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**SUMMARY**  
**OF WRITTEN SUBMISSIONS**  
**MADE ON BEHALF OF**  
**MR RONALD ALDERSON**

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**RE- PARK BARN FARM, WISLEY COMMON**  
**M25 JUNCTION 10 / A3 WISLEY INTERCHANGE**  
**OBJECTOR REFERENCE: TR010030 / M25J10-AP034**

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**SUMMARY OF WRITTEN REPRESENTATIONS**

We consider that the draft order is unsuitable in its current form. It should not be confirmed in view of the issues set out below:-

*(a) Overcompensation for the loss of SCL*

Acquisition of the land at Park Barn Farm (“PBF”) may be desirable, but it is not actually required as replacement land (“RL”) to compensate for the Special Category Land (“SCL”) which is needed for construction of the Scheme. Highways England (“HE”) is seeking to ‘overcompensate’ for the loss of SCL in the following ways:-

- i. It has overstated the current ‘advantage’ provided by the SCL that would be lost due to the Scheme construction;
- ii. It has ignored the significant benefits to the existing public rights of way network that would result from a re-modelling of the existing road junctions;
- iii. It is seeking to provide RL in a 1:1 ratio for the acquisition of permanent rights over the order land even where those rights do no cause any disadvantage to the public interest;
- iv. Section 31(5) Planning Act 2008: The order land is needed for road widening and drainage and the giving over other land in exchange is unnecessary;
- v. The high environmental quality of land at PBF; and

- vi. It has applied historically high land replacement ratios which have no direct bearing on the current situation.

All this results in a vast over-inflation of the RL requirement which HE says is needed to satisfy the relevant statutory tests. Quite simply put, HE's demand for RL is grossly excessive.

(b) Whether a compelling case in the public interest exists: prejudice suffered by the landowner

Compulsory acquisition of the land at PBF is also seriously disadvantageous to Mr Alderson's property interests, his private and family life:-

It has the effect of severing the residential curtilage in a way which would be highly detrimental to the amenity and enjoyment of the remaining property. This prospect is already impacting RA's prospects of selling PBF, which affects his future plans, at a time of serious ill-health.

Given that sufficient RL has already been identified elsewhere in the Scheme, HE has plainly failed to demonstrate the existence of a 'compelling need in the public interest' ("CNIP") for compulsory acquisition of the land at PBF.

(c) Other alternatives for RL

HE has also failed to pursue other potentially better opportunities for acquiring RL, e.g. the option of securing the current use of the land at Pond Farm as a direct benefit to the scheme.