

From: [REDACTED]
To: [M25 Junction 10](#)
Subject: HE M25/A3 proposed interchange upgrade works
Date: 26 November 2019 22:13:30
Attachments: [HE M25 A3 new interchange Written Representation from Ockham Parish Council.docx](#)

HE M25/A3 proposed interchange upgrade works

Written Representation from Wisley Action Group (WAG)

26 November 2019

Interested Party, WAG request that the Examiner considers the attached submission

While the submission has been prepared by Ockham Parish Council (OPC). WAG wish to express their support for the OPC submission in our own right.

We are particularly concerned about the impact on the SPA and the way in which the ES has been prepared. The environment and AQ issues are unresolved as are the traffic flows directed into the Ripley High Street. The impact of the proposed former Wisley Airfield development has not been adequately taken into account and the knock on impact without the Burnt Common slips onto the A3 will mean high risk travel on the congested A3 to M25 J10.

Yours sincerely

Mary-Claire Travers
on behalf of WAG

HE M25/A3 proposed interchange upgrade works

Written Representation from Ockham Parish Council

November 2019

Interested Party, Ockham Parish Council, who represent the hamlets which make up Ockham request that the Examiner considers the following:

Air Quality and Emissions:

You have been advised by Wisley Action Group in Doc RR-029 that in June 2018 the air quality in the SPA on the eastern side of A3 was in excess of the legal limit. Accordingly, with an increase in the number of vehicles using the M25/A3, there will be more pollution which will impact negatively air quality and nitrogen deposition on the SPA.

A 2018 report by Public Health England shows that high levels of particulate matter PM2.5 and Nitrogen dioxide NO2 have severely negative impacts on health. The increase of vehicles on the A3 and elevating vehicles onto the proposed RHS Wisley bridge will negatively impact the already dangerously low air quality level.

We anticipate that the air quality and emissions will deteriorate from the outset of commencement of works due to the number of construction vehicles on site. This will negatively affect residents within the Parish of Ockham as the construction compounds are located close to housing settlements at Mill Lane and Elm Corner and the harmful physical impacts will continue beyond the point of completion of the works as the road alterations become fully operational.

Document APP-059 acknowledges that 'During construction, the potential adverse effects on community health are through individual and a combined impacts related to traffic, air quality, noise, vibration, drainage/water environment, geology and soils, and visual impact, particularly for communities with increased susceptibility (potential issue) and increased vulnerability (pre-existing issue) to health issues, from construction traffic and activity, increased congestion, decreased connectivity to public and commercial services and loss of amenity. There may also be some disruption to lifestyles and daily routines for example travelling to school, work or retail amenities may take longer or be perceived to be less safe.During operation, the impact of the additional capacity on the road of the Scheme could lead to some increase in air pollution and noise for communities living around the Scheme and on connecting roads which could have an adverse effect on community health'. In light of this, there must surely be obligation on the applicant to find a different approach to implement their plans and if there is no alternative, for the examiner to recommend that the works do not take place.

Furthermore, the proposed routing of visitor traffic to and from the RHS is likely to increase traffic through Ripley and further damage the air quality, currently close to acceptable limits, within this parish as well as within the parish of Ockham.

For further information regarding air quality level – please see Appendices D2, D3, D4 from The Lovelace Neighbourhood Plan which can be accessed under Planning Policy Consultations on the Guildford Borough Council website.

Biodiversity, Ecology and natural Environment:

Ockham Parish Council and residents have grave concerns about the impact of the proposed works on the natural environment within Ockham. Ockham contains one SSSI (Ockham & Wisley Commons SSSI) that is a constituent part of the Thames Basin Heaths SPA. The significance of preserving areas of the natural environment cannot be underestimated and it should be noted that Guildford Borough Council, in which much of the proposed upgrade works will take place, have formally declared a National Climate Emergency.

APP-133 states clearly in 3.2.11 that The National Policy Statement for National Networks states that changes to SSSI are only allowed to be made if the benefits clearly outweigh the impacts on the features of the site specifically affected. The Thames Basin Heaths Special Protection Area is a significant site for biodiversity. Similarly, paragraph 5.29 of the NPS NN states that development consent should not normally be granted where there would be an adverse effect on an SSSI or on Ancient Woodland.

OPC challenge the assertion that the development benefits will outweigh the detrimental effect on TBHSPA and the SSSI and the Ancient Woodland at Elm Lane and around the proposed new Cockcrow Bridge.

Within 23.7.1, document AP-002 refers to the eight locations identified for enhancement work within the SPA and these include Elm Lane where it advises of 4.0 ha of woodland clearance to open up parts of the plantation woodland to the south and west of Bolder Mere..... plus about 7.3ha of intense selective thinning of mostly Scots pine and birch..... It also refers to Old Lane where there will be about 3.8 ha of woodland clearanceplus about 1.0 ha of selective thinning of mostly Scots pine and birch.

4.2.5 of document APP-043 advises of the permanent loss of 5.9 acres of SPA. This will consist of 5.8 ac of Scots pine dominated woodland and 0.1 ac of open water at Bolder Mere. In addition, 8.6 ac of Scots pine dominated woodland will be temporarily lost as a result of the scheme.

7.2.4 states this is a permanent loss of 2.7% of the Ockham and Wisley Commons component of the SSSI and in 7.2.10 the mixed woodland to be lost.....does form a supporting habitat of the SPA and does contribute to the overall invertebrate resource within the SPA

The replacement SPA land suggested is not contiguous and we assert that this should be reconsidered. Contiguous SPA protects and preserves the wildlife habitats and biodiversity where small pockets of SPA land cannot fulfil the requirement in the same way.

The relocation of SPA land will affect the wildlife and numerous habitats, amongst these, we raise the following:

APP-095 suggests a likelihood of bat habitats within the SPA which is to be moved from Elm Lane
APP-101 - Breeding birds have been seen very close to the SPA which is to be moved from Elm Lane.
APP-098 – 7.1.5.11 states that following the sighting of a sand lizard by Cockcrow Bridge, the 2017 survey cannot confirm likely absence of sand lizards in this area. In addition, reptiles have been found along the A3 between Bolder Mere and Elm Lane and these habitats will be destroyed by the proposed works.

APP-102 relating to badgers has been redacted and so we are not aware of the location of badger habitats identified during the survey carried out on behalf of HE but anticipate that the relocation of SPA land will have some impact on badgers.

We have significant concerns about the loss of Ancient Woodland at Elm Lane and around proposed new Cockcrow Bridge. As the Woodland Trust state in Document RR-031

'The Trust is concerned about the direct loss of 0.4ha from two ancient woods and the impacts on 11 veteran trees, two of which are proposed to be removed. 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.

The National Planning Policy Framework, paragraph 175 states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists". Paragraph 5.32 of the National Policy Statement for National Networks also contains wording related to the protection of ancient woodland and veteran trees, stating: "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'.

Surrey Wildlife Trust in Document RR027 state that the design of the proposed green Cockcrow Bridge needs to be at least 25 metres wide to support the wildlife and ensure it is fully effective.

To summarise, the proposed work is going to seriously impact the biodiversity, ecology and natural environment within Ockham.

Compulsory Acquisition and / or Temporary Possession:

APP-002 states within 25.2 The main construction compound is sited adjacent to the Ockham Park Roundabout – on the Nutberry Farm site.

This is very close to Ockham Mill conservation area. The construction vehicles will cause noise, disruption and dust. There will inevitably be a large number of vehicles parked at the site for construction workers. The document states that these will be contained within the compound. OPC require that there should be no parking in Mill Lane. The construction vehicles will undoubtedly create delays at the roundabout and we have significant concerns about likely considerable delays when RHS events take place (nb the RHS have a full annual timetable with frequent events when vehicle queues back right round the Ockham Park roundabout from the southbound A3).

There is also a declaration that Ockham Park roundabout will be fully signalised. We are not convinced that this won't lead to significant gridlock.

25.2.4 within APP-002 advises that hardstanding will be created for the main construction site.

APP-054 advises within 9.9.15 'The construction compound areas would be restored and returned to their original owners as part of the works at the end of the construction phase. The exact nature of the restoration of these areas would be agreed with the owners but as a minimum it would replicate

or be capable of leading to the replication of the pre-existing conditions before construction started'. We require that this undertaking is adhered to.

APP-002 advises within 25.2.9/10 of the construction compound on hardstanding of TFM near Elm Lane. The construction compound activity will lead to noise, access disturbance, light pollution, dirt and we are also concerned about working hours. These are all factors that will disturb Elm Corner residents and the fragile eco system of the SSSI. There are concerns about safe access for residents with construction vehicles sharing the existing Elm Lane access on/off A3.

APP-025 advises within Section 3 on Page 8, HE appear to be acquiring swathes of land that is Crown and/or Common Lane. Under 3.1.6/7 on page 9 of the BoR, HE state that there is some Exchange Land from the M25 construction that still has not been registered to the rightful owners. We request clarity about the exchange land HE is specifically offering to Ockham as compensation for land that they have permanently acquired? Part of the Exchange land known as Snakes Field was given to Ockham as compensation following the dualising of the A3 trunk road in the early 1980's. Approximately, half of Snakes Field is presently in the ownership of both HE and SCC. Why after all of these years has it not been transferred to Ockham/GBC? Part of Snakes Field owned by HE, looks to include part of the SPA. Does this parcel of HE land also include part of BOAT 525? Further information about exchange land is contained with HE document 9.1 Transferring Historic Common Land and Exchange Land (no Examiners reference available as at 19.11.19)

We request that where there is compulsory acquisition or temporary possession of land owned by homeowners within Ockham, solutions that fully satisfy residents are reached. This includes Work No.34 of APP-018 modifications to the entrance to Orchard Cottage, Elm Corner.

Economic and Social Effects:

Ockham Parish Council together with other parties such as RHS (RR-024) and Elm Corner Residents Group (RR-010) are convinced that the proposed road bridge to RHS Wisley is not the best access solution. We respectfully request that this design detail is reconsidered. As has been stated earlier, the proposal to adjust the access to RHS Wisley will have significant impact on the neighbouring parish of Ripley in terms of volume of vehicles using the village and increased deterioration in the air quality. See also air quality emissions section above.

The working hours stated for the construction period suggest normal working hours of Monday to Saturday lunchtime. However, there will be the need for overnight works to take place on M25/A3. As the parish is at the heart of the proposed works, Ockham Parish Council should be consulted on the timetabling of all works and given advance notice which can then be shared with residents.

The severe thinning of the trees and vegetation adjacent to the A3 and on Old Lane will cause light and sound pollution to residents in Ockham including those at Elm Corner, Church End and Martyrs Green. There will also be dust and increased air pollution. All these factors will extend into the future when the scheme is fully operational.

Residents of Ockham must have full vehicular access to local roads in order to access their properties at all times.

In summary, residents of Ockham and businesses within Ockham are likely to be negatively affected during the construction phase of the project with impacts such as a drop-in air quality and an increase in traffic queues and delays continuing into the future.

Historic Environment / Landscape and Visual Effects / Noise, vibration and Lighting:

Ockham is a historic village that has been occupied since at least the middle bronze age (c.1500-1100 BC).

There are landmark sites within Ockham which include:

All Saints' Church - 12th century and Grade 1 listed.

19th century Semaphore Tower, Grade II listed

2 Conservation areas

29 Grade II listed properties including Ockham Mill

Ockham Village Green

Ockham Parish Council request that they are informed of all archaeological remains discovered during the construction period and that they are consulted on the preservation of these. This should include the milestones sited along the A3 (one adjacent to existing turn to Elm Lane and one at the end of Old Lane) and the parish boundary stone referred to in document APP-056.

APP-054 contains the summary of significant visual effects during construction. No 10 relates to Elm Corner, No 20 relates to Church End and No 22 to Hatch Lane. There are additional notes re visual impacts from footpaths and bridleways within Ockham and Ockham Common. We anticipate that the visual effects of the works will be greater than those documented.

We have concerns about the vibrations from construction traffic and request that no construction vehicles used for the construction travel through the Ockham conservation areas. Ockham Road North, Old Lane, Ockham Lane, Alms Heath, Long Reach, Guilehill Lane, Elm Lane and Mill Lane are, in some cases, single lane and in all cases, unsuitable for construction traffic.

We refer to document APP-038 regarding dust, noise, vibration, light during construction and during operation. We challenge the assertion that all mitigation possible has been put in place so that there will be no breaches/nuisance. In addition, within document APP-049 the executive summary states that 'No residual significant adverse effects were predicted in the operation phase of the Scheme'. We cannot comprehend how it is possible to accurately predict the levels of pollution through the construction period and beyond into the period of operation and we consider that figures have been underestimated.

The Chatley Semaphore Tower with its unique vantage point on Chatley Heath is 19th century and Grade II listed. Set on the top of the Heath within approx. half a mile distance from both A3 and M25, it is vulnerable to negative factors such as dust, noise and vibration pollution.

Further, the proposed new bridge will create severe light pollution for the hamlet of Elm Corner as well as noise and vibration and as mentioned earlier, the level of traffic through the neighbouring parish of Ripley, for which we have seen no satisfactory statement of mitigation planning, is going to vastly increase pollution and disturbance.

Document APP-042 advises within 4.3.7 that there will be some planting between Elm Corner and the A3 with evergreen species such as holly, to provide a visual screen between the A3 and the housing properties along Elm Lane. The (woodland) management will also include the removal areas of rhododendron. We request that acoustic fencing is provided along the A3 southbound from the M25 to Ockham Park to mitigate for the removal of the woodland.

Document APP-042 advises within 2.6.3 that most of the new and amended sections of highway will be finished with a Thin Surface Course System (TSCS) to ensure noise from tyres should be 3.5 dB(A) less than that for a traditional hot-rolled asphalt surface. However, 2.6.4 advises that this noise reducing surface will not be used on the proposed Wisley overbridge which will increase the level of noise for residents in Elm Corner particularly and Ockham as a whole.

Other Strategic Projects and Proposals / Planning Policy / Local Plan / Lovelace Neighbourhood Plan:

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 by Ockham Parish Council under a S.113 action in the High Court and we are 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 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:

Safety Issues:

As stated earlier, the roads in and around Ockham – other than the main arterial routes – are narrow, travel through conservation and residential areas and have speed limits of no greater than 40 mph. The proposed works will significantly increase traffic in the parish with a knock-on effect into neighbouring parishes, particularly Ripley.

Local roads are not suitable for construction traffic and the works will affect the free movement of bicycles, pedestrians and equestrians. The executive summary of document APP-058 acknowledges this. Cockcrow Bridge, the existing footbridge at Elm Lane, the M25 roundabout and Ockham Park roundabout are all frequently used by non-motorised users and mitigation needs to be put in place

so that these parties are able to safely access both sides of the A3 / M25 during the works as they can at present.

APP-002 at 17.2.4 states there is possible need for a toucan crossing of Wisley Lane diversion a short distance from the Ockham Park Junction roundabout.

Work No 50 of APP-021 refers to the improvement of Byway 525 (Byway Open to All Traffic), between Elm Corner and Old Lane, to include tarmac resurfacing of the Byway and works to tie-in to Hatch Lane and Old Lane. We are not clear about the detailed design where the new 'Elm Lane' will tie in with Old Lane. We are not aware of any safe crossing point that has been designed for Non-motorised users.

APP-043 refers in 3.3.11.2 to the connection to Old Lane from the junction 10 A3 southbound on-slip. This is scheduled to be amended and we request consultation on and sight of the detailed design of this as it is a local road that is frequently used by all residents of Ockham.

Antisocial behaviour in Ockham:

We request further information about 16.1.19, contained within APP-002 relating to the unsurfaced maintenance track for area west of Bolder Mere to access the gantry. It is imperative that this track is not utilised for anti-social behaviour.

APP-049 2.5.17 relates to entry to the car parks at Ockham Bites where the existing car park entrances will be closed. We request that the new entrances are designed to prevent anti-social behaviour. The car park should be secured out of hours.

Work No 52 of APP-021 refers to attenuation ponds on old Elm Lane - The part of Elm Lane that will no longer be required for access to Elm Corner (ie the section beyond Orchard Cottage to the A3) is being kept open for access to the drainage attenuation ponds. By leaving 'old' Elm Lane accessible, there is a strong possibility of anti-social behaviour, parking and motorbike access to TFM. We suggest that the road should be broken up, made into a narrow track suitable for bridleway and the tankers should find another way to occasionally access the attenuation ponds – perhaps from Wisley bridge. The design of an attenuation pond is such that they require little / no maintenance therefore maintaining the tarmac access is unnecessary and this should be amended.

Public Transport:

There is no public transport in Ockham other than the 715 which stops at the bus stop on Elm Lane for access to RHS Wisley and the coach that travels between Heathrow and Guildford, also stopping at the bus stop on Elm Lane. As a result of this, locals rely on private vehicles to travel. The proposed works will significantly add to the number of vehicles using the road network locally putting it under severe strain.

As mentioned above, OPC are not convinced that the proposed road bridge to access RHS Wisley is the most appropriate design. The scheme as planned will direct an increased level of traffic through local villages using local roads which are not suitable for a greater level of vehicular use.

In addition to this Ockham Park junction will be overwhelmed by the volume of construction vehicles, RHS Wisley traffic, waste tankers accessing the Thames Water site in Wisley Lane.

Water Environment:

APP-045 refers in 4.6.2 to Stratford Brook which flows under the A3 at the western end of the Scheme, immediately adjacent to Ockham Park junction. We are concerned about possible disturbance to aquatic species in Stratford Brook which is linked to the SSSI.

APP-046 maintains that the proposed works do not create unacceptable levels of flood risk to the area but with the alterations to the trunk road system, an increase in hard landscaping, the removal of so many trees and the weather extremes we are experiencing as a result of climate change, we challenge this assertion.

OPC reserves its right to submit further information and material as the Examination Period progresses.

OPC request the opportunity to speak at a future Open Floor Hearing.

OPC request the opportunity to attend site visits undertaken by the Examiners within Ockham.