

Summary of Written Representations M25 10/ A3 Wisley Interchange Improvement Development Consent Order Application

Prepared for:

Wisley Property Investments Limited

Prepared by:

Savills (UK) Limited
244-246 High Street, Guildford, GU1 3JF

1. Summary

- 1.1. Wisley Property Investments (WPIL) is the principal landowner of the Wisley Airfield, which is allocated for a new settlement by Allocation A35 of the adopted Guildford Local Plan 2015-2034 (GBLP). **Appendix 1** demonstrates WPIL's land ownership on the basis of the previous planning application submitted in 2014 (which was dismissed at Appeal in June 2018, 'the Appeal Scheme'). Part of the new settlement allocation is affected by Highways England's (HE) Development Consent Order (DCO) application for the upgrading of M25 Junction 10. The planning application process for the new settlement will be undertaken in 2020, with implementation envisaged alongside the DCO delivery from 2022. The first occupations in 2022/23 will coincide with the practical completion of the Junction 10 works. This acts as a resubmission to the application dismissed at Appeal, as the outstanding matters were resolved via the adoption of the GBLP.
- 1.2. WPIL is broadly supportive of the DCO scheme and the necessity to make enhancement to the strategic road network on the A3/ M25 at and around Junction 10. Subject to satisfactory resolution of the issues identified in this Written Representation, the improvements will enable the delivery of the GBLP as noted by the Plan itself (for example Section 3: Spatial Vision for the Borough, Policy ID2: Supporting the Department for Transport's "Road Investment Strategy", Allocation A35: Former Wisley Airfield, Ockham and Appendix 6 - Infrastructure Schedule). In particular, Allocation A35 acknowledges the relationship between the delivery of the new settlement and the M25 Junction/A3 Wisley interchange upgrade. The delivery of the Junction upgrade is supported by Guildford Borough Council's (GBC) Infrastructure Delivery Plan (IDP).
- 1.3. However, WPIL has some objections to the DCO as drafted, notably:

Land and the avoidance of the need for compulsory purchase

- 1) WPIL objects to the compulsory acquisition of any of its land. Without a private treaty agreement to regulate the implementation of the powers sought in the DCO, the Scheme could impede the delivery of the GBLP and runs contrary to the development plan in this respect. WPIL remains committed to engaging with HE regarding the use of its land to enable the construction of the relevant DCO works via private treaty agreement, but as these negotiations are in the early stages, WPIL must maintain its objection to the compulsory acquisition powers sought over WPIL land until those negotiations have satisfactorily concluded.

In response, the Written Representations proposes changes to:

- The Land Plans 1 and 2 (APP-006);
- Amendments to Schedules 5 and 7 of the DCO; and
- Inclusion of text within the DCO to provide for the legal licences enabling HE to build over WPIL land.

Highways Modelling

- 2) WPIL requests that the DCO Examination hears the detailed information on HE's traffic modelling methodology and outputs, so that the implications for strategic developments, such as Wisley Airfield and the local road network can be understood by the Examining Authority, WPIL and others. WPIL is seeking clarification from HE on the transport modelling, in particular the matters raised by Surrey County Council (SCC) in their Relevant Representation. If it is concluded that a material adverse impact will arise then the DCO should consider opportunities for mitigation measures and work with SCC to identify those that can be brought forward within the provisions of the DCO.

To secure and not prejudice the future primary site access into allocation A35

- 3) Proposed arrangements for securing site access to the GBLP A35 allocation from the proposed Wisley Lane diversion, including provision for an appropriate site access with appropriate traffic conditions (such as speed restriction) on the proposed Wisley Lane, and DCO Requirements or planning obligations if the DCO is made (the DCO must protect a future site access). Specifically:
 - a) The DCO must either include the opportunity to use the temporary construction access to form the permanent site access or include the opportunity to place a Requirement (condition) on the DCO to not prejudice site access to enable delivery of allocation A35 both during initial construction phases and future occupation (a potential access location is shown in **Appendix 3**).
 - b) HE should facilitate access to enable the delivery of allocation A35 by the Wisley Airfield contractors from the Ockham roundabout during the construction of the DCO works. The planning application process for the new settlement will be in 2020 (see **Table 2.1** in Section 2 of this Written Representation) in order to enable the GBLP housing trajectory. This means that the implementation of the new settlement is also likely during the DCO construction period.
 - c) Traffic management provisions should be included in the DCO with respect of the proposed Wisley Lane's access function to allocation A35 and also with respect of construction access for the delivery of the DCO. The Appeal Scheme conditions required main works construction traffic to access the site from the Ockham Park Junction and not from Old Lane / Ockham Lane due to the impact on the local road network (the Appeal Scheme included necessary construction conditions – see **Appendix 10**).
 - d) The proposed gas main diversion to the south of the new Wisley Lane route should be constructed to a specification, including depth and protection by means of sleeving or protective measures to enable an access road suitable as a new access to allocation A35 to be constructed over it. Any wayleave or other agreement with the relevant statutory provider for the gas main should specifically allow for these works to be carried out without abnormal cost to WPIL/ the delivery of allocation A35.

Summary of Written Representations

Wisley Airfield



All of these matters should be included as a specific protective provision in the DCO, and not be left for the detailed design/ discharge of DCO Requirements stage.

In response to these concerns, WIPL's written representation proposes specific amendments to the DCO to ensure that HE's construction access off Wisley Lane and the proposed gas main alongside the Wisley Lane diversion take into account the preferred access route into the Wisley Airfield site.

Ecology and the need to ensure robust mitigation of any adverse effects including to not prejudice the timely delivery of the required Suitable Alternative Natural Greenspace (SANG) to enable the delivery of allocation A35

- 4) The relationship between HE's biodiversity strategy (including proposed SPA-related matters and on-site works) and the future delivery of allocation A35.

The DCO temporary works area (for topsoil storage and contractors compound to the north, and biodiversity improvement measures to the south), and potential implication for part of the proposed SANG to enable the delivery of allocation A35. A significant proportion of the proposed SANGs will be to the area north of the airfield and adjoining the DCO temporary works area, (and to the south at Stratford Brook including the location of proposed retained rights). WPIL intend that first occupation of the Wisley Airfield scheme will coincide with the DCO scheme being open to traffic. The northern SANG and that at Stratford Brook will be required to be provided at first occupation. SANG construction works for this area is anticipated to take two years prior to opening (see SANG Management Plan – **Appendix 10**). Accordingly, any use of this temporary area beyond DCO scheme open date should be minimised or avoided or be for as short a period as possible. The construction of the DCO should not interfere with the SANG user experience from this date. In particular, any noisy or intrusive uses (such as, concrete crushing or other similar activity) should not occur beyond this date. Further part of the proposed topsoil storage area overlaps with proposed northern SANG, and this land area should be reduced to the minimum actually required. Given its importance to the housing delivery trajectory of the GBLP, this matter should be considered at DCO stage and not left to detailed design and implementation phase of the project.

Other matter raised in WPIL's written representation include:

- 5) HE's Landscape and Ecology Management and Monitoring Plan (APP-106, ES Appendix 7.20) and how this relates with parts of the proposed SANG.
- 6) Species permeability of the diverted Wisley Lane, and appropriate mitigation for any impact on the SNCI, and on reptiles / amphibians and other species. WPIL would be prepared to consider facilitating access to HE ahead of DCO contract period to enable ecological mitigation measures (for example, species translocation) in a seasonally appropriate period, to assist in the timely delivery of the DCO scheme.

Summary of Written Representations

Wisley Airfield



- 7) Detailed proposals for the proposed works to Stratford Brook and their future management. WPIL would be prepared to consider an agreement for WPIL to be under an obligation to carry out future maintenance to an agreed specification on this land (with appropriate step in rights in the event of default) to avoid the necessity for future rights by HE and so enable the seamless delivery of this and the SANG Management Plan.

In response to these considerations, WPIL's Written Representation identifies a range of matters on which common ground is under discussion with HE, including the means of delivering and reinforcing relevant safeguards. An amendment is also sought to Requirement 3(2)(e) (Construction and handover environmental management plans) in Schedule 2 Part 1: Requirements of the draft DCP (APP-018).

Recognition of the trees on-site and approach to mitigate any loss.

- 8) HE's proposals on existing trees and landscape on and near to Wisley Airfield, including for example Wisley Lane diversion and mitigation measures possible alongside the delivery allocation A35. Regard to be had of the relevant arboriculture information (see **Appendix 13**).

Charles Collins
Director

+44 (0) 1483 796837
+44 (0) 7870 999596
ccollins@savills.com

Katherine Munro
Associate Director

+44 (0) 1732 789712
+44 (0) 7870 987955
katherine.munro@savills.com