacts for Elm Corner residents due to proximity to the scheme particularly in winter when the roads are wet and the trees are not in leaf.

COMPULSORY ACQUISITION AND / OR TEMPORARY POSSESSION

More defined detail is required with regards to Compulsory/Temporary Possession of land and the extent of works to be conducted at Elm Corner.

Two Elm Corner properties, Orchard Cottage and Twenty Twelve, will require accommodation works to re-align driveways, however it seems only Orchard Cottage has been noted by HE as requiring works.

Specifically with regards to Orchard Cottage, there is little clarity as to the need for access to the property or what this access entails. Under Work No. 34 of the Draft DCO (APP-018), further clarity is required in relation to:

The exact works proposed. There have been three different explanations as to the inclusion of the property in the site maps:

1. a re-alignment of the drive to allow for the closure of Elm Lane from the A3 and the construction/modification of “new” Elm Lane, with entrance via Old Lane;
2. to enable access to facilitate a temporary/permanent turning circle; and
3. access to electricity/phone lines as part of the overall works

☒ Page 423 of [APP-025] states taking temporary possession of the private access way to the property [Plan Ref 23/2]. The property is next to the sub-station which is adjacent to unoccupied property [Plan Refs 23/3 & 23/4]. Is it necessary to access Orchard Cottage or can access be effectively granted via the adjacent land, either for the construction of a turning circle or for access to electricity/phone lines? Or does Plan Ref 23/2 only refer to the re-alignment of the drive?

The current understanding is that inclusion of the property in the DCO boundary is for re-alignment of the drive only, though this needs to be definitively confirmed.

Greater clarity is also needed around remedial accommodation works and the adequacy of compensation for these works. Adequacy of compensation will be dependent upon the disruption caused to affected properties. Affected residents will also need to have control over the design and choice of all building materials for any works undertaken. This is of particular relevance for Orchard Cottage and Twenty Twelve.

Essential mitigation required:

- Both Orchard Cottage and Twenty Twelve (the latter not yet referenced as needing work) require accommodation works to realign driveways.
- Clarity and consultation with residents is needed as to the details of works impacting properties. The site visit regrettably did not provide the detailed answers hoped for by affected residents.

BIODIVERSITY, ECOLOGY AND NATURAL ENVIRONMENT

Old Elm Lane between Orchard Cottage and the A3 should be dug up and returned to nature to deliver a reduction in habitat fragmentation, as part of Highways England’s Biodiversity Plan target for delivering biodiversity net gain against offsetting metrics.

We have seen in document APP-198 that Highways England and Natural England have stated their common ground. Their agreement appears to supersede information contained within the APP-002 and APP-043 as detailed below but is then contradicted by document APP-012 which still shows the DCO to include these areas and consequently we include the information.

APP-138 8.2 Statement of Common Ground with Natural England regards the SPA Compensation package, the meeting minutes are in Appendix 21 and state 'As discussed at the meeting we have now confirmed that we will be increasing the size of the Wisley SPA Compensation land to include the whole of the field. This will provide approx. 5 ha of additional compensation land. It is proposed to use this whole field and the large field within the Old Lane Compensation Land, but remove the small field within the Old Lane Compensation Land and the Elm Corner SPA Compensation Land from the SPA Compensation Package. Following on in Appendix 28 dated 09/04/2019, a letter from Natural England confirms removal of the SPA Compensation Land adjacent to Elm Corner. In addition, in Appendix 29 a letter dated 12/04/2019 from Natural England to Atkins states 'there are no plans in current site management plans to clear woodland in the areas within the SPA directly affected by the scheme in order to restore or create heathland. It is essentially maintained to provide a 'buffer' between open heathland and the A3/M25. This is considered an important function in reducing aerial pollution, traffic noise, spread of litter and visual disturbance'.

HOWEVER

In APP-012 Scheme Layout Plans sheet 3 of 31 still shows the Elm Lane SPA enhancement area E4 which has been moved to Wisley.

In APP-007 Works Plans the aforementioned deleted Elm Corner SPA Compensation Land is still shown on Sheet 3 of 31 (TR010030/APP/2.3) as environmental compensation and mitigation works, Work No 58(a). This area should no longer be within the DCO red line works area.

There will be a loss of Ancient Woodland at Ockham Park junction due to the construction of the RHS over bridge and link road. Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since 1600AD. Ancient woodland takes centuries to develop and evolve, creating vital links between plants, animals and soils – a habitat for many of the UK's most important and threatened fauna and flora species.

Therefore, it cannot be re-created and cannot afford to be lost. Neither is it justifiable to lose the link between the ancient woodland, the SPA, and the former Wisley Airfield, the latter of which has been left in part to re-wild itself immediately adjacent to the ancient woodland, consequently supporting thriving ecosystems of flora and fauna. For example, rare wild orchids are located on land immediately to the west of the Three Farms Meadow hard standing.

DRAFT DEVELOPMENT CONSENT ORDER (DDCO)

The dDCO does not take into account the up to date details within APP-138 Statement of Common Ground with Natural England as detailed in our comments on Biodiversity, Ecology and Natural Environment. All Highways England's plans which show the area south of the A3, around Elm Corner and Bolder Mere should show the correction of the red line limits within which the development and works may be carried out i.e. Work No 58(a) is no longer applicable.

HISTORIC ENVIRONMENT

An historic milestone is sited on the A3 adjacent to existing turn to Elm Lane and another at the end of Old Lane. These form part of the historic character of the village and must be safeguarded and preserved.

OTHER STRATEGIC PROJECTS AND PROPOSALS

The Former Wisley Airfield (Three Farms Meadow) which lies within Ockham, is identified as the majority part of a strategic development site in Policy A35 of the Guildford Borough challenged Local Plan adopted in April 2019. This adopted Local Plan has been challenged under a S.113 action in the High Court and is currently awaiting ruling.

We are aware that consideration for access to this proposed development on the FWA/TFM has been taken into account in the proposed works. However, we feel it should be recognised by the Examiner and Highways England that a planning application for a development of 2,000+ dwellings was unanimously rejected by the GBC Planning Committee in March 2016 on 14 Planning grounds. The site was the subject of a five-week Public Inquiry held in September-October 2017. The Inspector upheld the GBC Planning Committee decision to refuse the application and his decision was ratified by the Secretary of State.

Therefore, we request the Examiner considers the planning history relating to FWA/TFM, the Lovelace Neighbourhood Plan and the recent challenge under a S.113 action to the adopted Local Plan and recognises that all discussions that have taken place between WIPL and HE regarding development of FWA/TFM are premature.

TRANSPORTATION AND TRAFFIC

The proposed works include stopping up the sole vehicular access from the A3 APP-049 2.5.16 to sixteen Elm Corner properties, and building a new access road on BOAT 525.

Residents are concerned about safe access, with construction vehicles sharing the existing Elm Lane access on/off the A3 during the works period due to the construction compound on Three Farms Meadows. There is also general concern for general vehicular access throughout the time of the works. Residents require greater detail with regards to overall timing of the works as well as whether overall access to Elm Lane will be impacted/closed at particular points throughout the day.

One of the main objectives of the RHS over bridge has been to alleviate the impact of cars visiting RHS Wisley Gardens whilst not encroaching any RHS land, but at the expense of European protected sites and their qualifying features, ancient woodland and veteran trees, fauna and flora species, and the local communities of Elm Corner and Ripley, among others.

The overflow car parks at RHS Wisley can currently only just accommodate the visitors at peak times, and with projected visitor numbers increasing by 50% to 1.5 million per annum we feel further infrastructure/solutions will be needed in the very near future. The proposed route for cars, coaches

and lorries going to the RHS Wisley Gardens via the over bridge adds 2.7million vehicle miles of wasted travelling and additional CO2 emissions each year. The additional emissions, noise, lighting and environmental impacts on the SPA are excessive. Most visitors to RHS Wisley are, however, repeat visitors who will know they can avoid the additional mile by exiting the A3 at Burnt Common via the historic Ripley village.

The road improvements for the visitor attraction that is RHS Wisley Gardens should not be considered as imperative reasons of overriding public interest (IROPI) or that of the important ecological sites, since it benefits a very small number and section of the public. Gardens should not be prioritised over nature at a time of ecological emergency.

The use of a large area of redundant land in the central reservation does not seem to have been explored by Highways England and their ecologists which may allow realignment and a slip road on the north bound side of the A3. This area of central reservation is shown in AP-014 longitudinal section. The current central reservation is a mix of woody scrub and trees at its widest point and could be used to avoid the need for the RHS over bridge. We have not been provided with a clear reason or documents to support the decision to disregard this potential solution.

Alternative design solutions to the very expensive and excessive RHS over bridge could have been:

- A Park and Ride facility for the RHS Gardens.
- A realignment using the A3 central reservation, for an access road off the Ockham Park roundabout into and out of RHS Wisley gardens on the north side of the A3.

Additionally, the provision of north and south bound slip roads at the Ockham Park roundabout could greatly improve the outcome of the project for residents in Ockham and Ripley.

Essential mitigation required:

- Construction of New Elm Lane should be in phase 1 of the works to ensure continuity of vehicular access to properties at all times with minimal disruption to residents.
- Safety of the proposed junction between 'new' Elm Lane and Old Lane is essential and we still do not see details for the junction beyond some short term improvement to sight lines.

We would also like to see the alternatives to the RHS Wisley bridge considered afresh along with south facing slips at Ockham Park.

DRAINAGE

HE have been made aware of the need for a culvert at the very wet point in New Elm Lane. This does not appear to be represented in the plans.

At the Three Farms Meadow and Elm Lane/BY544/Hyde Lane junction, there is a bund to prevent run-off from the hard standing, entering Elm Lane and flooding the A3. Run-off from the construction works site needs to be diverted.

CLOSE

Elm Corner Residents Group reserves its right to submit further information and material as the Examination Period progresses.

Elm Corner Residents Group request the opportunity of a future Open Floor Hearing / open meeting.

Elm Corner Residents Group request the opportunity to speak at a future Open Floor Hearing.

Elm Corner Residents Group request the opportunity to attend site visits undertaken by the Examiners within Ockham.