

# M25 junction 10/A3 Wisley interchange

TR010030

## 9.19 Applicant's Response to Written Representations

Rule 8(1)(c)(i)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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# Infrastructure Planning

## Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

### M25 junction 10/A3 Wisley interchange

### Development Consent Order 202[x ]

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## 9.19 APPLICANT'S RESPONSE TO WRITTEN REPRESENTATIONS

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# 1. Purpose and Structure of Responses to Written Representations

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to the written representations submitted to the Planning Inspectorate (PINS) on or before deadline 1 (26 November 2019).
- 1.1.2 This document is structured in two parts:
- Part 1 provides Highways England's comments in response to written representations submitted by Interested Parties with statutory functions;
  - Part 2 – provides Highways England's comments in response to written representations submitted by persons with an interest in land (PILs) other than those who have statutory functions; and
  - Part 3 provides Highways England's comments in response to written representations submitted by members of, or representatives of, local communities within the vicinity of the Scheme.
- 1.1.3 Highways England has sought to provide comments where it is helpful to the Examination to do so, for instance where a written representation includes a request for further information or clarification from Highways England or where Highways England considers that it would be appropriate for the Examining Authority to have Highways England's views in response to a matter raised by an Interested Party in its representations. Where issues raised within a representation have been dealt with previously by Highways England, for instance in response to a question posed by the Examining Authority in its first round of written questions or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.4 Highways England has not provided comments on every point made within the written representations (for instance, Highways England has not responded to comments made [about the adequacy of its pre-application consultation given that Highways England has already provided a full report of the consultation it has undertaken as part of its application for the Development Consent Order (DCO)) and PINS has already confirmed the adequacy of the pre-application consultation undertaken when the application was accepted for Examination]. In some cases no comments have been provided, for instance, because the written representation was very short, or because it expressed objections in principle to the Scheme or expressions of opinion without supporting evidence. For the avoidance of doubt, where Highways England has chosen not to comment on matters raised by Interested Parties this is not an indication Highways England agrees with the point or comment raised or opinion expressed.

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## Part 1- Interested parties with statutory functions

## REP1-012 Elmbridge Borough Council

Reference	Written Representation Issue	Highways England Response
REP1-012-1	Elmbridge Borough Council (the Council), gives its general support to the aims of the Highways England (Applicant) M25 Junction 10/A3 Wisley interchange improvement project...	Highways England welcomes the general support of Elmbridge Borough Council for the Scheme.
REP1-012-2	<p><b>Traffic and Impact on Local Road Network (LRN)</b></p> <p>The Council has reviewed and is supportive of the comments and concerns made by SCC, as the Local Highway Authority, regarding the traffic issues (e.g. modelling/capacity/mitigation/road safety/scheme design/etc.). The Impact on the LRN especially in and around Painshill junction and A245/Seven Hills Road junction are areas of concern for the Council.</p> <p>The Council shares the concerns that SCC have expressed about the increased traffic pressure on the LRNs during project construction and once implemented, for example the need to resurface and maintain the Seven Hills Road (south).</p> <p>The Council also strongly supports the suggestion of the Applicant working to link the Painshill and A245/Seven Hills Road traffic signal controls to improve the flow of traffic, especially with this being a primary route created by the banned right hand turn from Seven Hills Road. The proposed Change 3(AS-023) to remove the retaining wall Work No. 47(c) and therefore only provide two lanes toward the Painshill junction instead of the proposed three lanes when traffic will reroute in this direction was unexpected. The Council notes SCC comments requiring revised information to demonstrate the proposal would provide benefits to the LRN and mitigate the impact of the scheme both for traffic flow and users of the footpath proposed in the original design.</p> <p>The Council previously stated the desire that within funding secured, the repair and/or resurfacing of the LRNs impacted, during construction and through diverted traffic routes created by the project, be included and works completed, and was very disappointed to learn that the Applicant does not intend to enter into any S106 agreements with SCC.</p>	<p>Highways England anticipates that the use of the local road network for construction traffic will be minor as it is envisaged that construction traffic will largely use the Strategic Road Network. The dDCO [APP-018] requires a traffic management plan to be put in place for the purposes of the construction phase (see Requirement 4 of the dDCO).</p> <p>As set out in paragraph 2.7.15 of the Environmental Statement (contained in Environmental Statement (Chapters 1-4) [APP-049]) closures of the A3 and M25 will be required periodically for operations such as bridge demolition or the installation of new structures such as bridge decks or gantries. These closures will be kept to a minimum and will take place overnight, or if unavoidable at weekends. Otherwise the works will be carried out whilst maintaining narrow running lanes on the M25 and/or A3 and temporary slip roads will be provided at M25 junction 10 to maintain traffic flows through the junction during the works. On this basis, significant diversion of strategic traffic to the local road network and a consequential increased risk of damage to the local road network is not anticipated.</p> <p>Highways England does not agree that there is a need to resurface that part of Seven Hills Road (south) between the A245 Byfleet Road and the entrance to the Hilton Hotel. This is because the surface of the existing carriageway is already suitable and further surfacing works would not be justified.</p> <p>Highways England welcomes the support of EBC regarding the linking the Painshill and A245/Seven Hills Road traffic signal controls to improve the flow of traffic.</p> <p>The proposed change as set out in Highways England's notification to make a request for changes to the DCO [AS-023] to remove the retaining wall Work No. 47(c) and provide two lanes toward the Painshill junction instead of the proposed three lanes will be formally requested by Deadline 4 on 11 February 2020. In advance of the formal request, Highways England will be carrying out non-statutory consultation on the changes and welcomes the opportunity to discuss any concerns which EBC may have as part of that process.</p>
REP1-012-3	<p><b>Land Interests</b></p> <p>The Council is a landowner of multiple sites which will be impacted by the proposed works. One property is partially within the DCO boundary, Painshill Park, which is currently leased to Painshill Park Trust.</p> <p>The Council as a landowner, notes the proposed removal of a vehicular access and exit point from the A3 to our property. This is located near the second countdown marker on the south bound exit slip road. The Council's long-leasehold tenant, Painshill Park Trust has raised this matter separately.</p>	Please see Highways England response to Painshill Park Trust in the Applicant's Comments to Relevant Representations [REP1-009] and in this document to their Written Representation [REP1-026].
REP1-012-4	<p><b>Non-motorised User (NMU) Routes:</b></p> <p>The Council supports the suggested linkages by SCC to ensure the NMU routes are linked allowing this network to provide the safe, secure and segregated travel option for residents.</p>	Highways England welcomes EBC's support for the proposed improvements to the NMU network around junction 10 as part of the Scheme.

## REP1-013 Environment Agency

Reference	Written Representation Issue	Highways England Response
REP1-013-1	<p>We intend to update the Statement of Common Ground that we have previously prepared with the applicant to reflect our latest position and summarise our ongoing engagement, for submission by the next application deadline of 18 December.</p>	<p>The Environment Agency and Highways England continue working closely together to resolve outstanding matters summarised in the Agency's 'comments, queries and issues' log (version 3.0). Protected provisions have been agreed and the Statement of Common Ground continues to be progressed and a revised copy will be submitted to the ExA at Deadline 3.</p>
REP1-013-2	<p>In reviewing the draft Order, our fisheries &amp; biodiversity officer made the following request: "Please can Requirement 10 (Bolder Mere) include the requirement to provide details of the Ground Investigations and Risk Assessment required for understanding GW [groundwater] flows and the potential impact that the piling works may have on Boldermere lake? Although this is mentioned in the REAC (which this requirement references), I feel it should also be mentioned specifically in requirement 10 as there could be a risk to WFD [Water Framework Directive] compliance if this is not properly addressed. Details of the new retaining wall should also be a requirement of Requirement 10 to ensure the necessary mitigation measures have been incorporated into the design.". This is identified as matter reference '016 (FT)' in the attached comments log.</p> <p>We understand from reviewing the attached comments log that the applicant intends to provide a revised Requirement 10 for us to review. At the time of writing, we are awaiting the revised requirement.</p>	<p>Highways England has now responded on this issue to the Environment Agency. Highways England does not object in principle to including the additional changes to Requirement 10 as requested by the Environment Agency. However, given that the requested requirements are already provided for by the dDCO [APP-018], it seems unnecessary to duplicate existing provisions/requirements.</p> <p>Highways England has committed to providing the Ground Investigations and Risk assessment in RD1.16 of the Register of Environmental Actions and Commitments (REAC) [APP-135] stating that to in order to prevent adverse effects on groundwater flow, Highways England will ensure an intrusive ground investigation is undertaken to determine the groundwater flow direction and the depth to groundwater. On the basis of these investigations, alterations will be made to the detailed design of the piles or retaining walls, to ensure they do not form a barrier to groundwater flow. Assessment of this impact will be covered within Piling Risk Assessment. The Piling Risk Assessment will be submitted to the Environment Agency for approval and agreement prior to commencement of the construction phase.</p> <p>The commitments set out in the REAC are secured through Requirement 3 of the dDCO [APP-018]. Requirement 3 states that no part of the authorised development is to commence until a CEMP has been approved by the SoS in consultation with the relevant planning authority (Requirement 3(1)). The CEMP must reflect the commitments made in the REAC and mitigation measures detailed in the Environmental Statement (Requirement 3(2)). The Scheme must be constructed in accordance with the approved CEMP (Requirement 3(3)). Therefore, the commitments set out in the REAC are secured.</p> <p>In addition, the agreed Protective Provisions for the protection of the Environment Agency provide that before beginning to construct any specified work (which includes any work or operation authorised by the DCO as is in, on, under, over or within 8 metres of a drainage work or otherwise likely to... affect the flow ... of... ground water, Highways England must submit to the Agency for their approval details of such works. Any such specified work must not be constructed except in accordance with such plans as approved in writing by the Environment Agency... (para 19 of the Protective Provisions). 'Plans' is quite broadly defined and includes sections, drawings, specifications, calculations and method statements.</p> <p>Therefore, the additional provisions in Requirement 10 are not required in our view. We hope the explanation above provides the Environment Agency with sufficient reassurance that the dDCO includes appropriate mechanisms which secure the need for Highways England to provide the Environment Agency with the details of the Ground Investigations and Risk Assessment and to ensure that the necessary mitigation measures in respect of the retaining wall are incorporated into the design.</p> <p>Highways England will continue discussions with the Environment Agency on proposals to modify Requirement 10 of the dDCO and fully expect to meet a mutually satisfactory outcome on this matter.</p>
REP1-013-3	<p>We would like to make clear that we overall agree with the conclusions of the Flood Risk Assessment (FRA) (reference: APP-046) for matters within our remit. We agree that fluvial flood risk issues have been satisfactorily addressed. This follows verbal confirmation at our meeting with the applicant's agents on 8 October and the comments provided by the applicant in the attached comments log, following the flood risk issues we raised following a review of the application documents...</p> <p>Our only outstanding concerns relate to the provision of sufficient information within the FRA as submitted to demonstrate that the conclusions of the FRA are sound. It has taken additional confirmation (whether written or verbally) to confirm some of the FRA issues that we raised in our comments log.</p> <p>We therefore recommended to the applicant that the FRA should be updated to better demonstrate that the conclusions are sound. Albeit we acknowledge that the provision of this additional information will not affect the underlying conclusions of the report.</p>	<p>Given that the Environment Agency acknowledges that the provision of this additional information will not affect the underlying conclusions of the FRA [APP-046], Highways England is not proposing to update the FRA.</p>

## REP1-015 National Grid

Reference	Written Representation Issue	Highways England Response
REP1-015-1	<p><b>Tower ZM021:</b></p> <p>(a) A right of access to Tower ZM021 is required for NGET and its contractors along the new private access track during the construction and operation phases of the Proposed Development.</p> <p>(b) It is expected that the Promoter would be willing for the provision of a specific right of access to be secured in a side agreement/asset protection agreement negotiated between the parties.</p>	<p><b>Tower ZM021:</b></p> <p>National Grid Electricity Transmission (NGET) are listed as an occupier of land parcel 6/6 as identified on the Land Plans [AS-002] and the Book of Reference [APP-025]. Land parcel 6/6 is contiguous with proposed Work No. 35 as set out in Schedule 1 to the dDCO [APP-018]. Highways England is entering into negotiations related to access via Works No. 35, 35(g) and 35(h) as shown on the Works Plans [AS-003].</p>
REP1-015-2	<p><b>Tower ZM022:</b></p> <p>(a) Future access to Tower ZM022 will be via the new private road. NGET will also require a secure gate to be installed off this private road to allow access to Tower ZM022 itself.</p> <p>(b) A right of access to Tower ZM022 is therefore required for NGET and its contractors along the private road during the construction and operation phases of the Proposed Development.</p> <p>(c) It is expected that the Promoter would be willing for the provision of a specific right of access to be secured in a side agreement/asset protection agreement negotiated between the parties. It is also expected that the side agreement would make provision for the installation by the Promoter of a secure gate leading off the access road to Tower ZM022.</p>	<p><b>Tower ZM022:</b></p> <p>A gate can be included off the access road for NGET maintenance access to tower ZM022. This would be subject to agreement on access rights with landowners.</p> <p>NGET are listed as an occupier of land parcels 6/23, 7/11a, 7/29 and 8/5, as shown on the land plans [AS-002], which are contiguous with proposed Work No. 40 in Schedule 1 of the dDCO [APP-018] Highways England is entering into negotiations related to access via Work no. 40) as shown on the Works Plans [AS-003].</p>
REP1-015-3	<p><b>Tower ZM023:</b></p> <p>(a) Future access to Tower ZM023 will be via the new private road referred to in relation to Tower ZM022.</p> <p>(b) A right of access to Tower ZM023 is therefore required for NGET and its contractors along the private road during the construction and operation phases of the Proposed Development.</p> <p>(c) It is expected that the Promoter would be willing for the provision of a specific right of access to be secured in a side agreement/asset protection agreement negotiated between the parties.</p> <p>(d) It is noted that the private road is located very close to two sides of the base of Tower ZM023. In order to ensure that the tower foundations are not adversely impacted during construction and operation of the Proposed Development/ appropriate protective works (agreed through NGET's standard plant protection process) will need to be fully implemented prior to commencement of any works in the immediate vicinity of Tower ZM023,</p> <p>(e) Balfour Beatty Atkins ("BBA"), acting on behalf of the Promoter, have previously agreed to investigate moving the access track as far from the base of Tower ZM023 as possible. An update on BBA's investigations is therefore requested,</p> <p>(f) Although Tower ZM023 is located outside of the current Order Limits, it is further noted that the Land Plans identify the permanent acquisition of land immediately adjacent to three sides of Tower ZM023. Since tower foundations are often wider at ground level, confirmation is required from the Promoter as to whether powers of compulsory acquisition and/or temporary possession are either intended or likely to affect any part of the existing foundations of Tower ZM023.</p>	<p><b>Tower ZM023:</b></p> <p>Access will be via Work No 40 in Schedule 1 of the dDCO [APP-018] to the part of the land where the tower is located. Highways England will be willing to enter negotiations related to access via Work no. 40 as shown on the Works Plans [AS-003].</p> <p>Works adjacent to utility infrastructure, including that of NGET, will be subject to article 43 and Part 1 of Schedule 9 of the dDCO [APP-018] which contains protective provisions for the benefit of electricity undertakers, requiring notice, accompanied by a plan, to be given the utility infrastructure owner. Highways England is entering into discussions with NGET concerning protective provisions for its infrastructure.</p> <p>Highways England will endeavour to align the access track as far away from the base of ZM023 as the DCO boundary allows. A meeting has been held with NGET and further details will be provided during detailed design.</p> <p>As shown on Volume 2.8 Scheme Layout Plans (sheets 1-10 of 31) [APP-012], land parcels 7/1 and 7/11a, which are subject to permanent acquisition (as shown on the Land Plans [AS-002]), are required for the construction of a new private means of access (PMA). The powers to be obtained to construct this PMA are not intended to affect any part of the existing foundations of ZM023. The precise location and design of the PMA within the DCO boundary will be a matter for detailed design, but Highways England will endeavour to align the access track as far away from the base of ZM023 as the DCO boundary allows.</p> <p>Works adjacent to utility infrastructure, including that of NGET, will be subject to article 43 and Part 1 of Schedule 9 of the dDCO [APP-018] which contains protective provisions for the benefit of electricity undertakers, requiring notice, accompanied by a plan, to be given the utility infrastructure owner. Highways England is entering into discussions with NGET concerning protective provisions for its infrastructure.</p>
REP1-015-4	<p><b>Tower ZM024:</b></p> <p>(a) Future access to Tower ZM024 will be via the new private road referred to in relation to Towers ZM022 and ZM023.</p> <p>(b) A right of access to Tower ZM024 is therefore required for NGET and its contractors along the private road during the construction and operation phases of the Proposed Development.</p> <p>(c) It is expected that the Promoter would be willing for the provision of a specific right of access to be secured in a side agreement/asset protection agreement negotiated between the parties.</p> <p>(d) NGET also require a 6m exclusion/clearance zone between the base of Tower ZM024 and any works being carried out by the Promoter as part of the Proposed Development. Although any interactions would be addressed as part of NGET's plant protection process, the side agreement should contain express provisions which prevent the carrying out of works forming part of the Proposed Development within the identified 6m exclusion zone surrounding Tower ZM024.</p>	<p><b>Tower ZM024:</b></p> <p>Permanent access will be via Work No 40 (private means of access) to land parcel 8/5b (as shown on the Land Plans [AS-002]) where the tower is located. Highways England will be willing to enter negotiations related to access via Work no. 40.</p> <p>We note NGET's requirement for a 6 m exclusion/clearance zone between the base of ZM024 and any works being carried out by Highways England as part of the Scheme.</p> <p>The precise location and design of the PMA and associated earthworks, retaining wall, telecoms and electricity cable diversions within the DCO boundary will be a matter for detailed design.</p> <p>Works adjacent to utility infrastructure, including that of NGET, will be subject to article 43 and Part 1 of Schedule 9 of the dDCO [APP-018] which contains protective provisions for the benefit of electricity undertakers, which requires notice, accompanied by a plan, to be given the utility infrastructure owner.</p>



Reference	Written Representation Issue	Highways England Response
	<p>(e) The Land Plans indicate that Tower ZM024 and the surrounding land will be used temporarily with rights to be acquired permanently. The Promoter is asked to please confirm the nature and extent of (a) temporary use powers, and (b) the permanent rights relating to this area of NGET's operational land.</p> <p>(f) Notwithstanding the inclusion of NGET's operational land comprising and surrounding Tower ZM024 within the Order Limits, NGET will require specific provisions in the protective provisions and/or side agreement which disapply the Promoter's right to acquire NGET's operational land and/or to remove or interfere with any of its existing or future apparatus.</p>	<p>We are assuming that the land in question is parcel 8/5(b).</p> <p>(a) The temporary use of this land parcel will be to facilitate the construction a retaining wall and installation of telecoms /electricity cables.</p> <p>(b) The permanent rights to this land parcel are intended to be as follows:</p> <ul style="list-style-type: none"> <li>- Highways England maintenance access to the retaining wall and</li> <li>- Maintenance access to tower ZM024 from new PMA track.</li> <li>- access rights for NGET and other companies with equipment on this land parcel.</li> </ul> <p>Works adjacent to utility infrastructure, including that of NGET, will be subject to article 43 and Part 1 of Schedule 9 of the dDCO [APP-018] which contains protective provisions for the benefit of electricity undertakers, requiring notice, accompanied by a plan, to be given the utility infrastructure owner. Highways England is entering into discussions with NGET concerning protective provisions for its infrastructure.</p>
REP1-015-5	<p><b>Tower ZM025:</b></p> <p>(a) The Scheme Layout Plans identify that a new specific access route will be provided to Tower ZM025. Assuming this remains the case, and in any event, NGET will require a right of access for itself and its contractors during construction and operation of the Proposed Development.</p> <p>(b) NGET will require a further right to close the proposed dedicated slip-road between the A245 and the A3 to enable maintenance works to ZM025 to be carried out. (This point has previously been raised in discussions between NGET and the Promoter/BBA).</p> <p>(c) NGET also require a minimum 6m exclusion/clearance zone between the base of Tower ZM025 and the adjacent retaining wall proposed to be constructed by the Promoter.</p> <p>(d) It is expected that each of the above points will be dealt with and protections secured in the side agreement negotiated between the parties.</p>	<p><b>Tower ZM025:</b></p> <p>Work No. 48 is described as in Schedule 1 of the dDCO [APP-018] as "A new dedicated free-flow slip lane to connect the A245 Byfleet Road eastbound carriageway directly with the A3 northbound on-slip at the A3 Painshill junction and associated lighting and signage, to include a private maintenance access for an existing electricity pylon, in total approximately 135 metres in length, as shown on sheet 8 of the Works Plans".</p> <p>Closures of the highway will need to be agreed in the usual way with the strategic highway authority and/or the local highway authority.</p> <p>We note NGET's requirement for a 6m exclusion/clearance zone between the base of ZM025 and any works being carried out by HE as part of the Project.</p> <p>The precise location and design of the Painshill junction A245/A3 freeflow lane and associated earthworks within the DCO boundary will be a matter for detailed design.</p> <p>Works adjacent to utility infrastructure, including that of NGET, will be subject to article 43 and Part 1 of Schedule 9 of the dDCO [APP-018] which contains protective provisions for the benefit of electricity undertakers, requiring notice, accompanied by a plan, to be given the utility infrastructure owner. Highways England is entering into discussions with NGET concerning protective provisions for its infrastructure.</p> <p>Highways England's notification to make a request for changes to the DCO [AS-023] includes a proposal to remove the retaining wall Work No. 47(c) and provide two lanes toward the Painshill junction instead of the proposed three lanes. This change will be formally requested by Deadline 4 on 11 February 2020. In advance of the formal request, Highways England will be carrying out non-statutory consultation on the changes and welcomes the opportunity to discuss any concerns which NGET may have as part of that process.</p>
REP1-015-6	<p><b>Next Steps</b></p> <p>2.3.1 In respect of all of NGET's apparatus and infrastructure located within the Order Limits, or in close proximity to the Proposed Development and associated works (together the "Apparatus"), NGET will require protective provisions to be put in place to ensure that:</p> <p>(a) all NGET interests and rights including rights of access are unaffected by the power of compulsory acquisition, grant and extinguishment of rights and temporary use powers; and</p> <p>(b) appropriate protection for the retained apparatus is maintained during and after construction of the Proposed Development. This includes compliance with all relevant standards on safety clearances EN 43-8 (Development near overhead lines) and HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines). In this instance, the safe working by the Promoter and its contractors under and around the OHL is of particular concern to NGET.</p>	<p>The dDCO [APP-018] contains protective provisions for utility statutory undertakers in Schedule 9 Part 1. Highways England is entering into discussions with NGET concerning protective provisions for its infrastructure.</p>
REP1-015-7	<p><b>NGET - Regulatory Protection Framework</b></p>	<p>The NGET guidance will be taken account of by Highways England's principal contractor.</p>
REP1-015-8	<p><b>Property Issues</b></p> <p>4.1 NGET assert that maintaining appropriate property rights to support its assets is a fundamental safety issue. Insufficient property rights would have the following safety implications:</p> <p>(a) inability for qualified personnel to access apparatus for its maintenance, repair and inspection;</p>	<p>Highways England is continuing discussions with NGET concerning land acquisition issues.</p>

Reference	Written Representation Issue	Highways England Response
	<p>(b) risk of strike to cable/overhead lines if development occurs within the easement zone which seeks to protect the cable/overhead lines from development; and</p> <p>(c) risk of inappropriate development within the vicinity of the assets increasing the risk of damage to the asset and integrity of the system.</p>	
REP1-015-9	<p><b>Protective Provisions</b></p> <p>5.1 In order to protect its statutory undertaking, NGET insists that in respect of connections and works in close proximity to its Apparatus as part of the Proposed Development, the following procedures should be complied with by the Promoter:</p> <p>(a) NGET is in control of the plans, methodology and specification for works within 15 metres of any retained Apparatus; and</p> <p>(b) works within in the vicinity of NGET apparatus are not authorised or commenced unless protective provisions are in place preventing compulsory acquisition of National Grid's land or rights or the overriding or interference of the same and including appropriate insurance and indemnity provisions to protect National Grid. Any acquisition of rights must be subject to NGET's existing interests and rights and not contradict with or cut across such rights.</p> <p>5.2 NGET maintains that without an agreement or qualification on the exercise of unfettered compulsory powers or connection to its apparatus, the following consequences will arise:</p> <p>(a) failure to comply with industry safety standards, legal requirements and Health and Safety Executive standards create a health and safety risk; and</p> <p>(b) any damage to Apparatus has potentially serious hazardous consequences for individuals located in the vicinity of the Apparatus if it were to fail.</p> <p>5.3 The proposed draft Order does not yet contain protective provisions expressed to be for the specific protection of NGET. The draft Order is therefore currently deficient from NGET's perspective.</p> <p>5.4 NGET contends that it is essential that protective provisions on NGET's standard terms are incorporated in the draft Order to its satisfaction so as to ensure adequate protection for NGET's Apparatus and existing and future property rights.</p> <p>5.5 Negotiations between the parties in respect of the form of the protective provisions to be included within the Order are advancing but have not yet concluded and there remain a number of outstanding issues (as explained in detail above).</p> <p>5.6 Should it not be possible to reach agreement on these matters with the Promoter, NGET reserves the right to attend a Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the protective provisions.</p> <p>5.7 If this is necessary, NGET reserves the right to provide further written information in advance in support of any detailed issues remaining in dispute between the parties at that stage.</p>	<p>Highways England is entering into discussions to ensure NGET's apparatus is adequately protected.</p>

## REP1-016 Ockham Parish Council

Reference	Written Representation Issue	Highways England Response
REP1-016-1	<b>Air Quality and Emissions</b>	<p>The air quality assessment as documented in Environmental Statement Chapter 5: Air Quality [APP-050], included the calculation of concentrations of oxides of- nitrogen (NOx) and nitrogen deposition at receptor points within the Thames Basin Heaths SPA for comparison with the critical level and critical loads respectively.</p> <p>The critical level for NOx concentrations strictly applies only to locations more than 20 km from towns with more than 250,000 inhabitants or more than 5 km from other built-up areas, industrial installations or motorways or major roads with traffic counts of more than 50,000 vehicles per day but is applied on a precautionary basis in all designated sites (paragraph 5.3.3 in APP-050). In accordance with Highways England's Interim Advice Note 174/13, where a potentially adverse effect cannot be ruled out, i.e. where NOx concentrations are above the critical level and the change with the Scheme is greater than 0.4 µg/m3 the changes in nitrogen deposition are calculated, and the potential for adverse effects considered by the ecologists within the Habitats Regulations Assessment: Stage 2 [APP-043].</p> <p>The assessment for the opening year showed that both the critical level of NOx concentrations and critical load of nitrogen deposition were exceeded within the SPA, both with and without the Scheme, with concentrations/ deposition rates decreasing with distance from the road. The potential for adverse effects resulting from nitrogen deposition on the integrity of the SPA is considered within the Habitats Regulations Assessment: Stage 2 [APP-043]. Paragraphs 7.2.25-52 of the Habitats Regulations Assessment: Stage 2 [APP-043] appropriate assessment considered the changes in nitrogen deposition as a result of the Scheme. This assessment determined that there will be no adverse effects on the integrity of the SPA due to changes in air quality as a result of the Scheme.</p>
REP1-016-2	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 air quality which is already in breach of regulatory limits.	<p>Sensitive receptors are included in an air quality assessment where they are within 200 metres of a road traffic source of emissions, in accordance with the Highways England methodology in the Design Manual for Roads and Bridges. Beyond this distance, changes will be negligible. There are no sensitive residential human health receptors within 200 metres of the proposed bridge, or within 200 metres of the A3 south of junction 10 where the national nitrogen dioxide annual mean objective could apply. There are two other receptors within 200 metres of the A3, where people could be present for a short period of time, and thus the nitrogen dioxide 1-hour mean objective could apply: RHS Wisley Gardens (receptor R57); and Ockham Bites Café (receptor R40); both of which have been included in the air quality assessment.</p> <p>As shown in Table 5.7.9 of the Environmental Statement Appendix 5.1 Air Quality [APP-080], the annual mean nitrogen dioxide concentrations at these receptors are expected to remain below the objective of 40 µg/m3 in future years and thus would also be expected to meet the 1-hour mean objective. As a result of the Scheme these receptors are expected to have an imperceptible change and a small decrease in annual mean nitrogen dioxide concentrations respectively in the opening year.</p> <p>A screening assessment was undertaken for PM<sub>2.5</sub> (Appendix 5.1 of APP-080). This shows that there is no risk that the Scheme would exceed the PM<sub>2.5</sub> air quality criterion and consequently further assessment of PM<sub>2.5</sub> was not undertaken for the Scheme.</p>
REP1-016-3	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.	An assessment of the construction traffic was undertaken which showed that there would not be a significant effect on air quality, as documented at paragraph 5.14.4 of Environmental Statement Chapter 5 Air Quality [APP-050].
REP1-016-4	Document APP-059 acknowledges that 'During construction, the potential adverse effects on 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	<p>The text quoted from Chapter 14 of the Environmental Statement provides an overall summary of the type of effects during construction and operation of the Scheme. Environmental Statement Chapter 14: Health impacts [APP-059] reports on effects on health. Design, mitigation and enhancement measures have been incorporated into the construction and operation of the Scheme to avoid, reduce and compensate for the adverse health impacts as appropriate, as detailed in paragraphs 14.9.1 -14.9.3. The health assessment concludes that, after mitigation, the Scheme will not have a significant effect on health during the construction and operational phase.</p> <p>As documented in paragraph 5.10.1 of Environmental Statement Chapter 5 Air Quality [APP-050], construction traffic would not have a significant adverse effect on air quality.</p>

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	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.	<p>As documented in paragraph 5.14.10, the assessment has shown that overall there is not likely to be a significant adverse effect on air quality during operation, and at paragraph 5.9.3, no mitigation measures for air quality have been proposed.</p> <p>Please refer to the Highways England's response [REP1-009] to Ockham Parish Council's Relevant Representation [RR-002], for further details on the noise and vibration assessment undertaken as part of the Scheme including upon individual receptors, and potential mitigation measures.</p> <p>Environmental Statement Chapter 6 Noise and Vibration [APP-051] states that no significant adverse effects on noise levels or vibration levels are likely to occur when the Scheme is operational.</p> <p>During the construction phase, the noise assessment states that with mitigation measures in place, noise and vibration from construction activities would not result in any significant adverse effects in Ockham (Table 6.27 in APP-051). Temporary adverse effects were predicted at eight sensitive receptors close to the A3 or Painshill Interchange. Impacts will be minimised at these locations through implementation of mitigation measures secured in the Outline Construction Environmental Management Plan [AS-016].</p>
REP1-016-5	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 in breach of regulatory limits within this parish as well as within the parish of Ockham.	<p>Please refer to the Highways England's response [REP1-009] to Wisley Action Group's Relevant Representation [RR-029], which considered air quality impacts upon Ripley as a result of the rerouting of traffic for RHS Wisley from the south. It was found that the difference in pollutant levels in Ripley between the situations with and without the Scheme in place would be imperceptible.</p> <p>The Environmental Statement Chapter 5 Air Quality [APP-050] has been undertaken on a scheme-wide basis, taking account of overall changes in traffic volumes, journey distances and traffic speeds. The air quality assessment has not separately evaluated the changes in vehicle emissions specifically related to RHS Wisley Gardens traffic.</p> <p>With the Scheme, the traffic modelling shows that all RHS Garden Wisley traffic to and from the A3 south will travel via Ripley. This is a small proportion of total traffic travelling through Ripley. Furthermore, the A3 will be the signed route for RHS Wisley Gardens with direction signage beginning before Burntcommon junction. Should traffic leaving the Gardens and heading south not route through Ripley (e.g. because of signing), the already very modest traffic impact on Ripley on account of the Scheme will be reduced and the impact on air quality reduced.</p> <p>Air quality in Ripley is currently relatively good. In accordance with its local air quality management duties, Guildford Borough Council monitors concentrations of nitrogen dioxide – the key pollutant associated with road traffic – at several roadside or kerbside locations in Ripley: Ripley High Street (until the end of 2017); and two sites on Newark Lane. At all these locations, annual average concentrations were below the national air quality objective set to protect human health in all available years of monitoring (between 2016 and 2018). The data for 2016 and 2017 is documented in Table 5.6.1 of the Environmental Statement Appendix 5.1 Air Quality [APP-080]. Further information on monitoring data is available on Guildford Borough Council's website at <a href="https://www.guildford.gov.uk/article/19807/Air-quality-monitoring">https://www.guildford.gov.uk/article/19807/Air-quality-monitoring</a></p> <p>There would not be a significant effect on air quality at sensitive receptors in Ockham as a result of any traffic changes with the Scheme, as changes in pollutant concentrations at the selected receptors are expected to be imperceptible, and the majority of receptors are outside of the air quality study area, as shown in Figure 5.1 of Environmental Statement: Chapter 5 Air Quality Figures 1 of 2 [APP-064]. Monitoring by Guildford Borough Council at one site in Elm Corner (WS1) showed annual average nitrogen dioxide concentrations of 14 µg/m3 in both 2016 and 2017, as documented in Table 5.6.1 of the Environmental Statement Appendix 5.1 Air Quality [APP-080], well below the national air quality objective.</p>
REP1-016-6	<p><b>Biodiversity, Ecology and natural Environment:</b></p> <p>Ockham Parish Council 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.</p>	<p>The location of the M25 junction 10/A3 Wisley interchange has meant that impacts on the Thames Basin Heaths SPA and Ockham and Wisley Commons SSSI is unavoidable.</p> <p>However, the Scheme is a Nationally Significant Infrastructure Project (NSIP) and the Imperative Reasons of Overriding Public Importance (IROPI) why the Scheme is required are explained in Section 4 of Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>In addition, an assessment of other feasible alternative options has been undertaken in Section 3 of Habitats Regulations Assessment Stage 3-5 [APP-044]. This demonstrates how the least harmful option was selected with regards to minimising impacts on the SPA. Sections 3.2 and 3.3 of Environmental Statement Chapters 1-4 [APP-049] discuss the option selection process with regards to a number of factors, including minimising impacts on the SPA and SSSI.</p>

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		<p>Section 7.14 of Environmental Statement Chapter 7: Biodiversity [APP-052] explains how, having established that benefits clearly outweigh the impacts on the features of the site, the Scheme complies with the National Policy Statement for National Networks (NPS NN).</p> <p>Section 2.1 of Environmental Statement Chapters 1-4 [APP-049] explains the need for the Scheme. Section 7.14 of Environmental Statement Chapter 7: Biodiversity [APP-052] explains how the Scheme complies with the NPS NN in relation to designated sites and ancient woodland.</p>
REP1-016-7	<p>We have seen in document APP-138 para 8.2 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.</p> <p>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 7.3 ha 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 clearance ...plus about 1.0 ha of selective thinning of mostly Scots pine and birch.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>The Statement of Common Ground with Natural England [APP-138], the Introduction to the Application and Scheme Description [APP-002] and the Habitats Regulations Assessment: Stage 2 [APP-043] and the Scheme layout plans [APP-012 and AS-004] all refer to the same suite of compensatory measures. The requirement for a suite of compensatory measures and their composition are explained below.</p> <p>There will be a permanent loss of 5.9 ha of SPA and a temporary loss of 8.6 ha as a result of the Scheme.</p> <p>The Habitats Regulations Assessment Stage 2 [APP-043] concluded that, based on the precautionary principle, it is not possible to ascertain that this habitat loss of land would have no adverse effect on the integrity of the SPA. This resulted in the requirement for compensatory measures.</p> <p>Natural England, Forestry Commission, RSPB, Surrey County Council and Surrey Wildlife Trust (SWT) were consulted on an appropriate suite of compensatory measures.</p> <p>A range of options were considered as SPA compensation land and were refined over the development of the Scheme and are described in Section 5 of Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>The suite of compensatory measures includes two areas of SPA compensation land (totalling 8.1 ha), both of which are immediately adjacent to the SPA and therefore are contiguous with the SPA. The suite of compensatory measures also includes eight SPA enhancement areas within the existing SPA (totalling 47.4 ha).</p> <p>The proposals for the SPA compensation land parcels and the SPA enhancement areas are described in paragraphs 5.1.25-5.1.31 and 5.1.46-5.1.69 of 5.3 Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>The decision making process behind refining the SPA compensation land parcels and SPA enhancement areas can be found in Habitats Regulations Assessment Annex C [APP-042]. The consultation process throughout the HRA can be found in Habitats Regulations Assessment Annex B [APP-041].</p> <p>The SPA compensation land consists of grazed grassland that will be planted with young trees to form wood pasture. This will not have an adverse impact on any of the species mentioned.</p> <p>The SPA enhancement areas will be managed to benefit wildlife, particularly heathland birds and invertebrates. All works within SPA enhancement areas will be done sensitively and under Precautionary Methods of Working to avoid potential harm to species such as badgers, bats, reptiles, great crested newts and birds.</p>
REP1-016-8	<p><b>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</b></p> <p><i>'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 1600 AD. 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.</i></p>	<p>Please refer to the Highways England's response [REP1-009] to Ockham Parish Council's Relevant Representation [RR-002] concerning the loss of Ancient Woodland at Elm Lane and around the new Cockcrow Bridge, and potential mitigation measures, and Highways England's response [REP1-009] to the Woodland Trust's Relevant Representation [RR-002] which demonstrated the Scheme's accordance with national planning policy, and its outlined proposed identification, protection and mitigation measures for veteran trees and Ancient Woodland.</p> <p>As described in Section 7.4.1 of Chapter 7 of the Environmental Statement [APP-052], the Scheme has been refined to minimise the impacts on ancient woodland. This has resulted in a reduction of ancient woodland loss from approximately 1.0 ha to 0.4 ha across the Scheme. The loss of 0.4 ha is unavoidable due to the location of ancient woodland parcels immediately adjacent to the A3 at Elm Corner woods and Heyswood. There is no ancient woodland near the new Cockcrow bridge.</p> <p>Mitigation is not possible if ancient or veteran trees are lost, due to their irreplaceable nature. However, specific measures to protect retained veteran trees are identified in paragraphs 7.10.15–16 of Chapter 7 of the Environmental Statement [APP-052]. These include, wherever possible, the location of access tracks, haul roads and site compound and material storage areas to be sited outside designated sites and ancient woodland, away from retained veteran trees (and outside of notable habitats), and a buffer zone to be implemented around these receptors where works are not limited by the existing carriageway.</p>

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		Possible compensatory measures are identified in paragraphs 7.10.19-25 of Environmental Statement Chapter 7: Biodiversity [APP-052] and include translocating veteran trees and dead wood to the wood pasture compensatory land. Dead wood habitat will also be provided using material from other trees felled onsite .
REP1-016-9	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.	At present the dDCO provides for the possibility of a 10 m wide green bridge but Highways England is seeking to bring forward proposals in the DCO (by way of a non-material change application) for a 25 m green bridge, which would be subject to designated funds becoming available. By letter dated 4 November 2019, Highways England has notified the Planning Inspectorate of its intention to bring forward a number of changes to the Scheme. A copy of the letter can be found on the Scheme's section of the Planning Inspectorate's website.
REP1-016-10	<p><b>Compulsory Acquisition and / or Temporary Possession:</b></p> <p>[A]PP-002 states within 25.2 The main construction compound is sited adjacent to the Ockham Park Roundabout–on the Nutberry Farm site.</p> <p>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.</p> <p>OPC require that there should be no parking in Mill Lane.</p> <p>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).</p>	<p>As stated above assessments of noise and air quality impacts from construction traffic have been undertaken and have concluded that there would be no significant effects. Adequate parking for the construction workforce will be provided within the construction compound and the construction workforce will be prohibited from parking on Mill Lane. The proposals for monitoring and mitigating construction effects are set out in the Outline Construction Environmental Management Plan (oCEMP) [AS-016] and the Register of Environmental Actions and Commitments (REAC) [APP-135].</p> <p>Under Requirement 3 of the dDCO [APP-018] a Construction Environmental Management Plan (CEMP) is to be approved by the Secretary of State, following consultation with the relevant planning authority before the authorised development, or the relevant part of it, may commence.</p> <p>Measures included in the CEMP will include measures to control noise, air and dust, and light pollution.</p> <p>Requirement 4 of the dDCO prohibits any part of the works commencing until a Traffic Management Plan has been approved by the Secretary of State after consultation with the local planning authority and relevant highway authority. The Traffic Management Plan will prohibit the use of unsuitable roads by construction traffic.</p> <p>Access to the main construction compound for construction traffic will be via the Ockham Park roundabout. The construction traffic for the Scheme will, therefore, increase traffic demand at the roundabout, which may cause some intermittent additional congestion and delay. However, the number of additional construction vehicles using the Ockham Roundabout will be relatively small compared to background demand, adding up to approximately 1,000 vehicle movements a day through the junction during the busiest two months of construction activity. This represents up to approximately a 3 to 4% increase in traffic through the junction. For most of the construction programme the impact of construction traffic will be substantially less than during the busiest two months. Consequently, any additional impact on congestion and delay at the Ockham Park roundabout due to the construction traffic will be relatively minimal and will be temporary.</p>
REP1-016-11	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.	As shown in Table 7-14 of the Transport Assessment [APP-136] the modelling of the operation of the amended Ockham Roundabout with traffic signals has also demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay at the junction.
REP1-016-12	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.	Article 31(5) of the dDCO [APP-018] requires that any land which is temporarily used for the carrying out of the authorised development must be restored to the reasonable satisfaction of the owner before possession of the land is given up.
REP1-016-13	<p>APP-002 advises within 25.2.9/10 of the construction compound on hardstanding of TFM near Elm Lane. The construction compound activity which is sited adjacent to Orchard Cottage will lead to:</p> <ul style="list-style-type: none"> <li>• Noise,</li> <li>• access disturbance,</li> <li>• light pollution,</li> <li>• dirt and we are also concerned about working hours.</li> </ul> <p>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. We request that the compound is moved to a location that will cause less disruption, disturbance and pollution to residents.</p>	<p>Please refer to the Highways England's response [REP1-009] to Elm Corner Residents Group's Relevant Representation [RR-010] concerning the use, environmental and traffic impacts of the construction compound at Wisley Airfield.</p> <p>As can be seen on Sheet 2 of the Temporary Works Plans [APP-015], the construction compound at Wisley Airfield is mostly for use for material storage and mainly topsoil storage. As such it would be little used by machinery apart from at the start and end of the works when the soil would be placed and removed. A small area of land as shown blue on sheet 2 of the Temporary Works Plans will be used as a work site to construct the new Wisley Lane overbridge and associated works but would be decommissioned once these are complete. Lighting would only be required in the small construction compound (i.e. the blue shaded area) when the daytime working hours would be affected by shorter day lengths in the winter months.</p> <p>The noise assessment documented in Chapter 6 of the Environmental Statement [APP-051] demonstrates that with mitigation measures secured in the Outline CEMP [AS-016] used to minimise construction noise levels, there will be no significant adverse effects at Elm Corner during the construction and operation phases of the</p>

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		<p>Scheme. Examples of the CEMP measures for reducing construction noise are provided in Section 6.9 of the Environmental Statement Chapter 6: Noise and Vibration [APP-051], including the use of 'sound reduced' generators and compressors, machines in intermittent use to being shut down when not in use, siting static equipment within the compound as far away from noise sensitive buildings as practicable. No significant effects were identified relating to construction traffic [APP-051], paragraph 6.10.11. No adverse or significant effects are likely to occur at the SPA due to noise from the construction or operation phases of the Scheme [APP-051], paragraph 6.10.6 and Table 6.24.</p> <p>Access would initially be via the existing Elm Lane off the A3 and subsequently off the Ockham Park junction once the new bridge over the Stratford Brook is completed (which is expected to be early in the construction phase). The existing section of Elm Lane at Elm Corner would not be used for construction traffic apart from those needed to improve Elm Lane/the By-way Open to All Traffic (BOAT) itself. As such the amount of construction traffic operating in this area would be limited.</p> <p>Environmental Statement Chapter 9: Landscape [APP-054] considers the impacts of lighting during construction and identifies no likely significant effects in terms of light pollution during construction. The assessment takes account of mitigation, including:</p> <ul style="list-style-type: none"> <li>• Construction compounds, such as the compound at Wisley Airfield would have lighting which would be activated by motion sensors to prevent unnecessary usage.</li> <li>• The main site compounds would be lit as required during hours of darkness.</li> <li>• Lighting would be directional, and positioned sympathetically, to minimise light spill and disturbance for highly sensitive receptors.</li> </ul> <p>The Construction Environmental Management Plan (CEMP) is secured under Requirement 3 of the dDCO [APP-018] and includes the requirement for a management plan to be approved for construction site artificial lighting prior to the commencement of that part of the Scheme.</p> <p>Generally, the works will not be carried out at night. However, there are some particular circumstances in which works beyond the usual working hours may be permitted and these are set out in Requirement 3(2)(b) of Schedule 2 to the dDCO [APP-018].</p> <p>Following the assessment methodology set out in paragraphs 5.5.5 and 5.5.6 of the Environmental Statement Chapter 5: Air Quality [APP-050], with appropriate mitigation measures in place, any adverse effects resulting from dust emissions from the construction works would be minimised such that there would not be any significant residual effect on the nearby receptors (paragraph 5.10.3).</p> <p>The air quality assessment documented in the Environmental Statement Chapter 5: Air Quality [APP-050] demonstrates that with mitigation measures secured in the Outline Construction Environmental Management Plan [AS-016] used to minimise construction dust levels, there will be no significant adverse effects at Elm Corner during the construction phase of the Scheme. Examples of the Construction Environmental Management Plan (CEMP) measures for reducing construction dust are provided in Section 5.9 of the Environmental Statement Chapter 5: Air Quality [APP-050].</p> <p>Paragraphs 7.9.11-7.9.27 of Environmental Statement Chapter 7: Biodiversity [APP-052] considered potential impacts on receptors, including the SSSI, during construction and operation. This included disturbance as a result of noise and/or light and changes in air quality.</p> <p>As explained above, noise and lighting at the compound will be controlled. In addition, it is located outside the SSSI (approximately 100 m at the closest point) and separated by an area of woodland.</p> <p>Paragraphs 7.10.6 to 7.10.14 outline mitigation measures to be incorporated into the Construction Environmental Management Plan (CEMP) to minimise impacts resulting from construction, including the use of compounds. These mitigation measures are also included in Table G.3 of the Outline CEMP [AS-016].</p> <p>With these measures in place the construction compound at Wisley Airfield will have no significant impacts on the SSSI.</p>
REP1-016-14	<p>APP-025 advises within Section 3 on Page 8, HE appear to be acquiring swathes of land that is Crown and/or Common Land.</p> <p>Under 3.1.6/7 on page 9 of the BoR, HE states 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?</p>	<p>As set out in Paragraphs 7.2.14 to 7.2.20 of the Statement of Reasons [APP-022] there is still some exchange land to be registered in connection with the original M25 acquisition. There is one outstanding historic case to complete the legal acquisition of land from Surrey County Council (SCC), which, when complete, allows Surrey County Council to update the common land register, by de-registering the common land being acquired by Highways England and registering the exchange land, as provided in the M25 Compulsory Purchase Orders.</p>

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	<p>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?</p> <p>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 AS-107 Transferring Historic Common Land and Exchange Land.</p> <p>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.</p>	<p>As regards Snakes Field, Highways England's understanding is that there is no basis for it to be transferred to the Parish Council, unless arrangements to this end have been made between the Parish Council and Surrey County Council. Highways England is not party to any such arrangement.</p> <p>As set out in Section 5.7 of the Statement of Reasons [APP-022], Highways England will seek as a matter of course to reach agreement with affected parties. Highways England is engaging with landowners whose land will be acquired permanently, used temporarily or is subject to new rights being acquired.</p>
REP1-016-15	<p>We are not able to ascertain any detail about the hammerhead turn proposed for Elm Lane. This should be designed specifically for vehicular manoeuvre and in such a way that it does not encourage parking or anti-social activity. We request that Elm Lane residents, such as Orchard Cottage, 2012 and 1 &amp; 2 Fellside Cottages are consulted about the precise location and design of this turn.</p>	<p>The hammerhead is a standard design to accommodate a service vehicle such as a refuse vehicle to manoeuvre and return along Elm Lane.</p>
REP1-016-16	<p><b>Economic and Social Effects:</b></p> <p>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.</p> <p>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.</p>	<p>The consideration of alternatives is set out in the Statement of Reasons [APP-022] and Chapter 3 of the Environmental Statement (contained within Environmental Statement (Chapters 1-4) [APP-049]). This document explains why the Wisley Lane diversion within the Scheme is the preferred option. As regards traffic through Ripley, please see above.</p> <p>The estimated additional weekday daily traffic (AADT) due to the Scheme on B2215 Portsmouth Road/Ripley High Street between Newark Lane and the Ockham Park junction (which is the section of road within Ripley most impacted by the Scheme) is approximately 1,000 vehicles in 2020 and 1,550 vehicles in 2037. These increases in traffic flows represent approximately a 5% increase compared to without the scheme and equates to a maximum of 3 to 4 additional vehicles every minute (1 to 2 in each direction) during the busiest periods. The additional traffic through Ripley due to the Scheme of which RHS Wisley is but a small component, is therefore insufficient to give rise to any significant adverse impacts. This is because a) traffic modelling has demonstrated that the local road network can accommodate the additional traffic due to the Scheme without material deterioration in traffic congestion and delay (i.e. the road network operates within capacity); and b) the forecast increases in traffic flow through Ripley due the Scheme are well below the thresholds required to trigger a significant adverse severance, road safety, noise or air quality effects.</p> <p>As regards air quality, the Scheme results in an imperceptible change at receptors R59 to R62 in Ripley as documented in Table 5.7.9 of App-080 for nitrogen dioxide concentrations. The effect is not considered to be significant given that concentrations are expected to be below the national annual mean objectives for NO2 and PM10 both with and without the scheme. This includes the effect of additional traffic travelling to and from RHS Wisley through Ripley.</p>
REP1-016-17	<p>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 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</p>	<p>Generally, the works will not be carried out at night. However, there are some particular circumstances in which works beyond the usual working hours will be necessary (e.g. night-time closures for bridge demolition). These are set out in Requirement 3(2)(b) of Schedule 2 to the dDCO [APP-018].</p>
REP1-016-18	<p>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.</p>	<p>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.</p> <p>The proposed tree felling and replanting scheme will have a negligible impact on noise levels at Elm Corner, Church End and Martyrs Green. Any small noise increases will be short-term and more than negated by the effects of the low noise road surfacing proposed on the A3, as shown by the noise contours on Figures 6.11 and 6.12 in Environmental Statement: Chapter 6 Noise and Vibration Figures 2 of 2 [APP-067].</p> <p>Environmental Statement Chapter 5: Air Quality [APP-050] noted that during construction, with the application of appropriate mitigation measures secured in a Construction Environmental Management Plan (CEMP), as required by Requirement 3 of the dDCO [APP-018], significant residual effects at nearby sensitive receptors would be unlikely (paragraph 5.10.3 in APP-050).</p>



Reference	Written Representation Issue	Highways England Response
		During operation of the Scheme the air quality assessment showed that there is not expected to be an overall significant adverse effect on air quality, as documented in paragraph 5.14.10 of Environmental Statement Chapter 5: Air Quality [APP-050].
REP1-016-19	Residents of Ockham must have full vehicular access to local roads in order to access their properties at all times.	Some temporary closures of local roads are unavoidable, but any restrictions upon access to individual properties will be short lived and there will be appropriate notification and management of the situation by Highways England.
REP1-016-20	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.	As documented in the Environmental Statement Chapter 5: Air Quality [APP-050] noted that during construction, with the application of appropriate mitigation measures secured in a Construction Environmental Management Plan (CEMP), as required by Requirement 3 of the dDCO [APP-018], significant residual effects at nearby sensitive receptors would be unlikely (paragraph 5.10.3). There are not expected to be any adverse effects during construction from dust emissions at receptors in Ockham, as they are outside of the air quality construction dust study area, as shown in Figure 5.2 of APP-064.
REP1-016-21	<b>Historic Environment/ Landscape and Visual Effects / Noise, vibration and Lighting:</b> 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.	Archaeology is the subject of Requirement 14 in the dDCO [APP-018]. All archaeological work will be carried out to methodologies in the form of written schemes of investigation (WSI) designed and approved in consultation with the County Archaeologist for Surrey. Deposition of any artefacts and archives will follow national guidelines following agreement with the landowners of the land from which artefacts were recovered. It is expected that there will be an outreach element to the proposed archaeological programme, which will include dissemination of results to the local community as well as more widely.
REP1-016-22	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.	The Environmental Statement Chapter 9 Landscape [APP-054] included a landscape and visual assessment which 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.
REP1-016-23	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.	All of the site compounds are very close to or directly accessible from the SRN and so any use of roads by construction traffic outside the SRN will be limited.NC
REP1-016-24	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 under estimated.	The assessment of environmental impacts has been prepared in accordance with the Infrastructure Planning (EIA) Regulations 2017 and the Design Manual for Roads and Bridges (DMRB) Volume 11 (and associated documents). The forecasting methods and requirements specific to each assessment topic are set out in the relevant topic chapters (Chapters 5 to 16), Consequently the potential impacts identified during the construction and operational phase are sufficiently accurate to enable a robust assessment.
REP1-016-25	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.	The Environmental Statement Chapter 11 Cultural Heritage [APP-056] was undertaken in consultation with Historic England. The area of the Scheme encompasses a small part of the overall setting of this feature. The main reason for the placement of the tower in this location was to achieve visibility of the semaphore from other semaphore towers in the admiralty communications chain from London to the naval dockyard at Portsmouth. Visibility to other locations from this tower, apart from to adjoining semaphore towers within the chain, was not part of its design ethos and therefore contributes little if anything to its overall significance. The Scheme does form part of the setting of this feature that contributes to its significance.  With the application of appropriate dust mitigation, secured in the Construction Environmental Management Plan under Schedule 2 Requirement 3 of the dDCO [APP-018], significant residual adverse effects at the Chatley Semaphore Tower would be unlikely, as documented in paragraph 5.10.3 of Environmental Statement Chapter 5 Air Quality[APP-050].  The noise assessment provided in Chapter 6 of the Environmental Statement [APP-051] includes noise predictions at Chatley Semaphore Tower. Paragraph 6.10.13 states that this location would not be significantly affected by noise in the operational phase as negligible changes were predicted in the short term and long term effects as shown in Figures 6.11 and 6.12 of Environmental Statement: Chapter 6 Noise and Vibration Figures 2 of 2 [APP-067].

Reference	Written Representation Issue	Highways England Response
		<p>During the construction phase, no adverse or significant effects from road traffic noise or construction activities are likely at the Chatley Semaphore Tower when mitigation measures are applied (paragraph 6.10.11, Table 6.27, paragraph 6.10.25). These mitigation measures are set out in the Outline CEMP (oCEMP) [AS-016] and secured under Schedule 2 Requirement 3 of the dDCO [APP-018].</p>
REP1-016-26	<p>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.</p>	<p>The Environmental Statement Chapter 9 Landscape [APP-054] considers the impacts of lighting from the Scheme. Neither the Wisley Lane diversion nor the improved Elm Lane/BOAT will be lit. As such there will be no increase in light pollution arising from the Scheme in the Elm Corner area. There will be areas of retained woodland between the properties at Elm Corner and proposed Wisley Lane overbridge. These plantations will provide screening between the properties and vehicles to limit any light pollution from passing cars.</p> <p>Environmental Statement Chapter 6 Noise and Vibration [APP-051] paragraph 6.8.33 states that during the operation of the Scheme, minor noise decreases are predicted at Elm Corner in the short term. Paragraph 6.8.38 states that negligible changes are predicted at Elm Lane in the long term. On this basis, no significant effects are likely to occur at Elm Corner, as summarised in Table 6.24. These predictions take into account traffic using the proposed Wisley Lane overbridge and low noise road surfacing on the A3 that is included as part of the Scheme to reduce road traffic noise. Paragraphs 6.8.57 to 6.8.60 conclude that found that no impacts from vibration are likely to occur.</p> <p>The potential impacts for road traffic noise levels at Ripley in the operational phase were considered in the wider area assessment, which can be found in paragraphs 6.8.54 and 6.8.55 of Chapter 6 of the Environmental Statement: Noise and vibration [APP-051]. As stated in paragraph 6.8.54, "In the short-term and the long-term, the Basic Noise Level calculations indicated that for the majority of the roads the change in road traffic noise levels was negligible according to the impact magnitude criteria in the DMRB 11:3:7". Although not mentioned by name, the roads in Ripley were among those where negligible changes were predicted.</p>
REP1-016-27	<p>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.</p>	<p>The proposed tree felling and replanting scheme will have a negligible impact on noise levels at Elm Corner, Church End and Martyrs Green. Any small noise increases will be short-term and more than negated by the effects of the low noise road surfacing proposed on the A3, as shown by the noise contours on Figures 6.11 and 6.12 in Environmental Statement: Chapter 6 Noise and Vibration Figures 2 of 2 [APP-067]. On this basis, there is no requirement for acoustic fencing.</p>
REP1-016-28	<p>Document APP-002 advises within 23.2.1 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, 23.2.2 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.</p>	<p>All road bridges, including the Wisley Lane overbridge will be surfaced with Hot Rolled Asphalt (HRA) because it is less permeable when compared to a Thin Surface Course System (TSCS) and is a more durable option, as the underlying layers and structure will be protected from surface water infiltration. As stated above, the noise assessment incorporated traffic noise from the Wisley Lane overbridge with an HRA surface.</p>
REP1-016-29	<p><b>Other Strategic Projects and Proposals/ Planning Policy / Local Plan / Lovelace Neighbourhood Plan:</b> 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.</p> <p>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.</p> <p>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 WPIL and HE regarding development of FWA/TFM are premature.</p>	<p>Highways England has taken the Guildford Local Plan, the soundness of which was recently upheld by the High Court, into consideration in the proposed Scheme.</p>
REP1-016-30	<p><b>Transportation and Traffic:</b> <b>Safety Issues:</b></p>	<p>Assessment of the Scheme covers the M25, A3 and local roads in the vicinity of Junction 10, including Ockham Road North and Portsmouth Road, Ripley.</p>

Reference	Written Representation Issue	Highways England Response
	<p>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.</p>	<p>Traffic modelling of the Scheme, presented in the Transport Assessment [APP-136], has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay overall on both the SRN and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered by the Scheme.</p> <p>Traffic modelling indicates that Scheme will have a minimal traffic impact on roads in Ockham. Daily traffic flows on B2039 Ockham Road North are forecast to reduce with the Scheme compared to without the Scheme in both 2022 and 2037. Daily traffic flows on Ockham Lane, west of Old Lane, are forecast to marginally change with the Scheme compared to without the Scheme, with a small increase in 2022 and a small reduction in 2037.</p> <p>The estimated additional weekday daily traffic (AADT) due to the Scheme on B2215 Portsmouth Road/Ripley High Street between Newark Lane and the Ockham Park junction (which is the section of road within Ripley most impacted by the Scheme) is approximately 1,000 vehicles in 2020 and 1,550 vehicles in 2037. These increases in traffic flows represent approximately a 5% increase compared to without the scheme and equates to a maximum of 3 to 4 additional vehicles every minute (1 to 2 in each direction) during the busiest periods. The additional traffic through Ripley due to the Scheme is therefore insufficient to give rise to any significant adverse impacts. This is because:</p> <p>a) traffic modelling has demonstrated that the local road network can accommodate the additional traffic due to the Scheme without material deterioration in traffic congestion and delay (i.e. the road network operates within capacity); and</p> <p>b) the forecast increases in traffic flow through Ripley due the Scheme are well below the thresholds required to trigger significant adverse severance, road safety, noise or air quality effects.</p>
REP1-016-31	<p>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.</p> <p>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.</p> <p>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 tarmacadam 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.</p>	<p>The existing section of Elm Lane at Elm Corner would not be used for construction traffic apart from those needed to improve Elm Lane/the By-way Open to All Traffic (BOAT) itself. As such the amount of construction traffic operating in this area would be limited.</p> <p>The works are intended to be programmed so that affected PRoW, footpaths or cycleways remain open for part, or duration, of the construction period, and so that other routes can act as a diversion route for those affected. Including along the A3 shared pedestrian and cycle non-motorised user (NMU) route and at J10 so temporary severance is mitigated. Replacement overbridges at Cockcrow and Wisley Lane are provide before existing routes close to minimise severance for NMUs across the A3 and M25.</p> <p>The preliminary design for the improved BOAT 525 is shown on sheet 24 of the Scheme Layout Plans [AS-004]. There is no footway along this section of the BOAT or Old Lane. There are many pedestrian tracks through Ockham Common in the vicinity and pedestrians can cross where safe to do so.</p> <p>Improvements to the Old Lane/Elm Lane junction will be made to ensure the safe operation of the junction as part of Work No. 50 in Schedule 1 of the dDCO [APP-018].</p>
REP1-016-32	<p>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.</p>	<p>The detailed design is expected to be similar to the current design proposal for the junction, which can be seen on sheet 4 of the Scheme Layout Plans [APP-012 and AS-004].</p>
	<p><b>Antisocial behaviour in Ockham:</b></p> <p>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.</p> <p>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.</p> <p>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</p>	<p>With reference to 16.1.19 contained within Introduction to the Application and Scheme Description [APP-002], the maintenance track will have a secure gate to prevent unauthorised access.</p> <p>As regards access out of hours to the car park at Ockham Bites, Highways England notes there is no provision within the Scheme for these to be secured out of hours, that being a matter for Surrey County Council and/or the police.</p> <p>With reference to Work No. 52 contained within the dDCO [APP-018]. The section of Elm Lane south of Orchard Cottage is shown on sheet 23 of the Scheme Layout Plans ([APP-012] and [AS-004]) to have a secure access gate, in addition the Scheme Layout Plan sheet No. 2 shows a secure a gate between Elm Lane and Wisley Airfield and the access to Elm Lane from the southbound A3 will be stopped up. These measures will help deter antisocial behaviour.</p>

Reference	Written Representation Issue	Highways England Response
	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.	
REP1-016-33	<p><b>Public Transport:</b></p> <p>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.</p> <p>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.</p>	The primary objective of the Scheme is to improve the SRN for the benefit of all users of it.
REP1-016-34	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.	Please see response to 'Compulsory Acquisition and / or Temporary Possession' above.
REP1-016-35	<p><b>Water Environment:</b></p> <p>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.</p>	<p>Environmental Statement Chapter 7 Biodiversity [APP-052] assesses the impacts of the Scheme on the aquatic species of Bolder Mere and Stratford Brook, as a result of the construction and operation. Environmental Statement Chapter 8 Road drainage and the water environment [APP-053] also considers the impacts of the Scheme on the wider water environment of Bolder Mere and Stratford Brook. Mitigation and enhancement measures have been identified and outlined in sections 7.10 and 8.9 of the Environmental Statement.</p> <p>In addition, the impact of the Scheme on the Bolder Mere and Stratford Brook water bodies has been assessed in the Water Framework Directive Assessment Report [APP-045]. Measures have been carefully developed to mitigate the effect of the Scheme on the Bolder Mere water body, in consultation with the Environment Agency, Natural England and Surrey Wildlife Trust. Consultation on the Stratford Brook water body has been undertaken with the Environment Agency. The mitigation measures are set out in Section 5 and Appendix F of the Water Framework Directive Assessment Report [APP-045].</p>
REP1-016-36	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.	This matter is dealt with in the Environmental Statement [APP-046]. The existing surface water drainage system for the A3 and M25 is approximately 35-40 years old and does not comply fully with current design standards or Environment Agency requirements in terms of attenuation of flow rates into receiving waters. A new and/or upgraded surface collection system to address existing flooding and mitigate the increase in carriageway runoff rates is an important feature of the Scheme design. Surface water run-off from new and widened carriageways will be directed towards a series of new drains and ditches that will convey the flow to drainage balancing ponds or swales.

## REP1-017 Ripley Parish Council

Reference	Written Representation Issue	Highways England Response
REP1-017-1	The development site does not sit within Ripley parish, but the effects of the proposal will be felt keenly in the village. The parish council has consistently raised the lack of south-facing slip roads at the Ockham roundabout as a matter of great concern. The council believes that the modelling promoted by Highways England is flawed. As the Royal Horticultural Society has identified in its video available online (RHS 2018), visitors leaving its site and wishing to head south on the A3 are unlikely to use Highways England's predicted route.	This is a matter that has been raised by the ExA in its Written Questions (1.13.6 and 1.13.7)
REP1-017-2	Traffic leaving Wisley and wishing to join the A3 southbound will travel through Ripley on their way to the Burnt Common interchange situated south east of the village. Traffic movements through the village and along the B2215 will increase dramatically due to the predominant use of sat-nav, alongside local knowledge. The addition of south-facing slip roads to the Ockham roundabout will solve this issue.	Please see the Highways England response to the representation made by RHS/SCC above/below in [REP1-020], which justifies the Scheme's approach towards south facing slips at Ockham Park junction, and associated modelling undertaken by Highways England.

## REP1-020 Surrey County Council

Reference	Written Representation Issue	Highways England response
[Paragraph (para) numbers quoted in column 1 below relate to the paragraph or item numbers used in Surrey County Council's written representation (REP1-020) or in SCC's response to the Examining Authority's Rule 8 letter (REP1-019)]		
REP1-020-1	<p><b>Need for the Scheme</b></p> <p>Para 1.2: SCC supports the Scheme in principle but wishes to ensure that it does not result in unacceptable impacts on residents, businesses and the environment or additional liabilities for SCC</p>	<p>SCC's support is acknowledged and welcomed. Each of SCC's specific concerns relating to the Scheme's impacts are addressed in turn below.</p>
REP1-020-2	<p><b>Detailed design and technical approvals and impact on Surrey County Council's position</b></p> <p>Paras 1.3, 2.6.1 and 3.2.1: SCC seeks provision within the wording of the DCO for it to approve remaining detailed design elements for the Scheme, including temporary works affecting SCC's assets, structures and works to bus stops and associated fees for doing so</p>	<p>The draft Development Consent Order (dDCO) [APP-018] provides for SCC's involvement in the detailed design process and related matters as follows:</p> <ul style="list-style-type: none"> <li>Article 11(1) provides that highway works (other than a trunk road or special road) must be completed to the reasonable satisfaction of the local highway authority in whose area the works are situated.</li> <li>Article 17 requires the undertaker to obtain the consent of the traffic authority in relation to a number of specified traffic regulation matters.</li> <li>Article 20 sets out the circumstances in which the undertaker may require the approval of a highway authority or street authority for the carrying out of surveys or investigations on their land,</li> <li>Article 31 of the dDCO stipulates that in the case of land used temporarily during construction, the undertaker must restore the land to the reasonable satisfaction of the owner of the land.</li> <li>Article 35 of the dDCO makes provisions relating to apparatus in stopped up streets.</li> <li>Article 47 makes provision for arbitration in the event of any differences on any relevant matter.</li> <li>The Requirements in Schedule 2 require Highways England to obtain approvals on a range of matters at the detailed design stage. SCC is named as a consultee for Requirements for those matters which are directly related to its functions.</li> <li>Schedule 9 (Part 4, paragraph 9) requires the undertaker to obtain approval for any works to specified key watercourses.</li> </ul> <p>This approach is consistent with other made DCOs for motorway or trunk road schemes, with the most recent examples being the A19 Testo's and the M20 junction 10A schemes. Highways England is in discussions with SCC regarding the terms of a side agreement, including arrangements for SCC's involvement in detailed design and technical matters not addressed by the above dDCO articles and matters relating to SCC's assets or land. Progress on these discussions will be addressed in a statement of common ground (SoCG) with SCC which will be submitted to the examining authority at Deadline 3.</p>
REP1-020-3	<p>Para 1.3: SCC seeks provision within the wording of the DCO for the payment of costs incurred by SCC in approving any relevant design details.</p>	<p>The dDCO [APP-018] contains some provisions requiring the undertaker to make financial payments to SCC in certain circumstances:</p> <ul style="list-style-type: none"> <li>Article 10 (sub-paragraphs (4) and (5)) confirms that certain specified provisions of the New Roads and Street Works Act 1991 will apply and thus the undertaker will be liable for the payment of inspection fees to SCC.</li> <li>Schedule 9, Part 4, paragraph 34 provides for the undertaker to meet costs that SCC may reasonably incur in approving and examining any plans or works in relation to works to key watercourses.</li> </ul> <p>Highways England is also in discussions with SCC with a view to entering into a legally binding agreement on a range of matters, including in relation to the payment of costs incurred by SCC in approving other relevant design details as they relate to aspects relevant to SCC's statutory functions. An update on progress made in these discussions will be provided in a SoCG with SCC to be submitted during the Examination.</p> <p>See also Highways England's response to RR04-7 below.</p>

Reference	Written Representation Issue	Highways England response
REP1-020-4	Para 2.6.1: SCC considers that the design of any structures (loading and dimensions) which are to be adopted by SCC must be agreed first with SCC	See response to REP1-020-2 above.
REP1-020-5	Paras 2.6.1, 2.6.4, 2.6.5 and 5.1.1.6: SCC considers that the technical and detailed design of proposed structures and works (both permanent and temporary) supporting any SCC highway, including rights of way must be agreed with SCC.	See response to REP1-020-02 above.
REP1-020-6	Paras 2.8.2 and 3.1.1: SCC asks that provision is made within the DCO or in a separate agreement for protective provisions for the benefit of SCC as local highway authority to cover impacts on the local road network (LRN). Such provisions to include: commuted sums, asset handover, funding a dedicated post to act on SCC's behalf, inspection and testing of materials and works, implementation of road safety audit recommendations, making good defects to the LRN and indemnities for SCC against any liabilities due to the carrying out of the works. SCC also seeks confirmation on the timing for the payment of any commuted sums.	<p>Highways England is in discussions with SCC with a view to entering into a legally binding agreement on a range of matters, to include asset handover arrangements, the inspection of the works and making good defects etc. Progress on these discussions will be reported in a SoCG with SCC to be submitted during the examination process. However, Highways England does not consider it appropriate to include protective provisions for the benefit of local highway authorities because other statutory provisions exist for authorities to recover their expenses for repairing damage. Nor does Highways England consider it appropriate for the DCO to make provision for the payment of commuted maintenance sums for local highway works because other central Government funding mechanisms are available for this purpose.</p> <p>See also Highways England's response to REP1-020-60 below, addressing SCC's point regarding commuted sums.</p> <p>SCC commented in REP1-020 (paragraphs 1.6(4) and 5.1.4.1) that it was disappointed to learn at the issue specific hearing on the DCO held on 12 November 2019 that Highways England does not intend to enter into any section 106 agreements with SCC. Highways England wishes to clarify that it does intend to enter into agreements with SCC on a range of matters, to include asset handover arrangements, the inspection of the works and making good defects etc, however these need not be made under section 106 of the Town and Country Planning Act 1990 specifically. As to entering into a section 106 agreement for the provision of mitigation at Ripley, Highways England does not consider such mitigation to be justified for the reasons set out in REP1-020-9 and REP1-020-11 below. Nor does Highways England consider it appropriate for the DCO to include protective provisions for the benefit of SCC as a local highway authority for the reasons set out above.</p> <p>SCC has also referred to the A303 Sparkford to Ilchester DCO (see REP1-019 and REP1-020) as containing protective provisions for the benefit of the local highway authority (in that case Somerset County Council). Highways England has been in dialogue with SCC to explain that the approach for that Scheme was an exception to the usual approach for Highways England schemes and that SCC's points raised can be more appropriately addressed in a separate bespoke side agreement.</p>
REP1-020-7	Paras 5.1.3.1, 5.1.3.2, 5.1.3.3 and 5.1.3.4: SCC requests that Highways England enters in to a Planning Performance Agreement to reimburse SCC for its costs in providing technical input on the scheme development. SCC expresses disappointment that Highways England has declined to agree to reimburse costs for certain activities, despite previously having provided SCC with a draft PPA document.	As noted above, discussions are progressing on the possibility of a side agreement encompassing a wide range of matters, relevant to Surrey County Council's role as regards the Scheme, the outcome of which will be reported in a SoCG with SCC to be submitted during the examination process.
REP1-020-8	<p><b>Arrangements for further community involvement in finalisation of scheme design</b></p> <p>Paras 1.6 (1) and 2.8.1: SCC is seeking clarification as to how the wider community will be engaged on the final scheme proposals, given that a number of changes have been made to the Scheme since the statutory consultation.</p>	<p>The DCO examination process will provide the wider community with the opportunity to present their views on the final Scheme, as the DCO application already describes all of the works for which consent is being sought. This includes any changes that have been made to the Scheme since the statutory consultation was carried out in 2018. Highways England has publicised the accepted application in the prescribed manner, to ensure that the wider community has been appropriately informed about their opportunity to make representations. Highways England has also announced its intention to bring forward a small number of non-material changes to the DCO application (AS-023). Highways England will carry out further consultations with affected or interested parties prior to submitting details of these changes later in the DCO examination process, as set out in the Applicant's letter regarding request for changes to the DCO [AS-031].</p> <p>Once the Order is granted, approval of specific design details will be a matter for the Secretary of State following consultation with the relevant requirement consultees. The discharging of requirements is not normally a matter which involves further engagement with the wider community, as once the Order is granted the DCO process operates to support the efficient delivery of Nationally Significant Infrastructure Projects. As a government company, Highways England is nevertheless committed to keeping its customers and stakeholders informed about its work and plans. Requirement 3(2)(e) of the dDCO [APP-018] requires Highways England to prepare, obtain approval and implement a community relations strategy in the context of the Outline Construction</p>

Reference	Written Representation Issue	Highways England response
		<p>Environmental Management Plan (OCEMP) [AS-016] to ensure that the wider community is kept informed during the construction of the Scheme.</p>
<p>REP1-020-9</p>	<p><b>Impact on local road network - Ripley</b></p> <p>Paras 1.6, 2.2.1, 2.2.2, 2.2.3, 2.3.2.1 and 2.3.2.2: SCC is very concerned about the negative impacts of increased traffic through Ripley, including the potential impact of some RHS Wisley Garden traffic rerouting through Ripley in the evening peak due to the Scheme closing the existing Wisley Lane junction. SCC also questions a number of the conclusions in the Transport Assessment Report (APP-136) as they relate to the Scheme's impacts on Ripley, including the predicted changes in flows on Newark Lane and Ripley High Street and the Scheme's effects on the operational performance of the Ripley High Street/Newark Lane/Rose Lane junction.</p>	<p>Highways England's traffic modelling and assessment (see the Transport Assessment Report [APP-136] and the Transport Assessment Supplementary Information Report which is being submitted by Highways England at Deadline 2 (Volume 9.16)) demonstrate that the local road network can accommodate forecast traffic flows in both the 2022 opening year and the 2037 design year without material deterioration in traffic congestion and delay.</p> <p>Table 4.1 of the Transport Assessment Supplementary Information Report (Volume 9.16) shows that the Scheme will not significantly increase traffic through Ripley. In 2022, the Scheme is predicted to increase overall daily traffic flows (AADT) by 5% compared with the do-minimum and for the 2037 design year assessment the Scheme is predicted to increase daily traffic flows (AADT) by 5.3% compared with the do-minimum. These increases are the equivalent of approximately 3-4 additional vehicles every minute (1 to 2 in each direction) during the busiest periods and are not sufficient to give rise to any significant adverse impacts.</p> <p>Analysis of impacts during the peak periods is provided in the Transport Assessment Report [APP-136] as amended by the Errata [AS-021]. Table 7.9 in the Transport Assessment Report presents the predicted changes in traffic flows at the B2215 Ripley High Street/Newark Lane/Rose Lane junction for the morning and evening peak periods. Tables 7-10 to 7-12 in the in the Transport Assessment Report present the results of the operational assessments and are supplemented by the detailed results set out in Appendix H.</p> <p>In the 2022 opening year assessment, it can be seen from Table 7-9 of the in the Transport Assessment Report (as amended) that the Scheme will increase the busier morning peak flows through the B2215 High Street/Newark Lane junction by just 1% overall. This is the equivalent of one additional vehicle every three minutes and will generally occur as a result of traffic reassigning to use the B2215 as a route to and from the improved A3. In the evening peak, the Scheme will increase flows through the junction by 7% overall, the equivalent of two additional vehicles per minute. The evening peak increase would occur predominantly on the B2215 High Street heading south, which is expected to arise in part on account of the rerouting of traffic resulting from the closure of the existing Wisley Lane junction.</p> <p>Overall, given the small predicted increases in flows for the 2022 opening year, the Scheme's effects on the operational performance of the local road network through Ripley will be limited. No significant increases in journey times or queuing are predicted (see Tables 7-10 and 7-11 of the Transport Assessment Report [APP-136]) and conditions will continue to be generally within the range of stable to free-flowing (evident from the Tables in Appendix H of the in the Transport Assessment Report). The only exception being at the existing Newark Lane 'pinch poin' where even without the Scheme the congestion which already occurs in the morning peak because of its limited exit capacity is expected to continue (see Table H-75). The Scheme will cause some deterioration in performance for traffic turning right into Newark Lane, due to slight increases in counter flows on the High Street northbound, but this is only anticipated to occur in the 7-8am morning peak and the level of service will nonetheless remain stable overall (see Table H-75).</p> <p>In the 2037 design year, the overall flows through the B2215 High Street/Newark Lane junction with the Scheme are predicted to decrease by 2% in the morning peak and increase by 2% in the evening peak. The increase in the evening peak will be the equivalent of one additional vehicle passing through the junction every 1.5 minutes. Some larger changes in certain directional flows are however predicted, especially in the morning peak, when flows on the High Street heading north are predicted to increase by 24% and flows on Rose Lane by 18%. The increase in northbound flows on Ripley High Street will be the equivalent of an extra 3.2 vehicles per minute and the increase on Rose Lane is numerically smaller and will be the equivalent of one extra vehicle every 2.5 minutes. These increases are likely to be due to more traffic reassigning to take these routes to access the A3 in the morning, possibly avoiding other congested routes elsewhere, assuming, as noted above, there are no north-facing slip roads at Burntcommon. However, these increases will be offset by larger reductions in flows heading south on the High Street, as the Scheme's improvements to the A3/Old Lane junction will make that a more attractive route for traffic heading south, especially from the former Wisley Airfield development, thereby avoiding Ripley. The reassignment of more traffic to Old Lane in the 2037 do-something case is also likely to offset any</p>



Reference	Written Representation Issue	Highways England response
		<p>increased use of Ripley High Street as a route for traffic affected by the closure of the existing Wisley Lane junction, which explains why the predicted do-something increases in the evening southbound flows along Ripley High Street are less in 2037 than those predicted for 2022. Further reductions in flows on Newark Lane are also predicted in both the morning and evening peaks, as exit capacity at the High Street junction is further constrained by the traffic flows on the High Street, causing Newark Lane traffic to reassign to other routes.</p> <p>Given the small change in overall traffic flows attributable to the Scheme in 2037, the difference in the operational performance of the network between the do-minimum and do-something scenarios will be limited. With the exception of the right turn in to Newark Lane in the morning peak and the right turn in to Rose Lane in the evening peak, the Scheme will not make the operational performance of the network any worse than the do-minimum situation predicted for 2037. Average journey times and delays will be generally comparable and although some increase in queue lengths is predicted in the evening peak as a result of the Scheme, the increase in average queue length is the equivalent of 2.4 extra vehicles. Only the right-turn into Newark Lane is likely to become unstable as a result of the Scheme. This will be due to increased northbound flows further limiting opportunities for traffic to turn right into Newark Lane, exacerbating the loss of performance already anticipated in the do-minimum situation. This is predicted to occur in the morning peak between 8 am and 9 am, and, as the traffic model does not make any allowance for the provision of north-facing slips at Burntcommon (see response to REP1-020-21 for further explanation), the impact may be overstated. Whilst the Scheme will, as noted, result in some loss of service during the evening peak at the right turn in to Rose Lane, the level of service overall at the junction will continue to be at a satisfactorily stable level and there will be minimal change overall compared with the do-minimum scenario.</p> <p>The predicted traffic flows and operational effects described above take full account of the likely rerouting of traffic on account of the Scheme closing the existing Wisley Lane junction. Highways England's assessment has taken a worst-case approach in this regard also. Paragraph 7.8.5 of the Transport Assessment Report [APP-136] explains that the assessment assumes that all of the Wisley Lane traffic travelling to and from the south would reroute through Ripley which accounts for approximately one third of all RHS Wisley Garden traffic (visitors, staff and deliveries combined). On an event day (which is likely to overstate the case compared with a typical day) this would add up to approximately 1,900 trips (two-way) through Ripley by 2037, allowing also for the very significant growth in visitor numbers being planned by RHS Wisley as part of their redevelopment proposals. Further analysis on this is presented in section 2.5 of the Transport Assessment Supplementary Information Report (Volume 9.16) referred to above.</p> <p>The peak time operational assessments presented in the Transport Assessment Report [APP-136] include an allowance for RHS Wisley Garden traffic rerouting through Ripley. However, in practice most RHS visitors will travel to and from the Gardens in the interpeak period, when roads are less busy. Changes in inter-peak flows are presented in Appendix C of Highways England's Traffic Forecasting Report [REP1-010].</p> <p>Further analysis presented in the Transport Assessment Supplementary Information Report (Volume 9.16) shows that for RHS Wisley Garden visitors and other traffic affected by the closure of the A3/Wisley Lane junction, the difference in journey times between routing through Ripley and following the signposted route via M25 junction 10 would be approximately one minute (see Table 2.9 of the Transport Assessment Supplementary Information Report). This indicates that with an effective signage strategy in place it is likely that some motorists will prefer to follow the signposted route, especially those less familiar with the local area, and that the assessment of the effects on Ripley can be regarded as a worst case in this regard, both for the peak and inter-peak periods.</p> <p>It is important to note that the predicted traffic flows through Ripley as reported in the Transport Assessment Report [APP-136] and in the Transport Assessment Supplementary Information Report (Volume 9.16) make no allowance for the provision of north-facing slips at Burntcommon, for the reasons set out in response to REP1-020-21 below. This means future changes in traffic flows may be overstated as they relate to Ripley. Policy A35 of the Guildford Local Plan identifies the requirement for the Burntcommon slips as mitigation for the impact of the former Wisley Airfield development on Ripley High Street. The Burntcommon slips would help alleviate pressure on Ripley from forecast traffic growth without the Scheme by offering a more direct route for traffic travelling to and from the A3 from the Send and Clandon directions. This means that any increases in general</p>

Reference	Written Representation Issue	Highways England response
		<p>background traffic flows through Ripley and reassignment of traffic accessing the A3 due to the Scheme are therefore likely to be overstated in the assessment results. Nevertheless, allowing for the consequential significant increases in background traffic growth in Ripley between 2022 and 2037, the modelling indicates that the network would generally perform within the stable range, with the principal exception being at Newark Lane, which is already a notable 'pinch-point' on the network at present and will continue to be in the future, with or without the Scheme. The increase in traffic through Ripley directly attributable to the Scheme itself is predicted to be insignificant overall and will have a minimal effect on the operation of the local road network when compared with the do-minimum situation.</p> <p>Reference should also be made to Highways England's responses to REP1-020-20 and REP1-020-21 below which address matters relating to the provision of south-facing slips at the Ockham Park junction and the provision of north-facing slips at the Burntcommon junction.</p> <p>Paragraph 2.2.1 of SCC's relevant representation highlights that SCC also has a number of concerns about some elements of the Transport Assessment Report and sets out its further concerns in paragraph 2.2.2. These are dealt with in turn below.</p> <ol style="list-style-type: none"> <li>1. <u>Modelling Assumptions and methodology</u>: Firstly, in relation to the modelling itself, Highways England has undertaken extensive engagement with SCC during the preliminary design stage of the project, including on the approach and methodology for carrying out the traffic modelling and in relation to the preparation of the traffic assessment report. A summary of this engagement will be provided in a statement of common ground with SCC to be submitted during the DCO examination. The Transport Assessment Report [APP-136] has been carried out in accordance with Planning Practice Guidance (PPG), 'Travel Plans, Transport Assessments and Statements' (Paragraph: 001 Reference ID: 42-001-20140306 to Paragraph: 015 Reference ID: 42-015-20140306 inclusive) published by Ministry of Housing, Communities &amp; Local Government in March 2014 and having regard to SCC's 'Transport Development Planning Good Practice Guide' published in 2017. Whilst SCC is concerned that the results presented in the Transport Assessment Report [APP-136] appear 'counter-intuitive' as they relate to some of the predicted effects on Ripley, the forecast changes in traffic flows are predicated on a complex series of inter-related assumptions in the model, including driver behaviour, background traffic growth and network capacity. Overall, as previously discussed with SCC, the strategic model assigns trips to the most beneficial route for drivers based on a combination of user costs, journey times and distances.</li> <li>2. <u>Newark Lane predicted traffic flows</u>: SCC questions why the Transport Assessment Report [APP-136] (Table 7.9) predicts a reduction in flows on Newark Lane at Ripley, if Newark Lane is to become a potential alternative route for traffic affected by the closure of Wisley Lane. As is the case now, the volume of traffic using Newark Lane during peak periods is limited by the 'pinch-point' at the Newark Lane/Ripley High Street junction. The traffic modelling for the Scheme shows that this situation will be further exacerbated once planned new developments add to do-minimum traffic flows along the High Street, further constraining exit capacity for Newark Lane. Therefore, without the Scheme, 2037 traffic flows on Newark Lane are predicted to decrease compared with the 2015 base conditions, as more traffic is expected to reroute to other alternative routes. With the Scheme in place, traffic flows on Newark Lane are predicted to decrease further. This is largely due to the Scheme further increasing opposing flows along Ripley High Street, constraining exit capacity for Newark Lane. This traffic will reassign to a variety of alternative routes which may include reassigning via M25 junction 11 or via the A245 Byfleet Road once the Scheme has improved journey times through M25 junction 10 and near Painshill.</li> <li>3. <u>SCC questions why trips currently using Newark Lane and Wisley Lane would re-route via M25 junction 11 or the A245 as stated in the Transport Assessment Report [APP-136]</u>. Traffic currently using Newark Lane is predicted to reroute to a variety of alternative routes as a result of the Scheme, depending on trip origins and destinations and which route is most beneficial in terms of journey times, distances and costs. Some of the trips on Newark Lane have origins and destinations in the Woking area and are predicted to reroute via the A245, through Byfleet to join or leave the A3 at Painshill. However, some trips are also likely to reroute via the A247 through Send. Some trips, again depending upon their origin</li> </ol>

Reference	Written Representation Issue	Highways England response
		<p>and destination, may also reroute via M25 junction 11, once the Scheme improves journey times through the M25/A3 Wisley interchange.</p> <ol style="list-style-type: none"> <li>4. <i>SCC questions why a reduction in the level of service is predicted for the right turn into Rose Lane in the do-something scenario (see Figure 7.6 of APP-136).</i> This is because the Scheme will remove the congestion on the A3 northbound that causes queuing back along the B2215 Portsmouth Road through Ripley and obstructs traffic from turning right into Rose Lane. With the Scheme, traffic turning right from Ripley High Street into Rose Lane will not be obstructed or delayed by queuing traffic and consequently the level of service will improve from Level F to Level A.</li> <li>5. <i>SCC questions why there is a reduction in flow on the southbound B2215 Ripley High Street approaching the Newark Lane junction between the 2037 do-minimum and 2037 do-something scenarios (see Table 7.9 of APP-136 as amended).</i> This is primarily because traffic generated by the former Wisley Airfield development and travelling south will reassign to access the A3 via Old Lane rather than travel through Ripley once the A3/Old Lane junction is improved. In the do-minimum scenario traffic from the Airfield development travelling to and from the south will route mostly via Ripley because this will be quicker than routing via the congested M25 junction 10. In the do-something scenario, all the former Wisley Airfield traffic bound for the south is likely to exit via Old Lane, as this would offer a quicker route than the Ripley alternative.</li> <li>6. <i>SCC questions why the results in the microsimulation modelling indicate journey time savings with the scheme in all time periods modelled (Table 7.11 of APP-136).</i> Table 7-11 of the Transport Assessment Report [APP-136] shows the predicted average journey time for trips through Ripley in the 2022 and 2037 Do Minimum and Do Something scenarios. It shows that predicted journey times are similar between the Do Minimum and Do Something scenarios (within 3 seconds), with the exception of the 2037 morning peak hour. The greater improvement in predicted journey times during the morning peak hour is due to Scheme reducing traffic congestion and delay at Painshill, junction 10 and on the A3 northbound carriageway, which in turn reduces traffic queues on the B2215 Portsmouth Road/Ripley High Street.</li> <li>7. <i>SCC questions why the level of service for the right turn from the B2215 High Street in to Rose Lane improves significantly between the do-minimum and do-something scenarios.</i> See point 4 above for answer.</li> <li>8. <i>SCC comments that the junction does not validate well within the modelling work for the DCO Scheme as set out in Tables C-8 and C-9 of the Transport Assessment Report [APP-136].</i> Highways England confirms that the modelling undertaken uses standards which are consistent with the Highways England South East Regional Traffic Model (SERTM) and Department for Transport's Transport Appraisal Guidance, (TAG Unit M3.1). Regarding the link movement validation: the measures refer to both the absolute and percentage flow difference and the GEH statistic (a formula used in traffic modelling to compare two sets of traffic volumes). In section 3.2.7 of Unit M3.1 it states: "The two measures are broadly consistent and link flows which meet either criterion should be regarded as satisfactory". For both the wider and local road network links, for all time periods, the validation meets these standards.</li> </ol>
REP1-020-10	<p><b>Closure of the Wisley Lane junction/retention of left turn out</b></p> <p>Paragraph:2.2.5: SCC considers that Highways England should have modelled retaining a left turn out of Wisley Lane on to the A3 as part of its traffic modelling and transport assessment of the Scheme.</p>	<p>Highways England acknowledges that SCC has no objection to the proposed closure of the A3/Wisley Lane junction. However, SCC questions why a left turn out of Wisley Lane has not been modelled either individually or in combination with the provision of slip-roads at Burntcommon and/or Ockham Park junctions.</p> <p>Highways England has not modelled any scenario retaining a left-turn out of Wisley Lane because it considers that such an arrangement cannot be safely accommodated. There is a compelling case in the public interest for closing the existing junction between the A3 and Wisley Lane on safety grounds, in accordance with the objectives of the National Policy Statement for National Networks. The operation of the junction already breaches current standards in the Design Manual for Roads and Bridges relating to separation, weaving and</p>

Reference	Written Representation Issue	Highways England response
		<p>merging distances and there is clear evidence that this junction is a significant contributory factor in this section of the A3 having a 49% higher collision rate than other dual carriageways of a similar type. Collision data for the 5-year period between 2013 and 2018 indicates that approximately 20 personal injury collisions have occurred in the vicinity of the junction, resulting in more than 30 casualties, one of which was serious.</p> <p>Retaining a left turn out of Wisley Lane would present an increased safety risk once the A3 is widened to four lanes, which would be in direct conflict with the objectives and requirements of the National Policy Statement for National Networks. It would result in greater conflict between traffic merging from Wisley Lane and traffic on the A3 northbound carriageway diverging to the two nearside northbound lanes in preparation for exit at M25 junction 10, including in preparation for using the free-flow left turn lane. Given that more than 25% of RHS Wisley Garden traffic is known to travel along the A3 north of M25 junction 10, this traffic would have to cross two lanes of A3 diverging traffic before being able to join the correct lane for northbound travel, which would be a particularly hazardous manoeuvre for visitors leaving the Gardens.</p> <p>Notwithstanding Highways England's fundamental concerns about conflict between merging and diverging traffic, it must also be recognised that there is still insufficient space available between Wisley Lane and M25 junction 10 to achieve an acceptable standard of merge lane for traffic exiting from Wisley Lane. The provision of a left turn would also result in the unnecessary loss of additional habitat from the Thames Basin Heaths Special Protection Area, which cannot be justified.</p> <p>Highways England is not aware of any other examples of such a side road junction being retained on a dual purpose four-lane trunk road and where there is a 2-lane drop within 1km of the next junction and considers it essential that the junction be closed on safety grounds. The Scheme makes provision for an alternative access road to be provided which will safely connect RHS Wisley Gardens and Wisley Lane directly with the Ockham Park junction.</p> <p>As noted in the response to REP1-020-9 above, Highways England recognises that the closure of this junction will change some journeys, particularly for traffic travelling to and from Wisley Lane from the south, including people visiting RHS Wisley Gardens. However, even assuming that all of that traffic would divert via Ripley and the A3 junction at Burntcommon, the effects on overall traffic flows through Ripley and the operation of the High Street/Newark Lane junction would still be limited. Daily traffic flows (AADT) through Ripley, including as a result of the Wisley Lane junction closure, are not predicted to increase by more than 5.5% in either 2022 or 2037. The majority of the additional Wisley Lane trips would occur in the inter-peak period when the roads will be quieter than during peak periods and will not affect the operational performance of the network through Ripley. Whilst the assessments have assumed that all of the affected traffic would route via Ripley, the Ripley route would be just one minute quicker than the signposted route via M25 junction 10, (based on interpeak times in 2022). With such a small difference in journey times it is unlikely that all visitors would take the route through Ripley in the way the effects of the Scheme have been modelled.</p>
REP1-020-11	<p><b>Mitigation for effects on Ripley</b></p> <p>Para 1.6 (point 1), 2.3.2.3 and 2.3.2.5: SCC is concerned that the Scheme makes no provision for mitigating its impacts on traffic flows through Ripley (including additional HGV traffic) and looks to Highways England to fund (through a S.106 agreement) a comprehensive package of mitigation measures, including speed reduction measures, carriageway resurfacing, B2215 High Street, Newark Lane, Rose Lane junction improvements, the provision of cycling facilities along the B2215, upgrading bus stops/shelters and other associated measures to help mitigate against severance caused by the additional generated by the Scheme.</p>	<p>Highways England considers that there is no requirement for the Scheme to provide the suggested mitigation measures at Ripley. The Scheme will not significantly increase overall traffic flows through Ripley and as a result the effects on the operational performance of the local road network on account of the Scheme will be limited.</p> <p>As explained in the Transport Assessment Supplementary Information Report submitted by Highways England at Deadline 2 (Volume 9.16), increases in average daily traffic flows (AADT) through Ripley directly attributable to the Scheme would be less than 5.5% overall in both the 2022 and 2037 do-something scenarios. During the busier morning peak periods the Transport Assessment Report [APP-136] assesses that the Scheme will not increase traffic volumes at the critical High Street/Newark Lane junction by more than 1% overall in both the opening and design year assessments. The Scheme's effects on the operational performance of the local road network through Ripley in the morning peak will as a consequence be limited in both 2022 and 2037. The principal exception being the Newark Lane turning movements which will continue to be constrained by limited exit capacity, as they are at present regardless of whether the Scheme is implemented or not. In the evening peak, the Scheme will increase flows through the High Street/Newark Lane junction by 7% in 2022, but numerically the increase in flows will be smaller than in the busier morning peak and conditions on the network</p>

Reference	Written Representation Issue	Highways England response
		<p>will remain stable or free-flowing. By 2037, the increase in flows through Ripley attributable to the Scheme will be proportionately less, adding 2% to flows overall with improvements to the Old Lane junction providing a more attractive alternative route for former Wisley Airfield traffic travelling to and from the south, thus reducing additional demand. Overall, the network performance will not be significantly affected as a result. This is confirmed in section 7-5 of the Transport Assessment Report [APP-136].</p> <p>The modelling reported in the Transport Assessment Report [APP-136] and further presented in the Transport Supplementary Information Report does however indicate that there will be very significant increases in traffic flows through Ripley whether the Scheme is built or not. Without allowing for the provision of the Burntcommon slips, it is predicted that daily traffic flows through Ripley by 2037 will increase by 66% compared with the 2015 base flow (see Table 4.1 in the Supplementary Information Report). Much of this increase would be attributable to general background traffic growth and to traffic likely to be generated by the development of sites allocated in the Guildford Local Plan, most notably the former Wisley Airfield site. The Scheme itself would add just 5% to daily traffic flows through Ripley. Should there be a need for mitigation at Ripley, which Highways England disputes, it is clearly evident that this need is primarily on account of general traffic growth and traffic generated by the development of the former Wisley Airfield site rather than due to Highways England's Scheme. Policy A35 of the recently adopted Guildford Local Plan identifies the mitigation for increased development related traffic flows through Ripley High Street as comprising the Burntcommon slips. SCC has subsequently confirmed in a meeting held on 11 December 2019 that it would not be requiring any further mitigation to accommodate the predicted increase in do-minimum traffic flows other than the Burntcommon slips.</p> <p>In terms of SCC's point about severance, Highways England does not consider that the Scheme will give rise to any significant severance effects. In line with the <i>Guidelines for the Environmental Assessment of Road Traffic</i>, published by Institute of Environmental Assessment in 1993, it is generally held that a significant severance effect would only arise if traffic flows were to increase by more than 30%. All of the predicted flow changes attributable to the Scheme (as shown in Table 7.9 of the Transport Assessment Report [APP-136]) would be well below this threshold. Whilst Table 7.9 does show that the northbound flow on Ripley High Street in the morning peak is predicted to increase by up to 24% by 2037, this increase would be offset by an almost commensurate reduction in traffic in the opposite direction, as more former Wisley Airfield development traffic accesses the A3 via Old Lane instead. Overall, traffic flows on Ripley High Street would therefore be similar in the with and without the Scheme scenarios and there would be no increased severance effect along the High Street.</p> <p>SCC's relevant representation at paragraph 2.3.2.5 (3) identifies a package of mitigation measures that it considers should be funded by the Scheme to address its severance effects. However, SCC does not provide any justification as to how these measures would address the effects of increased traffic flows, including in particular road resurfacing and the upgrading of bus shelters and bus information. None of these measures have been identified as necessary to mitigate the more significant increase in traffic flows through Ripley that is predicted to occur without the Scheme. Highways England considers that they are unreasonable and disproportionate as regards the limited effects of the Scheme.</p> <p>SCC's relevant representation (at paragraph 2.3.2.4) also suggests that the Scheme should provide mitigation for increasing heavy goods vehicle traffic through Ripley. However, the increase in HGV traffic through Ripley on account of the Scheme would be small, amounting to an additional 44 vehicles per day (approximately one additional HGV every ten minutes) in 2022 with a reduction in HGVs predicted by 2037.</p> <p>Furthermore, no significant environmental effects on account of the 5% increase in daily traffic flows attributable to the Scheme are predicted. No significant air quality or noise effects at Ripley have been identified in the Environmental Statement (See Environmental Statement Chapter 5: Air Quality [APP-050] and Environmental Statement Chapter 6: Noise and Vibration [APP-051]).</p> <p>To conclude, the modelling shows that there is the potential for significant increases in traffic flows through Ripley. However, these are mostly due to increases in background traffic growth and more particularly due to traffic likely to be generated by the development of sites allocated in the recently adopted Guildford Local Plan, including at the former Wisley Airfield site, rather than on account of the Scheme. As set out in the response to REP1-020-10 above, Highways England will continue to engage with SCC and Guildford Borough Council (the relevant local planning authority) to support their work in identifying solutions for alleviating the pressure on the</p>

Reference	Written Representation Issue	Highways England response
		<p>road network that is likely to be caused by these developments, including specifically the mitigation required for the former Wisley Airfield development site and further junction improvements on the A3. As already noted, the Guildford Local Plan identifies the Burntcommon slips as mitigation for the effects on Ripley High Street attributable to the former Wisley Airfield development. SCC does not consider there to be a requirement for any further mitigation at Ripley in the without Scheme scenario. As the Scheme would not significantly change traffic flows, give rise to significant effects on the operation of the network or result in significant adverse amenity impacts (noise and air quality) compared to the without Scheme situation, Highways England considers that there cannot be any reasonable justification to require further mitigation at Ripley on account of the Scheme and above that already identified in the Guildford Local Plan.</p>
<p>REP1-020-12</p>	<p><b>Impact on local road network – Old Lane</b></p> <p>Paras 2.2.4, 2.3.5.1 and 2.3.5.2: SCC is concerned about the projected increase in trips along Old Lane and seeks clarification on the rationale for this. SCC states that any increase in vehicular traffic south of the Wisley Airfield site should be avoided as SCC intends for this to become an important NMU route between the Airfield development and Effingham Junction station.</p>	<p>Section 8 and Table A-1 in the Transport Assessment Supplementary Information Report which is being submitted by Highways England at Deadline 2 (Volume 9.16) present detailed information and analysis of changes in traffic flows predicted at Old Lane (derived from the strategic model).</p> <p>With the Scheme, daily traffic flows on the section Old Lane between Ockham Lane and the A3 are predicted to increase by up to 13% in 2022. Numerically, the Scheme would add approximately 390 trips (two-way) per day, which is small (the equivalent of one additional vehicle travelling along Old Lane every two minutes) and would be easily accommodated without any impact on the operation of the local road network. This increase is likely to be attributable to some local traffic from nearby communities and from Effingham and Cobham using Old Lane to access the A3 instead of other routes, avoiding congestion at the A245/A307 junction in Cobham and on the A246.</p> <p>In 2037, the Scheme is predicted to increase daily traffic flows on the section of Old Lane between the A3 and Ockham Lane by 100%. This increase will be primarily due to the Scheme improving the A3/Old Lane junction and making Old Lane a more attractive route for traffic from the former Wisley Airfield development seeking to access the A3 southbound. The traffic modelling assumes that with the Scheme all of the former Wisley Airfield development traffic travelling towards Guildford will access the A3 via the improved Old Lane junction rather than via the Ockham Park junction/B2215 and Ripley, on the basis that Old Lane will offer a quicker route. The former Wisley Airfield development traffic is therefore predicted to account for approximately 50% of the predicted increases in traffic flows along this section of Old Lane in the 2037 do-something modelled scenario. The other half of the increase will be due to traffic rerouting in the local area in response to relative changes in journey times via competing routes brought about by the Scheme in combination with forecast traffic growth. Whilst this represents a large percentage increase in flow, the assessments show that the improved A3/Old Lane junction will provide sufficient capacity to accommodate the predicted traffic flows, including in the peak hours, without any loss of service or operational performance. The reassignment of traffic from the former Wisley Airfield development to Old Lane will also have the beneficial effect of reducing traffic flows through Ripley.</p> <p>Without the Scheme, traffic flows on this section of Old Lane are predicted to increase by up to 55% between 2022 and 2037.</p> <p>For the section of Old Lane between Ockham Lane and Effingham Junction, the Scheme is not expected to result in any significant change in traffic flows in 2022, however in 2037 the modelling predicts that traffic flows on this section of Old Lane would increase by approximately 30% with the Scheme, indicating the potential for greater reassignment of local traffic accessing the A3 once both the former Wisley Airfield development is built and the A3/Old Lane junction is improved as part of the Scheme. Most of this increase in traffic is likely to be attributable to local traffic reassigning to avoid congestion on the local road network, principally on the A246 and seeking to route via the A3 instead, joining at the improved A3/Old Lane junction. Indeed, as congestion on the A246 worsens there is likely to be an increase in traffic using this section of Old Lane regardless of whether the Scheme is built or not. As can be seen from Table A-1, do-minimum daily traffic flows on Old Lane will increase by 50% between 2022 and 2037 without the Scheme.</p> <p>SCC has expressed concern about traffic flows increasing on this section of Old Lane and has questioned why Highways England has not allowed for the closure of Old Lane in its traffic modelling work. SCC comments that closing Old Lane to southbound traffic to the south of the airfield development access would be the best way of mitigating impacts. However, given the limited change in traffic flows attributable to the Scheme in 2022,</p>

Reference	Written Representation Issue	Highways England response
		<p>Highways England considers that such a measure should be assessed and secured in connection with mitigation for the development of the former Wisley Airfield site. Policy A35 of the Guildford Local Plan requires the developers of the former Wisley Airfield site to create a safe off-site cycle route to Effingham Junction. SCC has explained that it envisages that this new cycle facility will need to be routed along Old Lane which would necessitate measures to reduce traffic flows. In Highways England's view, there is no justification for the Scheme to fund such measures given its minimal effect on traffic flows on this section of Old Lane in the opening year. Highways England is continuing to engage with SCC on this matter and intends to summarise progress made in a statement of common ground with SCC to be submitted at Deadline 3. See also Highways England's response to REP1-020-13 below.</p> <p>As noted above, without the Scheme do-minimum traffic flows on the section of Old Lane are predicted to increase by approximately 50% between 2022 and 2037. Numerically the predicted increases in flows, both in the do-minimum situations and in the 2037 do-something case are small. The increase in 2037 do-something flows shown in Table A-1 of the Transport Assessment Supplementary Information Report is the equivalent of an extra two cars per minute, when averaged over a 12 hour day and can be accommodated with minimal impact on the operation of the local road network.</p>
REP1-020-13	<p>Para 2.3.5.2: SCC comments that no allowance for the closure of Old Lane to southbound traffic (south of the Wisley airfield site) has been made in the traffic modelling for the Scheme. SCC consider this would be the best way to mitigate impacts on Old Lane.</p>	<p>Table 3.2 of the Transport Assessment Report [APP-136] sets out which changes to the highway network have been taken into account in the traffic modelling for the Scheme, in particular for the future years do-minimum cases. In line with standard practice, Highways England has taken into account those changes which have firm commitments as regards their implementation. Whilst Highways England understands that there were discussions about closing part of Old Lane in connection with the planning appeal for proposed development at the former Wisley Airfield site, this appeal was dismissed and there is no certainty that a similar provision will be made in any future planning application. Policy A35 of the recently adopted Guildford Local Plan specifies the mitigation measures that are considered necessary to facilitate development of the former Wisley Airfield site. There is no requirement in Policy A35 that any part of Old Lane must be closed and therefore in the light of this uncertainty, no allowance has been made in traffic modelling for the Scheme. Highways England considers that the closure of Old Lane is a matter that should be addressed through any subsequent planning application for the development of the former Wisley Airfield site, as this will be the primary source of projected traffic increases on Old Lane once the Scheme is implemented. Information on forecast traffic flows on Old Lane was provided in Highways England's Traffic Forecasting Report [REP1-010] and further analysis is provided in the Transport Assessment Supplementary Information Report (Volume 9.16) which is being submitted at Deadline 2.</p> <p>For the section of Old Lane to the east of the junction with Ockham Lane, the increase in traffic flows in the do-something scenario as noted in the response to REP1-020-12 above is likely to be attributable to traffic from the Effingham direction reassigning to access the A3 at the improved Old Lane junction and avoid congestion on the A246. Highways England and SCC are in discussions on this matter and the outcome of these discussions will be reported in a statement of common ground to be submitted to the examination at Deadline 3.</p>
REP1-020-14	<p>Paras 1.6, 2.2.4, 2.3.6.1 and 2.3.6.2: SCC is concerned about a projected increase in traffic on Ockham Lane and through Bridge End and Martyr's Green and seeks clarification on the rationale for this. SCC is concerned that the traffic modelling may not have made any allowance for a 'through vehicular link' to be provided as part of the development of the former Wisley Airfield site, which is a requirement of the adopted Guildford Local Plan as mitigation for Ockham Lane.</p>	<p>Section 8 and Table A-1 in the Transport Assessment Supplementary Information Report which is being submitted by Highways England at Deadline 2 present information and analysis of the predicted changes in traffic flows at Ockham Lane. The predicted traffic flows are derived from the strategic model which is primarily intended to model the effects on links carrying much higher flows.</p> <p>Without the Scheme, the AADT data indicates that traffic volumes on Ockham Lane east of Old Lane are likely to increase nearly six-fold in the period between 2022 and 2037. Although this is a high increase proportionately, numerically the total number of additional trips will not be significant (less than approximately 900 vehicles per day – the equivalent of one additional vehicle per minute averaged across the day). Most of the do-minimum increase is likely to be attributable to traffic associated with the former Wisley Airfield development. The predicted flows are likely to be overstated as Highways England has not modelled a 'through vehicular link' within the former Wisley Airfield development as part of its traffic forecasting for the Scheme, largely because of a lack of certainty on the intended design of such a route in the absence of a current planning application for the site.</p> <p>In 2022, with the Scheme, daily traffic flows on Ockham Lane east of Old Lane are predicted to increase by approximately 125%. Again, the actual number of additional trips is small, up to approximately 185 additional</p>

Reference	Written Representation Issue	Highways England response
		<p>trips per day. This is the equivalent of just one additional vehicle every three minutes averaged over a 12 hour day and can be accommodated without detriment to the operational performance of the local road network. This increase is likely to be attributable to traffic rerouting in the local area in response to relative changes in journey times via competing routes brought about by the Scheme in combination with forecast traffic growth.</p> <p>By 2037, traffic flows on Ockham Lane east of Old Lane are predicted to increase by approximately 80% with the Scheme. The actual number of additional trips is however small, up to approximately 795 additional trips per day, which equates to around 1 additional vehicle every minute during the peak periods. Again this is likely to be attributable to traffic rerouting in the local area in response to relative changes in journey times via competing routes brought about by the Scheme in combination with forecast traffic growth.</p>
RR004-15	<p><b>Impact on local road network - Painshill</b></p> <p>Para 2.3.8.1: SCC seeks clarification as to whether the transport assessment and Road Safety Audit have correctly assessed the proposed design for the A3 northbound off-slip at the Painshill junction, including the proposed tiger-tail arrangement and whether the design improves the do-minimum situation in terms of traffic flow and safety.</p>	<p>It is confirmed that the traffic modelling correctly reflects the proposed Scheme design for the A3 northbound off-slip at the Painshill junction (including the 'tiger-tail' arrangement) and as evidenced in Table 7.26 of the Transport Assessment Report [APP-136] the Scheme would deliver an improvement in the level of service at this off-slip.</p> <p>A Stage 1 Road Safety Assessment has been carried out at the preliminary design stage. No issues with the northbound A3 off-slip were identified. A copy of the Road Safety audit is provided in Appendix I of the Transport Assessment Report. As set out in Highways England's response to Examining Authority First Written Questions (ExAWQ1 1.1.27) as a matter of good practice, a further interim Stage 1 RSA is being undertaken to reflect the final Scheme design the subject of the DCO application. It is not anticipated that the findings of the study will be materially different. In any event a Stage 2 RSA will be carried out at the detailed design stage.</p>
REP1-020-16	<p><b>Impact on local road network - A245 Byfleet Road/Seven Hills Road junction</b></p> <p>Para 2.3.8.5: SCC supports the proposed changes to the operation of the A245/Seven Hills Road junction, prohibiting right turning and straight-on movements from Seven Hills Road (north). However, SCC consider that Old Byfleet Road should only be stopped up once the straight ahead and right turn movements have been banned. .</p>	<p>SCC's support for the proposed modifications to the A245 Byfleet Road/Seven Hills Road junction is acknowledged and welcomed. The design proposals for this junction have been specifically amended to incorporate the changes discussed with SCC during the targeted non-statutory consultations.</p> <p>Highways England understands that SCC considers the banning of right turn movements to be an integral part of the design solution for the A245 Byfleet Road and Seven Hills Road junction. The Scheme therefore makes specific provision for this as can be seen in Part 6 of Schedule 3 of the dDCO [APP-018]. Highways England will consult SCC on the detailed phasing of the works at this location as part of the detailed design process. However, given that provision is already made in the dDCO for restricting certain turning movements at the junction, Highways England considers that SCC's suggestion to limit the stopping up of Old Byfleet until the turning restrictions have been brought into effect would impose an unnecessary restriction on the delivery of the Scheme. As a live highway, the phasing of the works in this area will need very careful consideration, including the timing of opening the new means of access to Feltonfleet School, which in Highways England's view is a more critical phasing consideration.</p> <p>Highways England notes that SCC has further commented in REP1-020 (see paragraph 2.3.8.7 of REP1-020) that the banning of the right turn movement at the junction should be regarded as mitigation for the effects of the Scheme on the local road network. Highways England has no further comments to make beyond the response given above.</p>
REP1-020-17	<p>Para 2.3.8.5: SCC is seeking evidence/assurance that the single exit lane from Seven Hills Road (north) will operate efficiently.</p>	<p>The Scheme has been amended specifically to incorporate changes discussed with SCC during the targeted non-statutory consultation held in November 2018. SCC confirmed its support for the design of this junction when responding to the second targeted non-statutory consultation held in April 2019. Traffic modelling of the Seven Hills junction, with a single exit lane from Seven Hills Road, has demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay. Section 7.9 of the Transport Assessment Report [APP-136] shows that the Scheme will improve the performance of the junction.</p>
REP1-020-18	<p>Para 2.3.8.5: SCC seeks confirmation that there is sufficient space within the DCO boundary to enable the left-turn filter to Seven Hills Road South and associated works to divert access to Feltonfleet School to be carried out.</p>	<p>The DCO boundary includes all of the land that is required to construct, operate and maintain the Scheme. Whilst a limited amount of deviation can be allowed for in the Scheme to provide sufficient flexibility for developing detailed designs, any land to be subject to compulsory acquisition powers or temporary possession must be proportionate and no more than that which is reasonably required. Highways England is satisfied that the boundary allows sufficient space in which to carry out the junction improvement and other works in the vicinity of Feltonfleet School.</p>



Reference	Written Representation Issue	Highways England response
REP1-020-19	<p>Para 2.3.8.5: SCC seeks a number of modifications to the proposed design for the A245 Byfleet Road/Seven Hills Road junction, notably:</p> <ol style="list-style-type: none"> <li>1. To include an additional controlled crossing over the A245 Byfleet Road to the west of Seven Hills Road (to connect with a separate designated funds scheme proposal);</li> <li>2. To extend the proposed NMU route along the eastern side of Seven Hills Road (south) so that it joins with the NMU route proposed alongside the A245;</li> <li>3. To include capacity improvements for traffic turning left from the A245 Byfleet Road eastbound carriageway to Seven Hills Road (north);</li> <li>4. To include provision for the resurfacing of Seven Hills Road (south), as this will become a substitute access route for properties on the west side of the A3;</li> <li>5. To link the road traffic signals at the Painshill junction with the A245/Seven Hills Road junction, if feasible.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Scheme has been amended specifically to incorporate the changes discussed with SCC during Highways England's first targeted consultation carried out in 2018. The matter of incorporating an additional NMU crossing to the west of the junction was subsequently raised in SCC's response to Highways England's second targeted and non-statutory consultation on the Scheme carried out in 2019. Highways England acknowledges that SCC regard the lack of a crossing at this location is a current deficiency in the local highway network but considers that this is a matter for the local highway authority to address. Most of the forecast traffic growth along the A245 Byfleet Road will not be attributable to the Scheme, as can be seen from the forecast traffic flows presented in Appendix C of the Traffic Forecasting Report [REP1-010]. Moreover, a survey undertaken in May 2017 recorded only two pedestrians crossing the A245 Byfleet Road at the Seven Hills Road junction between 06:00 and 19:00, which indicates little usage/demand. On this basis, the case for extending the DCO boundary further west to include this additional crossing cannot be justified for the purposes of delivering the Scheme. Nonetheless, Highways England acknowledges SCC's concerns about the lack of crossing facilities on the A245 Byfleet Road and has supported SCC in seeking designated funds to secure this improvement, as well as a number of other local improvements in the wider area between Ockham and Painshill.</li> <li>2. In relation to SCC's request to extend the NMU route along the eastern side of Seven Hills Road (south) so that it joins with the proposed new non-segregated footway/cycle track (Work No. 44(c)), Highways England does not agree that this additional work would be necessary for the purposes of the Scheme. The particular section of Seven Hills Road south concerned is no more than 120m in length and given the low volumes of traffic anticipated to be using this route, should be adequate for meeting the needs of cyclists, without having to compulsorily acquire further land from third parties to facilitate construction of a new cycle track. There is an existing footway along the east side of Seven Hills Road (south) which will be retained</li> <li>3. As to SCC's suggestion to amend the Scheme to include additional capacity for traffic turning left from the A245 Byfleet Road to Seven Hills Road (north), Highways England does not consider that this additional measure is necessary. Traffic modelling of the Seven Hills junction has demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay. The Scheme makes provision for increased capacity at this junction by reducing the number of phases at signals which will improve the left-turn movement. Section 7.9 of the Transport Assessment Report [APP-136] shows that the performance of the junction improves with the Scheme compared to without the Scheme. On this basis, there is no requirement to further improve the capacity for traffic turning left from A245 Byfleet Road eastbound to Seven Hills Road (north).</li> <li>4. Highways England does not agree that there is a need to resurface that part of Seven Hills Road (south) between the A245 Byfleet Road and the entrance to the Hilton Hotel. This is because the surface of the existing carriageway is already suitable and further surfacing works would not be justified.</li> <li>5. Finally, Highways England has given consideration to the possibility of linking the signals at the Seven Hills Road junction with the A3 Painshill junction as suggested by SCC. However, Highways England concludes that there is unlikely to be any operational benefit from doing so. The two junctions are approximately 500 metres apart and TD50/04 of the DMRB indicates that where the stagger distance is greater than 250m, junctions should normally be considered as two separate independent signal controlled junctions. However, this is a matter that can be considered at the detailed design/implementation stage, as the DCO requires works to be undertaken to the reasonable satisfaction of SCC as street authority.</li> </ol>
REP1-020-20	<p><b>The provision of south-facing slip roads at Ockham Park junction</b></p> <p>Para 1.6 (point 1), 2.2.5 and 2.3.2.5: SCC requests details of Highways England's traffic modelling and other detailed technical feasibility evidence, which justifies the decision not to make provision for either one or both of the south-facing slips at Ockham Park junction within the Scheme. SCC requests that Highways England provides evidence to demonstrate whether the south-facing slips at Ockham would have a positive impact on the local road network, either individually or in combination, including in combination with retaining a left-turn out of Wisley Lane on to the A3 and the provision of north-facing slips at Burntcommon.</p>	<p>Highways England does not consider there to be any highway justification for providing south-facing slips at the Ockham Park junction, either individually or in combination with north facing slips at the Burntcommon junction or as part of the M25 junction 10/A3 Wisley interchange Scheme. The traffic modelling results presented in the Transport Assessment Report [APP-136] section 7.6 show that the Ockham Park junction will operate within capacity in the future, with the Scheme in place and taking into account any forecast traffic likely to be generated by development that is planned on the adjacent former Wisley Airfield site as well as other background traffic growth in the area more generally (see section 7.6 of the Transport Assessment Report [APP-136]). There is no planning policy requirement for south-facing slips to be provided to facilitate forecast or planned growth, including the development of the former Wisley Airfield site or other sites allocated in the Guildford Local Plan.</p>

Reference	Written Representation Issue	Highways England response
		<p>The modelling and assessments conclude that the Scheme would have a limited effect on the operational performance of the local road network through Ripley, and thus there is no justification to bring forward south-facing slips as mitigation for the Scheme's limited impact on Ripley (See response to REP1-020- 09 above).</p> <p>The signposted route via M25 junction 10 would add approximately 5.6 minutes to journeys for people travelling to Wisley Lane from the A3 Guildford direction and 1.6 minutes to their return journeys.</p> <p>There is also insufficient justification to provide the south-facing slips as mitigation for the additional journey times incurred by people travelling between the A3 from the south and Wisley Lane, including visitors to RHS Wisley Garden. The alternative route that would be signposted by the Scheme (via M25 junction 10) would add approximately 5.6 minutes to journeys for people travelling to Wisley Lane from the A3 direction and 1.6 minutes to their return journey. Should visitors choose to travel through Ripley northbound journeys would be 4.8 minutes longer than the without Scheme scenario and return journeys would be almost comparable with the without Scheme scenario (just 0.3 minutes longer). These increases are unlikely to be sufficient to deter people from making these trips.</p> <p>More significantly, the amount of traffic that is likely to be most affected by the closure of the A3/Wisley Lane junction and which would benefit from south-facing slips as a result of the Scheme would be relatively small. As set out in the Transport Assessment Supplementary Information Report (Volume 9.16), Table 4.1, it is estimated that approximately 1,900 vehicles (two way trips) would be affected in the 2037 design year, assuming that about one third of RHS Wisley Garden visitors continue to travel from the south and based on an event day volume of traffic and taking into account RHS Wisley's projected increase in visitor numbers. This amount of traffic is insufficient to justify the provision of south-facing slips as mitigation for the closure of the Wisley Lane junction. Clearly any effect on Wisley Lane traffic should be balanced against the significant benefits that the Scheme would deliver in providing a safer alternative access and improved journey times for the majority of RHS Wisley visitors approaching Wisley Lane from the north and from the M25.</p> <p>It should also be recognised that there would be significant technical challenges that would need to be overcome to enable delivery of south-facing slips at Ockham. These include the potential need to widen the A3 south of Ockham, the feasibility of achieving a safe weaving/merging separation between the junction and Ripley services to the south and increased environmental impacts and flood risks. The provision of south-facing slips also has the potential to affect a wider area of the local road network, which would also need careful consideration.</p> <p>On 26 October 2017 a Ministerial Statement was made in the House of Commons to confirm that south-facing slips at Ockham would not be provided as part of the Scheme, reaffirming that the funding commitments in the Government's Road Investment Strategy only relate to improving the junction 10/A3 Wisley interchange and the Painshill junction. Given the absence of funding or any Government commitment to delivering the slips or any other evidence indicating that the slips should be provided to mitigate the effects of the Scheme, Highways England does not consider it necessary or appropriate for it to carry out the further modelling and testing requested by SCC. No allowance for the south-facing slips has therefore been made within the traffic modelling work as reported in the Transport Assessment Report [APP-136]. The traffic modelling results set out in the Transport Assessment Report provide sufficient evidence that south-facing slips are not required and the further modelling work that SCC requests is therefore unjustified.</p> <p>Whilst Highways England's position therefore remains that there is no case for providing south-facing slips at Ockham as part of the Scheme, the construction of the Scheme would not prevent the delivery of south-facing slips at Ockham Park junction at some point in the future, should they be justified in planning terms and should suitable funding be secured.</p>
REP1-020-21	<p><b>The provision of north-facing slip roads at the A3 Burntcommon Junction</b></p> <p>Paras 1.6 (1) , 2.2.5 and 2.3.2.5: SCC asks Highways England to confirm its in principle support for the provision of north-facing slip roads at the Burntcommon junction, as SCC consider these to be necessary to address</p>	<p>The provision of north-facing slip roads at the A3 Burntcommon is not required for the purposes of the Scheme nor as mitigation for any of its effects. As set out in the response to REP1-020-09 above, the Scheme would not give rise to significant effects at Ripley which would justify the need to incorporate these slips within the Scheme as mitigation. SCC makes reference to paragraph 6.2.3 of the Transport Assessment Report [APP-136] to support its view about north-facing slips being needed. However, that paragraph is referring to congestion caused by capacity constraints at the M25 junction 10/A3 Wisley interchange, which the Scheme has been</p>

Reference	Written Representation Issue	Highways England response
	current A3 congestion as well as for providing mitigation for the development of the former Wisley Airfield site which is allocated in the Guildford Borough Local Plan.	specifically designed to address. The realisation of the Scheme's benefits in this regard are not contingent upon any further intervention at Burntcommon.  Highways England notes that the recently adopted Guildford Local Plan requires the provision of north-facing slips at the A3 Burntcommon junction as mitigation for the development of the former Wisley Airfield site. This is clearly a matter to be addressed as part of the development planning process when a planning application for development of the former Wisley Airfield site is submitted. Nonetheless, Highways England does recognise the potential opportunity for the new slip roads to support local plan aspirations and to relieve pressure on local roads associated with traffic accessing the A3 at Guildford. Highways England is therefore continuing to engage in discussions with SCC and Guildford Borough Council on these matters and to encourage the relevant parties to progress their assessments so that the feasibility of the slip roads and mitigation for the former Wisley Airfield site can be appropriately demonstrated.
REP1-020-22	<b>Impacts on bridge over River Wey Navigation at Pyrford (B367 Newark Lane)</b>  Para 2.6.6: SCC is concerned about a possible increase in traffic using the bridge and the need for mitigation for any impacts on its fabric.	Traffic modelling has indicated that the Scheme will result in a negligible change (0.3%) in daily traffic flows at the River Wey Navigation Bridge at Pyrford (B367 Newark Lane) compared with the do-minimum scenario. On this basis, the Scheme is not anticipated to increase the risk of damage to the fabric of the bridge and consequently no mitigation is required. Further information on forecast traffic flows, including on the B367 Newark Lane, is provided in Highways England Traffic Forecasting Report [REP1-010].
REP1-020-23	<b>Elm Lane –design proposals</b>  Para 2.3.7.2: SCC asks that the proposed levels and gradients for Elm Lane and the Wisley Lane Diversion be designed so that they do not prejudice the ability to provide a connection between the two in the future as part of the Wisley Airfield development.	The Scheme provides for a new bridleway connection between the proposed Wisley Lane Diversion and Elm Lane (Work No.34), however Highways England does not consider it necessary to provide a link for traffic at this location in the way suggested by SCC. Although such a link would enable the residents of Elm Corner to access the A3 via the Ockham Park junction once the current unsafe junction between Elm Lane and the A3 is stopped-up, such an arrangement would also have the effect of creating an unsuitable through-route for traffic between the former Wisley Airfield development site and Old Lane to the north.  Elm Lane is a narrow highway, approximately 3 to 4.5 m wide. For most of its length it is classified as a byway open to all traffic. Passing through Ockham Common and an area designated for its ecological value and importance, it is primarily used as a means of access for a small number of residential properties situated on the Common and at Elm Corner. It would not be suitable for carrying any additional traffic beyond its current usage.  The need to tackle safety concerns at the A3/Elm Lane junction has not been disputed and feedback received during statutory and non-statutory pre-application consultations indicated a general preference by local residents for a substitute access route to be taken from Old Lane to the north and not via the airfield site as is being suggested by SCC. By routing Elm Corner's substitute access via Old Lane, the Scheme avoids the risk of creating a through route for airfield traffic. It also avoids the risk of severing this small rural community, an effect which might otherwise arise if the Scheme were to route just the southern portion of Elm Corner to the south via the SCC suggested link.
REP1-020-24	<b>Manor Pond Design Proposals</b>  Paras 2.5.3 and 2.5.5: SCC supports the provision of a new drainage pond at Manor Pond (Work No. 52(j)) but asks for details of screening and fencing.	The Scheme Layout Plans [APP-012], sheet 9, show that the pond will be enclosed by a highway boundary fence and screened with tree and shrub planting. Requirement 16 of Schedule 2 of the dDCO [APP-018] stipulates that any permanent and temporary fencing must be constructed and installed in accordance with the Highways England's <i>Manual of Contract Documents for Highway Works</i> .
REP1-020-25	<b>Variable Message Signs (VMS) on local road network</b> Paras 1.6 (point 1), 2.7.1, 2.7.2 and 2.7.3: SCC asks for the Scheme to fund the replacement of two existing VMS on the A245 approaching the Painshill junction and to provide additional new VMS signs on the LRN, including on the B22215 and the B2039 approaching the Ockham Park junction. SCC suggests that these new VMS signs should be installed in advance of works on the SRN.	Whilst the provision of signage on the local road network is principally a matter for SCC as local highway authority, Highways England has engaged in discussions with SCC to identify opportunities to support the Council in securing these improvements. The provision of replacement Variable Message Signs (VMS) at Painshill is now the subject of a separate designated funds application and with a view to it secured outside the scope of the DCO application.
REP1-020-26	<b>Loss of HGV Parking and consequential effects on local road network</b> Paras 1.6 (1), 2.4.1, 2.4.2 and 2.4.3: SCC is concerned about the loss of HGV parking laybys and considers that this issue has not been adequately addressed in the DCO. SCC considers that the bulk of existing demand is from drivers travelling along the M25 and asks that replacement facilities be provided or that Highways England demonstrates that the Scheme would not displace HGV trips on to local roads, particularly at Burpham.	As set out in Highways England's response to Examining Authority First Written Questions (ExAWQ1 1.13.23), the existing HGV layby is located on the junction 10 southbound slip road prior to the diverge to Old Lane. Highways England is improving M25 junction 10 by adding free flow left turn lanes and extending the diverge at the junction with Old Lane utilising the space currently taken by the HGV layby. Replacing the HGV layby at this location would be unsafe as there is insufficient room to locate a layby and also due to the volume of traffic merging at junction 10 and diverging at Old Lane.

Reference	Written Representation Issue	Highways England response
		<p>A replacement layby would require a minimum of 1,000m weaving length between the upstream junction merge and also 1,000m to the downstream junction diverge. Due to the proximity of junctions on the A3 it is not possible to provide a layby to a compliant design within the Scheme limits. Furthermore, adding laybys to the widened A3 would require acquisition and development of land within a SPA.</p> <p>Whilst the Scheme would result in the closure of one HGV layby and two all vehicles laybys between M25 junction 10 and the Ockham Park junction, there is adequate capacity elsewhere along the A3 to meet the needs of A3 HGV drivers who would be affected by the closures. There are a further five laybys on each of the A3 carriageways within a 15 minute drive time south of M25 junction 10 and when surveyed in July 2018 most of these were not fully utilised and could readily accommodate displaced HGV parking demand.</p> <p>The laybys that are to be closed are generally well used, which suggests that they may also be used as a convenient stopping off point for drivers making a short diversion from the M25. These drivers are unlikely to use the facilities further south on the A3, as the necessary diversion from the M25 will be less convenient. Instead these drivers are likely to seek out facilities elsewhere, such as at Cobham Services. Even if some M25 HGVs did continue further south to use alternative layby facilities along the A3, it is unlikely that it would give rise to material adverse effects on the local road network or on the amenity of nearby properties. It is the case that the HGVs would need to use some short sections of local roads to return to the M25, given the configuration of the junctions on this section of the A3. However, the absolute numbers of vehicles involved would be relatively small in relation to general background traffic flows.</p>
REP1-020-27	<p><b>Impact on non-motorised users (NMUs) and related matters</b></p> <p>Para 2.5.5 : SCC asks whether the footpath proposed in the vicinity of Manor Pond would link in to the existing footpath in this area.</p>	<p>The Scheme provides for the replacement of the existing footway that runs alongside the A245 Byfleet Road eastbound carriageway between the junction with Seven Hills Road (north) and the bus stop serving eastbound services. This is shown on sheet 9 of the Scheme Layout Plans [APP-012] and is described in Schedule 1 of the dDCO [APP-018] as Work No. 47(e).</p>
REP1-020-28	<p>Para 3.1.5: SCC questions the justification for classifying the proposed NMU route along the Wisley Lane Diversion as a separate bridleway. Instead SCC considers that this facility would form part of the overall highway.</p>	<p>The design has been developed to ensure that the bridleway/cycle track provision is separate from the Wisley Lane carriageway, so that users (including horse riders and family cyclists) do not have to mix with the traffic on this road, which will carry all the RHS Wisley Garden visitors and may, in the future, also carry traffic into a housing development on the airfield site. This design will maintain the continuity of the segregated NMU route along the A3 corridor from Painshill junction to Ockham Park junction. Confident road cyclists will still be able to use the road carriageway, if they wish.</p> <p>This approach also means that the bridleway will appear on maps as a key link in the public rights of way (PRoW) network, providing clarity for non-motorised users and ensuring that a suitable maintenance regime is provided for in the long term.</p>
REP1-020-29	<p>Para 3.1.6: SCC seeks assurances that the design for all NMU provision (including along the proposed Wisley Lane Diversion) is suitable, in terms of proposed surface treatment (sealed surface required for cyclists and unsealed surface for equestrians) and proposed widths.</p>	<p>All new NMU provision has been designed to meet the requirements of the intended users, in line with the standards set out in the Design Manual for Roads and Bridges (TA 90/05). Sealed surfaces will be provided on all proposed new lengths of footway, cycle track or shared footway/cycle tracks. Where new shared use routes are proposed, including those that are proposed to be classified as new bridleways, a 3m wide tarmac surface will be provided for pedestrians and cyclists and soft verges will be provided for use by horse-riders. Further information on proposed widths and surfaces of proposed new NMU routes is provided in Schedule 1 of the dDCO [APP-018] and on the cross-sections contained in Engineering Drawings and Sections [APP-014]. Schedule 3, Part 8 of the dDCO [APP-018] also makes provision for some existing permissive routes to be upgraded to public rights of way and for some existing public footpaths to be upgraded to public bridleways. In those instances, no works are proposed as the routes are already considered to be suitable for their intended purpose.</p>
REP1-020-30	<p>Paras 5.1.1.3 and 6.2: SCC considers that the NMU (comprising Work No. 35) should be routed as close to the A3 as possible to reduce enclaves of private land being left in the middle of what will become highway land.</p>	<p>Parts of the NMU route (Work No. 35, comprising a new bridleway) between Wisley Lane and Cockcrow bridge and between Cockcrow bridge and Sandpit Hill bridge are intentionally set back from the A3 because of the terrain or because they are designed to follow an existing track alignment and/or the alignment for the proposed gas main diversion. By utilising existing features and integrating the design with utility diversion requirements, it has been possible to reduce the extent of habitat loss from the Thames Basin Heaths Special Protection Area (SPA). Overall, the Scheme as designed would cause less additional habitat damage than if the NMU route was provided separately adjacent to the A3.</p> <p>The alignment of these sections of the NMU have been designed specifically so that the NMU route becomes an integral feature of the SCC common land/open space. The proposed Highways England highway boundary would be aligned along the A3 side of the NMU route, as shown on the Scheme Layout Plans [APP-012]. As a</p>

Reference	Written Representation Issue	Highways England response
		<p>result, there will not be any 'enclaves' of different land ownership in the way SCC is concerned about. A high quality route on the alignment proposed will help support nature conservation objectives for the SPA, by channelling users away from other more ecologically sensitive locations within the common land. It will also provide a more attractive environment for NMUs than that which would be possible by aligning it directly adjacent to the A3 carriageway as at present.</p> <p>Providing the NMU route close alongside the A3 carriageway would, in some locations, have required considerable increases in the height (and cost) of retaining walls and would have created a route dominated by concrete, traffic movement and noise, or one which had to run directly alongside noise barrier fencing, both of which would have been unattractive to users.</p> <p>There are 'islands' in the DCO boundary to reduce the extent of SPA land within the red line (and hence the impact on the SPA and extent of compensation land required). Temporary fencing (consented via a separate application under section 38 of the Commons Act 2006 where necessary) will be required to allow safe construction of the bridleway, but once this fencing has been removed, public access will be reinstated and will extend as far as the proposed A3 boundary.</p>
REP1-020-31	<p><b>Impact on public transport</b></p> <p>Para 3.2.1: SCC consider that any new bus shelter to be provided as part of the Scheme should be upgraded to include real time passenger information.</p>	<p>The Scheme makes provision to relocate affected bus stops and it is Highways England's intention to provide these to a comparable standard. There is no real-time information at the bus stops at present and these enhancements are not necessary for the purposes of the Scheme. Real-time bus information is now readily available via mobile apps and text messaging and provision can be made for a printed timetable to be displayed at the bus stop.</p>
REP1-020-32	<p>Para 3.2.1: SCC considers that changes to bus stop facilities near Wisley Lane and the proposed new turnaround facility at the entrance to RHS Wisley Garden should be referenced in the TA.</p>	<p>The effect on the two bus stops which are currently situated on either side of the A3 near Wisley Lane is addressed in section 5.5 of the Transport Assessment Report [APP-136]. These bus stops are served by the 715 bus route which runs between Guildford and Kingston. To ensure that the widened A3 meets appropriate design standards it will be necessary to close the two existing bus stops. As a consequence, the Scheme makes provision for a replacement bus stop to be provided at the entrance to RHS Wisley Gardens on Wisley Lane as mitigation.</p> <p>At present, the 715 service routes through Ripley and either joins or leaves the A3 at the Ockham Park junction depending upon the direction of travel. The new bus stop location will require the bus to divert off the A3 via the proposed Wisley Lane Diversion to either pick up or set down passengers and then return to the Ockham Park junction to continue its journey. Whilst this diversion will increase journey times for the bus service by approximately three minutes, it needs to be balanced against the benefits that the Scheme will deliver in terms of improved journey times along the A3 between Ockham and Painshill. The new bus stop location will also be more convenient and safer for people visiting RHS Wisley Gardens and may help attract new customers to the benefit of the bus operator as well as to the benefit the Royal Horticultural Society in encouraging sustainable travel modes for its growing number of visitors.</p>
REP1-020-33	<p>Para 3.2.1: SCC highlights that works to provide a bus turnaround facility at Wisley Lane will need to be timed to align with the operational requirements of RHS Wisley Gardens as well as bus operators. SCC suggest that bus operators may not support diverting their route as assumed in the DCO unless there was an incentive for them to do so. SCC suggest that Highways England make a payment of £30-£50K per annum for 2 years to address this issue.</p>	<p>Highways England has worked closely with SCC to discuss how the bus stop facilities that would be affected by the Scheme should best be accommodated within the design proposals. The Scheme makes provision to relocate the bus stops that are currently situated in the laybys on the A3 in the vicinity of Wisley Lane, to a position adjacent to the entrance to RHS Wisley Gardens. Highways England is not aware of any objection that this location would be unsuitable and nor has the need for financial incentives been raised to date.</p> <p>It is recognised that the revised bus stop location would increase journey times for operators by approximately three minutes, as buses would need to divert from the A3, however this would need to be balanced against the benefits that the Scheme would deliver to overall journey times on the A3 between Ockham and Painshill and improved safety. In addition, being conveniently sited for RHS Wisley Gardens, the proposed new bus stop location presents an opportunity for operators to work alongside RHS Wisley to attract new customers and improve fare revenue. As noted above, the new bus stop location may also help support the work of RHS Wisley in encouraging greater use of sustainable modes of travel for its growing number of visitors. In the longer term, once the former Wisley Airfield Site is developed, the potential for additional patronage will increase further.</p>

Reference	Written Representation Issue	Highways England response
		<p>SCC suggests that it would be helpful for Highways England to pay in the order of £30,000 - £50,000 per year for two years, however no justification has been provided to justify this figure or to demonstrate how it would mitigate for the Scheme's unavoidable effects.</p> <p>The detailed design of the bus stop facilities will be addressed once the DCO application has been determined. In accordance with Article 11 of the dDCO [APP-018] these works will need to be completed to the reasonable satisfaction of SCC as the relevant street authority. Highways England will also consult RHS Wisley in finalising these proposals. Highways England is willing to enter into discussions with both SCC and RHS Wisley to agree arrangements for this.</p> <p>Reference should also be made to the Transport Assessment Supplementary Information Report being submitted by Highways England at Deadline 2 (Volume 9.16). Section 5 of this report sets out further information about the impact of the Scheme on the No.715 bus service and confirms that the increase in journey times to access the re-sited bus stop at Wisley Lane will be more than off-set by the improvement in journey times at the M25 junction 10/A3 Wisley interchange that will be delivered by the Scheme.</p>
REP1-020-34	<p>Para 3.2.1: SCC considers that the Scheme should provide for the upgrading of bus stops at the Ockham Park junction, and suggests that the Scheme could make provision for a new pedestrian footway to connect with RHS Wisley Gardens if no agreement can be reached with bus operators about diverting services via RHS Wisley.</p>	<p>Highways England met with SCC on 27 June 2018 and again on 13 September 2018 to discuss possible solutions for dealing with the bus stops located on the A3 near Wisley Lane and which would be affected by the Scheme. As a result of those discussions, the DCO application makes provision for a new bus stop facility to be provided at the entrance to the RHS Wisley Gardens. In view of this, the provision of an additional footway between the bus stop at Ockham Park junction and RHS Wisley is not required. It would be less convenient for passengers than the arrangement proposed in the Scheme and would necessitate taking further land from RHS Wisley to facilitate its construction with unnecessary consequential impacts on the Gardens and mature vegetation. The Scheme makes provision for retaining a bus stop on the A3 southbound off-slip at Ockham Park junction, but it has been previously agreed with SCC that relocating the bus stop from the B2115 Portsmouth Road to the A3 northbound on-slip would be unsafe, due to the risk of conflict between bus movements and other accelerating traffic.</p>
REP1-020-35	<p>Para 3.2.1: SCC suggests that any shuttle bus arrangement to be provided during construction is operated from existing stops in Ripley village rather than from the existing stops at Ockham Park junction, as this would benefit more passengers.</p>	<p>Requirement 4 of Schedule 2 of the dDCO [APP-018] stipulates that no part of the authorised development may commence until a traffic management plan has been approved by the Secretary of State, following consultation with the relevant highway authority, i.e. SCC. In carrying out the works, HE will need to address the need for temporary bus stop facilities to maintain continuity of bus services. There are also commitments in the Register of Environmental Actions and Commitments (REAC) [APP-135] requiring the undertaker/principal contractor to agree measures with SCC regarding arrangements for maintaining bus services during the construction works.</p>
REP1-020-36	<p>Para 3.2.1: SCC is of the view that the siting for the replacement bus stop on the A3 southbound on-slip at Painshill is not the best location. SCC asks to see a copy of the Road Safety Audit for this arrangement and for Highways England to confirm what alternative solutions have been considered.</p>	<p>Highways England met with Surrey County Council on 27 June 2018 and 13 September 2018 to discuss possible solutions for accommodating the bus stop on the A3 southbound on-slip at Painshill within the revised Scheme design. SCC was invited to confirm whether it had any preferences on locations, but no better alternatives were identified. Highways England also confirms that no particular issues or concerns were identified in the Road Safety Audit for the Scheme, a copy of which is provided in Appendix I of the Transport Assessment Report [APP-136].</p>
REP1-020-37	<p><b>Road safety and other safety matters</b></p> <p>Paras 1.6, 2.3.3.2, 2.3.8.3, 3.1.3, 4.1.2.1, 4.1.2.2 and 4.1.2.3: SCC expresses concern that the Road Safety Audit undertaken for the Scheme may not cover every element of the design proposals and is not sufficiently detailed to demonstrate that the Scheme can be delivered safely. SCC is seeking reassurance on a number of design elements affecting its interests, including the safety of designs for the Ockham Park junction, the A245/Seven Hills Road junction, the A245 Byfleet Road/Painshill junction, the diversion and realignment of Wisley Lane, Old Lane, Elm Lane and any NMU routes that Highways England is looking to SCC to adopt/maintain in the future. SCC is concerned that the DCO boundary may have to change if further measures are deemed necessary in subsequent RSAs.</p>	<p>The <i>Design Manual for Roads and Bridges</i> (DMRB) requires road safety audits (RSAs) to be undertaken at various stages of a highway project, notably at the preliminary design and detailed design stages and then again upon completion and after opening of the works. A copy of the Stage 1 RSA for the preliminary design stage which was carried out in accordance with the DMRB methodology (<i>G119 – Road Safety Audit</i>, published in January 2019) is provided at Appendix I in the Transport Assessment Report [APP-136]. Only five potential issues were identified and addressed as a result of the Stage 1 audit and these are documented in the audit report. No further issues or concerns in relation to any of the matters queried by SCC were identified, using the checklist process set out in Appendix B of G119. As a matter of good practice, a further interim Stage 1 RSA is being undertaken to reflect the final Scheme design the subject of the DCO application. It is not anticipated that the findings of the study will be materially different.</p> <p>Whilst SCC considers that more detail should be provided in the RSA report, the content and level of detail are consistent with the guidance in the DMRB G119, which requires the RSA team to report only the specific issues or potential problems identified. The Stage 2 RSA, which will be carried out at the detailed design stage will be</p>

Reference	Written Representation Issue	Highways England response
		undertaken at a greater level of detail and Highways England will share the contents of that RSA with SCC at the appropriate time to provide the necessary assurances on the points raised.
REP1-020-38	Para 2.3.2.4: SCC questions whether Highways England has consulted the emergency services on its proposals for closing the existing Wisley Lane junction and considered the consequential implications for emergency service response times.	It is confirmed that the Surrey Fire and Rescue Service and the Office of the Police and Crime Commissioner for Surrey were consulted as part of Highways England's statutory pre-application consultation for the Scheme carried out in 2018. Whilst the diversion of Wisley Lane will increase journey times for affected traffic, principally for journeys to and from the Guildford direction (or further south along the A3), this needs to be balanced against the improved journey times along the A3 between Ockham and Painshill that would be delivered by the Scheme, benefitting response times across the area overall.
REP1-020-39	Para 2.3.4.1: SCC is concerned that speeds may be exceeded along the 30mph section of the Wisley Lane diversion/realignment and is seeking clarification as to what physical design measures are to be provided within the Scheme to help avoid excessive speeds or create an enforcement burden.	No concerns or issues on this point were identified in the Stage 1 Road Safety Audit for the Scheme, a copy of which is provided in Appendix I of the Transport Assessment Report [APP-136]. Highways England agreed the speed limits for the Wisley Lane diversion and Wisley Lane as it proceeds towards Wisley village with Surrey County Council. Accordingly, it is not Highways England's intention to take this matter further. Once the Wisley Lane diversion is open to traffic, it will be open to Surrey County Council to amend the speed limits as it sees fit.
REP1-020-40	Para 2.3.5.1: SCC is concerned about the safety implications of increased traffic using Old Lane.	<p>The existing junction at Old Lane and the A3 southbound on slip has been re-designed with improved merge and diverge provision and will facilitate safer movement through the junction. The junction between Old Lane and Elm Lane will also be improved as part of works to provide a substitute access route to Elm Corner. This will include improvements to sight lines, road markings and signage, which will help reduce the risk of collisions.</p> <p>There is the potential for the increase in traffic flow on Old Lane due to the Scheme to give rise to an increased risk of accidents. However, the increase in the actual number of additional vehicles is relatively modest (up to 66 vehicles/hour in 2022 and up to 575 vehicles/hour in 2037). This in combination with the fact that the section of Old Lane most affected by increased traffic volumes due to the Scheme, is subject to a 40mph speed limit, vehicles over 7.5t are prohibited (except for access), it has no private accesses, no frontage activity, no pedestrians and few side road junctions, which means that the increased risk of accidents due to the additional traffic is likely to be relatively limited.</p>
REP1-020-41	Para 2.3.8.4: SCC asks that Highways England continues to engage with Painshill Park and Elmbridge Borough Council to find a solution for emergency/service access to Painshill Park adjacent to the Gothic Tower.	<p>As set out in the response to REP1-020-38 above, the Surrey Fire and Rescue Service and the Office of the Police and Crime Commissioner for Surrey were consulted as part of Highways England's statutory pre-application consultation for the Scheme carried out in 2018. The Fire and Rescue Service was further consulted as part of Highways England subsequent targeted non-statutory consultations, including specifically on the matter of the emergency access to Painshill Park. Highways England has continued to engage with the Surrey Fire and Rescue Service to satisfy itself that every consideration has been given to finding a possible solution.</p> <p>In responding to Highways England's consultations, the Surrey Fire and Rescue Service has agreed that the existing access direct from the A3 presents a safety hazard and has raised no objection to its closure. It was satisfied that in cases of an emergency, access to the Gothic Tower could be gained through Painshill Park. Whilst the Fire and Rescue Service commented that this would be a longer route compared with direct access from the A3, it noted that the A3 access could not be used in any event for the deployment of aerial appliances for high level fire-fighting due to the topography around the Gothic Tower. In addition, the Fire and Rescue Service considers that the risk to life from fire is low because the Gothic Tower does not present a sleeping risk and is fitted with fire detection equipment. On this basis, the Fire and Rescue Service has confirmed that it considers that the route via the Park would be commensurate with the level of risk.</p> <p>Highways England's position on this matter therefore remains unchanged. It considers that it would be unsafe for the existing access to be retained. The provision of a substitute purpose-built access direct from the A3 for use in emergencies would conflict with relevant standards in the Design Manual for Roads and Bridges as regards the risk of conflict with weaving traffic and traffic diverging to the A3 southbound off-slip at M25 junction 10. Extending the new private access road which is proposed as part of the Scheme to serve New Farm, the Heyswood Camp Site and Court Close Farm would also offer little benefit. Response times using this route are unlikely to be any quicker than via the Park given that there will be at least two sets of security gates to be negotiated before reaching the Gothic Tower and high level appliances would still be unable to access the Gothic Tower from this direction in any event due to topographical conditions.</p>

Reference	Written Representation Issue	Highways England response
		<p>Whilst every effort has therefore been made to address the concerns of Painshill Park, Highways England concludes that it would not be appropriate for the Scheme to provide a replacement access direct from the A3, including for emergency purposes. It is acknowledged that this would have the effect of increasing response times associating with routing through the Park, however this should be balanced against the wider benefits of the Scheme in reducing congestion and journey times between Painshill and Ockham, which will facilitate improved emergency response times in most instances.</p>
REP1-020-42	<p>Para 2.5.5: SCC asks for a road safety audit to be provided in respect of the access to a new drainage pond (Manor Pond) to demonstrate how vehicles can safely access the pond from the A245. SCC also seek assurances about the safety and security of the pond, including whether gating would allow safe access, how the design will prevent fly-tipping and provide screening for habitats.</p>	<p>A detailed Road Safety Audit for the proposed drainage attenuation pond will be carried out at the detailed design stage in accordance with Highways England's project control framework process and the requirements of the <i>Design Manual for Roads and Bridges</i> (DMRB). Highways England will discuss possible solutions for a security gate during the detailed design stage and as noted above is currently in discussions with SCC on the terms of a separate agreement covering a range of matters including how SCC will be involved in such details. The Scheme Layout Plans [APP-012], sheet 9 indicate that areas of tree and shrub planting are proposed around the pond to integrate it with surrounding woodland and provide suitable screening for habitats. The detailed designs for this planting will need to be submitted for approval in accordance with Requirement 6, in Schedule 2 of the dDCO [APP-018].</p>
REP1-020-43	<p>Para 3.1.3: SCC requests that a road safety audit for the proposed NMU facilities at the Ockham Park junction be undertaken to ensure that the designs are safe and that there is sufficient width to accommodate the projected number of users.</p>	<p>A copy of the Stage 1 RSA for the preliminary design, which was carried out in accordance with the DMRB methodology (G119 – Road Safety Audit), is provided at Appendix I in the Transport Assessment Report [APP-136]. Only five potential issues were identified as a result of the Stage 1 audit and all have been addressed at the pre-application stage. No issues or concerns were identified in relation to the proposed NMU facilities at the Ockham Park junction. Highways England has commissioned an update of the Stage 1 RSA and the results of this will be shared with SCC during the course of the examination. NMU routes will be provided in accordance with relevant design standards. The main NMU route between Wisley Lane and Painshill (Seven Hills Road south) will include as a minimum a 3m surfaced route together with soft verges up to 3m wide, which far exceeds the current level of provision. See also the response to REP1-020-37 above.</p>
REP1-020-44	<p>Para 3.1.7: SCC questions whether a Vehicle Restraint System is needed between the A245 westbound carriageway and the proposed new retaining wall. SCC also suggests that a 1.4m parapet will be required if the NMU is to be aligned along the top of this new retaining wall.</p>	<p>It is confirmed that a vehicle restraint system will be installed at this location in accordance with DMRB standards and provision will also be made for a parapet along the top of the retaining wall in accordance with relevant height requirements.</p>
REP1-020-45	<p>Para 4.1.2.4: SCC asks whether consideration has been given to the provision of screening for headlights between the new service roads and the A3.</p>	<p>Anti-dazzle fencing will be provided between the A3 and the new service roads, as shown by a blue "ADF" line type on the Scheme Layout Plans (APP-012 and AS-004, sheets 6 and 7).</p>
REP1-020-46	<p><b>Speed limits and traffic regulation matters</b></p> <p>Paras 1.6, 2.3.7.1 and 4.1.1.1: SCC agrees with all of the speed limits proposed in the DCO except for the limit for Elm Lane. SCC consider that a 20mph limit would be more appropriate at Elm Lane than the 40 mph limit proposed in the draft DCO.</p>	<p>The speed limits specified in the dDCO [APP-018] reflect those that were agreed with SCC in February 2019. SCC subsequently suggested a different speed limit for Elm Lane shortly before the DCO application was submitted for examination leaving insufficient time for Highways England to consult affected local residents. Highways England has since confirmed in the Applicant's notification to make a request for changes to the DCO [AS-023] that it intends to apply for a non-material change to the DCO to make provision for a 20 mph speed limit on Elm Lane as requested by SCC. The intention is to apply for this change by the end of February 2020. Acceptance of this proposed change will be at the discretion of the examining authority and its inclusion within the DCO will also be subject to the outcome of further consultation. SCC responded in REP1-020 (paragraphs 1.6, 2.3.7.1 and 4.1.1.1) that it welcomes this proposed change.</p>
REP1-020-47	<p>Paras 4.1.1.2 and 4.1.3.1: SCC considers that Highways England should be responsible for delivering any traffic regulation order notices associated with the DCO in a holistic manner, including the publication of any statutory notices and the carrying out of any associated consultations.</p>	<p>The draft DCO contains all of the necessary powers and provisions to give effect to the speed limits and proposed signage and without the requirement for compliance with any further separate order making processes. Article 17 of the dDCO [APP-018] describes the procedure which will apply to traffic orders which may be made by highways England under the DCO, including any associated consultation requirements.</p> <p>Highways England will bear the cost of any signage associated with traffic regulation changes to the local road network, including changes to speed limits, and is willing to discuss with Surrey County Council the possibility of the Council taking on the responsibility of erecting or changing traffic signs at Highways England's expense.</p>
REP1-020-48	<p><b>Adoption and maintenance and Impact on SCC's financial position</b></p> <p>Paras 1.6 (2), 3.1.2 and 5.1.1.2: SCC does not wish to adopt the proposed NMU route (comprising work No. 35 and associated earthworks, fencing drainage etc), instead SCC considers that this should be maintained by Highways England as it is a replacement for the loss of the existing route alongside the A3 and because its need is also partly attributable to the Scheme prohibiting cycling on the A3.</p>	<p>Highways England and Surrey County Council do not currently agree that Work No. 35 should be maintained from completion by SCC as the local highway authority. Whilst SCC is correct to describe the work as a replacement for an existing facility, it should be recognised that the existing NMU route which runs alongside the edge of the A3 carriageway is limited in width and generally of poor quality. The Scheme makes provision for a much enhanced facility, which will not only improve the amenity for current users, but will also be of value to</p>



Reference	Written Representation Issue	Highways England response
		<p>horse riders as well as cyclists and pedestrians. The Scheme therefore directly supports SCC's objectives in its Rights of Way Improvement Plan to improve the quality of the rights of way network and to increase recreational enjoyment.</p> <p>Given the wider benefits of the proposal, Work No. 35 should be seen as an important addition to the public rights of way network rather than just as part of the strategic road network and should be classified accordingly. SCC has not objected to the route being classified as a bridleway and has indeed expressed a preference for such a classification over Highways England's previously suggested restricted byway classification for this route. As Highways England does not have a statutory duty to maintain public rights of way, the responsibility for maintaining the bridleway should rest with the relevant highway authority, namely SCC and should be funded through the usual Government channels. This is entirely consistent with the approach taken in other made DCO schemes, where new and improved public rights of way are delivered as part of strategic road network improvement schemes.</p>
REP1-020-49	Para 2.3.3.3: SCC considers that the proposed traffic signals at the Ockham Park junction should be owned, maintained and operated by Highways England and not SCC. SCC is seeking to agree a Collaborative Traffic Management (CTM) approach with Highways England.	The Ockham Park junction forms part of the local highway network and Highways England therefore considers that responsibility for the maintenance of the proposed new traffic signals should rest with SCC as local highway authority, in the same manner as the rest of the junction.
REP1-020-50	Paras 2.3.4.2 and 5.1.1.5: SCC states that it cannot agree to adopt the Wisley Lane diversion unless provision is made for a commuted sum to cover its maintenance costs. SCC also seeks clarification on future maintenance responsibilities for the section of the Wisley Lane diversion where it passes over Stratford Brook.	<p>The proposed Wisley Lane diversion is being provided within the Scheme as a substitute connection for part of the affected local road network. There is no disagreement with SCC that this route should be classified as a side road and accordingly its future maintenance should rest with SCC as the relevant local highway authority and be funded by Government through the usual channels. Highways England expects that this would apply to the full extent of the Wisley Lane diversion, including where it passes over Stratford Brook, but excluding responsibility for the structural, non-highway elements of the Wisley Lane overbridge, where it carries the road over the A3. This approach is consistent with other made DCOs for Highways England schemes.</p> <p>Article 12 of the dDCO submitted at Deadline 2 provides that any highway (other than a trunk road or special road) constructed under the Order is to be maintained by and at the expense of the local highway authority in which the highway lies, unless there is an agreement to the contrary. It is not a question of the local highway authority agreeing to accept this responsibility, the obligation is imposed by the Order. The dDCO has been amended for Deadline 2 to make this clear, but it was also the case under the dDCO as submitted with the Application. The approach is standard in DCOs and reflects the DCO model provisions.</p> <p>See also Highways England's response to REP1-020-60 below which addressed SCC's point on the question of commuted maintenance sums.</p>
REP1-020-51	Para 2.3.8.2: SCC considers that Highways England should maintain the proposed signalised pedestrian crossing on the A3 southbound on-slip at the Painshill junction. SCC wishes to agree a Collaborative Traffic Management approach with Highways England.	As Highways England is already responsible for the maintenance of the existing signals at the Painshill junction, it is also willing to maintain the proposed new crossing on the southbound-on slip. This can be confirmed in a separate legal agreement with SCC, which is currently being discussed. As this will be a toucan crossing that can be activated on demand by non-motorised users, opportunities to integrate it into the wider phasing of other signals will be limited. Nonetheless, Highways England welcomes SCC's suggestion about a collaborative approach to traffic management and will continue to engage further with SCC in this regard. Progress on these discussions will be set out in a statement of common ground with SCC to be submitted to the examination in accordance with the examining authority's Deadlines.
REP1-020-52	Para 2.5.3: SCC welcomes the provision of a new drainage pond at Manor Pond within the Scheme (Work No. 52(l)) but comments that it would only be prepared to adopt this feature subject to seeing detailed designs and agreement on a commuted maintenance sum.	<p>Article 12 of the dDCO [ ] submitted at Deadline 2 (Article 11 of the dDCO [APP-018]) stipulates that works must be completed to the reasonable satisfaction of the local highway authority which should provide SCC with reassurance on this point, as this will apply to highway drainage features as well as carriageway works. Highways England is currently engaging in discussions with SCC with a view to reaching agreement on a range of matters, which may include arrangements for involving SCC in the detailed design of certain elements of the Scheme which pertain to SCC's functions as local highway authority. The outcome of these discussions will be set out in a statement of common ground with SCC to be submitted during the examination, in accordance with the examining authority's Deadlines.</p> <p>See also the response to REP1-020-60 below as it relates to the matter of commuted maintenance sums.</p>

Reference	Written Representation Issue	Highways England response
REP1-020-53	Paras 2.6.1 and 5.1.1.4: SCC is not prepared to adopt any part of the structure comprising the Wisley Lane Overbridge (Work No. 33(d), including approach embankments, carriageway surfacing/pavement and vehicle restraint barriers as it considers that the entire structure should be maintained by Highways England.	The standard approach which applies across Highways England's network is that for side road bridges passing over a trunk road or special road, Highways England retains responsibility for the maintenance of the structure and that part of the associated approach embankment integral to its supporting abutments. The highway surface (being those elements above the waterproofing membrane and indicator layer) is then maintained by the relevant local highway authority. This is reflected in the drafting of article 12 in the dDCO submitted at Deadline 2 (Article 11 of the dDCO [APP-018]) which is consistent with other made DCOs for Highways England schemes. Highways England is not aware of any special circumstances which justify a departure from this widely accepted approach.
REP1-020-54	Paras 2.5.4, 2.6.1 and 5.1.1.6: SCC seeks confirmation that the Scheme makes suitable provision for maintenance access to proposed new structures and features, including hard standings for inspection/maintenance vehicles and that these should be agreed with SCC. Where access strips are needed, SCC prefers these to be included within the proposed highway and not over 3 <sup>rd</sup> party land.	As noted in the response to REP1-020-18 above, the DCO boundary includes all of the land that is required to construct, operate and maintain the Scheme. Highways England is satisfied that the boundary allows sufficient space to accommodate the necessary maintenance access requirements. Schedules 5 and 7 of the dDCO [APP-018] identify which rights in land would need to be compulsorily acquired from third parties to ensure the maintenance access requirements are secured for the Scheme. Access to works for which SCC will be responsible for in the future is generally accommodated within the proposed highway boundaries or can be accessed via SCC's own estate. In preparing its DCO application, Highways England has had full regard to the 'Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land'. In particular, no provision has been made to acquire title where the acquisition of rights would be sufficient for the purposes of re-entering land to carry out maintenance. For example, the dDCO provides for the acquisition of rights on Plot 9/13 (as shown on sheet 9 of the Land Plans (AS-002)) for the maintenance of a proposed carrier drain adjacent to the A245 but it is not considered necessary to include that plot within the highway boundary (as shown on sheet 9 of the Scheme Layout Plans (APP-012)). Other elements of the Scheme which are intended to be maintained by SCC in the future, such as Work No. 35, will be on land acquired by Highways England for the purpose of the Scheme. Arrangements regarding maintenance access rights over such land for SCC will be addressed in a separate agreement between Highways England and SCC.
REP1-020-55	Para 3.1.3: SCC agrees to adopt the proposed NMU link between the Wisley Lane Diversion and the B2215 Portsmouth Road, via Ockham Park junction, subject to agreement on a commuted sum.	SCC's agreement to the principle of adopting the proposed NMU link is acknowledged and welcomed. Article 11 of the dDCO [APP-018] provides that the NMU link will be the responsibility of SCC from its completion. See the response to REP1-020-60 below as regards the matter of commuted sums for maintenance.
REP1-020-56	Para 3.1.4: SCC seeks confirmation that Highways England has consulted with the M25 DBFO team responsible for managing the M25 to ensure that there is adequate funding for the future maintenance of any new or modified NMU overbridges.	Highways England confirms that the DBFO team has been consulted. However, the position as regards the maintenance of NMU overbridges is no different to that set out in the response to REP1-020-53 above. In accordance with article 11(3) of the dDCO [APP-018] Highways England expects to retain responsibility for maintaining the structural elements of any new or replacement bridges carrying NMU routes over the M25 and A3 and that SCC will only be responsible for the maintenance of the highway surfaces. This approach is consistent with that adopted across the wider network.
REP1-020-57	Para 7.7: SCC's agreement to maintain the proposed green bridge would be subject to the payment of an appropriate commuted sum having regard to the specific maintenance liabilities associated with the structure and its ecological elements.	<p>The Scheme makes provision (subject to securing the necessary designated funds) to replace the existing Cockcrow Overbridge with a 'green bridge' instead of a standard NMU/accommodation overbridge. Whilst the green bridge is not required as mitigation for the Scheme, the intention is that it will help address the severance of habitats caused by the existing A3 and on this basis Highways England confirms that it will accept responsibility for its future maintenance, as well as the structural elements of the bridge. The highway surface specifically will be subject to the same arrangements as any other highway overbridge as set out in article 11(3) of the dDCO [APP-018].</p> <p>See also Highways England's responses to REP1-020-53 and REP1-020-56 as regards maintenance responsibilities for overbridges and Highways England's response to REP1-020-67 as regards the points raised by SCC on the width of the green verge.</p> <p>Highways England notes that SCC has made further representations regarding the matter of maintenance of the green bridge (see paragraph 7.6 of SCC's Written Representation [REP1-020]). SCC reaffirms its view about the lack of clarity over the maintenance of this feature. Highways England hopes that this response now provides sufficient clarity and assurance for SCC to fully address their concerns.</p>
REP1-020-58	Paras 2.6.1, 3.1.1, 5.1.1.1 and 5.1.2.6: SCC asks for a full schedule/details of the specific items/features that SCC will be expected to adopt so that future maintenance responsibilities can be agreed, including surfacing, structures, drainage, earthworks, traffic signals, green infrastructure and NMU routes.	Article 11 of the dDCO [APP-018] sets out the position as regards new or altered highway works. It states that any street (other than a trunk road or special road) must be maintained by and at the expense of the local highway authority once the works are completed. This is taken to include side roads and public rights of way

Reference	Written Representation Issue	Highways England response
		<p>and associated drainage and earthworks, but as set out in article 11, it excludes bridge structures. This approach is consistent with other made DCOs. Highways England is engaging in discussions with SCC on these matters and has prepared a plan identifying the relevant features to share with SCC, which Highways England hopes will address this point and the same point reiterated by SCC in item 7 of SCC's Response to Rule 8 Letter [REP1-019].</p> <p>In the case of environmental mitigation and compensation works, Highways England is engaging in discussions with SCC on the arrangements for the long term management of these areas and the possibility of entering into a legally binding agreement for SCC to carry out the management on Highways England's behalf as part of SCC's wider management role for the Ockham and Wisley Commons. Progress on these discussions will be provided in a statement of common ground with SCC to be submitted during the examination. However, it is emphasised that the dDCO includes all of the necessary powers for Highways England to carry out and maintain, manage and monitor the environmental works and securing this mitigation is not contingent upon reaching agreement with SCC.</p>
REP1-020-59	Paragraph 5.1.1.6: SCC considers that any elements to be transferred to SCC need to be agreed in accordance with Article 11 of the DCO.	See response to REP1-020-02 above. Article 11 requires that the works must be completed to the reasonable satisfaction of the local highway authority. Highways England is engaging in further discussions with SCC about how SCC should be involved at the detailed design stage and the outcome of those discussions will be addressed in a statement of common ground with SCC, to be submitted during the examination.
REP1-020-60	Paras 1.6, 2.5.3, 2.6.1, 2.6.2, 3.1.1, 5.1.1.6, 5.1.2.1, 5.1.2.2, 5.1.2.3, 5.1.2.4, 5.1.2.5, 5.1.2.6 and 5.1.2.7, 7.4 and 10.4: SCC is seeking commuted sums to cover the costs of maintaining all infrastructure that would become its responsibility (including specific mitigation and enhancement proposals and to offset temporary effects on the local road network during construction), but to date no commitments/assurances on commuted sums have been made/given by Highways England. SCC is looking for this to be addressed either in the DCO or in a separate S106 agreement and points out that there is precedent for the payment of commuted sums between Surrey County Council and Highways England.	<p>Highways England is in discussion with SCC on terms for a separate legally binding agreement to address a number of issues raised in relation to works affecting the local road network and other SCC assets, including maintenance and the long-term management of environmental mitigation works. However, Highways England does not consider it appropriate for the DCO to make provision for the payment of commuted maintenance sums in respect of works affecting or to become part of the local highway network as maintenance of the local network is a duty which is funded through other central Government channels. Progress on the discussions as regards the side agreement with SCC will be reported in a SoCG with SCC to be submitted during the examination process.</p> <p>Highways England notes that SCC has made further representation on the need for a mechanism to provide for commuted sums (see item 7 of SCC's Response to Rule 8 Letter [REP1-019]).</p>
REP1-020-61	<p><b>Impact on Surrey County Council's land interests</b></p> <p>Paras 6.1 and 6.2: SCC requests that Highways England sets out its initial financial offer in respect of land acquisition and compensation for land that will be adversely impacted/blighted (including land sandwiched between the A3 and the proposed NMU route) and provides further information to SCC digitally so that SCC may identify the areas of land take and residual land.</p>	Highways England is continuing to engage with Surrey County Council in respect of land acquisition and compensation matters, with a view to reaching agreement on possible terms. The digital information requested in the relevant representation has been provided to SCC. A summary of progress made in these discussions, along with negotiations with other affected landowners and interests, will be provided during the examination in accordance with the examining authority's stipulated Deadlines.
REP1-020-62	Para 6.3: SCC requires Highways England to provide further funding to enable matters relating to the transfers of historic exchange land to be completed.	<p>Highways England has agreed to cover SCC's reasonable legal costs in this regard. This has been offered on the understanding that all relevant transfers and registrations will be completed without delay and in a timely manner to facilitate determination of the DCO application. An update on progress will be provided during the course of the examination.</p> <p>Highways England notes that SCC has commented further on this matter in their Written Representation [REP1-020] (see paragraphs 6.4 and 6.5), which confirm that Highways England has agreed to meet SCC's further reasonable external legal costs and that matters are now in hand. SCC confirms that it is in discussion with Highways England to see how the necessary work can be concluded within the examination timetable.</p>
REP1-020-63	<p><b>Impact on Landscape, Environment, Biodiversity and Archaeology</b></p> <p>Para 2.3.5.1: SCC is concerned about the environmental impact of increased traffic on Old Lane, including impacts on the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI), County registered toad crossings, noise and air quality and asks how impacts are to be mitigated. SCC makes specific reference to discussions on the need for toad tunnels and amphibian type fencing.</p>	<p>As explained in the response to REP1-020-12 above, the traffic modelling predicts that the Scheme will increase daily traffic flows on Old Lane by 12% in the 2022 opening year and by 100% in the 2037 design year. The most significant increase in 2037 will be largely due to the Scheme improving the Old Lane/A3 junction, making this route more attractive for former Wisley Airfield development traffic seeking access to the A3 southbound.</p> <p>The effects of the Scheme on the Ockham and Wisley Commons SSSI are set out in Environmental Statement Chapter 7: Biodiversity [APP-052], section 7.11, whilst effects on air quality and noise are addressed in Environmental Statement Chapter 5: Air Quality [APP-050] and Environmental Statement Chapter 6: Noise and Vibration [APP-051] respectively. Both the air quality and noise assessments reported in the ES take account of</p>

Reference	Written Representation Issue	Highways England response
		<p>increased traffic flows on the affected road network, including on Old Lane. In terms of air quality, the predicted increase in traffic flows are below the threshold for assessing air quality. In terms of noise, no significant noise effects are predicted at receptors along Old Lane as the forecast changes in traffic flows attributable to the Scheme, are too small to give rise to a discernible change in noise levels. Similarly, the predicted increases in traffic flows due to the Scheme will not give rise to any significant operational effects on the SSSI, as confirmed in Table 7.8 of Environmental Statement Chapter 7: Biodiversity [APP-052] (see page 134).</p> <p>Environmental Statement Chapter 7: Biodiversity [APP-052] also considers the impacts of the Scheme on Conservation Verges as identified in the Surrey Road Verge Habitat Action Plan. The citation for the Bolder Mere Conservation Verge, which includes Old Lane, notes that its biodiversity interest lies in its population of Common Toad (which it states is of county importance) and that it is a registered toad crossing. The environmental assessment concludes that there would be a neutral effect on the Conservation Verge as a result of the Scheme. It is however recognised that there is already a high mortality rate for toads at Old Lane and the predicted increases in traffic as a result of the Scheme are likely to exacerbate this situation further. Highways England therefore intends to bring forward mitigation proposals and to incorporate these measures within the Scheme by way of a non-material change to the DCO, which will be accompanied by an addendum to the environmental statement in this regard – see Applicant's notification to make a request for changes to the DCO [AS-023]. SCC has confirmed in REP1-020 (see paragraph 2.3.5.1) that it welcomes this proposed change, which would address SCC's comments made previously.</p>
REP1-020-64	<p>Paras 7.1, 7.2 and 7.3: SCC wishes to reserve its position regarding the SPA Management Plan, the Landscape and Ecology Management Plan and the Outline Construction Environmental Management Plan, as it regards these documents as 'living documents' and because discussions with Highways England are still continuing, including in relation to compensatory mitigation, exchange land, landscaping and SPA enhancement measures.</p>	<p>The package of environmental mitigation and compensation measures which is included in the Scheme has been developed in close consultation with a number of key stakeholders, including SCC. Highways England understands that SCC is supportive of the measures being proposed, including the location and extent of the various elements of SPA compensation and enhancement and the areas being proposed as replacement land. Highways England recognises that the detailed designs for these areas will need to be agreed in accordance with DCO Requirements and discussions are continuing with SCC as to their potential role in the longer term management and monitoring of the environmental features that are proposed on their estate. The Management Plans (see Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015], Environmental Statement Appendix 7.20 Landscape and ecology management and monitoring plan [APP-106] and 7.2 Outline Construction Environmental Management Plan [AS-016]) should not be regarded as draft or 'living documents' as they are submitted for approval as part of the DCO application. However, the level of detail they contain is inevitably commensurate with the preliminary design status of the Scheme at this point in time. There will be an opportunity to incorporate any further comments that SCC may wish to make in the final detailed plans which will need to be approved under the relevant DCO Requirements.</p> <p>Highways England will submit to the examination a Statement of Common Ground with Surrey County Council to confirm points of agreement on these management plans and to identify if there are any outstanding matters. See also response to REP1-020-66 which confirms Highways England's intention to enter in to a legally binding agreement in respect of the long term management of a number of environmental mitigation measures.</p>
REP1-020-65	<p>Para 7.3: SCC expresses concern about tree felling proposed within the SPA enhancement areas. SCC considers that these works could make the retained trees more susceptible to wind throw, increasing maintenance liabilities for SCC as well as impacting on air quality and noise and reducing landscape/visual screening.</p>	<p>The Habitats Regulations Assessment (HRA) for the Scheme [APP-039 to 044] determined that there would be a requirement for compensatory measures to be provided given that the potential for adverse effects on the integrity of the Thames Basin Heaths Special Protection Area as a result of the Scheme could not be definitively ruled out. The package of compensatory measures was developed in close consultation with Natural England, Forestry Commission, RSPB, Surrey County Council and Surrey Wildlife Trust. The suite of compensatory measures includes a number of enhancement measures within the SPA itself, including some selective tree thinning, mostly of Scots pine and birch to create a network of glades better suited to supporting the qualifying bird species.</p> <p>The potential for wind throw was raised as an issue by the Forestry Commission (in a meeting held on the 27 October 2017, as recorded in Annex B of the HRA [APP-041]). As a result, the Scheme has been designed to ensure that sufficient areas of woodland will be retained to reduce this risk. A belt of woodland between the edge of the A3 and the M25 and the proposed enhancement areas will be retained and other areas of land subject to temporary possession will be replanted with trees and shrubs upon completion of the works, to further increase visual screening and protection of the retained woodland from wind throw.</p>

Reference	Written Representation Issue	Highways England response
		<p>With regard to air quality, the HRA Stage 2 [APP-043] considers the potential for adverse effects on the integrity of a European site. Paragraphs 7.2.25-7.2.52 assess the potential for adverse effects resulting from nitrogen deposition during construction and operation. All increases in nitrogen deposition are below 1% of the critical range during construction, and during operation any increases greater than 1% of the critical range are confined to the retained woodland areas within 12m of the road edge and will have no adverse effect on the habitats utilised by the SPA qualifying species. Whilst the air quality assessment does not specifically take into account the presence or absence of trees in line with standard practice, the felling trees will not affect the conclusions on air quality reported in the HRA.</p> <p>With regard to noise, as described in 7.2.82-89 of the HRA Stage 2 [APP-043], the Scheme provides for new and replacement noise barriers along the A3 and the M25. The assessment in the HRA determined that the majority of the SPA will see changes (increases or decreases) of less than 3 dB as a result of the operation of the Scheme. Any increases of greater than 3 dB within the SPA will be extremely localised and confined to areas within the retained woodland habitat immediately adjacent to the A3 and M25, thus not affecting any heathland habitats (existing or proposed enhancement areas) where the qualifying SPA species occur. As with the air quality assessment, it is not normal practice to model the presence or absence of trees in noise assessments. Generally, trees only provide a degree of noise attenuation when in a dense thick forest and such attenuation is also subject to seasonal variation. It is unlikely that the SPA enhancement measures would give rise to a material change in the operational noise assessment results. The majority of the trees that would be felled are Scots Pine with limited vegetation coverage at traffic level.</p> <p>Environmental Statement Chapter 9: Landscape [APP-054] acknowledges the loss of trees and woodland as a result of the SPA enhancement measures. It is noted within the chapter that this will alter the character of the landscape returning its pre-existing heathland character before the introduction of 20<sup>th</sup> century plantations. The Scheme has been designed to retain substantial belts of trees along both the M25 and A3 in order to maintain the visual screening that exists at present. It was concluded that the loss of trees and woodland from the SPA enhancement areas, whilst altering the nature of views within the SPA would not lead to a significant increase in visual impact from road infrastructure and vehicles. This is because the majority of trees to be felled near the A3 would comprise Scots Pine, with limited vegetation cover at traffic level.</p>
REP1-020-66	<p>Para 7.4: SCC requests that Highways England enter into a written agreement to provide assurances that it will meet the cost of undertaking environmental mitigation works and future maintenance.</p>	<p>The dDCO [APP-018] contains all of the necessary powers for Highways England to carry out the Scheme's environmental works and to secure their longer term management. The environmental measures are clearly described in Schedule 1 of the dDCO and Schedules 5 and 6 of the dDCO identify all of the rights and powers in respect of the relevant land. The dDCO Requirements that are set out in Schedule 2 stipulate that the authorised development must be carried out, maintained, managed and monitored in accordance with approved plans, which make the delivery and funding of the environmental measures legally binding on Highways England, which should provide suitable assurance to SCC on this point.</p> <p>At present, all of the land in the vicinity of M25 junction 10 which is designated as forming part of the Thames Basin Heaths Special Protection Area, together with most of the common land and open space in this area, is owned by SCC and managed on SCC's behalf by Surrey Wildlife Trust for nature conservation and public recreation purposes. Highways England is currently engaging in discussions with SCC and the Surrey Wildlife Trust about whether they wish to play a role in the long-term management of the proposed environmental measures on Highways England's behalf. This would require the parties to enter into a legally binding agreement to provide the necessary assurances, including provisions for funding. Progress on these matters will be confirmed in a Statement of Common Ground between Highways England and Surrey County Council to be submitted to the examination at the appropriate time.</p>
REP1-020-67	<p>Paras 7.5, 7.6 and 7.7: SCC considers that a wider green verge on the replacement Cockcrow Overbridge would be more likely to support ecological functioning than that which is currently proposed in the DCO and that a wider verge would also provide more effective compensation for historic severance effects caused by the construction of the A3 and M25. SCC seeks clarification as to whether the green bridge is being promoted as essential mitigation for the Scheme or as an additional option. SCC also express concerns about potential implications for material from the green bridge being washed on to the A3 and any other additional maintenance liabilities associated with its management.</p>	<p>As set out in Highways England's response to REP1-020-57 above, the dDCO [APP-018] makes provision for a 10m wide green verge to be provided as part of the replacement for Cockcrow Overbridge. This feature has been incorporated within the Scheme to address the severance of habitats caused by the existing A3 and is not required as mitigation for the Scheme. . The inclusion of the 'green bridge' element is contingent upon securing the necessary designated funds.</p> <p>It is however acknowledged that both SCC and Surrey Wildlife Trust have expressed a preference for a wider verge than that which is currently provided for in the DCO. In response, Highways England has undertaken</p>

Reference	Written Representation Issue	Highways England response
		<p>further work and agrees that it would be technically feasible to provide a wider green bridge and that there is a reasonable prospect of designated funds being made available to facilitate this. As set out in Applicant's notification to make a request for changes to the DCO [AS-023], Highways England intends to bring forward proposals for a bridge incorporating a 25m wide green verge, again purely as a measure to address severance caused by the existing A3 and not due to the Scheme itself. The acceptance of such a change will be at the discretion of the examining authority and the proposal will continue to be subject securing designated funds, as the feature is not required as mitigation for the Scheme. Highways England notes that SCC has confirmed its support for this change, as they consider that a 25m wide verge would improve the ecological functioning of the bridge as a wildlife corridor (see paragraph 7.6 of SCC's Written Representation [REP1-020]).</p> <p>As to maintenance of the green verge, see Highways England's response to REP1-020-57 above, which confirms that Highways England will retain responsibility for the long-term maintenance of the verge. Highways England believes this clarification will address the points raised by SCC, including in paragraph 7.7 of SCC's Written Representation [REP1-020].</p> <p>The detailed design of the green bridge will include measures to prevent material being washed onto the A3 and these can be agreed as part of discharging Requirement 9 of Schedule 2 of the dDCO [APP-018]. Highways England believes that this will address the issues raised by SCC in RR-004 (paragraph 7.7) and paragraph 7.8 in SCC's Written Representation [REP1-020].</p>
REP1-020-68	Para 7.9: SCC comments that it has yet to see the results of a programme of archaeological investigations and wishes to reserve its position until such detail is provided.	<p>Measures for mitigating the impact of the Scheme on known archaeology are set out in section 11.9 of Environmental Statement Chapter 11: Cultural heritage [APP-056]. Further measures to be adopted during construction are set out in Appendix A of the Outline Construction Environmental Management Plan [AS-016], and in Table 1.2 of the Register of Environmental Actions and Commitments (REAC) [APP-135], page 27. Requirement 14 of the dDCO [APP-018] makes clear that no part of the authorised development is to commence until a written scheme for the investigation and mitigation of areas of archaeological interest has been approved, following consultation with the relevant planning authority and the County Archaeologist. It also requires the authorised development to be carried out in accordance with the approved written scheme. SCC has not raised any concerns about the archaeological mitigation approach proposed in the DCO application to date and Highways England is continuing to engage with SCC with a view to preparing a statement of common ground to submit during the course of the examination.</p> <p>In the event of any archaeological remains being revealed during construction or associated investigations that have not been identified in Environmental Statement Chapter 11: Cultural heritage [APP-056], Requirement 14 in Schedule 2 of the draft DCO requires the undertaker to determine appropriate mitigation in consultation with the County Archaeologist.</p>
REP1-020-69	<p><b>Impact on SCC as Lead Local Flood Authority: Protective Provisions and land drainage consents</b></p> <p>Paras 1.6 (1) and 8.1: SCC wishes to see certain protective provisions included in the DCO for the benefit of SCC as a Local Lead Flood Authority. SCC states that it has provided to Highways England details of the provisions that it wishes to see included.</p>	The dDCO [APP-018] includes provisions for the protection of SCC in respect of ordinary watercourses (see Part 4 of Schedule 9), which Highways England considers should provide adequate assurance to SCC and which are founded on the approach used in other highway DCO schemes. Highways England is continuing to engage with SCC on the detailed wording of these provisions. Progress on these matters will be set out in a Statement of Common Ground with SCC to be submitted during the examination and agreed by Highways England.
REP1-020-70	Para 2.5.1: SCC (as the consenting authority) would like to see/approve any enhancements proposed to ordinary watercourses.	The protective provisions in the dDCO [APP-018] provide for this. Paragraph 29 of Part 4 of Schedule 9 of the dDCO requires the undertaker to obtain the approval of SCC prior to undertaking any of the works to key watercourses as specified in paragraph 28 of the same schedule.
REP1-020-71	Paras 2.5.2 and 8.2 SCC asks for evidence confirming the Environment Agency's agreement that flood compensation has been adequately addressed, including mitigation for any current flooding of the road network in the vicinity of the Scheme and any increased run off caused by the Scheme. SCC is particularly concerned about locations where surface water flooding already occurs in times of intense rainfall. SCC asks that the Scheme provides mitigation to regulate run off from the A245 westbound carriageway, M25 junction 10 circulatory, between the A3 and the former Wisley Airfield and in the vicinity of the Ockham Park junction and Stratford Brook.	<p>Confirmation of the Environment Agency's agreement on these matters is set out in the Statement of Common Ground between Highways England and the Environment Agency submitted in support of the DCO application (Statement of Common Ground with Environment Agency [APP-139], page 27). Highways England is continuing to engage with the Environment Agency to address a number of outstanding flood risk matters raised in the Environment Agency's relevant representation. It is intended that an updated statement of common ground between Highways England and the Environment Agency will be provided during the DCO examination to confirm where further agreement has been reached.</p> <p>The existing surface water drainage system for the A3 and M25 is approximately 35-40 years old and does not comply fully with current design standards or the Environment Agency's requirements in terms of attenuation of flow rates into receiving waters. A new and/or upgraded surface collection system to address existing flooding</p>

Reference	Written Representation Issue	Highways England response
		<p>and to mitigate the increase in carriageway runoff rates is an important feature of the Scheme design. Surface water run-off from new and widened carriageways will be directed towards a series of new drains and ditches that will convey the flow to drainage balancing ponds or swales. In total, 14 new balancing ponds are proposed, including alongside the A245, in the vicinity of M25 junction 10 and adjacent to the A3 between M25 junction 10 and the Ockham Park junction – all locations highlighted to be of concern by SCC. The drainage design will ensure that for widened carriageways the peak run-off rates will not exceed current rates up to the 1 in 100 year return period and will not exceed greenfield runoff rates for new impermeable road sections.</p>
REP1-020-72	<p><b>Impact on Surrey County Council as Waste Authority</b></p> <p>Para 9.1: SCC questions the validity of some of the assumptions underpinning materials and waste assessments, including whether materials and waste will be distributed across the scheme construction period and whether the sourcing of materials is realistic. SCC wishes to ensure that the impact from increased demand for materials is not disproportionately concentrated on Surrey and suggests that the assessment should be informed by a Construction Plan containing phases.</p>	<p>The materials and waste assessments contained in Environmental Statement Chapter 12: Materials and waste [APP-057] are based on the best available data at the time of the assessment.</p> <p>Sensitivity analysis based on a reasonable 'worst-case' scenario of all construction, demolition and excavation waste arising from the Scheme in a single year shows that the impact would still be considered 'not significant'.</p> <p>Material consumption for the Scheme has been assessed against a regional or national baseline (dependant on available information) and it is expected materials will be sourced from both within Surrey and outside of Surrey, as required. The assessment confirmed that the impact on the materials baseline is 'not significant'.</p>
REP1-020-73	<p>Para 9.2: SCC questions the assumptions in the Environmental Statement about the capacity of composting facilities and facilities to deal with excavated hazardous waste.</p>	<p>The volume of material for composting has been estimated in Environmental Statement Chapter 12: Materials and waste [APP-057]. The estimate includes vegetation clearance and material associated with proposed enhancement works within the Thames Basin Heaths Special Protection Area (SPA). Further work is being undertaken to identify suitable composting facilities and their capacity to manage this material, where this information is publicly available. This will inform whether the SPA enhancement works may need to be phased or material stockpiled within the Scheme's boundary to enable recovery of the material. These matters will be addressed in detail as part of discharging Requirement 8 of Schedule 2 of the dDCO [APP-018].</p> <p>Based on the assessment, the impact on hazardous waste infrastructure within Surrey is expected to be negligible. The ground investigation, including preliminary waste classification for the Scheme is still ongoing and the results of this will enable a more detailed estimate of the type and quantity of any hazardous waste arisings from the Scheme to be made. Requirement 3 of the dDCO stipulates that no part of the authorised development is to commence until a Construction Environmental Management Plan (CEMP) has been approved by the Secretary of State in consultation with the relevant planning authority. The CEMP must include method statements and management plans for a number of aspects, including the management of materials and the management of site waste.</p> <p>Paragraph 9.2 of SCC's relevant representation indicates that it has a number of queries about the capacity assumptions used in the ES but does not elaborate further. Highways England is therefore engaging in discussions with SCC to understand its potential concerns further. If relevant, these matters can be included within the scope of a statement of common ground with SCC to be submitted during the course of the DCO examination.</p>
REP1-020-74	<p>Para 9.3: SCC comments that the implications for the January 2019 Draft Surrey Waste Local Plan should be assessed.</p>	<p>The draft Surrey Waste Local Plan (2017) is referenced in the assessment contained in Environmental Statement Chapter 12: Materials and waste [APP-057]. Highways England acknowledges that the Surrey Waste Local Plan – Part 1 Policies Submission Plan (2019) has since been published. This states that construction, demolition and excavation waste arising in Surrey during construction of the Scheme is 2,494,000 tonnes per year. The construction, demolition and excavation waste arising from the Scheme has been estimated at 28,100 tonnes per year. This represents 1% of the construction, demolition and excavation waste arising in Surrey.</p>
REP1-020-75	<p><b>Impacts during Construction</b></p> <p>Paras 10.1 and 10.2: SCC expresses concern about impacts on the local road network during construction and highlights the importance of effective traffic management. It suggests that protective provisions are needed to ensure that any resulting impacts on the local road network are addressed. SCC highlights that it has outstanding concerns regarding Highways England's draft Traffic Management Plan.</p>	<p>Highways England agrees that an effective traffic management plan will be essential. The dDCO [APP-018] has therefore been prepared to address this point specifically. In terms of the Scheme design, provision is made for the construction of temporary slip roads at M25 junction 10, to enable traffic flows to be maintained through the interchange during the works. This key feature of the proposals is explained in paragraphs 25.3.1 and 25.3.2 of the Introduction to the Application and Scheme Description [APP-002]. Paragraph 25.3.3 of APP-002 and paragraph 2.7.8 of Environmental Statement (Chapters 1-4) [APP-049] also explain that the traffic management</p>

Reference	Written Representation Issue	Highways England response
		<p>proposals will make provision for narrow running lanes on the A3 and M25 and reduced speed limits for safety reasons. With these measures in place, significant rerouting of traffic to the local road network is not anticipated.</p> <p>Requirement 4 of Schedule 2 has also been drafted to stipulate that no part of the authorised development comprising the alteration or improvement of the M25 or A3 is to commence until a traffic management plan for the relevant works is approved by the Secretary of State following consultation with the relevant planning authority and highway authority. This will provide a suitable mechanism for any outstanding SCC concerns on traffic management to be addressed.</p> <p>Construction traffic routes are shown on the Temporary Works Plans [APP-015]. This shows that construction traffic will mostly access the works via the strategic road network. Both the Register of Environmental Actions and Commitments (REAC) [APP-135], page 6, and the Outline Construction Environmental Management Plan (OCEMP) [AS-016], Table Appendix A.1, page 48, confirm that construction traffic will be routed to avoid residential areas as far as possible, to help reduce impacts on the local road network. Paragraph 7.11.15 of the Transport Assessment Report [APP-136] confirms that a Construction Workforce Travel Plan will also be prepared to help identify measures to reduce the impact of construction traffic on the local highway network.</p> <p>Highways England is submitting a Transport Assessment Supplementary Information Report to the examination at Deadline 2 (Volume 9.16). Section 9 of this report provides further analysis to confirm that the Scheme would not give rise to a significant displacement of traffic to the local road network during the construction phase of the Scheme.</p> <p>See also Highways England's response to REP1-020-7 in this table below.</p>
REP1-020-76	Para 10.3 SCC highlights that Wisley Lane must remain open during the works, as there is no suitable diversion route for affected traffic, given the weight limits that apply at Pyrford Lock.	As stated in paragraph 2.7.16 of the Environmental Statement (Chapters 1-4) [APP-049], Wisley Lane will be kept open at all times apart from overnight closures necessary to complete carriageway tie-in works. Whilst paragraph 2.7.16 goes on to state that the diversion would be via Pyrford Lock bridge, given the limited volume of traffic likely to be affected by overnight closures, it is assumed that this diversion could be accommodated whilst recognising that weight restrictions apply at the bridge. Requirement 4 of the dDCO [APP-018] stipulates that no part of the development comprising the alteration or improvement of the M25 or the A3 is to commence until the Secretary of State has approved a traffic management plan for the works. SCC is named as a Requirement consultee in this regard and will have the opportunity to help determine arrangements at the relevant time.
REP1-020-77	Para 10.4: SCC considers that it should be compensated financially for any damage or fatigue to the local road network caused by diverting traffic on to the local road network during construction	<p>As set out in paragraph 2.7.15 of the Environmental Statement (Chapters 1-4) [APP-049] closures of the A3 and M25 will be required periodically for operations such as bridge demolition or the installation of new structures such as bridge decks or gantries. These closures will be kept to a minimum and will take place overnight, or if unavoidable at weekends. Otherwise the works will be carried out whilst maintaining narrow running lanes on the M25 and A3 and temporary slip roads will be provided at M25 junction 10 to maintain traffic flows through the junction during the works. On this basis, the significant diversion of strategic traffic to the local road network and a consequential increased risk of damage to the local road network is not anticipated.</p> <p>Requirement 4 of the dDCO [APP-018] stipulates that no part of the authorised development comprising the alteration or improvement of the M25 or A3 may commence until a traffic management for the relevant part of the Scheme is approved by the Secretary of State following consultation with the relevant planning authority and highway authority. This will provide for SCC's involvement in determining traffic management arrangements.</p> <p>See also Highways England's response to REP1-020-75 above which refers to the further analysis contained in the Transport Assessment Supplementary Information Report which is being submitted by Highways England at Deadline 2 (Volume 9.16).</p>
REP1-020-78	Paras 10.5 and 10.6: SCC expresses concern about how the works will be carried out whilst maintaining safe access to Ockham and Wisley Commons for NMUs, including how works to replace PROW carrying bridges will be programmed and avoid the need for temporary closures of routes that would compromise accessibility.	During construction, most of the existing NMu routes across the A3 and M25 will be maintained in use, with some minor diversions. This is explained in Environmental Statement (Chapters 1-4) [APP-049], section 2.7. Temporary fencing may be necessary along some routes for safety reasons. Similarly, where areas of land are required temporarily for constructing the Scheme, they too will be fenced off from public access to maintain safety. Where such fencing crosses common land consent will be obtained under section 38 of the Commons Act 2006. The area of temporary possession for SPA enhancement works will not be fenced off from public



Reference	Written Representation Issue	Highways England response
		<p>access, as these works will be undertaken using short-term temporary closures of the relevant paths. Signage and staff will divert users around the working area, in a similar manner to the woodland management work that is carried out on the common.</p> <p>Where existing bridges are to be replaced (M25 Clearmount, A3 Wisley and A3 Cockcrow), the replacement structures will be built before the existing bridges are demolished. The replacement structures will be sited as close as possible to the existing bridges to avoid causing unnecessary or lengthy diversions. Paragraph 2.7.16 of Environmental Statement (Chapters 1-4) [APP-049] also states that the existing Wisley footbridge will be retained until the Wisley Lane diversion overbridge is completed and open for use. Temporary stair access to the Wisley Footbridge may be required during the works until the new Wisley Lane overbridge is completed and open for use.</p> <p>The existing crossings at Junction 10 will need to be closed during construction, as will the shared use footway/cycle path alongside the A3 carriageway. Diversions for A3 NMUs will be signposted along local roads and bridleways during this period.</p> <p>When complete, the Scheme will provide a new bridleway link along the A3 corridor with a surface also suitable for road cyclists, including new bridges over the M25 and A3, which will provide a more pleasant route than the current shared surface without any need to cross the A3 at traffic signals. There will also be new public rights of way defined to provide a better-connected network of bridleways between the bridges and across the common land and open space.</p>
REP1-020-79	Para 10.7: SCC considers it imperative that construction traffic is not routed through Ripley.	<p>As shown on the Temporary Works Plans [APP-015] access to the construction works will be obtained primarily from the strategic road network. Both the Register of Environmental Actions and Commitments (REAC) [APP-135], page 6, and the Outline Construction Environmental Management Plan (OCEMP) [AS-016], Table Appendix A.1, page 48, confirm that construction traffic will be routed to avoid residential areas as far as possible, to help reduce impacts on the local road network, which will include Ripley. Requirement 3 in Schedule 2 of the dDCO [APP-018] provide that a full construction environmental management plan must be approved by the Secretary of State before the development can be commenced, which will need to detail the commitments already set out in the OCEMP on construction traffic routes.</p> <p>Further Requirement 4 in Schedule 2 in the dDCO provides that no part of the authorised development comprising the alteration or improvement of the M25 or A3 is to commence until a traffic management plan has been approved by the Secretary of State. SCC is named as a consultee for the purposes of Requirement 4 and will therefore have the opportunity to contribute to the details of any measures in this respect. In addition, paragraph 7.11.15 of the Transport Assessment Report [APP-136] confirms that a Construction Workforce Travel Plan will be prepared, which will include measures to reduce the impact of construction traffic on the local highway network, which may include measures for signing or directing workforce traffic via the strategic road network as far as possible.</p>
REP1-020-80	Para 10.7: SCC questions the validity of assumptions in the Transport Assessment regarding the levels of traffic expected to access the proposed main compound from the A3 London direction, as they consider this will be the main source of the workforce and thus by implication the proportion of trips should be higher.	<p>Highways England's construction advisors prepared an estimate of construction traffic likely to be generated by the construction of the Scheme. This estimate included construction materials and equipment, as well as commuting by the construction workforce. The impact of the construction traffic, and the assumptions on which the assessment is based, are explained in section 7.11 of the Transport Assessment Report [APP-136]. Highways England considered it reasonable to assume that construction generated traffic would be equally split between the four directions available at junction 10 on the M25 and A3. On all approaches to M25 junction 10, it is estimated that construction traffic will make up less than 6% of mainline flows during the busiest peak, two-month, period of construction activity in 2022. It should be noted that construction traffic flows are likely to be significantly lower than this outside of the two-month peak period of construction activity.</p>
REP1-020-81	Para 10.7: SCC considers that the Transport Assessment has not fully assessed the likely impact on the local road network during construction of the Scheme and asks for this to be addressed. SCC also expresses concern that an increase of 6% of mainline flow on the A3 south of junction 10 could be severe. SCC suggests that Highways England should prepare a Communications Plan to ensure effective communication with the travelling public and a Mitigation Plan (to address HGV routing) and to protect communities affected by reassigning traffic.	<p>The Scheme has been designed to reduce impacts on the local road network as far as possible. A combination of temporary slip roads at M25 junction 10 and narrow running lanes on the mainline A3 and M25 will help ensure that traffic flows through the interchange will be maintained during the works. As a result of these measures, significant reassignment of strategic traffic to the local road network is not anticipated.</p>

Reference	Written Representation Issue	Highways England response
		<p>In addition, where road closures will be necessary for safety reasons, such as during the demolition of bridge structures or the placement of new structures over the A3 or M25, these closures will be kept to a minimum and will take place either overnight or if unavoidable at weekends. This will avoid the need for significant diversions of strategic traffic via the local road network.</p> <p>Construction traffic delivering materials to the work sites will be routed via the strategic road network for the most part and Highways England's undertaker will prepare a construction workforce travel plan to direct or sign workforce traffic appropriately. The traffic modelling for the Scheme, as reported in the Transport Assessment Report [APP-136], section 7.11, concludes that construction traffic will make up less than 6% of mainline flow at the busiest point in the construction programme and no severe impacts were identified. Further information on these points is provided within the following DCO application documents:</p> <ul style="list-style-type: none"> <li>• Introduction to the Application and Scheme Description [APP-002] – paragraphs 25.3.1 and 25.3.2 describe the proposals for temporary slip roads at M25 junction 10;</li> <li>• Environmental Statement (Chapters 1-4) [APP-049] paragraph 2.7.8 explains that the traffic management proposals will make provision for narrow running lanes on the A3 and M25 and reduced speed limits;</li> <li>• the Transport Assessment Report [APP-136] sets out the results of the construction impact assessment in section 7.11; and</li> <li>• the Temporary Works Plans [APP-015] show the proposed construction traffic routes.</li> </ul> <p>Reference should also be made to Requirement 3 of the dDCO [APP-018] which stipulates the development must not commence until a Construction Environmental Management Plan (CEMP) is approved by the Secretary of State. This will need to further detail the commitment made in the outline Construction Environmental Management Plan (OCEMP) [AS-016], Table Appendix A.1, that construction traffic will be routed to avoid residential areas as far as possible to reduce impacts on the local road network. This will help address SCC's point about the need for a mitigation plan for HGV routing. Requirement 3 also stipulates that a community relations strategy must be submitted to and approved by the Secretary of State before any part of the development may commence, which will address SCC's point about the need for an effective communications plan.</p> <p>See also Highways England's response to REP1-020-75 above which refers to further analysis on contraction phase impacts contained in the Transport Assessment Supplementary Information Report being submitted by Highways England at Deadline 2 (Volume 9.16).</p>
REP1-020-82	<p>Para 10.8: SCC questions whether the former San Domenico site can be safely accessed for use as a construction compound. SCC refers to a number of collisions at the entrance to the Starbucks Drive Thru and expresses concern about it becoming more hazardous.</p>	<p>Whilst the Temporary Works Plans [APP-015] indicate that access to the proposed compound on the former San Domenico site will be obtained directly from the A3, as explained in paragraph 2.7.11 of Environmental Statement (Chapters 1-4) [APP-049] this will be for a limited duration until the new substitute access route (comprising a 4.8m wide hard surfaced route as part of Work No. 35) is completed and available for use as a construction access. 50 mph speed limits and other traffic management measures, including the clear demarcation of a dedicated acceleration and deceleration space specifically for construction traffic will be implemented which will help ensure that the former San Domenico site can be safely accessed in the interim.</p> <p>The site is well located for serving the works to be carried out on the A3 to the north of M25 junction 10 and utilising its existing access point avoids the need to construct a wholly new access from the A3 and the consequential disruption that this would otherwise entail. Effectively this site will operate as a satellite construction compound and construction traffic movements will therefore be less than those associated with the main compound.</p>
REP1-020-83	<p>Para 10.9: SCC asks for a commitment that temporary construction compounds are fully restored to their pre-construction condition, recognising opportunities for landscape, habitats and biodiversity improvements.</p>	<p>The restoration of land used temporarily (including for construction compounds) is provided for under Requirement 17 at Schedule 2 of the draft DCO [APP-018]. Sub-paragraph (3) of Requirement 17 specifically requires the undertaker to demonstrate how opportunities to achieve biodiversity gains have been taken when developing suitable restoration schemes for the land used temporarily during construction. For this reason, no further additional commitments are considered necessary.</p>
<p><b>Additional points made by Surrey County Council in REP1-020 which are not addressed in any of the above</b></p>		

Reference	Written Representation Issue	Highways England response
REP1-020-84	Paragraph 2.2.1 as amended by REP1-020: SCC notes that Highways England has not shared with SCC the technical information provided to RHS Wisley and has yet to respond to questions raised in paragraph 2.2.1 of RR-004.	Highways England continues to engage with SCC on matters relating to the Scheme. A meeting was held on 11 December 2019 during which Highways England sought to address the detailed questions raised by SCC. Highways England is sharing the information requested by SCC. Please refer to letter dated 16 December 2019 from BDB Pitmans to Richard Max and Co regarding traffic modelling information. The letter contains two links from which all of the traffic modelling data provided to Richard Max and Co by Highways England can be accessed. Due to the amount of data involved, Highways England will provide it by way of a secure internet link to any party that makes a request.
REP1-020-84	Paragraph 2.3.8.6: SCC comments that it is not in a position to support Highways England's proposal to change the Scheme as regards the A245 Byfleet Road and requests copies of the latest drawings and Road Safety Audit for these proposals.	As set out in the Applicant's notification to make a request for changes to the DCO [AS-023], Highways England intends to make a formal request to the Examining Authority for a number of changes to be made to the DCO. The intention is to submit these changes at the beginning of February 2020. Prior to that Highways England intends to undertake further targeted consultations on these changes as set out in the Applicant's letter regarding request for changes to the DCO [AS-031] and will provide further information to SCC at this time. The design for the proposed change was discussed with SCC at a meeting held on 11 December 2019.
REP1-020-85	Paragraph 5.1.4.2: SCC requests that the DCO contains a provision similar to provision 13 of The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 (now revoked) for the street authority to be able to enter into agreements with the undertaker.	Highways England does not consider that there would be any need or benefit in including a provision based on article 13 of the now lapsed Model Provisions Order. This provision is in effect a permissive power which enables DCO promoters to enter into agreements with a street authority. However, as Highways England is a highway authority and enjoys various powers under Highways Act 1980, including in relation to agreements with other such authorities, it is not necessary to include this article in the dDCO [APP-018].  Highways England notes that SCC also made this point at item 7 in REP1-019.
REP1-020-86	Paragraphs 6.6 and 7.6: SCC expresses concern about the Scheme's effects on the car park at Old Lane/Ockham Bites Café, including the permanent loss of car parking capacity and effects on plans for expanding car parking provision in the future. SCC requests that the Scheme makes provision to reconfigure the car park to create replacement places to mitigate any effects on visitors to the common, revenue from parking charges and on the income for the Ockham Bites Café.	The Scheme will result in the permanent reduction of approximately 30% of the space available for car parking at the Ockham Bites Café/Ockham Common Car Park and an approximately 40% reduction in the total area available for parking during construction. Access to the car park will be maintained throughout. However, Highways England recognises that this will be disruptive to visitors and to the Ockham Bites Café and is in discussion with SCC as to whether the matter of mitigation can be addressed within the scope of a separate side agreement or whether it is more appropriate for this impact to be address as part of a compensation settlement which is the usual channel for such situations.  Highways England is not aware of any plans by SCC to extend car parking at this location but will continue to engage with SCC to understand how the Scheme is likely to affect this. The eastern car park is largely unaffected by the Scheme.  Highways England notes that there is a second car park for visitors to the common land which is located approximately 320 metres to the east. However, this car park lies wholly within the boundary of the Ockham and Wisley Commons Site of Special Scientific Interest (SSSI) and the Thames Basin Heaths Special Protection Area and may have limited potential for expansion. The Ockham Bites Car Park is however outside of the designated SSSI and, with some reconfiguration, there is the potential to make more effective use of the available space to offset for some of the loss of space due to the Scheme. Highways England will continue to engage with SCC on this matter and progress will be reported in a SoCG to be submitted at Deadline 3 of the examination.
REP1-020-87	Paragraph 6.7: SCC expresses concern about the physical and visual severance effects of the Scheme at the Ockham Bites Car Park and asks that Highways England reduces the height of the embankment or realigns it to the western side of the Café. SCC also asks that the Scheme makes provision for SCC maintenance vehicles to be able to cross the track and access both sides of the Common at this location.	The design of the replacement Cockcrow Overbridge must be suitable to accommodate vehicles used in connection with the management of the Ockham and Wisley Commons. Aligning the approach ramps to the western side of the café as suggested would not provide sufficient space to accommodate the necessary design radii for vehicles needing to cross on the bridge and would not therefore offer a feasible solution. Whilst the height of the replacement Cockcrow Bridge has been kept to the minimum possible for ensuring sufficient headroom on the A3, the approach ramps have to be designed to connect with the deck height in a manner which complies with relevant design standards on maximum gradients for NMUs.  The alignment proposed is considered appropriate and ties-in well with the existing division between the east and west car parks. At its commencement from Old Lane, the work will be at grade and maintenance vehicles will be able to access both sides of the car park. Whilst visitors wishing to walk towards Curries Clump will join the bridleway at the Old Lane end instead of directly adjacent to the Café as at present, consideration will be

Reference	Written Representation Issue	Highways England response
		<p>given at the detailed design stage for including steps within the embankment earthworks if SCC considers this would be helpful, to provide a more direct alternative route. The embankment would rise 8.6m at its maximum height, to height similar to Curries Clump. Whilst this will obstruct views in to the common from parts of the car park and café, it would have the benefit of screening the car park from the common.</p>
REP1-020-88	<p>Paragraph 6.8: SCC notes that Highways England's proposal to change the DCO to accommodate the diversion of a gas main (AS-023 change No. 5) will require additional land from SCC and has asked for further information about this proposal.</p>	<p>As set out in the Applicant's notification to make a request for changes to the DCO [AS-023], Highways England intends to make a formal request to the Examining Authority for a number of changes to be made to the DCO. The intention is to submit these changes at the beginning of February 2020. Prior to that Highways England intends to undertake further targeted consultations on these changes as set out in the Applicant's letter regarding request for changes to the DCO [AS-031] and will provide the relevant information to SCC at this time.</p>
REP1-020-89	<p>Paragraph 10.1: SCC requests that provision is made in the DCO for the Scheme to be subject to the South East Permit Scheme.</p>	<p>Highways England is concerned that the incorporation of the South East Permit Scheme into the DCO would have the effect of introducing a further consenting process that could create procedural obstacles or delay the implementation of two nationally significant infrastructure projects. Highways England is currently in discussions with SCC on the scope of a side agreement which could provide for a more proportionate arrangement for the Scheme and to provide SCC with the necessary assurances as regards the co-ordination of works affecting the local highway network.</p>
<p><b>Additional points made by Surrey County Council in REP1-019 which are not addressed in any of the above</b></p>		
REP1-019-1	<p>Item 7: SCC expresses concern about the lack of clarity in Article 11 (1) of the dDCO as regards the meaning of the term 'unless otherwise agreed with the local highway authority'.</p>	<p>Reference should be made to article 12(1) of the revised dDCO as submitted at Deadline 2 (Volume 3.1(1)) in this regard (Article 11 of the dDCO [APP-018]).</p> <p>The intention behind the drafting of this provision (which is well-precedented in Highways England DCOs) is that the default position if the dDCO is made will be that those elements of the Scheme which form part of the local highway network will become the responsibility of SCC as local highway authority from their completion. Notwithstanding this, it is open to Highways England and SCC to enter into an agreement to provide otherwise. For completeness, where no such agreement is entered into, the default provision of article 12(1) (of the dDCO submitted at Deadline 2 and Article 11 of the dDCO [APP-018]) shall prevail.</p>
REP1-019-2	<p>Item 7: SCC requests that the term 'unless otherwise agreed with the local street authority' be included within article 11(3).</p>	<p>Please refer to article 12(3) of the revised dDCO as submitted at Deadline 2 (Volume 3.1(1)) (Article 11 of the dDCO [APP-018]) in this regard, which amends the dDCO to include the wording as requested by SCC.</p>
REP1-019-3	<p>Item 7 SCC ask for clarification as to where provision is made in the dDCO which allows for agreements that might otherwise have been made under section 4 of the Highways Act 1980.</p>	<p>Please see response to REP1-020-3 above</p>
REP1-019-4	<p>Item 7: SCC expresses concern about the lack of clarity in Article 47 of the dDCO as regards the costs of arbitration.</p>	<p>Please refer to article 47 of the revised dDCO as submitted at Deadline 2 (Volume 3.1(1)) in this regard. It would not be appropriate for the article 47 to make specific provisions as to the award of costs as that is a matter to be settled as part of any arbitration pursuant to that article.</p>

## REP1-029 Lovelace Neighbourhood Plan

Reference	Written Representation Issue	Highways England Response
REP1-029-1	Thank you for allowing me to submit the Lovelace Neighbourhood Plan (LNP) as a written representation to the Examination (open meeting, 6pm, 12th November 2019). Despite Highways England (HE) being contacted as a statutory consultee during the LNP Regulation 14 Public Consultation (September – November 2018), neither the LNP Steering Group or Ripley Parish Council have had any liaison with HE, nor were either advised of the above meeting, so were unable to register as Interested Parties. The comments made at the meeting were therefore off-the-cuff.	In accordance with The Infrastructure Planning (Examination Procedure) Rules 2010, Highways England publicised notices of the DCO Examination outside Ripley Village hall and in numerous other locations in the area, as well as the local press, from 16 October 2019 and maintained them until 19 November 2019. Further, full details about the Scheme are readily available to everyone on the National Infrastructure Planning website.
REP1-029-2	It would be sensible for the examination to take account of the numerous proposals for the area and their traffic implications. Consideration of other local developments Lovelace is the borough electoral Ward covering Ripley, Ockham and Wisley and the vast majority of the proposed Junction 10 works will occur within its boundaries. The three villages will be severely affected by a number of projects in the next few years, all of which will have an adverse effect on the Strategic and Local Road Networks in the area, some short-term, others on-going. The LNP summarises these projects, including the Junction 10 works, and the policies and justifications address the short and long-term effects of them.	The traffic modelling methodology as described in the Transport Assessment Report [APP-136] did take into account numerous other developments as listed in Table 3.1 of Environmental Statement Chapter 16 Assessment of cumulative effects [APP – 061].
REP1-029-3	Substantial increase in traffic through Ripley	The estimated additional weekday daily traffic (AADT) due to the Scheme on B2215 Portsmouth Road/Ripley High Street between Newark Lane and the Ockham Park junction (which is the section of road within Ripley most impacted by the Scheme) is approximately 1,000 vehicles in 2020 and 1,550 vehicles in 2037. These increases in traffic flows represent approximately a 5% increase compared to without the scheme and equates to a maximum of 3 to 4 additional vehicles every minute (1 to 2 in each direction) during the busiest periods. The additional traffic through Ripley due to the Scheme is therefore insufficient to give rise to any significant adverse impacts. This is because a) traffic modelling has demonstrated that the local road network can accommodate the additional traffic due to the Scheme without material deterioration in traffic congestion and delay (i.e. the road network operates within capacity); and b) the forecast increases in traffic flow through Ripley due the Scheme are well below the thresholds required to trigger significant adverse severance, road safety, noise or air quality effects.
REP1-029-4	Impact on Ripley, LRN and SNR as a result of the proposed 4-way junction at the A3 Burnt Common Junction as part of WPIL's proposed housing development on the former Wisley Airfield site	Highways England notes that the recently adopted Guildford Local Plan requires the provision of north-facing slips at the A3 Burntcommon junction as mitigation for the development of the former Wisley Airfield site. This is a matter to be addressed as part of the development planning process when a planning application for development of the Wisley Airfield site is submitted. Further justification for this is set out in the response to the Surrey County Council Written Representation [REP1-020].
REP1-029-5	Construction traffic through Ripley	The impact of construction traffic through Ripley is addressed above in responding to Ockham Parish Council.

## REP1-045 RSPB

Reference	Written Representation Issue	Highways England Response
REP1-045-1	<p><b>Absence of Alternative Solutions</b></p> <p>The RSPB welcomes Highways England's rejections of several more damaging options and the efforts it has made to reduce the land take of the scheme (both permanent and temporary) to a minimum. Therefore we do think the consideration of alternative scheme designs has been fully addressed. However, it needs to be highlighted that the legal requirement of an absence of alternative solutions is more wide-ranging than the scheme design, and also requires consideration of alternative means to achieve the purpose the scheme is intended to deliver. The RSPB does not have the relevant expertise to be able to comment on these wider issues but wanted to highlight the need for that consideration and that the Examining Authority and the Secretary of State must be satisfied with the case advanced by Highways England including the two further tests required by regulation 64(1), the Habitats Regulations.</p>	<p>A comprehensive assessment of alternative solutions was carried out and the findings of that assessment are presented in the Habitats Regulations Assessment Stages 3 - 5 [APP – 044]. There are no feasible, less-damaging alternatives which were identified during the option appraisal and design evolution which would meet the objectives of the Scheme, and have a lesser effect on the integrity of the SPA.</p>
REP1-045-2	<p><b>Imperative Reasons of Overriding Public Interest (IROPI)</b></p> <p>Although the RSPB does not have the technical expertise to review and comment on in detail the Applicant's traffic safety figures, we have considered the Transport Assessment Report and its arguments on need, focusing on the five key objectives included namely:</p> <ul style="list-style-type: none"> <li>• Improve journey time reliability and reduce delay</li> <li>• Improve safety and reduce both collision frequency and severity</li> <li>• Improve crossing facilities for pedestrians, cyclists and horse riders and incorporate safe, convenient, accessible and attractive routes</li> <li>• Minimise impacts on the surrounding local road network</li> <li>• Support projected population and economic growth in the area.</li> </ul> <p>We wish to highlight that for each of these objectives we consider it is important for the Examining Authority and the Secretary of State to consider whether taking these issues into consideration risks increasing any impacts (such as facilitating further development) upon the Thames Basin Heaths SPA.</p> <p>The RSPB, of course, recognises the very important issue of highway safety for all possible users, but are concerned by Highways England's advancement of arguments under the other headings – namely improve journey time reliability and reduce delay, minimise impacts on the surrounding local road network but in particular support projected population and economic growth in the area.</p> <p>The RSPB also notes the assertion that the scheme offers beneficial consequences of primary importance to the environment. As the environmental measures provided by this scheme are required as a result of the scheme rather than being the reason for the promotion of the scheme we do not consider that this justification applies.</p> <p><b>Improving journey time reliability and reducing delay</b></p> <p>...compounding of small time savings for journey times is capable of justifying damage to a protected site of European importance on its own or as part of the wider justification</p>	<p>Highways England have provided several reasons, including improved public safety, to justify IROPI (Section 4.3 of Habitats Regulations Assessment: Stage 3-5 [APP-044]). It is noted that the RSPB feel that improved public safety, improvements to network capacity and traffic flow, economic growth and human health are the key justifications for IROPI.</p> <p>Accordingly, improvements to journey times as a result of the Scheme form just one of the IROPI which are relied upon.</p> <p>Highways England notes that the RSPB considers that the Scheme cannot rely on the 'beneficial consequences of primary importance to the environment' element of the IROPI derogation.</p> <p>As explained in Section 5.1 of the Habitats Regulations Assessment: Stages 3-5 [APP-044], the suite of compensatory measures are designed to ensure, with confidence, that the negative effects of the Scheme on the SPA are offset. This will include the regeneration of 22.5 ha of heathland, which will provide new breeding and foraging habitats for the SPA qualifying species.</p> <p>It should be emphasised that, as a result of the suite of compensatory measures, as shown in Table 7.8 in Section 7.12 of the Environmental Statement Chapter 7: Biodiversity [APP-052] the Scheme will result in a residual permanent positive effect on the SPA.</p>
REP1-045-3	<p><b>Improving safety and reducing both collision frequency and severity</b></p> <p>As mentioned above the RSPB recognises the importance of this need and therefore considers this the strongest argument advanced by Highways England. However, we do wish to stress again it is for the Examining Authority and the Secretary of State to consider whether the details provided are of a level to be imperative reasons of overriding public interest and that this evaluation can only be undertaken once the Examining Authority and the Secretary of State have reached the conclusion that there are no less damaging alternative solutions available that would serve to reduce the frequency and severity of collisions to an acceptable level.</p>	<p>It is noted that the RSPB consider that improved public safety is the key justification for IROPI.</p>
REP1-045-4	<p><b>Improving crossing facilities for pedestrians, cyclists and horse riders and incorporate safe, convenient, accessible and attractive routes.</b></p> <p>As with our comments above on highways safety, there is also considerable merit in improving crossing facilities ensuring that convenience, accessibility and attractiveness of these routes to encourage people to use them as opposed to less safe alternatives. However we are not sure they demonstrate IROPI in their own right,</p>	<p>The proposed package of environmental measures, together with the changes and additions to the PRoW network, will not increase the recreational pressure on the parts of the SPA that currently support the qualifying bird species. These elements are needed to provide an appropriate standard of NMU access along the A3 corridor, across the A3 and M25, between the bridges over the M25 and A3 and between the various areas of common land and open space and, therefore, are considered a valid aspect of the IROPI.</p>

Reference	Written Representation Issue	Highways England Response				
	<p>particularly if there are potential risks in them encouraging increased recreational access to parts of the SPA (to which access is currently constrained by the road layout).</p>	<p>The principal points of existing public access into the SPA are into the part south of the A3 from Old Lane via the Bolder Mere (Ockham Bites) and Pond car parks, and into the part north of the A3 from Wisley Lane and the RHS or Wren's Nest car parks. Vehicular access can also be gained into the southern part from Elm Lane, but there is no parking within the SPA on this route. Vehicular access into the northern part of the SPA is restricted to SWT staff and visitors to the SWT office at Pond Farm, plus users of the scout camp site nearby. There are also various points of access by foot, horse or cycle, following the PRow or other tracks, including the bridges over the M25 at Buxton Wood, Clearmount and Hatchford Wood. Cockcrow bridge provides a connection over the A3 between the two parts of the SPA near Bolder Mere car park.</p> <p>The Scheme will retain or reinstate this basic pattern of public access to the SPA from Old Lane, Elm Lane, Wisley Lane and the bridges over the M25 and A3, with three changes. A new bridge will be added over the M25 at Sandpit Hill, providing a second route in from Pointers Road; the footway/cycle track alongside the A3 will be replaced by a new bridleway running broadly parallel to the A3 near to the edge of the SPA; and two bridleways will be designated - one running through the northern part of the SPA along the existing partly surfaced track that serves Pond Farm - and the other along an existing horse track close to the A3 and M25 between Cockcrow bridge and Hatchford Park bridge.</p> <p>These changes may increase recreational activity in the wooded fringes of the SPA and along a track already well used but will not facilitate increased public accessibility into the open heathland parts of the SPA. The Scheme will, however, improve recreational access into the large areas of replacement land in the two quadrants around junction 10 that are not within the SPA, which could, by providing larger areas to explore and additional circular routes, reduce recreational pressure on the SPA heathland.</p>				
<p>REP1-045-5</p>	<p><b>Supporting projected population and economic growth in the area</b>          Given the RSPB's concerns about the potential impacts of housing development and anything else that may lead to increased risks to the SPA and its species, we are very concerned that this is being advanced as an IROPI argument here. We note that it is anticipated that the scheme will allow an additional 2,200 trips (a 28% increase). We do not consider that either housing development or works which facilitate such development (or anything else that may lead to an increased risk to the SPA and its species), are ever likely to constitute imperative reasons of overriding public interest, and we are clear in our view that this should not be the case here.</p>	<p>We note the RSPB's view on this matter. However, Highways England remains of the view that the proposal is consistent with the National Policy Statement for National Networks. The proposals support for projected population and economic growth in order to meet the Government's objectives of significantly boosting the supply of homes, and the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development, both of which are also set out in the National Planning Policy Framework.</p>				
<p>REP1-045-6</p>	<p><b>Ownership of the Compensation Land</b>          One of the crucial requirements for compensation measures is that they are certain and secured – legally and financially. Currently, the RSPB is not aware of any legal agreements having been secured to allow the <i>compensation</i> land to be used as such (we note that the Examining Authority has raised this issue in its First Written Questions ExQ1.4.27). The landowners, Surrey County Council and the Royal Horticultural Society, are currently under no legal obligation to make their land available for compensatory measures, so until such agreements have been secured it is not possible to conclude that the compensation will be implemented. Therefore the RSPB urges the Examining Authority and the Secretary of State to adopt one of the two following approaches if the compensation land has not been secured by the end of the examination:</p> <table border="1" data-bbox="311 1457 1113 1682"> <tr> <td data-bbox="311 1499 341 1520">i</td> <td data-bbox="359 1499 1113 1556">To refuse consent as the necessary legal agreements are not secured; or</td> </tr> <tr> <td data-bbox="311 1562 341 1583">ii</td> <td data-bbox="359 1562 1113 1640">To condition the scheme via the DCO such that no scheme works can begin until the necessary legal agreements are secured to the satisfaction of the Secretary of State and Natural England.</td> </tr> </table> <p>We wish to add that Option (i) is consistent with Action Point 5 agreed at Issue Specific Hearing 1 in relation to the draft Development Consent Order, which requires the Applicant "To ensure that, as far as is in their power, any and all other consents outside the DCO required for the scheme are progressed with and concluded by the close the Examination."</p>	i	To refuse consent as the necessary legal agreements are not secured; or	ii	To condition the scheme via the DCO such that no scheme works can begin until the necessary legal agreements are secured to the satisfaction of the Secretary of State and Natural England.	<p>Highways England has sought to discuss the acquisition by agreement and management of SPA compensation land with the relevant parties. Discussions between Highways England and the parties with a view to acquisition by agreement and management are ongoing.</p> <p>In the absence of an agreement with the parties providing for management of the compensation land in accordance with the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015], the dDCO includes powers for Highways England to acquire permanent rights over the land in order to ensure that the works will be delivered. The delivery of the compensatory measures is therefore secured.</p> <p>Requirement 8 of the dDCO [APP-018] requires details of the SPA compensatory habitat creation and enhancement measures to be submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and Natural England. The approved SPA Management and Monitoring Plan must include a timetable for the completion of the environmental mitigation and enhancement works and Highways England will work on this timetable with the appointed principal contractor.</p>
i	To refuse consent as the necessary legal agreements are not secured; or					
ii	To condition the scheme via the DCO such that no scheme works can begin until the necessary legal agreements are secured to the satisfaction of the Secretary of State and Natural England.					
<p>REP1-045-7</p>	<p><b>Duration of habitat management and monitoring of habitats created, restored and/or enhanced</b>          The RSPB considers it very important when evaluating the likely effectiveness of habitat creation, restoration and/or enhancement, to consider the duration of proposed management and monitoring. The reason is straightforward. Lowland heathland is a successional habitat i.e.it requires management to retain its</p>	<p>The committed lengths of management and monitoring proposed in the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015] currently vary according to the habitat which is being created.</p> <p>The lengths of time proposed reflect the 'ease of creation' for that habitat type and the time period required for growth of any dominant species (i.e. heather), it also takes into consideration factors such as climate, soil</p>				

Reference	Written Representation Issue	Highways England Response
	<p>characteristic features. If left unmanaged it will develop into woodland which will no longer support the birds for which the SPA is designated. Therefore, since the compensation and enhancement habitat must be in an appropriate condition for the lifetime of the operation of the scheme (we note that the scheme assessment under webTAG uses a 60-year appraisal period), the suggested 20 years for habitat management and monitoring, as set out in the draft SPA Management and Monitoring Plan, is not sufficient. Lowland heathland is a successional habitat i.e.it requires management to retain its characteristic features. If left unmanaged it will develop into woodland which will no longer support the birds for which the SPA is designated. Therefore, since the compensation and enhancement habitat must be in an appropriate condition for the lifetime of the operation of the scheme (we note that the scheme assessment under webTAG uses a 60-year appraisal period), the suggested 20 years for habitat management and monitoring, as set out in the draft SPA Management and Monitoring Plan, is not sufficient.</p> <p>Instead, the RSPB would expect to see a clear statement of how the long-term management of the created, restored and/or enhanced will be secured in perpetuity. This does not need to cover who will do the works (as such matters can be dealt with at an appropriate time), but must clearly set out how the works will be contracted for (i.e. by the land owners or an alternative party) and funded (i.e. who will be responsible for paying for the long-term maintenance works). In the absence of such a statement serious concerns remain about the long-term security of these measures and therefore whether the compensatory measures as currently proposed can be relied upon.be relied upon.</p>	<p>conditions and management practices and applies a precautionary approach in terms of the suggested durations.</p> <p>The lengths of time proposed are based on when those individual habitats could, realistically, achieve a condition which is 'established' and can be managed with ease together with the rest of the SPA site by the existing arrangements in place between SCC and SWT.</p> <p>Highways England has worked closely with SCC and SWT to develop this approach and neither party have raised any concerns regarding the length of management and monitoring proposed for any habitat type.</p> <p>Highway England's legal team is currently working with SWT and SCC to put in place an agreement under which SWT, working with SCC, will undertake the necessary environmental / ecological works such that the necessary measures (i.e. the SPA compensatory land and SPA enhancement areas) are undertaken. However, the provision of the measures does not depend upon agreement being reached as the dDCO includes the necessary land acquisition powers to ensure that the land can be acquired.</p> <p>There are appropriate mechanisms in place to secure the compensatory habitat measures in the long term and therefore the length of management and monitoring proposed in the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015], is sufficient (however, please see below with regards to monitoring SPA qualifying species).</p>
REP1-045-8	<p>The RSPB is also concerned by the approach proposed towards monitoring the impacts. Despite it being provided as compensatory habitat for SPA birds, the Objectives set out in paragraph 7.3.4 of the SPA Management and Monitoring Plan do not make any reference to either SPA birds or the invertebrates that they forage upon. This is a very concerning omission and the RSPB strongly recommend that both are included in the monitoring package set out in table 7.3.5 of the SPA Management and Monitoring Plan. We note that paragraph 7.11.1 sets out a reason for this approach (concern about the potential impact of harsh winters on the SPA bird population) but we consider that it is possible for this to be taken into account when considering the effectiveness of the compensatory measures (i.e. setting an expected number of birds of each species that would be found on the compensatory habitat save where one or more harsh winters has caused the population numbers to decline significantly). To this end we note that the proposed frequency of monitoring of SPA birds (set out in table 7.11.1 of the SPA Management and Monitoring Plan) is such that it may be difficult to identify the extent to which one or more harsh winters have caused the population to decline. Consequently, we recommend that Highways England, the Examining Authority and the Secretary of State give careful consideration to a revision of the frequency of monitoring</p>	<p>Highways England have proposed monitoring for both SPA bird species and the invertebrates they forage upon. This is outlined in section 7.11 (Species Monitoring Approach) of the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015]. Paragraph 7.11.1.1 explains that the monitoring of habitats (creation and enhancement) is dealt with in the preceding sections to ensure that the measures of success are achieved and any issues with creation, enhancement or reinstatement works are rectified.</p> <p>Paragraphs 7.11.1.3 to 7.11.1.16 explain how the species monitoring will trigger appropriate management interventions (as required) and how the results of this monitoring will be analysed with reference to the measures of success (set for each habitat type) by the monitoring party and the Steering Group.</p> <p>Highways England will give consideration to the proposed frequency of monitoring SPA qualifying species as currently set out in Table 7.11.1 of the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015]. The SPA Management and Monitoring Plan will be refined during the DCO process. This will be undertaken in consultation with Natural England.</p> <p>With regards to the monitoring of SPA compensation land, please refer to Highways England's response to the Relevant Representation of Natural England [RR-020] set out in the Applicant's Comments on Relevant Representations' [REP1-009].</p> <p>As described above, invertebrate monitoring has been proposed in section 7.11.3 of the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015] for a total of 15 years (with surveys taking place in years 3, 7, 10 and 15 after project completion).</p>
REP1-045-9	<p>We have similar concerns in relation to the restoration of the temporary land take areas within the SPA/SSSI, noting that although these measures are intended to benefit invertebrates that there is no such objective (paragraph 7.7.3) and that this is not included as a monitoring requirement (table 7.7.5). We note with concern the absence of this requirement and the limited 5 year monitoring period (paragraph 7.7.5.1) which raises concerns about the level of confidence that can be attributed to the likely effectiveness of the restoration measures and the degree to which the effects will be temporary</p>	<p>Temporary land take areas will be maintained (managed and monitored) during the initial 5 year establishment phase (as outlined in section 7.7 of the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015]). The planting/habitat creation planned within these areas is not considered to be complex (tree/shrub planting with gaps left for bare scrapes or mounds) and therefore a long term management duration is not required for these areas and establishment will be achieved sufficiently after 5 years for these areas to be handed back to SWT (or an equivalent party) to manage in the long term.</p> <p>However, should unexpected issues arise with the reinstatement of these temporary land take areas (within the SPA) the Steering Group will be able to review this approach if it is deemed to be insufficient at meeting the measures of success set for temporary land take areas.</p>
REP1-045-10	<p><b>Steering Group</b>          The RSPB welcomes its proposed inclusion on the Steering Group to inform decision making throughout the duration of the SPA Management and Monitoring Plan. However, we note that terms of reference are not yet available, which limits our ability to assess the likely effectiveness of the steering group which will depend in particular on setting an appropriate frequency of meetings and establishing an appropriate means of resolving any potential conflicts. We note that the dispute resolution method has been picked up by the Examining</p>	<p>Highways England have committed in the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015] (in paragraphs 7.2.1.11 to 7.2.1.13) to set the terms of reference for the Steering Group during the development of the management plan. This will include details regarding frequency of meetings, how meetings will be administered and how any conflicts will be resolved. Highways England will draft the terms of reference and invite comments on them by all suggested members of the Steering Group to ensure that the likely effectiveness of the Steering Group is achieved.</p>



Reference	Written Representation Issue	Highways England Response
	<p>Authority in its First Written Questions (ExQ1.4.26). We consider that a draft set of terms of reference need to be made available to be considered as part of the overall scheme package.</p>	<p>Highway England's legal team is currently working with SWT and SCC to put in place an agreement under which SWT, working with SCC, will undertake the necessary environmental / ecological works such that the necessary measures (i.e. the SPA compensatory land and SPA enhancement areas) are undertaken. The roles defined under this agreement will feed into the terms of reference for the Steering Group.</p> <p>The terms of reference will include measures for conflict resolution but they have yet to be determined or discussed with those mentioned above and cannot detract from Highways England's overall responsibility to deliver upon its responsibilities under the requirements.</p>
<p>REP1-045-11</p>	<p><b>The Enhancement Package</b>            Throughout our discussions with the Applicant we have been clear that in order to be classified as "enhancement" the measures that are proposed need to be over and above what are required for the SPA to be in favourable condition.</p>	<p>The compensation measures and enhancement measures are in addition to the actions that are normal practice for the Thames Basin Heaths SPA.</p> <p>As recorded in the minutes for the meeting held with representatives of Natural England, Forestry Commission, Royal Society for the Protection of Birds, Surrey Wildlife Trust and Surrey County Council on the 16 March 2018 (Item 4, page 49 of Habitats Regulations Assessment Annex B [APP-041]), Surrey Wildlife Trust confirmed that their obligations were to maintain the SPA and SSSI, and therefore the SPA enhancement measures do not form part of normal practice. In particular, the clearance of woodland to allow heathland restoration would require a felling licence from the Forestry Commission and could not be undertaken as part of normal practice.</p> <p>As well as the SPA enhancement measures not forming normal practice, the creation of wood pasture outside the SPA and SSSI also does not form part of normal practice.</p> <p>The relevant representation from Natural England [RR-020] states in paragraph 3.1.2.6 that "<i>the proposed SPA enhancement works set out in Appendix 7.19 are additional to existing plans for habitat maintenance and management and, at present, there is no legal obligation on the part of Surrey County Council or Surrey Wildlife Trust to undertake any of the proposed enhancement works, ie expansion of heathland, creation of 'wood pasture' and enhancement of retained woodland</i>".</p>

## REP1-054 Councillor Colin Cross

Reference	Written Representation Issue	Highways England Response
REP1-054-1	Written Submission from Councillor Colin Cross (Guildford Borough Council Member for Lovelace Ward, covering Ripley, Ockham and Wisley Parishes) Lack of engagement and lack of publicity in Lovelace Ward	Highways England has had extensive discussion with officers and members of Guildford Borough Council. In addition, Highways England has made numerous attempts to engage with Councillor Cross, but to no avail. Further, two consultation events were held at Ripley Village Hall, both of which were attended by Councillor Cross. As regards publicity, see above response to the Lovelace Neighbourhood Plan. Highways England met with Guildford Borough Council councillors on 23 July 2019 to confirm that the DCO application had been submitted and accepted into Examination. The purpose of this meeting was to brief councillors on the submitted Scheme and to explain the DCO examination process.
REP1-054-2	Option 14 was chosen contrary to overwhelming public opinion being in favour of Option 9.	Highways England had to assess Options 9 and 14 against the National Policy Statement for National Networks together with the relevant legislation and policy. Details of this assessment process are provided in Section 3.2 of the Planning Statement [APP-133]. Highways England concluded Option 14 should be pursued as it provides significant traffic and safety benefits up to 2037 and 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.
REP1-054-3	The Scheme is not value for money	Highways England has prepared a full Economic/Business case for the Scheme in accordance with Department for Transport Major Scheme Appraisal Guidance. This can be seen in Section 4 of the Planning Statement [APP-133]. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.2. The Planning Statement [APP-133], illustrates that there is a clear need for the Scheme and it provides many key benefits. Section 6.3 of the Planning Statement summarises the key benefits, which include: <ul style="list-style-type: none"> <li>• Substantial reduction of delays in traffic movement at this junction.</li> <li>• Improved operation of the Painshill and Ockham Park Junctions. improving traffic flow between local communities across the A3.</li> <li>• Additional highway capacity directly linked to the likelihood of planned growth that can be feasibly delivered.</li> <li>• A reduction in accidents.</li> <li>• A suite of compensatory measures that 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.</li> <li>• A net increase in common land and open space.</li> <li>• Significantly enhanced facilities for pedestrians, cyclists and horse riders through new provision and improvements to the network of PRow and local road connections. Health benefits should arise from this.</li> </ul> The Scheme has been designed to ensure that the Scheme objectives are achieved and include delivering key environmental, social and economic benefits. See Section 2.3 of the Planning Statement [APP-133].
REP1-054-4	The Scheme will only provide a temporary solution to M25 J10/A3 problems and will do little or nothing to alleviate the real underlying problems with this junction and roads leading up to it.	As presented in the Transport Assessment Report [APP-136], traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) and local roads up to at least the design year 2037. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered by the Scheme.
REP1-054-5	Endorsement of the RHS Wisley's alternative solutions and comments	Please see Highways England's response to RHS Wisley in the response to REP1-038.
REP1-054-6	This DCO should be considered in the context of a number of highly relevant local developments which are coming together at around the same time.	The Scheme has been considered in the context of numerous relevant local developments, see Table 3.1 of the Transport Assessment [APP-136] and the Planning Statement [APP-133].
REP1-054-7	The specific problem is that traffic coming from the south via Ripley to visit the RHS equates to up to 400,000 more car journeys p.a., that's over 1,000 per day, 10am to 5pm, 7 days a week on average. The real problem is that visitors come more in the warmer weather and at weekends. That pushes the daily car movements to	Please refer to the response to the ExA's Written Question 1.13.17. The estimated additional weekday daily traffic (AADT) due to the Scheme on B2215 Portsmouth Road/Ripley High Street between Newark Lane and the Ockham Park junction (which is the section of road within Ripley most

Reference	Written Representation Issue	Highways England Response
	<p>2,000+ per day and up to 4,000 at peak summer 'event' weekends. That's +570 extra hourly car movements in an already busy and congested Ripley High Street, just related to RHS traffic. (There are 100+ staff at the adjacent Wisley Golf Club and many National Trust workers at offices in Wisley Village).</p>	<p>impacted by the Scheme) is approximately 1,000 vehicles in 2020 and 1,550 vehicles in 2037. These increases in traffic flows represent approximately a 5% increase compared to without the scheme and equates to a maximum of 3 to 4 additional vehicles every minute (1 to 2 in each direction) during the busiest periods. The additional traffic through Ripley due to the Scheme is therefore insufficient to give rise to any significant adverse impacts. This is because traffic modelling has demonstrated that the local road network can accommodate the additional traffic due to the Scheme without material deterioration in traffic congestion and delay (i.e. the road network operates within capacity).</p>
<p>REP1-054-8</p>	<p>The planned/approved local developments at Garlicks Arch, The Drift Golf Club (also in Lovelace Ward and at nearby Ockham Road North) and a new, locally sited, sewage works are all substantial construction projects which will go on over a number of years in each case.(Further details are available).</p> <p>The amount of HGV movements altogether are incalculable when added to the two major projects of the former Wisley airfield and RHS Wisley sites. Just how that can be made to work alongside the A3/M25 construction traffic and the inevitable semi-permanent road congestion will take a whole new level of traffic modelling skills. Please note that on a visit to Ripley Village will be imperative, particularly in rush hour, to see first hand the unique problems caused by the narrowness of Newark Lane(in the centre of the High Street and a main route to Woking station). In a fairly recent SCC Traffic Study of Ripley, it referred to the problems there as being "unmitigable" and "severe".</p>	<p>Highways England will aim to minimise any additional traffic congestion and delay due to construction activities and construction traffic.</p> <p>Part 1 of Schedule 2 of the dDCO [APP-018] sets out a number of requirements for the Scheme including traffic management during construction. Under Requirement 4 (Traffic management during construction) of the dDCO [APP-018] a Traffic Management Plan relevant to the part of the works involved must be submitted to and approved by the Secretary of State following consultation with the relevant planning authority and the relevant highway authority before the works can start. By these means traffic will be managed appropriately in order to avoid, so far as practicable, effects on the local road network. Other developments in construction at the relevant time will be taken into account as part of the approval process. Highways England has specifically incorporated through junction running along the M25 as it passes through the junction, in part to minimise the impact of construction works.</p> <p>In addition, the dDCO [APP-018] requires that a Construction Environmental Management Plan (CEMP) be approved by the Secretary of State that will contain numerous measures that will ensure the works are carried out in an appropriate manner. The CEMP will also include a community relations strategy (see Requirement 3 of the dDCO).</p> <p>Should planning permission be granted for a redevelopment of Wisley Airfield and the construction programme coincide with that for the DCO Scheme, then there is the potential for interdependencies during construction. Highways England will collaborate with WPIL to satisfactorily resolve any interdependencies during construction should the need arise.</p>
<p>REP1-054-9</p>	<p>The impact of the Scheme on the Ockham and Wisley Commons, Thames Basin Heath Special Protection Area (TBHSPA) and Site of Scientific Interest as well as RHS Wisley in relation to increase in pollution and toxicity levels needs to be fully addressed by the DCO Examination.</p>	<p>Please see above response to Ockham Parish Council on this issue.</p>
<p>REP1-054-10</p>	<p>There are simpler and less costly alternative solutions.</p>	<p>Highways England have been through a robust process to identify the need for the improvements and how it should be addressed and has assessed appropriate alternatives in order to arrive at the appropriate option to pursue.</p> <p>This assessment of alternatives is outlined in the Environmental Statement Chapter 3 [APP-049] and Section 3 of the Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>Also, please see Highways England's response to RHS Wisley in the response to REP1-038.</p>

## Part 2 - Persons with Interest in Land

## REP1-024 Extra MSA Cobham Ltd

Reference	Written Representation Issue	Highways England Response
REP1-024-1	To date, Highways England (the "Applicant") have not held any discussions with Extra regarding the proposed M25 junction 10/A3 Wisley interchange improvement (the "Scheme").	Highways England has held a public exhibition regarding the proposals at Cobham MSA on 16 March 2018 and 23 March 2018 between 08:00 and 20:00 hours. Extra was also invited to participate in statutory and non-statutory consultations for the Scheme, the most recent being additional consultation in April 2019.
REP1-024-2	<b>Impact on MSA</b> It is ...unclear why the Order limits extend to Bookham Road underbridge and whether the extend of land to be acquired is justified.	The Order land identified in the Land Plans [AS-002] is Parcel 17/2. This is identified as being for permanent acquisition by Highways England. As set out in the Statement of Reasons [APP-022] section 4.8.5, " <i>land already owned by the Applicant is included in the DCO in order to ensure that no known or unknown third-party rights, which might impede delivery of the Scheme, remain over the land</i> ".  Highways England is aware that Extra MSA Cobham Limited benefits from restrictive covenants relating to maintenance of the underbridge road (as contained in a transfer dated 10 May 2011 for the benefit of adjoining land) and rights of way entry support shelter and protection and rights to free passage of service media as contained in a Transfer dated 10 May 2011 for the benefit of adjoining land. Highways England is not proposing to alter these rights.
REP1-024-3	Extra request further clarity on the reasons for the extent of land included in the DCO limit. The Applicant should confirm the construction works to be performed in the vicinity of Cobham Services, the timing and duration of the works and the details of any temporary traffic management measures involved.	Please refer to Highways England's response to the Relevant Representation of Extra MSA Cobham Limited [RR-013] set out in Applicant's Comments on Relevant Representations [REP1-009].
REP1-024-4	Measures to maintain full access and egress to Cobham Services from both carriageways at all times should be included in the Scheme proposals.	Highways England will ensure that access and egress to the MSA is maintained throughout the construction of the Scheme.
REP1-024-5	No details for the retention or proposed relocation of the sign have been set out in the draft DCO. The loss of the sign would increase the risk associated with drivers making unsafe lane changes closer to the MSA access as drivers try to enter Cobham Services with less advanced notice, leading to increased occurrence of collisions. Extra requests that the Applicant confirms their proposals to retain or relocate their sign and that the proposals should be agreed with Extra as part of the Scheme development.	Please refer to Highways England's response to the Relevant Representation of Extra MSA Cobham Limited [RR-013] set out in Applicant's Comments on Relevant Representations [REP1-009].

## REP1-026 Girlguiding Greater London West

Reference	Written Representation Issue	Highways England Response
REP1-026-1	The current proposed access is flawed and should not be consented.	<p><b>Revised access proposal for Heyswood Campsite</b></p> <p>The Scheme includes the closure of the existing access to Heyswood Campsite, Court Close Farm, New Farm and a Southern Gas Networks compound from the A3, on the grounds of safety and in consequence of the widening of the A3 to 4 lanes in this location.</p> <p>Accordingly, a replacement private means of access (PMA) has been provided for those landowners affected by the close of the existing accesses .</p> <p>The proposed route is from a new junction on the Painshill junction southbound slip road which will facilitate residents and tenants, Heyswood campsite users and service vehicles (postal/refuse vehicles) to the properties as well as maintenance vehicles for the SGN network and Highways England's gantries on the A3.</p> <p><b>Design of the revised PMA</b></p> <p>The width of the PMA has been designed to meet Surrey County Council standards with a road width of 4.8 m to allow a car and a coach or service vehicle to pass safely. In addition, there are 2 m road verges each side with a variable width for earthworks. There may be drainage provision where this is necessary, a boundary fence (or security fence) and an allowance (limit of deviation) for the final detailed design / accurate topographic survey (approximately 2 m either side). Passing bays need to be provided every 100 m to allow two coaches to pass. At the locations of the passing bays the width is 6 m which can be accommodated by narrowing the verges to 1.4 m each side.</p> <p>The SGN gas main needs to be relocated as the proposed A3 widening and associated verge will be constructed over the existing main. The SGN 600 mm diameter medium pressure gas main is diverted adjacent to the route of the PMA. This requires a minimum 6 m width for construction and rights for maintenance. A width of 6 m is required by SGN to allow for installation of the 600 mm diameter pipe and valve chambers. Hence the total proposed width required is 12.8 m plus earthworks. The width of land take through Heyswood campsite is generally between 12 m and 14 m with a maximum width of 17.5 m. The extent of the land take varies due to existing site conditions such as an existing fence or land boundary. The proposed access and the gas main diversion both avoid any removal of the ancient woodland.</p> <p>Importantly, the PMA will not be a highway to which the public has a right of access. This road will be a private road for use in relation to the properties which it serves and for utility companies to access the gas valve compound. The Scheme includes the provision of security gates just beyond the access road's junction with the Painshill roundabout slip-road and a further set on the boundary of the Heyswood campsite. Highways England are satisfied that the gates and fencing will provide an appropriately secure access for the camp site.</p> <p>The type of security fencing and gates for Heyswood campsite is currently unspecified. Highways England is willing to further discuss the boundary treatment with the GGLW to find a solution that will improve the security and meet their requirements.</p> <p>By providing the PMA where it is along with security measures and fences whilst avoiding an impact on the ancient woodland, Highways England believe that it has achieved the best compromise between safeguarding and avoiding further damage to the ancient woodland.</p> <p>The Design Manual for Roads and Bridges (DMRB), TD 42/95 was used during the Scheme development. Paragraph 2.26 of this design standard is clear, namely that major/minor priority junctions "<i>should never be provided on [dual carriageway 3 lane all-purpose] D3AP roads</i>". Additionally, the DMRB Design Standard TD42/95 was superseded in August 2019 by CD123, which states in paragraph 2.1 "<i>Priority junctions shall not be used on motorways or all-purpose dual three lane carriageways.</i>" By implication a major/minor priority junction on a dual 4-lane all purpose (D4AP) road (which is what the A3 adjacent to the Heyswood campsite will become with the Scheme) would therefore be even less acceptable, even though TD42/95 and CD123 do not explicitly refer to D4AP roads with reference to major/minor priority junctions.</p>
REP1-026-2	...a far better alternative would be to locate the new access route further to the north ("the GGLW Alternative"), so that it can run along the edge of the widened A3.	<p>Highways England does not accept that the GGLW alternative is a workable or acceptable alternative to the replacement access for the following reasons.</p> <p>Highways England understands that the GGLW alternative would run adjacent to the A3 south of the Gas Compound and Court Close Farm for those residents only. The design width for the assumed 'GGLW</p>

Reference	Written Representation Issue	Highways England Response
		<p>Alternative' is 4.8 m, with passing bays. The width is specified in the relevant Surrey County Council highway design standards, with a road width of 4.8 m to allow a car and a coach or service vehicle to pass safely</p> <p>The 'GGLW Alternative' alignment arrangement will require an additional width of approximately 3.7 m of ancient woodland land take, adjacent to the A3, for the 380 m length of track. The total area of ancient woodland loss for this layout would be 1400 m<sup>2</sup>. Highways England disagrees that the loss of such an extent of ancient woodland would be acceptable in planning terms.</p> <p>A reduced access track width of 3.5 m was also considered with the gas main diverted through Heyswood campsite. This also required ancient woodland loss of approximately 900m<sup>2</sup>. After installation of the gas main the land through Heyswood campsite the land would be returned to the owner however SGN will have rights to maintain their gas main.</p> <p>The proposed PMA in the Scheme avoids taking additional Ancient Woodland compared with the GGLW Alternative which has a minimum loss of 900 m<sup>2</sup> Ancient Woodland.</p>
<p>REP1-026-3</p>	<p><b>Problem with the current proposed access</b></p> <p>4. The current proposed access as shown on the relevant access plan (Drawing number TR010030/APP/2.4 rev 0) involves the creation of a new surfaced road through the Campsite Land at a distance of some 30-50m from the existing other boundary of the Campsite.</p> <p>5. Unlike the current track which the proposed access loosely follows (the current track is only used by the Guides, was recently tarmacked, and is narrower than the proposed access), the new access will have to serve the property to the west of the Campsite: Court Close Farm. GGLW are aware the Court Close Farm is in use as a boarding house with around 8 lodgers. This presents significant safeguarding issues for the GGLW and the Campsite, which is used throughout the year as a camp and activity for the girls between the ages of 5 and 18, will need to be secured from the access.</p> <p>6. A minimum requirement will be to construct fencing and secure gating. The fencing will have to follow the length of the new access through the Campsite on both its north and south side, secure gates will be needed at each entrance to the Campsite. That fencing is illustrated on the current Scheme Layout plan (Sheet 7, TR010030/APP/2.8 rev 0); gates are not currently shown but will be necessarily in order to ensure adequate safeguarding.</p> <p>7. The installation of secure gates and fencing will have the effect of functionally separating the northern area from the main body of the Campsite: girl guides camping on the southern site will not be able to access the woodland area to the north without a supervisor, and any supervisor sleeping in the bungalow in the northern area will be significantly hampered in their ability to supervise the rest of the Campsite.</p> <p>8. In practice this will mean that the GGLW will not be able to use the northern area for any activities going forwards. It will also mean that a new bungalow and games store/shop building will be needed within the main area of the Campsite, which the DCO should make provision for. This will lead to a further loss of functional space.</p>	<p>Highways England is satisfied that the proposed access road represents the best compromise between the GGLW's concerns as to safeguarding and minimising harm to ancient woodland.</p> <p>The proposed access road continues from the Painshill junction southbound slip road, past New Farm, the Heyswood Campsite and terminates at Court Close Farm. The width is specified in the relevant Surrey County Council highway design standards with a road width of 4.8 m to allow a car and a coach or service vehicle to pass safely. In addition, there are 2 m road verges each side with a variable width for earthworks. There may be drainage where necessary, a boundary fence (or security fence) and an allowance (Limit of Deviation) for the final detailed design / accurate topographic survey (approximately 2 m either side). Passing bays need to be provided at 100 m centres to allow two coaches to pass. At the locations of the passing bays the width is 6 m which can be accommodated by narrowing the verges to 1.4 m each side.</p> <p>The SGN gas main needs to be relocated as the proposed A3 widening and associated verge will be over the existing main. The SGN 600 mm diameter medium pressure gas main is diverted on the route of the PMA. This requires a minimum 6m width for construction and rights for maintenance. A width of 6 m is required by SGN to allow for installation of the 600 mm diameter pipe and valve chambers. Hence the total proposed width required is 12.8 m plus earthworks. The width of land take through Heyswood campsite is generally between 12 m and 14 m with a maximum width of 17. 5 m. The extent of the land take varies due to existing site conditions such as an existing fence or land boundary. The proposed access and the gas main diversion both avoid any removal of the Ancient Woodland.</p> <p>The proposed access road will not be a highway to which the public has a right of access. This road will be a private road for use in relation to the properties which it serves and for utility companies to access the gas valve compound. The Scheme includes the provision of security gates just beyond the access road's junction with the Painshill roundabout slip-road and a further set on the boundary of the Heyswood campsite. Highways England are satisfied that the gates and fencing will provide an appropriately secure access for the camp site.</p> <p>The type of security fencing and gates for Heyswood campsite is currently unspecified. Highways England has been engaged in discussions with GGLW in respect of the possibility of the provision of screening and security measures in order to further screen and safeguard the Heyswood Campsite. Highways England is willing to enter into a side agreement with GGLW to provide further clarity as to further measures which may be provided at the Heyswood Campsite to provide further mitigation for the effects of the Scheme.</p> <p>Highways England does not accept that the bungalow within the campsite will need to be relocated as a result of the Scheme. Moreover, there is no guarantee that planning permission would be granted to relocate the bungalow as it is located within the Painshill Park registered park and garden.</p> <p>However, it is recognised that the north-western area of the campsite may need to become a supervised activity area.</p> <p>Highways England is willing to discuss with the GGLW the possible relocation of the games store/shop during detailed design, subject to any constraints or consents which may be required.</p> <p>The warden's bungalow will have 24/7 access to accommodate the warden. When supervisors are also residing in the bungalow, they will have access to all areas of the campsite. Whilst this will involve passing through two gates to access the larger area of the campsite, it is considered this will have a small impact on time moving across the site.</p>

Reference	Written Representation Issue	Highways England Response
REP1-026-4	<p><b>GGLW Alternative</b></p> <p>10. The alternative which GGLW have previously discussed with the Developer would be to relocate the access road closer further to the north, so that it runs alongside the widened A3. This would:</p> <ul style="list-style-type: none"> <li>• Minimise the necessary land take from GGLW;</li> <li>• Avoid the “sterilisation” of any additional portion of the Campsite by subdivision;</li> <li>• Facilitate the provision of security measure; and</li> <li>• Reduce the environmental impacts of the access road.</li> </ul> <p>11. Although the Developer’s reasons for not adopting the GGLW alternative have never been properly explained to GGLW, it is believed that the core reason is that further land take next to the A3 southbound land would result in additional loss of Ancient Woodland.</p> <p>14. First, the Developer relies on Natural England’s Ancient Woodland Inventory (“the AWI”) – which shows an area of ancient &amp; semi-natural woodland confined to the area to the north of the existing access track – but does not appear to consider either (1) whether that listing is justified or (2) whether any others of woodland in the locality also falls within that definition.</p> <p>15. In this respect, it is important to appreciate that the AWI is not a definitive record of ancient woodland or even equivalent to a designation. This is acknowledged by Natural England’s own May 2018 handbook:</p> <p><i>“The Ancient Woodland Inventory (AWI) is an evidence-based tool for the conservation of ancient woodland. It aims to be a “site-by-site listing of probable ancient woods” (Spencer &amp; Kirby 1992) and by its nature is provisional. It was compiled by the NCC between 1981 and 1992 in response to the call for better information about the distribution and size of the ancient woodland resource at a time when it was coming to be acknowledged as an irreplaceable biological and cultural heritage asset. The AWI was originally produced on a county basis with reports and paper maps published as they became available. It has since been digitised to create a national dataset which has been administered by the NCC’s successor bodies, English Nature and Natural England. Spencer &amp; Kirby (1992) report on the original nationwide project and Goldberg et al. (2007, 2011) and Goldberg (2015) give accounts of the subsequent development of the inventory to date.”</i></p> <p>18. It follows that where thorough and credible evidence is presented to show that, on balance, a wood does not meet the NPPF definition of Ancient Woodland it is not answer for a decision-maker to refer to the listing of woodland in the AWI as a freestanding form of evidence: the listing is only as good as the evidence which underpins it.</p> <p>19. The correct approach was explained by a Planning Inspector in the Boughton Lane, Maidstone call in decision, and endorsed by the Secretary of State when accepting this inspector’s recommendation (Appendix 1). The Inspector considered expert evidence which was presented to him and commented as follows:</p> <p><i>“256. Five Acre Wood is identified as Ancient Woodland in the local Inventory, and on the ‘MAGIC’ Database [13]. Both of these systems are either maintained or endorsed by Natural England, which is the Government agency with special responsibility for such matters. However, there is no statutory procedure for the designation of Ancient Woodlands, and therefore the inclusion of a site in either the Inventory or the Database does not amount to such a designation. Rather, it is an indication that a woodland may be ancient. This is effectively acknowledged by NE in the comments of one of its officers, where it is stated that, “whilst every effort has been made to make this revision as accurate as possible, the Inventory is still regarded as provisional”.</i></p> <p><i>257. In the case of Five Acre Wood, although the woodland is ‘provisionally’ identified as ancient, there is no evidence to that effect. The earliest mapped evidence dates from 1840, whereas the accepted definition requires continuity of woodedness since 1600 [84-85]. Although the appellants’ survey found 16 vascular species, which are possible ancient woodland indicators [142], NE again acknowledges that such evidence is normally used only for the purposes of confirmation, in situations where there is already other evidence from historic mapping. That is not the case here.</i></p> <p><i>258. It is evident that a good deal of work has gone into the production of the Maidstone Inventory. That work has involved not only painstaking research and analysis, but also an important element of expert judgement by experienced professionals. But for all that, there is no map-based evidence before this inquiry that shows any basis for believing Five Acre Wood to date back to 1600. If any such evidence</i></p>	<p>Highways England does not accept the explanation given by GGLW in its written representation as to the categorisation of woodland as ancient woodland for planning purposes for the following reasons.</p> <p>The core reason for the proposed alignment of the proposed access road is to minimise the impact on and loss of ancient woodland.</p> <p>The original provisional Ancient Woodland Inventory (AWI) for Surrey was first produced in 1988 by the Nature Conservation Council (NCC) and revised in 1997 by English Nature.</p> <p>A partnership project undertook a detailed assessment of the AWI for Surrey in 2011, using new information and advances in technology to address inaccuracies and omissions that may have occurred in the earlier AWI. This revised Surrey AWI was reported by Davies, R., Benstead-Hume, V, and Grose, M. in A revision of the Ancient Woodland Inventory for Surrey (2011). This revision represented “a complete and systematic rebuilding of the AWI dataset for Surrey”.</p> <p>This 2011 revision includes the ancient woodland boundary at Heyswood as recorded by Natural England on government MAGIC mapping. This is recorded on map 6 in Appendix 3 of the 2011 revision of the Ancient Woodland Inventory for Surrey.</p> <p>It is Highways England’s opinion that the boundary of Heyswood ancient woodland is correct, as this has been identified in the AWI and again in the following revisions of the AWI.</p> <p>Section 5.32 of the National Policy Statement for National Networks (NPS NN, 2014) states that the: “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”. Therefore, Highways England has a requirement to try to minimise the loss of ancient woodland as a result of the Scheme, which has been achieved in this location by selecting the access option at Heyswood that requires the least loss of ancient woodland.</p> <p>Environmental Statement Chapter 11: Cultural heritage [APP-056] was prepared in consultation with Historic England and the Painshill Park Trust. There is broad agreement that the area of land take within this part of the park removes a section of the registered parkland that contributes little to the overall significance of the registered park or the Listed Buildings that are associated with it. Although there will be harm, as set out in section 11.10 of Chapter 11, and summarised in Table 11.5, the residual effect on Painshill Park is moderate adverse, which in terms of the criteria of the National Planning Policy Framework (NPPF, 2019) is ‘Less Than Substantial Harm’.</p> <p>Consideration was also given to woodland as a wider habitat type, as well as specific consideration of ancient woodland. The selected option in the Scheme utilises the existing hardstanding access track through the Girl Guides site and thus minimises the amount of woodland and other habitats that will be lost in this location as a result of the Scheme. The alternative route along the edge of the A3, by comparison, would require additional land take over utilising the existing track.</p> <p>Highways England notes the Planning Inspector’s decision referred to in the GGLW written representation. In that case, the Planning Inspector noted that there is no formal statutory procedure for the designation of ancient woodland, and that the inclusion of a site in the AWI is not a formal ‘designation’ of a site’s status as such. Highways England does not dispute this.</p> <p>However, the decision of the Planning Inspector in that case is not binding precedent in the same manner as a judgment of the court albeit that it may be persuasive.</p> <p>Moreover, it would be disproportionate to require a developer or applicant for a development consent order to seek to go behind the listing in the AWI and undertake detailed historical research to establish positive proof that land was wooded in 1600 per the NPPF definition.</p> <p>In this case Highways England has undertaken all reasonable efforts to ascertain the status of the land as ancient woodland.</p>



Reference	Written Representation Issue	Highways England Response
	<p><i>existed, I can see no reason why it would not have been revealed during the course of Mr Forbes-Laird's lengthy correspondence with NE on this matter. When challenged on such a matter, it seems to me that it is incumbent upon NE to disclose any such evidence. The arguments presented by NE in that correspondence, and indeed by Dr Sansum subsequently [197], suggest merely that ancientness cannot be ruled out. In the absence of any underlying evidence of a positive nature, this is not enough.</i></p> <p><i>259. I make no recommendation as to whether Five Acre Wood's status should be changed, in terms of either the Inventory or the MAGIC database. Those are matters for the bodies responsible for those systems. But for the purposes of this appeal, I see no proper basis for applying paragraph 118 of the NPPF or any other policies that relate only to ancient woodland.</i></p> <p><i>260. Nevertheless, the Wood is evidently long established, and thus still has considerable value, both as a landscape feature and a wildlife habitat. As such, I have borne in mind NPPF paragraph 109 which aims to contribute to and enhance the natural and local environment in various ways, including by recognising the benefits of ecosystems, and minimising impacts on biodiversity”.</i></p> <p>20. This reasoning confirms that:</p> <ul style="list-style-type: none"> <li>(1) The AWI and local inventories are only indicative of ancientness [256];</li> <li>(2) The status of woodland is a matter for the decision maker to determine on the basis of the available evidence [258]; this is a different question as to whether the woodland should be included on the relevant inventories [259].</li> <li>(3) It is not sufficient to show that ancientness cannot be ruled out – there must be positive evidence that the woodland is ancient [258].</li> </ul> <p>21. Here the GGLW believes that there is no basis for distinguishing the area to the north of the track from the other wooded areas to the south and around the track. The land on both sides of the access track has, throughout the period of GGLW's ownership formed a single wood which was only separated by tarmac in 2013.</p> <p>22. This undermines the rationale for choosing the current proposed route over the GGLW alternative because it means that when properly analysed the current proposal will result in as great, if not more loss of ancient woodland than the GGLW alternative.</p> <p>23. <u>GGLW ask the ExA to require the Developer and Natural England to explain the basis on which they have concluded that the northern parcel is ancient woodland, and that the woodland and semi-natural pasture around the access track and to its south is not.</u></p>	
REP1-026-5	<p>24. Second, the Developer's approach does not recognise the trade-off between any harm to ancient woodland and harm to the historic significance of the Painshill Park Grade I listed RPG – which the Campsite forms part of. Development of the GGLW alternative would further reduce the total level of land take within the RPG and move the access road and security access further from the RPG's historic core. It would also offer the opportunity to replace the current tarmac with a more appropriate surface – which would allow recovery of a part of the original RPG and the ancient woodland. In failing to address this issue, the DCO fails to avoid or minimise conflict with the significance of the RPG pursuant to 5.129 of the NPS.</p>	<p>Highways England has had appropriate regard to both the impact of the Scheme on the registered park and garden at Painshill Park and the harm to ancient woodland.</p> <p>The effect of the Scheme on the registered park and garden has been minimised to the extent reasonably practicable.</p> <p>Section 5.131 of the National Policy Statement for National Networks (NPS NN)(2014) states that the: <i>“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 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.”</i></p> <p>Environmental Statement Chapter 11: Cultural heritage [APP-056] was prepared in consultation with Historic England and the Painshill Park Trust. There is broad agreement that the area of land take within this part of the park removes a section of the registered parkland that contributes little to the overall significance of the registered park or the Listed Buildings that are associated with it. Although there will be harm, it is in terms of the criteria identified in the National Planning Policy Framework (NPPF, 2019) which is Less Than Substantial Harm.</p>

Reference	Written Representation Issue	Highways England Response
		Highways England acknowledges that the Scheme will give rise to some effects on ancient woodland and the registered park and garden at Painshill Park. However, such effects are not significant or unacceptable and the Scheme accords with relevant planning policy including the NPS NN and NPPF.

## REP1-028 LGH Hotels Management UK Ltd

Reference	Written Representation Issue	Highways England Response
REP1-028-1	<p><b>Engagement with Highways England</b></p> <p>a) We have commenced discussions with Highways England (“HE”) over the provision of a temporary access licence, providing the acquiring authority with the opportunity to conduct their necessary geological and environmental surveys in advance of the carriageway works. These negotiations have been progressing well and we are hopeful that the licence agreement can be settled in the coming weeks.</p> <p>b) In relation to our client’s Property, there has been a lack of engagement to date over the land to be acquired. While HE may consider this to be one of the smaller interests affected by the scheme, we are aware of other businesses and property owners already having had extensive discussions over the route, mitigation works and remediation works to minimise the impact of the scheme on them. We are therefore frustrated that a similar approach has not been taken with my Client, who is willing to explore private treaty discussions once comprehensive explanation of the works has been provided.</p>	<p>Local businesses, including the Cobham Hilton, were contacted to discuss possible future land acquisition as well as concerns over the impact of the Scheme on their business.</p> <p>Highways England has consulted and engaged with Cobham Hilton on the following occasions:</p> <ul style="list-style-type: none"> <li>• Emails sent in 2017</li> <li>• Letter for statutory consultation Feb 2018</li> <li>• Not consulted for targeted consultation Nov. 2018</li> <li>• Additional targeted consultation (May 2019)</li> <li>• Letter invitation to commence negotiation on voluntary agreement for acquisition of land and rights sent 12 June 2019</li> <li>• DCO submission/land acquisition Letter - June 2019</li> <li>• DCO acceptance letter - July 2019</li> </ul> <p>There has been additional direct engagement with the hotel including meetings with hotel management and engagement with the agent for the site regarding site surveys. Highways England has engaged with Cobham Hilton and will continue to do so.</p>
REP1-028-2	<p>The Land Plans available on HE’s website suggest that the works are likely to remove a portion, and potentially all, of the existing natural foliage and screening between the carriageway and the hotel.</p> <p>With the additional carriageway being closer to the hotel, the loss of this screening has raised concerns over the impact which this will have on the desirability of the hotel, particularly the rooms closest to the new carriageway and the Client is concerned it will have a negative impact on the profitability of the business.</p>	<p>Environmental Statement Appendix 7.20 Landscape and ecology management and monitoring plan [APP-106], table 7.13.2, describes the approach to temporary land take reinstatement for compounds and soil storage areas. This includes, the design of a final planting plan and specifications for compound areas in consultation with the steering group and preparing the ground for tree/shrub / scrub planting and/or reseeded where appropriate. As indicated by the landscape and ecology management and monitoring plan, any removal of foliage will be reinstated.</p> <p>Areas of woodland that lie between the Hotel and A3 will be retained providing a visual buffer, furthermore, as illustrated in Scheme Layout Plans [APP-012], Sheet 7 this will be supplemented by a buffer and screening with proposed tree and shrub planting between on the road corridor between Cobham Hilton (plot 7/22) and the A3 to aid the segregation.</p> <p>Areas of land taken temporarily for site compounds or soil storage will undergo restoration work before being returned to their owners in their pre-existing condition or be capable of developing into that condition. Other areas taken temporarily to construct the works would be planted as shown on the Scheme Layout Plans [APP-012] and would form part of the landscape mitigation for the scheme.</p> <p>Highways England is willing to discuss specific concerns relating to the works with the hotel operator and to provide further details regarding the specific activities to be undertaken on the affected land within the hotel site as part of the detailed design process.</p>
REP1-028-3	<p>We would like to understand the nature of works planned and explore the possibility of works to mitigate the impact of HE’s scheme on the Property. We are aware that additional land is temporarily required in order to undertake the works. The hotel has not been consulted over this requirement, which we understand are currently located in a particularly disruptive location. It is expected that the negative impact on the operation of the business will be significant if the location of the temporary works remains as planned.</p>	<p>The Book of reference part 1 [APP-025] describes plot no. 7/22 as “Temporary possession and use of 5,075 square metres, or thereabouts, of garden (Seven Hills Hotel) situated to the south of Wood Court Lodge and to the north west of New Farm House”. Volume 4.3 Work Plans Sheet 7 [AS-003] show plot no. 7/22 to be used for “Site compound, soil storage or other temporary works site”. In Schedule 1 to the dDCO [APP-018] the description for Work No.52 (j) further states “A new drainage attenuation pond - on land to the west of the A3 and south of Seven Hills Road, to include an access from Seven Hills Road”.</p> <p>Environmental Statement Chapter 13: People and communities [APP-058] assesses the Scheme’s impacts on businesses, people and communities which are anticipated as part of the Scheme. The Scheme’s impacts were assessed upon businesses in terms of land take, severance, disruption and employment.</p> <p>Drawing on the detailed assessments in other chapters (Noise APP-051, Air Quality APP-050, Landscape APP-054), table 13.24 identifies Cobham Hilton for land take impacts through the construction phase. No direct physical impact is expected upon local businesses during operation.</p> <p>As identified above, where impacts have been identified for businesses, for example, the temporary acquisition of land for construction, areas will be restored to a condition equivalent to its original before being returned to its owner, further mitigation measures are outlined in the Noise [APP-051], Air Quality [APP-050], Landscape [APP-</p>

Reference	Written Representation Issue	Highways England Response
		<p>054] chapters of the Environmental Statement. Control measures will be set out in the final Construction Environmental Management Plan. As reported in the chapter, where land take is required for the Scheme, land owners will be compensated for the loss in accordance with the statutory compensation code.</p> <p>As explained above, the hotel operator has been consulted and engaged with throughout the development of the Scheme.</p>
REP1-028-4	<p>Our Client requires further details about proposed road closures, diversions, working hours and the projected period of the scheme works. Each of these elements will have to be considered to understand the impact on the Property.</p>	<p>As stated in Environmental Statement (Chapters 1-4) [APP-049], section 2.7.16 “<i>The construction of the Scheme will require periodic closures of the A3 and M25 for operations such as bridge demolition and installation of new bridge and gantry structures. These will be kept to a minimum and will take place overnight or, if unavoidable at weekends</i>”.</p> <p>In close proximity to the hotel, several changes will be undertaken to the local road network, summarised broadly from west to east along the Scheme:</p> <p>The A245 between Painshill junction roundabout and the B365 Seven Hills Road junction will be widened from dual-two lane to dual-three lane carriageway, with retaining walls used to minimise land requirements. The existing access into Old Byfleet Road will be closed and a new access provide via Seven Hills Road (South), including a left-turn lane with a short deceleration taper. Restrictions would be put in place so that there would be no right hand turn from the Byfleet Road to Seven Hills Road South or from Seven Hills Road North towards Byfleet as described in Environmental Statement (Chapters 1- 4) [APP-049], section 2.5.16.</p> <p>Working hours are set out in the outline Construction Environmental Management Plan (oCEMP) [AS-016], section 5.3. The majority of the work will be undertaken during daytime hours, subject to exceptions related to works requiring night-time closures for bridge demolition and installation or other works requiring the full or partial closure of, or otherwise adversely affecting the operation of the M25 and A3 carriageways; any oversize deliveries or deliveries where daytime working would be excessively disruptive to normal traffic operation; the provision of services at compounds, including CCTV and vehicle recovery; works associated with the diversion of existing utilities; junction tie-in works; works associated with traffic management and signal changes; cases of emergency; and as otherwise agreed by the local authorities in advance.</p> <p>Highways England liaises with all stakeholders during the construction of its Major Project schemes in line with its three imperatives, one of which is Customer Service. Public Information Events (PIEs) will be held in advance of construction and continue over a number of weeks and locations to ensure that they are accessible to all stakeholders, including local businesses. PIEs are organised to inform stakeholders of the phasing of the works, including key closures and planned diversion routes, which will have supporting documentation available on Highways England’s website. Highways England and its contractors will be present to answer any questions asked by stakeholders. Highways England considers this as an effective approach as was evident from the consultation undertaken prior to the application being submitted for development consent.</p> <p>Once construction begins, Highways England will send out regular newsletters to inform stakeholders of how the scheme is progressing and in particular, in advance of any major closures that would require diversions. This is so that businesses and other affected stakeholders can plan their journeys in advance. This will be captured within the Community Relations Strategy that will form part of the final Construction Environmental Management Plan as noted in the dDCO [APP-018], Requirement 3 (e).</p> <p>Construction of the Scheme is planned to commence in Winter 2020/21, with the Scheme planned to be open for traffic in September 2023. The projected programme is set out in more detail in section 2.7 of Environmental Statement: Chapters 1-4 [APP-049].</p>
REP1-028-5	<p>The scheme has proposed to reopen Seven Hills Road South as, we understand, a cycle and footpath. As this new byway will pass across the main entrance turning to the hotel require further details to understand the layout of this, how it will re-join the public highway and the proposals for the junction.</p> <p>We have safety concerns over the junction, with turning cars, lorries and other hotel vehicle movements and cyclist and walkers continuing along the route.</p> <p>Advice and consultation on how this will practically be created would be appreciated to ensure a system which will work in practice.</p>	<p>Seven Hills Road (south) will be retained as a highway between the A245 and just south of the Hilton Hotel junction. Pedestrians will be able to use the existing footway to the east of the road and cyclists will be able to use the existing road. A new private means of access (PMA) will be provided from Seven Hills Road (south) south of the junction with Hilton Hotel using the redundant section of Seven Hills Road (south). This will link to the new NMU route running parallel but segregated from the A3 to the south. Access to the Long Orchard properties and the Starbucks site (former San Domenico site) is also provided by this route.</p> <p>The existing road surface south of the entrance to the Cobham Hilton Hotel will be cleared and refurbished. Access control gates will be provided south of the entrance to the Cobham Hilton Hotel and near Redhill Road to prevent this route becoming a rat-run for A245 traffic as set out in Environmental Statement (Chapters 1- 4) [APP-049], section 2.5.18.</p>

Reference	Written Representation Issue	Highways England Response
		<p>Highways England acknowledges that the Starbucks site could no longer be used for any use that is dependent upon public vehicular access. Traffic volumes on the PMA will be light and hotel visitors (guests, services etc) would be used to sharing road space with other non-motorised users so will be safe for walkers and cyclists using this route.</p> <p>Layout plans can be found in the Work Plans [AS-003], Sheets 7 to 9.</p>
REP1-028-6	<p>From analysis of the Land Plans it would appear that there is more land being acquired than necessarily required for the scheme. We would welcome further engagement to understand the justification for the requirement of all land parcels. My client would like to minimise the area of land that will be permanently acquired.</p>	<p>The extent of land required is considered appropriate in the context of the works proposed on and around that land. The use of land associated with Zinc Cobham Hotels encompasses three land parcels: 7/19, 7/22, 7/23 and 9/4 as shown on Land Plans [AS-002]. Land parcel 7/23 is subject to acquisition of permanent rights with temporary possession. Land parcels 7/22 and 9/4 are subject to temporary possession (subsoil only). Land parcel 7/19 is subject to Title Acquisition. The specific reasons for the use of each land parcel are set out in the Statement of Reasons [APP-022], Table A.1: Acquisition of Land (land parcel 7/19), Table A.3: Temporary Possession of Land (land parcels 7/22 and 9/4) and Table A.2: Acquisition of Rights (land parcel 7/23).</p> <p>The extent of land that will be permanently acquired is appropriate for a balancing pond and access around it for maintenance, and for a non-motorised user (NMU) route. Highways England will continue to engage with Cobham Hotels Ltd as the Scheme develops.</p> <p>Please also see Highways England's response to the Examining Authority's First Written Questions (Volume 9.18), question 1.16.13.</p>
REP1-028-7	<p><b>Compensation</b></p> <p>In relation my Client's business, there are concerns that have not yet been considered or addressed relating to the potential for disruption which might result in a loss of income on both a temporary and permanent basis. Without the further detail identified above it is difficult to consider this comprehensively but based on our current knowledge we have identified the following risks:</p> <ul style="list-style-type: none"> <li>i) disturbance from noise and light during the period works are undertaken and potentially after-rooms closest to the scheme works will be made unusable or will have to be made available at reduced rates affecting the profitability of the business.</li> <li>ii) access restrictions arising from roadworks, diversions and road closures affecting access to the Property.</li> </ul>	<p>With regards to the disruption on a temporary basis, the temporary possession of land from Cobham Hilton (plot 7/22) will have slight adverse to insignificant effect as reported in the Environmental Statement Chapter 13: People and communities [APP-058], table 13.10.51.</p> <p>When the Scheme is operational, the daytime and night-time noise levels at Cobham Hilton were predicted to decrease at the worst affected building façade, as shown in Tables 6.2.1 and 6.3.1 in Environmental Statement Appendix 6.4 Predicted Road Traffic Noise Levels at Selected Locations [APP-084], resulting in a negligible to minor beneficial impact at this location. No significant effects were identified relating to construction traffic as described in Environmental Statement Chapter 6: Noise and Vibration [APP-051], section 6.10.11.</p> <p>Environmental Statement Chapter 6: Noise and Vibration [APP-051] indicates that residual adverse effects would occur at Silvermere Lodge and Court Close Farm, Table 6.27, which are located in the same area as Cobham Hilton. Calculations of construction noise levels at the Cobham Hilton show that without noise mitigation, a significant effect would occur at this location. Taking into consideration the mitigation measures secured in the Outline Construction Environmental Management Plan (oCEMP) [AS-016] to minimise construction noise levels, the residual construction noise levels would not exceed the existing daytime ambient noise levels. The Cobham Hilton is far enough away from locations where night-time construction works are proposed so that an adverse effect would not occur. Examples of the CEMP measures for reducing construction noise are provided in Section 6.9 of the Environmental Statement Chapter 6: Noise and Vibration [APP-051].</p> <p>As reported in Environmental Statement Chapter 9: Landscape [APP-054] section 9.9.5, construction lighting would be kept to the minimum luminosity necessary. Where appropriate, lighting would be activated by motion sensors to prevent unnecessary usage. The main site compounds would be lit as required during hours of darkness. Lighting would be directional, and positioned sympathetically, to minimise light spill and disturbance for highly sensitive receptors.</p> <p>In any event, compensation arising from the compulsory acquisition of land, including as to disturbance, may be payable in accordance with the compensation code.</p>
REP1-028-8	<p>We request that HE engage and work with our Client to discuss measures to mitigate potential losses. We are also concerned that should the scheme permanently impact the hotel business, there will be a consequential permanent impact on the value of the Property.</p>	<p>Highways England will continue to engage with the hotel operator as regards the effect of the Scheme on the hotel. As noted above, compensation for compulsory acquisition of land may be payable in accordance with the compensation code.</p>

## REP1-030 Monte Blackburn Ltd

Reference	Written Representation Issue	Highways England Response
REP1-030-1	<p><b>Review of Highways England's Proposals for M25 J10 and A3 Wisley Interchange Completed Scheme Proposals</b></p> <p>The site is, and has historically operated as, a roadside facility providing services for passing travellers on the A3. Therefore, the proposals to remove direct access from the A3 and to provide revised access via a 4.5m wide track, accessed via a local road, are clearly not suitable for the use of the site and would remove its function in its entirety. Not only would potential visitors not be able to access the site from the A3, but it would also be obscured from view by the proposed 3m acoustic fencing.</p> <p>To close the operational drive-thru coffee shop for a number of years, would deprive it of direct access for the passing traffic that it serves; suggesting that it would be returned to its owners who can re-open, with direct access from the A3 removed, is an absurd proposition, because the use would be commercially unsustainable. Clearly there would also be a serious adverse impact arising from the proposals to demolish the primary existing building on the site.</p>	<p>Please refer to Highways England's response to the Relevant Representation of Eurogarages [RR-012] set out in 'Applicant's Comments on Relevant Representations' [REP1-009].</p> <p>Additionally, please refer to Highways England's answer to the Examining Authority's first written questions and requests for information (ExAWQ1) 1.13.25: "Please confirm what the proposed access arrangements for the existing Starbucks site are on completion of the Proposed Development and following the return of the site to the land owner".</p> <p>For clarity, the fence indicated on the plans by the blue line and the legend "ADF" is an anti-dazzle fence. This will be 2 m in height.</p>
REP1-030-2	<p>It is important to take fully into consideration that the proposed compound would be located within the Green Belt as defined in the Elmbridge Local Plan and would also involve the loss of important ecological habitats including bats, reptiles, flora and badgers. The proposals for the PFS have been very carefully designed to minimise the impact on these sensitive habitats, following months of negotiation with the Council and local wildlife groups. The proposed compound which would encroach deeper into the site than the proposed PFS, would be inappropriate development which would clearly have an impact on the openness of the green belt.</p>	<p>As shown sheet 4 of the Temporary Works Plans [APP-015], the construction compound at the former San Domenico hotel could involve more land take than that of the building itself and hardstanding alone and may encroach into the area of open grassland.</p> <p>The red line boundary for the construction compound at the site of the former San Domenico hotel was designed to be sufficiently sized to incorporate the construction compound and the bat mitigation structure (including associated screening) to mitigate the loss of the bat roost within the former San Domenico hotel.</p> <p>As stated in the draft mitigation licence submitted to Natural England to which the Letter of No Impediment (LONI) dated 26.03.2019 relates (see Appendix A.25 within the Statement of Common Ground with Natural England [APP-138]), the replacement bat roost will be provided at the edge of the woodland to the north of B1 prior to the demolition of B1. The bat mitigation structure will be screened from any light spill/noise associated with the temporary site compound and future development of the land post-construction of the Scheme using fencing and tall tree/hedgerow planting. The construction compound will be reinstated with open grassland planting.</p> <p>With regards to habitats, reptiles, flora and badgers, the following mitigation (as stated in section 7.10 of the Environmental Statement Chapter 7: Biodiversity [APP-052]) will be implemented:</p> <ul style="list-style-type: none"> <li>• Vegetation clearance will be kept to a minimum;</li> <li>• The woodland and other habitats outside of the construction compound will be avoided and protected during use of the compound;</li> <li>• A pre-works badger survey will be undertaken to determine the use of the site by badger and whether or not a badger licence is required or if the works can be undertaken under a Precautionary Method of Working (PMW) alone; and</li> <li>• Provision of an Ecological Clerk of Works and implementation of a PMW during the preparation and use of the compound for species such as reptiles and badger.</li> </ul> <p>An assessment of the effect of the Scheme on the green belt is set out in the Planning Statement [APP-133], paragraphs 5.5.58 to 5.5.83. This concludes that there is policy support for the Scheme, and it will not detract from the fundamental purpose of the Green Belt nor its openness. Paragraph 5.6.4 concludes that the Green Belt is addressed fully in the consideration of the National Planning Statement for National Networks (NPS NN) policy framework. It also states that development within the Green Belt is a key issue within the National Planning Policy Framework (NPPF, 2019), 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.</p>
REP1-030-3	<p><b>Further Context to Objection            EG Group Planning Appeal–Former San Domenico Site</b></p> <p>EG Group submitted a planning application back in February 2017 for the development of a Petrol Filling Station with associated Convenience Store, replacing the existing main building on the site. At the time of writing a final decision on this application remains pending in the form of a planning appeal. The application had been refused by the Local Planning Authority on the recommendation of Highways England, but this was not expressed to be</p>	<p>Highways England notes the planning appeal currently under consideration, Planning Inspectorate reference: APP/K3605/W/19/3235260 and awaits the decision of the Secretary of State.</p> <p>Highways England's submission to the Planning Inspectorate in relation to the planning appeal can be found at: <a href="http://edocs.elmbridge.gov.uk/IAM/IAMCache/3496998/3496998.pdf">http://edocs.elmbridge.gov.uk/IAM/IAMCache/3496998/3496998.pdf</a>.</p>

Reference	Written Representation Issue	Highways England Response
	<p>in reference to these forthcoming works, but that dialogue with Highways England had stalled due to their refusal to respond further on matters relating to a Road Safety Audit of the site access arrangements. This was the sole reason for refusal of the permission.</p> <p>It remains the developers view that the application included appropriate mitigation at the site access and all issues had been resolved other than highways. All requisite information required by Highways England was provided by our client and in the opinion of the EG's highways consultant, Highways England should have been satisfied with the access proposals in technical terms. EG Group remain satisfied that the Planning Inspector will support this position and the Appeal will be allowed.</p> <p>EG Group issued a letter to Highways England's Chief Exec on 25<sup>th</sup> October 2017 documenting the issues arising from the behaviour of Highways England in relation to that planning application–this is appended to this letter for reference.</p>	
<p>REP1-030-4</p>	<p><b>Input to Earlier Consultation on M25 J10/A3 Wisley Interchange Works</b></p> <p>EG Group attended Highways England's Pre-DCO-Application consultation events and had direct correspondence with Highways England regarding their concerns with the proposed highway improvement works. On the 10<sup>th</sup> August 2017 representatives of our clients joined a webinar with Highways England and their consultants to discuss the scheme and this included discussion of a number of tabled potential alternative solutions presented by our clients in order to retain access to the site from the A3.</p> <p>Whilst access directly from the A3 is a fundamental requirement of a roadside service facility, at this location a number of alternative potential egress options were presented to Highways England, including an egress to the Wisley Interchange slips or to Seven Hills Road. These options were tabled in order to demonstrate that there were other potential solutions to allow the operation of the site as a roadside service area other than simply closing it off and forgetting about it. It is not our client's responsibility to find appropriate design solutions for Highways England—it is for Highways England to find a workable solution. It is clear that Highways England have chosen to completely ignore the existing lawful use of the site; their failure to consider any solutions to retain access that would meet the needs of motorists on this stretch of the highway network and accommodate the existing commercial operation of the site is completely unsatisfactory. It is clear that there has been a failure to show that all available and reasonable steps have been taken to maintain the commercial operation from the site.</p> <p>Part of Highways England's operational brief is to facilitate economic development, not to prevent it by stifling the progress of planning applications and failing to design new road schemes to accommodate existing land-uses, which will result in a direct loss of commercial operations on this site and employment of those staff who work there.</p> <p>It is our belief that Highways England have overlooked and failed to properly address this site and its context from the outset of this scheme and despite the best efforts of our clients they have failed to provide the appropriate level of consideration to the value of the service facility offered to users of the highway by the site, in both its current and proposed form, and the associated loss of employment that will arise.</p>	<p>Highways England reviewed the alternative proposals tabled by the EG Group. However, for reasons set out in Highways England's response to the Relevant Representation of Eurogarages [RR-012] set out in the Applicant's Comments on Relevant Representations [REP1-009], proposals utilising a direct access from the A3, including the Wisley Interchange Slips are not appropriate.</p> <p>Solutions which require a direct link to Painshill Park roundabout are impractical given these would require land take from Feltonfleet school, the extent of which includes listed buildings close to the existing highway boundary.</p> <p>A link to from the San Domenico site to Seven Hills Road South has been included in the Scheme. However, this is identified as a non-motorised user (NMU) route for the majority of its length from its connection with Seven Hills Road. To provide a road access to the San Domenico site of a suitable standard alongside the provision of an NMU route would require additional land acquisition from third parties through the use of compulsory acquisition powers.</p> <p>Highways England remains willing to engage with Monte Blackburn Limited on the effects of the Scheme on the former San Domenico site.</p>

## REP1-032 Painshill Park Trust

Reference	Written Representation Issue	Highways England Response
REP1-032-1	<p><b>Negotiation with Highways England</b></p> <ol style="list-style-type: none"> <li>In late 2017 Highways England published their intention to widen the A3 as part of their plans for changes to Junction 10 of the M25. Unfortunately, these plans were based on information about Painshill which was more than 40 years out of date, before the restoration had begun, and would have caused irreparable damage to the landscape.</li> <li>Collaborative discussions with Highways England and their consultants, Atkins, throughout 2018 eventually resulted in satisfactory proposals which minimized the damage to Painshill. Throughout these discussions, the Trust received assurances that its access onto the A3 at the western end of the park would either be retained or replaced by a separate access track. It was recognized that this access was necessary for the next phase of Painshill's restoration as well as the maintenance of the western end of the park and the safety of the Gothic Tower, the Temple of Bacchus and of the increasing number of visitors to that part of Painshill.</li> <li>For example, at a meeting between Highways England, Atkins and the Trust on November 15th 2018 it was minuted that "assurances were given that the Trust will be able to use the access road for emergency purposes and for service vehicles working at the western end of the park".</li> <li>In April 2019 the Trust was surprised to find that the provision for access at the western end of the park had been removed.</li> <li>At a meeting with Highways England on 29th July 2019 it was minuted that the Project Manager "confirmed that although there is no technical reason why the access route could not be extended, this had not been included within the DCO submission because due to pressure on Highways England time had run out...". It had been agreed that "the feasibility of providing an alternative access between chainage 3800 to 4150 would need to be looked at..." An appointment was made for a surveyor to attend the site but later cancelled. So far as the Trust is aware no further action has been taken.</li> </ol>	<p>Highways England has responded to this issue in the Applicant's Comments on Relevant Representations [REP1-009].</p>
REP1-032-2	<p><b>Why the access is needed</b></p> <ol style="list-style-type: none"> <li>Painshill is more than one mile from east to west and the only vehicular access is at the eastern end of the park. This is through the trade entrance and along a single-track path mainly used by visitors on foot. There are no other means of getting from the east to the west of Painshill.</li> <li>The path is not suitable for service or emergency vehicles. It is narrow, winding, with steep climbs and descents and overhung by low branches which make it difficult for high sided vehicles. There are gates to be opened and at busy times it is used by significant numbers of pedestrians, putting them in danger and further increasing the time needed to reach an emergency.</li> <li>In a recent trial by emergency services it took approximately 15 minutes for a fire engine to reach the Gothic Tower and that at a time when few visitors were using the path.</li> <li>In an emergency, access to the western end of Painshill is needed to evacuate visitors, for ambulances and fire fighting vehicles to get to the buildings, particularly the Grade II* Gothic Tower and the Temple of Bacchus, in the event of a fire and to save those visiting or living in the buildings.</li> <li>The Trust also needs to use this entrance for service vehicles in the next stage of its restoration programme and for landscape maintenance.</li> <li>On completion of the Temple of Bacchus, the entrance will be needed for service vehicles to support occasional events in the buildings and the landscape. These events will be designed to supplement the income of the Trust which is not yet financially self-sustaining.</li> <li>Visitor numbers are increasing fast. Last year 120,000 people visited Painshill. This year visitor numbers are increasing by about 20% with a short-term target to attract 150,000 visitors each year. An increasing proportion of these visitors are visiting the western end of the park as the restoration programme concentrates on that area. In a medical emergency it could be difficult for an ambulance to get to that end of the park and the use of helicopters is precluded by trees, electric pylons and wires.</li> <li>The Gothic Tower was gutted by fire in the past and has been completely restored by the Trust. It has five storeys served by a single spiral staircase. There is currently a public lavatory on the ground floor, a</li> </ol>	<p>We have consulted with the Surrey Fire and Rescue Service (SFRS), who have confirmed that they are able drive their fire appliance to the Gothic Tower via the existing internal road network at Painshill Park. SFRS stated "<i>the Gothic Tower is not a sleeping risk</i>" and "<i>on balance the likelihood of fire is low and the risk to life is low, and therefore the need for access should be commensurate</i>" (email from Tim Readings, Assistant Group Commander SFRS, 19 November 2019).</p> <p>The condition of the path within the park will not prevent access by a fire appliance and such controls are commonly found in residential areas as a means for traffic calming. In case of an emergency, measures can be put in place by the Trust to ensure gates along the route required within the park can be opened ahead of the arrival of the fire service or other emergency service. Emergency services attending incidents are clearly highlighted to other vehicles and pedestrians and considers public care when passing through busy areas.</p> <p>As the western part of Painshill Park can be accessed via the internal network of maintenance tracks, there is no basis for Highways England to acquire rights across third-party land to provide the Trust with such an access for the Trust's work, including any restoration programme or occasional events, which is 'used infrequently', as stated by Mr Reay-Smith at the Open Floor Hearing on 12 November 2019 and as stated in Painshill Park Trust written representation.</p> <p>Highways England is not aware of discussions between Painshill Park Trust and the emergency services discussing the main car park as a second point of entry.</p>



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	<p>café on the first floor and a display area on the second. There is a viewing platform at the top. Up to four years ago the Tower was lived in by a member of the Trust's staff. We expect to use it as living accommodation again either for staff or holiday lets to supplement the Trust's income.</p> <p>9. Other than in an emergency, the Trust's need to use the western entrance will be comparatively infrequent, perhaps once or twice a month. It will not be used as an entry for the public.</p> <p>10. There is no other vehicular access to the landscape. We understand that the emergency services are under the impression that the main car park entrance is a second point of entry. That is incorrect. Not only is that entrance secured by a raised drawbridge when the park is closed, there is no access at any time to any part of the park from it for a vehicle larger than a small buggy.</p>	
REP1-032-3	<p><b>The National Networks National Policy Statement</b></p> <ol style="list-style-type: none"> <li>The National Networks National Policy Statement sets out the need for, and the Government's policies to deliver, development of nationally significant infrastructure projects on the national road and rail networks in England.</li> <li>In the section headed "The Historic Environment", paragraph 5.131 states, in part: "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. .... 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 designated assets of the highest significance, including... Grade II* Listed Buildings ... grade I Registered Parks and Gardens should be wholly exceptional". Painshill Park is a Grade I Registered Park and Garden and the Gothic Tower, the building most affected, is a grade II* Listed Building.</li> <li>Paragraph 5.132 states: "Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development.</li> <li>Paragraph 5.133 states: "Where the proposed development will lead to substantial harm to ... 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....".</li> <li>Trustees of Painshill Park Trust believe that a proposal that restricts its ability to restore and maintain the western end of the landscape and which puts the buildings, the people using and living in them and our visitors at increased risk does represent substantial harm.</li> <li>The proposed development in question is not the widening of the A3. It is the last-minute decision, after a year of assurances to the contrary, that the western entrance to Painshill should be closed, when Highways England have clearly stated that the only reason for doing so was lack of time and that there was no technical reason why the access track could not be extended for 400 metres to allow the entrance to be retained.</li> </ol>	<p>From a heritage perspective, in accordance with the National Policy Statement for National Networks (NPS NN), the key consideration is whether the Scheme presents a negative and significant impact due to changes to the Registered Park or the setting of associated designated heritage assets, not whether it affects access arrangements for restoration and maintenance works to the Georgian landscape.</p> <p>There will be changes to the existing Registered Park and within the settings of associated listed buildings, but these will be of a quantum that will result in less than substantial harm, as noted in the assessment within Environmental Statement Chapter 11: Cultural heritage [APP-056]. With appropriate mitigation which is secured through the dDCO [APP-018] and the Construction Environmental Management Plan (CEMP), the Scheme will not give rise to significant adverse effects on Painshill Park. As the Scheme will give rise to less than substantial harm to the significance of a designated heritage asset, this harm should therefore be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 5.134 of the NPS NN).</p>

## REP1-035 Park Barn Farm

Reference	Written Representation Issue	Highways England Response
REP1-035-1	<p>(a) <b>Overcompensation for the loss of SCL</b></p> <p>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:-</p> <ol style="list-style-type: none"> <li>i. It has overstated the current ‘advantage’ provided by the SCL that would be lost due to the Scheme construction;</li> <li>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;</li> <li>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 not cause any disadvantage to the public interest;</li> <li>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;</li> <li>v. The high environmental quality of land at PBF; and</li> <li>vi. It has applied historically high land replacement ratios which have no direct bearing on the current situation.</li> </ol> <p>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.</p>	<p>In the development of the replacement land proposals for the Scheme, due regard has been had to the statutory requirements of the Planning Act 2008. The development of the proposals has also benefited from detailed consultation and engagement with relevant statutory bodies. Appropriate regard has been had to precedent from other highway schemes involving the acquisition of land from the common land and open space at Wisley and Ockham Commons and Chatley Heath.</p> <p>The details of the approach taken by Highways England to the identification of suitable replacement land are set out in section 2.7 of the Statement of Reasons Appendix C document [AS-005], pages 26-30.</p> <p>Accordingly, there is no basis for the assertion that the provision of replacement land as part of the Scheme is ‘grossly excessive’. We respond to each detailed point in turn below.</p> <p><b>Point i.</b></p> <p>The special category land (being common land or open space) that would be acquired for or burdened by rights acquired for the Scheme is all contiguous with larger areas of special category land, but it varies in character and use.</p> <ul style="list-style-type: none"> <li>• Alongside the M25 west of junction 10, it is mostly broadleaved woodland on both sides, with some Scots pine plantation on the south side near the A3 and some grazing meadows on both sides near Buxton Wood. There are horse tracks, footpaths and glades close to the existing highway fence along some lengths and PRow links close to the motorway on both sides near Clearmount bridge.</li> <li>• Alongside the A3 north of junction 10 it is broadleaved woodland, crossed by PRow and horse tracks on the west side, with the lower part of a cycle course near the A3 on the east side.</li> <li>• Alongside the A3 south of junction 10, there is a higher proportion of Scots pine plantation woodland, except near Cockcrow bridge, changing to broadleaved or mixed woodland along the west side and alongside Bolder Mere on the east side. A path runs close to the west side of the A3 between the Pond Farm access and Wisley Lane. The southern part of Wisley Common east of the A3 is mixed woodland, with deciduous ancient woodland south of this down to Ockham Park junction.</li> <li>• Alongside the M25 east of junction 10, it is mostly Scots pine plantation woodland along the south side, with broadleaved or mixed woodland along the north side. A track used by the public runs near to the highway fence along the south side.</li> </ul> <p>These areas, therefore, contribute to the ‘advantage’ provided by the existing special category land, from their visual character and habitat types, the scope for public use and their connection with larger areas.</p> <p>The package of replacement land parcels within the Scheme aims to provide, so far as is practicable, the range of landscape types and quality found in the special category land that will be acquired, or burdened by rights acquired, for the Scheme.</p> <p>The parcels of replacement land to be acquired at Park Barn Farm will provide broadleaved and mixed woodland and meadow areas, with connectivity principally to existing common land and open space, which is in keeping with the nature and status of much of the special category land that will be affected to the west of the A3.</p> <p>The parcels of replacement land to be acquired at Chatley Farm and Hatchford End will provide mainly mixed woodland and coniferous plantation woodland, with connectivity to existing common land and open space, which is in keeping with the nature and status of much of the special category land that will be affected to the east of the A3.</p> <p>As explained in the Common Land and Open Space report appended to the Statement of Reasons [AS-005], Chapter 5, the nature of the opportunities available for replacement land that is contiguous with the existing special category land mean that, apart from the two plots included between the M25 and Pointers Road, most of the replacement land areas will be less affected by noise from trunk road traffic than will the land to be acquired.</p> <p>For the above reasons, Highways England has properly assessed the existing ‘advantage’ provided by the special category land which is required for the Scheme. Consequently, there is no ‘over-inflation’ of replacement land.</p> <p><b>Point ii.</b></p>

Reference	Written Representation Issue	Highways England Response
		<p>Without specific additional NMU provision or mitigation, the 'remodelling' of the road layouts of the three junctions along the A3 will make movements across Ockham Park and Painshill junctions more difficult for NMUs and will prevent all movement of NMUs around or across junction 10.</p> <p>Accordingly, the Scheme also includes additional crossings and signal controls at Ockham Park and Painshill junctions and a new parallel route for NMUs alongside the A3, with new crossings over the M25 and A3. These PRow works are necessary for suitable provision for NMUs and do not influence the extent of replacement land provided, although existing and potential PRow and NMU access do influence the location of replacement land.</p> <p><b>Point iii.</b></p> <p>As explained at section 6.3 of the Common Land and Open Space report appended to the Statement of Reasons [AS-005], pages 76-79, where the acquisition of rights over special category land will impose a burden on the land, replacement land has been provided for within the order limits of the dDCO [APP-018] in accordance with section 132(4) to compensate for the loss of advantage to the special category land that will result from the acquisition of the right in question.</p> <p>If the exception under section 132(4) Planning Act 2008 to avoid special parliamentary procedure being engaged is to be satisfied, replacement land must be 'adequate to compensate... for the disadvantages which result from the compulsory acquisition of the order right.' The replacement land provision meets this requirement.</p> <p>As explained in the Statement of Reasons [APP-022] and the Habitats Regulations Assessment Stage 3-5 [APP-044], there is a compelling case in the public interest for the Scheme to proceed. Accordingly, were the dDCO to be subject to special parliamentary procedure (in the event that it is made), this would threaten the delivery of the Scheme within the period set in the Road Investment Strategy and undermine the delivery of two nationally significant infrastructure projects, contrary to the National Policy Statement for National Networks.</p> <p>As explained in Statement of Reasons Appendix C: Common land and open space Report [AS-005], Highways England has sought to provide replacement land at a 1:1 ratio in respect of the acquisition of permanent rights where permanent rights being sought under the dDCO would disadvantage the owner and/or the public in their use of the special category land.</p> <p>The categories of land to which this approach has been applied are specified in paragraph 6.3.13 (a) and (b) of AS-005. These comprise circumstances where a permanent surfaced track would be left in place and/or where there would be use of the land from time to time by vehicles used for inspection and maintenance of utilities or highways assets, which are viewed as being a burden on the land when compared with the existing situation.</p> <p>Where the rights being sought will be for undertaking and maintenance of environmental works to improve the biodiversity of the SPA (which are considerably larger areas), or for the upgrading of PRow without any permanent works, then replacement land is not being provided, as Highways England consider that these permanent rights being sought under the DCO would not be a burden that would disadvantage the owner and/or the public in their use of the special category land. Further explanation is provided at paragraphs 6.3.14 - 6.3.15 of AS-005.</p> <p>The provision of replacement land at a 1:1 ratio in respect of the acquisition of permanent rights over special category land which will constitute a burden on the land</p> <p><b>Point iv.</b></p> <p>Highways England has properly applied the legal tests in sections 131(5) and sections 132(5) Planning Act 2008. As regards section 131(5), this section applies in respect of the compulsory acquisition of special category land. Under this provision, a draft development consent order is not subject to special parliamentary procedure where:</p> <p style="padding-left: 40px;">(a) the order land does not exceed 200 square metres in extent or is required for the widening or <b>drainage</b> of an existing highway or partly for the widening and partly for the drainage of such a highway, <b>and</b></p> <p style="padding-left: 40px;">(b) the giving in exchange of other land is unnecessary, whether in the interests of the persons, if any, entitled to rights of common or other rights or in the interests of the public.</p> <p>This means that the exception in subsection (5) only applies if the land required is very small or is for drainage and/or widening of an existing highway alone.</p> <p>As the Common Land and Open Space report [AS-005] correctly identifies, the order land (i.e. the special category land subject to permanent acquisition) is required for other purposes, including new overbridges, an enlarged roundabout at junction 10, upgraded and lengthened slip roads on the M25 and A3, free-flow slip roads, the new Wisley Lane diversion and new gantries. It is not properly arguable that the acquisition of special category land for</p>

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		<p>the purposes of undertaking these works can be said to be for the 'widening' or 'drainage' of a highway within section 131(5).</p> <p>Accordingly, the order land cannot be said to be required 'for' either the widening or drainage of a highway, or partly for either of those activities. Section 131(5) is therefore not engaged.</p> <p>As regards section 132(5) Planning Act 2008, this section applies in respect of the compulsory acquisition of rights over special category land. Under this provision, a draft development consent order is not subject to special parliamentary procedure where:</p> <p><i>(a) the order land does not exceed 200 square metres in extent or the order right is required in <u>connection with the widening or drainage of an existing highway or in connection partly with the widening and partly with the drainage of such a highway, and</u></i></p> <p><i>(b) the giving of other land in exchange for the order right is unnecessary, whether in the interests of the persons, if any, entitled to rights of common or other rights or in the interests of the public.</i></p> <p>As regards the application of section 132(5) in this case, as noted at section 6.3.17 of AS-005, reliance is made in the alternative on section 132(5) (to the extent that the Secretary of State is not satisfied that the exception in section 132(3) is made out).</p> <p>The extent of section 132(5) is broader than the equivalent provision in section 131(5). The use of 'in connection with' in section 132(5), in comparison to 'for' in section 131(5) indicates that the parliamentary draftsmen intended that the provision of section 132(5) should have a wider meaning.</p> <p>In this case, the rights to be acquired over special category land for which replacement land is not to be provided (i.e. for those purposes set out in section 6.3.13 (c) to (f) of AS-005), are manifestly required in connection with the widening of a highway. As noted at 6.3.13 of AS-005, the relevant rights are required for the following purposes:</p> <ul style="list-style-type: none"> <li>• works to maintain enhanced NMU routes across special category land</li> <li>• access to replacement land for maintenance</li> <li>• works to carry out enhancements to existing and proposed parts of the SPA</li> <li>• general environmental mitigation works.</li> </ul> <p>Each of these categories of works are necessary in connection with the widening of the A3. The widening of the A3 will give rise to environmental effects, including the acquisition of land from the SPA and SSSI, and will affect existing NMU routes. Accordingly, the relevant rights sought over the affected special category land are necessary in consequence of the widening of the A3 to mitigate for its environmental effects. Thus, the acquisition of the relevant rights is plainly within the scope of section 132(5).</p> <p><b>Point v.</b></p> <p>Highways England does not accept that the environmental quality of the land at Park Barn Farm is 'just as good' as the special category land required for the Scheme.</p> <p>It is acknowledged that one part of the land at Park Barn Farm is included within a tree preservation order and a small part is classed as ancient woodland.</p> <p>However, it must be borne in mind that much of the special category land required for the Scheme is designated as SSSI, of which a large part is also SPA, and it includes several veteran trees. Therefore, in terms of acknowledged environmental quality, the special category land required for the Scheme is unquestionably better than that at Park Barn Farm given these high-level environmental designations.</p> <p>Moreover, the Scheme includes some works which are necessary to improve the environmental quality of parts of the Park Barn Farm parcels as an integral part of providing, in due course, appropriate public amenity.</p> <p>The reference to paragraph 5.181 of the National Policy Statement for National Networks at page 10 of [REP1-035] is misconceived. This paragraph provides that where sections 131 and 132 Planning Act 2008, replacement land provided under those sections 'will need to conform to the requirements of those sections.' As has been explained, the provisions of those sections are clearly satisfied in respect of the Scheme.</p> <p><b>Point vi.</b></p> <p>Sections 131 and 132 of the Planning Act 2008 (and sections of the Acquisition of Land Act from which they are derived) do not make provision as to what should be considered as 'no less advantageous' (for section 131) or 'adequate to compensate' (for section 132) and, therefore, precedent has been sought from other similar or related</p>

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		<p>projects involving the same commons in calculating the ratios or provision. This is set out in section 2.7 of the Statement of Reasons Appendix C document [AS-005], pages 26-30, with the results being set out in sections 6.1 (pages 73-75) and 6.4 (pages 80-82). The ratios used as a guide for this Scheme are lower than those used on the M25 scheme, with the influence of traffic noise on the order land being one of the factors taken into consideration.</p>
<p>REP1-035-2</p>	<p><b>b) Whether a compelling case in the public interest exists: prejudice suffered by the landowner</b>            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.</p>	<p>There is a compelling case in the public interest for the acquisition of land at Park Barn Farm to provide replacement land for special category land that is to be acquired for the Scheme. The compelling case is set out in section 5.4 of the Statement of Reasons [APP-022], pages 21-23, and sections 2.2 and 2.3 of the Common land and open space report [AS-005] pages 13-19. Under section 122(2)(c) Planning Act 2008, land can be compulsorily acquired for a nationally significant infrastructure project where its purpose is to provide replacement land.</p> <p>As has been explained, it is not accepted that there is 'sufficient replacement land elsewhere' such that the land at Park Barn Farm may be excluded from the order limits of the dDCO [APP-018].</p> <p>The interference with the landowner's right to private life is proportionate, as explained in chapter 6 of the Statement of Reasons, pages 26-27.</p> <p>Also of relevance is that when Highways England first considered Park Barn Farm as replacement land, the property had been recently placed on the market. Therefore, this appeared as a more appropriate location for purchase than would a property that an owner did not wish to sell and, in initial discussions, Mr Alderson did not object to the principle of Highways England acquiring part of the holding. It has never been Highway's England's intention to frustrate the landowner in his intentions to sell the house and a substantial area of associated land (about half the total holding), including the land close to the houses and all the riverside frontage. The arrangement of land included within the dDCO was also amended in accordance with a request made by the landowner at a meeting in January 2018 with Highways England's consultants. Highways England has, with the agreement of the landowner, recently pegged out the boundary of the land that would remain within the landowner's ownership, to help with prospective sale of the property.</p> <p>Discussions have taken place regarding acquisition of this land by agreement, including some held on a 'without prejudice' basis. The landowner has served a blight notice on Highways England. Highways England has served a counter-notice and the matter is now subject to the relevant statutory procedure.</p>
<p>REP1-035-3</p>	<p><b>c) Other alternatives for RL</b>            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.</p>	<p>As explained in section 5.5 of the Common Land and Open Space report [AS-005], Highways England has explored other opportunities for replacement land in the vicinity of the Scheme, but these locations were either not well connected to the existing area of special category land (if at all) and/or were considered unlikely to be successful.</p> <p>Pond Farm was one of the opportunities explored, due to its position as an enclosure within the extent of common land and open space in the western portion of Wisley Common.</p> <p>Identification of the land at Pond Farm land as replacement land for the Scheme would not "provide a valuable guarantee that such uses would be able to continue for the benefit of future generations" as asserted in REP2-018 (page 12), as the land is already owned by Surrey County Council. The opposite would be the case, as public access would be incompatible with the safe continuation of the herd management business.</p> <p>The situation for Pond Farm is described in section 5.5 of the Statement of Reasons Appendix C document [AS-005], page 71. In summary, acquisition of land at Pond Farm would have meant finding a new location for the Surrey Wildlife Trust herd management business, by which they maintain a network of Surrey County Council wildlife sites from this relatively central location, including several heathland SPA locations. This, in turn, would have jeopardised the ability of Surrey County Council to provide appropriate, grazing-based maintenance of the SPA habitat at the Wisley and Ockham Commons site.</p>

## REP1-038 Royal Horticultural Society

Reference	Written Representation Issue	Highways England Response
REP1-038-1	<p><b>Request for and Delivery of Information from HE</b></p> <p>Despite requests during informal and formal Consultation phases, the RHS has not to date received a full response to its request for traffic modelling data. Recent data issued by HE is incomplete and is hampering the RHS's ability to present its case to the ExA. The RHS reserves its position to submit further material as the Examination proceeds and wishes to express its frustration that the DCO Scheme is lacking in this regard.</p>	<p>Highways England has had a lot of discussion with RHS and has provided a very substantial amount of traffic modelling data to RHS. Further requests for information from RHS have been met.</p>
REP1-038-2	<p><b>Highways and traffic impacts</b></p> <p>The DCO Scheme would result in the worsening of access to and from the RHS Garden.</p> <p>The detrimental impacts of the DCO Scheme would be addressed by including components contained in the RHS Alternative Scheme namely:</p> <ul style="list-style-type: none"> <li>• The introduction of south facing slip roads to the Ockham Park Roundabout; and</li> <li>• The retention of Wisley Lane's direct "left out" connection to the A3 with an improved and compliant slip road northbound.</li> </ul>	<p><i>Access</i></p> <p>Highways England does not accept that the Scheme would worsen the access to and from the RHS Garden Wisley; to the contrary, it will be improved. The Scheme removes unsafe access from Wisley Lane to the A3 and replaces it with a safe access at the Ockham Park junction, namely the Wisley Lane diversion. The implications of this on changes to journey distances is presented below.</p> <p>Drivers approaching the RHS Garden Wisley from M25 J10 (and A3 north of J10) currently represent approximately 50% of RHS generated traffic. These drivers would experience a negligible change in journey distance approaching the garden and the Scheme would reduce their journey time around M25 J10. When leaving the garden to travel towards the M25 J10 (and A3 north of J10), their journey distance would increase by approximately 2.4 km (1.5 miles), but would involve safer access to the A3.</p> <p>Drivers approaching the RHS Garden Wisley from the south currently represent approximately 34% of RHS generated traffic; with 24% currently approaching via the A3 and 10% currently approaching through Ripley. With the Scheme in place, those drivers that decide to route via Ripley would experience a negligible change in distance approaching the garden; whilst those drivers routing via M25 J10 (up to 24%) would experience a 6 km (3.7 mile) increase in journey length to the garden. When leaving the garden, those opting to travel via Ripley would experience a 3.5 km (2.2 mile) reduction in journey length, whilst those routing via M25 J10 would experience a 2.5 km (1.6 mile) increase in their journey.</p> <p>Analysis of changes in journey distances due to the Scheme and proportions of RHS traffic using different routes is provided in the Transport Assessment Supplementary Information Report submitted at Deadline 2 (Volume 9.16).</p> <p><i>South facing slip</i></p> <p>Please see response to Questions 1.13.6, 1.13.7, 1.13.11, 1.13.15, 1.13.18 of the Highways England's the Examining Authority's Written Questions (Volume 9.18).</p> <p><i>Retention of Wisley Lane's direct "left out" connection to the A3</i></p> <p>We have demonstrated in the schematic provided in our Technical Note dated September 2019 that the actual weaving length (Lact) is only 953 m. The minimum weaving length required by design standards is 1 km and therefore the RHS Alternative scheme does not comply with the appropriate standards.</p> <p>With regard to weaving, we disagree with the suggestion by RHS that it is only the Wisley Lane traffic which is heading northbound on the A3 towards London which actually results in a weaving component from the slip. There will be traffic joining the northbound A3 from the Ockham Park junction wishing to get from Lane 1 and Lane 2 to Lane 3 and Lane 4 to continue north into London on the A3. There will also be traffic in lane 3 and subsequently lane 4 through and beyond the Ockham Park Junction that will want to access the diverge leading to the M25. The introduction of a merge from Wisley Lane will introduce additional vehicles and weaving movements, which drivers will not be expecting. Therefore, it will increase the risk of accidents, particularly because the vehicles merging from Wisley Lane will be slow moving.</p> <p>Highways England maintains that TD42/95 is the design standard for Major/Minor priority at grade junctions, which is what this particular element of the Scheme should be, but the design standards do not allow this type of junction on Dual 3 lane All Purpose (D3AP) roads and therefore by implication it is not permitted for use on Dual 4 lane All Purpose (D4AP) roads. As proposed by RHS, Highways England maintains that CD122 is not the correct design standard to be used for the RHS Alternative Scheme.</p>

Reference	Written Representation Issue	Highways England Response
REP1-038-3	<p><b>The RHS Alternative Scheme would result in much improved access arrangements compared to the DCO Scheme.</b></p>	<p>Highways England does not accept that the RHS Alternative Scheme would result in much improved access arrangements compared to the Scheme.</p> <p>The RHS alternative contains two additional elements to the Scheme: a left out from Wisley Lane on to the A3 and south facing slips at Ockham Park junction.</p> <p>First, the existing junction between the A3 and Wisley Lane is unsafe. The operation and continued retention of the junction already breaches current standards set out in the Design Manual for Roads and Bridges relating to separation, weaving and merging distances and there is evidence that its presence is a significant contributory factor in the poor accident record of this section of the A3.</p> <p>This is because there would be greater conflict between traffic merging from Wisley Lane and traffic on the A3 northbound carriageway manoeuvring in to the two nearside northbound lanes in preparation for exit at M25 junction 10. The nearside of the two exit lanes would also be free-flowing at junction 10, which is a further important safety factor as traffic is likely to be moving more quickly. Highways England is not aware of any other examples of such a side road junction being retained on a D4AP road and where there is a 2-lane drop within 1 km of the next junction.</p> <p>Secondly, the retention of a left turn out of Wisley Lane would not comply with the relevant design standards. Fundamentally, there is insufficient space between Wisley Lane and M25 junction 10 to achieve an acceptable standard of merge lane for traffic exiting from Wisley Lane. For these reasons, a left turn out should not be retained and the Scheme therefore makes provision for an alternative access road to be provided, namely the Wisley Lane diversion.</p> <p>The traffic modelling shows traffic routing via Ripley in the morning and evening peaks although it does not follow from this that in reality Ripley High Street will become the preferred route for all Wisley Lane movements to and from the south. This is because the modelling cannot reflect the impact that the signage strategy will have on users as it assumes that all traffic takes the lowest cost route in terms of distance and time. The modelling is therefore a worst-case assessment for Ripley in this regard.</p> <p>Moreover, there is no highway justification for providing south-facing slips at the Ockham Park junction on account of the Scheme. The traffic modelling results presented in the Transport Assessment Report (see section 7.6) [APP-136] shows that the Ockham Park junction will operate within capacity in the future with the Scheme in place.</p> <p>The modelling and assessments also conclude that the Scheme would have a limited effect on the operational performance of the local road network through Ripley, and there is no justification to bring forward south-facing slips as mitigation for the Scheme's limited impact on that settlement.</p> <p>Nor would there be sufficient justification to provide the slips as mitigation for the effect on the RHS Garden Wisley's visitors who travel to the Gardens from the south. These journeys would, as a result of the Scheme, lose the benefit of direct access to Wisley Lane from the A3 and would incur an increase in return journey times of approximately seven minutes if they follow the signed route. However, the volume of traffic that would benefit from south-facing slips would be small in absolute and relative terms and insufficient to justify their inclusion in the Scheme. It is also important to recognise that any effect on Wisley Lane traffic should be balanced against the significant benefits that the Scheme would deliver in providing a safer alternative access.</p> <p>South facing slips at Ockham Park junction are not required to mitigate any impacts due to the Scheme and, consequently, they do not form part of the Scheme.</p> <p>The Scheme does not preclude future implementation of south facing slips at Ockham Park junction. However, it is evident that there are several challenges and constraints associated with providing them, including the likely need to acquire land outside the highway boundary, which would need to be overcome to demonstrate that they are deliverable without detriment to either the free or safe operation of the A3, affordable and offer the most appropriate solution to the identified problem. These include that:</p> <ul style="list-style-type: none"> <li>the Ockham Park roundabout would need to be enlarged and the B2215 Portsmouth Road, the B2039 Ockham Road North and the Wisley Lane diversion connections with the Ockham Park Roundabout would need to be re-aligned. The roundabout is located within the Stratford Brook flood zone (Zone 3) and adjacent to both a Site of Nature Conservation Importance (SNCI) and a historic landfill site, so these factors would need to be taken into account in any provision of new slips.</li> <li>the Ripley services on the A3 are located only 1.5 kms south of Ockham Park junction. Consequently, there is insufficient distance between the junctions to provide a design with a standard compliant</li> </ul>

Reference	Written Representation Issue	Highways England Response
		<p>weaving length between the merge and diverge sections of the respective on and off slip roads. A minimum weaving length of 1000 m is required for a compliant design where only approximately 650 m northbound and 690 m southbound can be achieved. Therefore, the accesses off the A3 to the Ripley services would have to be relocated to accommodate south facing slips at the Ockham Park junction to achieve a compliant design; and</p> <ul style="list-style-type: none"> <li>third party land outside of the boundaries of both the public highway and the DCO would be required to construct the enlarged roundabout and to realign the side road connections and the slip roads.</li> </ul> <p>On 26 October 2017 a Ministerial Statement was made in the House of Commons to confirm that south-facing slips at Ockham would not be provided as part of the Scheme, reaffirming that the funding commitments in the Government's Road Investment Strategy only relate to improving the junction 10/A3 Wisley interchange and the Painshill junction.</p> <p>Whilst Highways England's position therefore remains that there is no case for providing south-facing slips at Ockham as part of the Scheme, the construction of the Scheme would not prevent the delivery of south-facing slips at Ockham Park junction at some point in the future, should they be justified in planning terms, and should suitable funding be secured.</p>
REP1-038-4	<p><b>Air quality and ecological impact</b></p> <p>As set out in RHS/DL/I and RHS/AB/I, the HE assessment has shown that the DCO Scheme will give rise to adverse impacts on NOX concentrations and Ndep rates within the SPA alongside the A3. The RHS Alternative Scheme will reduce these impacts. The RHS Alternative Scheme will have the added benefit of reducing the exposure of residents in Ripley to increased concentrations and of reducing emissions of the greenhouse gas (CO2).</p>	<p>Highways England does not agree that the Scheme will adversely affect the SPA as a result of changes in NOx concentrations and nitrogen deposition rates at locations in near the A3.</p> <p>As set out in paragraphs 7.2.40 (construction) and 7.2.52 (operation) of APP-043, Highways England assessment does not show an adverse effect within the SPA as a result of changes in nitrogen deposition rates. This is because the wooded area close to the A3 acts as a buffer for the heathland (as documented in paragraph 7.4.4 of APP-043) where the qualifying features occur.</p> <p>As discussed in the response to the RHS Air Quality Representation [REP1-041], even though the RHS Alternative Scheme has not been assessed, there is no basis for the proposition that it would have a notable effect on nitrogen deposition rates within the SPA compared to the Scheme. This is because the traffic modelling undertaken by Highways England has predicted that all the traffic travelling to and from RHS Wisley from the A3 south will access the gardens via Ripley and the results of the air quality assessment in the Environmental Statement, Chapter 5: Air Quality [APP-050] take this into account. Accordingly, the effect of this routing would be the same as the south facing slips forming part of the RHS Alternative Scheme in air quality terms.</p> <p>The assessment has shown that even with this traffic, changes in NO2 concentrations at receptors in Ripley near the High Street would be small or imperceptible, and still below air quality criteria. Hence, even though the RHS Alternative Scheme has not been assessed, it can be considered that it would not have a significant effect on NO2 concentrations at receptors in Ripley. To provide further clarification, an additional assessment (please see Response to RHS-DL-1 AQ REP1-041, Volume 9.17) was carried out to assess the effect of the traffic using the signposted route (i.e. via junction 10) and the additional traffic was shown to be unlikely to have any measurable effect on the reduction in species-richness as a result of changes in the nitrogen deposition rates and would still not cause an adverse effect on the integrity of the site.</p> <p>Although the RHS Alternative Scheme has not been assessed by Highways England, it can be considered that any reduction in CO2 emissions as a result of this Alternative would be negligible. Estimates of CO2 emissions as a result of the two routes that could be taken by traffic travelling between RHS Wisley and the A3 to the south are provided in Table 1 of the Response to RHS-DL-1 AQ REP1 -041, Volume 9.17. The key driver to reducing CO2 emissions will be through national policy measures, such as the move to zero emission vehicles.</p>
REP1-038-5	<p>The Statement to Inform Appropriate Assessment ("SIAA") has not correctly assessed the ecological impacts of the changes in air quality associated with the DCO Scheme.</p>	<p>The Statement to inform Appropriate Assessment (SIAA) [APP-043] has been carried out correctly.</p> <p>The findings of the SIAA identify an adverse effect on the Thames Basin Heaths SPA as a result of the land take required by the Scheme (paragraph 7.4.7 of the Habitats Regulations Assessment: Stage 2 [APP-043]. However, an adverse effect as a result in changes in air quality was ruled out. This assessment of changes in air quality was correctly carried out, as explained below.</p> <p>The HRA has followed the process as outlined in:</p> <ul style="list-style-type: none"> <li>The Planning Inspectorate (2016) Habitat Regulations Assessment Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects;</li> </ul>



Reference	Written Representation Issue	Highways England Response
		<ul style="list-style-type: none"> <li>Highways England (2009) The Design Manual for Roads and Bridges (DMRB) Volume 11, Section 4, Part 1 Assessment of Implications (of Highways and/or Road Projects) on European Sites (Including Appropriate Assessment) (HD 44/09)</li> </ul> <p>As detailed in 5.3 Habitats Regulations Assessment Annex B [APP-041], the HRA process, including the methods for assessing air quality impacts on the SPA, both alone and in combination, was agreed with Natural England (refer to item 2.0 of meeting minutes for 27 March 2018, as found in A.13 of the Statement of Common Ground with Natural England [APP-138]).</p> <p>The SIAA considered the nitrogen deposition (Ndep) levels at six transects within the Ockham and Wisley Commons component of the Thames Basin Heaths SPA (N dep levels are reported in Tables 7 and 8 in 5.3 Habitats Regulations Assessment: Stage 2 [APP-043], transect locations are illustrated in Figures 4 and 5 of the Habitats Regulations Assessment Figures [AS-012]).</p> <p>The assessment considered nitrogen deposition levels at a range of distances from the road edge for each transect, allowing comparisons of the existing 2015 baseline, 2022 with no Scheme and 2022 with the Scheme.</p> <p>As agreed with Natural England, the assessment focused on increases of greater than 1% of the critical load when comparing the 2022 with no Scheme data against the 2022 with the Scheme data (refer to item 2.0 of meeting minutes for 27 March 2018, as found in A.13 of the Statement of Common Ground with Natural England [APP-138]).</p> <p>The critical loads were taken from Air Pollution Information System (APIS) website, which gave three critical load class habitat types for the Ockham and Wisley Commons SSSI component of the Thames Basin Heaths SPA:</p> <ul style="list-style-type: none"> <li>Fen, marsh and swamp – Valley mires, poor fens and transitional mires (critical load 10-15 kg N/ ha/ year);</li> <li>Dwarf shrub heath – Dry heaths (critical load 10-20 kg N/ ha/ year); and,</li> <li>Dwarf shrub heath – Northern wet heath (critical load 10-20 kg N/ ha/ year)</li> </ul> <p>In addition, as outlined in paragraphs 7.9.23-7.9.26, the Environmental Statement Chapter 7: Biodiversity [APP-052] also assessed the changes between 2022 with no Scheme and 2022 with the Scheme for every point of each transect within the Ockham and Wisley Commons SSSI, against the increase in nitrogen deposition required to reduce measured species richness by one, as taken from Table 21 of Natural England Commissioned Report NECR210.</p> <p>The approach to the air quality assessment with regards to the SPA, SSSI, and in combination was agreed with Natural England. The methodology aligns with the existing guidance and the advice from Natural England. In addition, the methodology and findings of the appropriate assessment were also reviewed and agreed with Natural England, the RSPB and Surrey Wildlife Trust (as recorded in the meeting minutes on 28 June 2018 (Item 4.0) and 09 October 2018 (Item 5.0, page 64), in the Habitats Regulations Assessment Annex B [APP-041]).</p> <p>As noted in the response to the points raised in REP1-041, NOx concentrations were correctly projected forward using the LTTE6 factors in accordance with Highways England's Interim Advice Note (IAN) 170/12 v3, as noted in paragraph 5.5.23 of APP-050).</p> <p>There is no statutory requirement for ammonia to be included in the air quality assessment as discussed in the response to REP1-041. Paragraph 5.8 of the National Policy Statement for National Networks states that the air quality assessment should be consistent with Defra's published future national projections. Ammonia is not included in Defra's emission factors toolkit, nor is it included in Highways England DMRB guidance, and so there is no requirement for assessment. A sensitivity test was carried out to show the potential effect of including the contribution of ammonia as discussed in the response to REP1-041. This showed that there would be no material effect to the conclusions of the SIAA.</p> <p>The nitrogen deposition calculations were undertaken using the correct deposition velocity in the DMRB guidance at the time, however since then the deposition velocities have been revised. The revised nitrogen deposition calculations are provided in the response to REP1-041 and still show no adverse effect on the qualifying features of the site. This is further discussed in the response to 3.4 below</p> <p>The air quality assessment takes into account traffic from other plans and projects in the wider area, in addition to the Scheme, as documented in paragraph 5.11.3 of APP-050, and therefore allows for in combination effects. Therefore, Highways England is able to confirm that the assessment was carried out correctly.</p>

Reference	Written Representation Issue	Highways England Response
REP1-038-5	The SIAA presented does not comply with current case law and guidance on Habitats Regulations Assessments	<p>The Habitats Regulations Assessment: Stage 2 [APP-043] is compliant with case law and guidance on the carrying out of habitats assessments under the Habitats Directive and Habitats Regulations.</p> <p>Paragraph 39 of the Ecology and Habitats Regulations Assessment representation [REP1-043] submitted on behalf of RHS concludes that 'the TBHSPA is already receiving nitrogen deposition that is far in excess of critical loads and the conservation objectives for the site include an objective to reduce these levels to at or below the critical load'. As explained below, this is not correct.</p> <p>As stated in paragraph 4.21 in Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England (2018)), "If none of the site's sensitive qualifying features known to be present within 200 m are considered to be at risk due to their distance from the road, there is no credible risk of a significant effect which might undermine a site's conservation objectives".</p> <p>The reference to the Ockham and Wisley Commons SSSI component of the SPA exceeding the critical load for nitrogen deposition in paragraph 7.2.31 of the Habitats Regulations Assessment: Stage 2 [APP-043] is referring to the lower limit of the critical load range (10 kg N/ ha/ year).</p> <p>The lower limit of the critical load range was selected for assessing 1% of the lower limit of the critical load range when comparing the 2022 with no Scheme data against the 2022 with the Scheme data as it is the most sensitive value. The lower limit of the critical load range for heathland (taken from the APIS critical loads for habitat types within the Ockham and Wisley Commons SSSI component of the SPA, as explained in paragraphs 7.2.29 and 7.2.30 of the Habitats Regulations Assessment: Stage 2 [APP-043]) was used in the SIAA to maximise the sensitivity for detecting any increases in nitrogen deposition by 1% of the critical load.</p> <p>However, critical loads are presented in APIS as a range. The critical load range for heathland habitats within the Ockham and Wisley Commons SSSI component of the SPA is 10-20 kg N/ ha/ year.</p> <p>Whilst the SIAA [APP-043] considered the lower limit of the range, this was selected as a precautionary approach to investigating risks. The Natural England Commissioned report NECR210 (2016) <i>Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance</i> used the upper limit when determining if critical loads were exceeded.</p> <p>The Thames Basin Heaths SPA is designated for its qualifying species (Dartford warbler, nightjar and woodlark) rather than its habitats. The APIS data for the qualifying features of the Thames Basin Heaths SPA (<a href="http://www.apis.ac.uk/src/select-a-feature?site=UK9012141&amp;SiteType=SPA&amp;submit=Next">http://www.apis.ac.uk/src/select-a-feature?site=UK9012141&amp;SiteType=SPA&amp;submit=Next</a>) shows that nitrogen deposition loads are below the upper critical load threshold for dry heaths for all three of the qualifying features of the SPA and therefore the nitrogen deposition loads within the SPA do not exceed the critical load threshold for nitrogen deposition. Therefore, in terms of Advocate General Kokott's opinion, the critical loads for nitrogen depositions are not exceeded within the heathland habitats where the qualifying features of the SPA occur.</p> <p>The SIAA considered the nitrogen deposition levels at six transects within the Ockham and Wisley Commons component of the Thames Basin Heaths SPA, comparing nitrogen deposition data for 2022 with no Scheme data against 2022 with the Scheme.</p> <p>As agreed with Natural England (see item 2.0 of meeting minutes for 27 March 2018, as found in A.13 of the Statement of Common Ground with Natural England [APP-138]), the SIAA assessed whether the 2022 with Scheme calculations would lead to a significant change (increases of greater than 1% of the lower limit of the critical load) in nitrogen deposition rates, when compared to the 2022 without Scheme data. In addition, the Environmental Statement assessed for increases of 0.8 kg N/ha/yr.</p> <p>After taking into account the updated air quality data (as described in Appendix B of the comments response to the Royal Horticultural Society air quality representation [REP1-041]), the increases of 1% or greater between the 2022 without Scheme and 2022 with Scheme data are confined to within 50 m of the road.</p> <p>The qualifying species occur within the heathland habitats of the Ockham and Wisley Commons SSSI component of the SPA. As demonstrated in Figures 4 and 5 of the Habitats Regulations Assessment Figures [AS-012], there is a belt of Scots pine-dominated woodland along the edge of the A3 and M25, forming a buffer of at least 150 m between the road and the heathland where the qualifying species occur.</p> <p>This woodland buffer protects the habitats that the SPA qualifying species utilise from the nitrogen deposition emissions from the road. For each transect, the distance of the heathland from the road, and the nitrogen deposition rates (2022 with and without Scheme) for that distance (up to 200 m from the road) are listed below, based on the updated air quality data.</p>

Reference	Written Representation Issue	Highways England Response																																																						
		<p>As can be seen, at the distance that the heathland is situated from the road, there is negligible difference between the nitrogen deposition loads for the 2022 without Scheme and 2022 with Scheme, with either no perceptible change, or in the majority of cases, minor improvements.</p> <p>On this basis, the SIAA correctly ruled out adverse effects on the SPA as a result of air quality changes resulting from the Scheme, either alone or in combination, and is therefore robust.</p> <table border="1" data-bbox="1584 520 2748 1570"> <thead> <tr> <th rowspan="2">Transect</th> <th rowspan="2">Approximate distance of heathland from the road (up to 200 m)</th> <th colspan="3">N dep rate</th> <th colspan="2">2022: no Scheme vs operational Scheme</th> </tr> <tr> <th>Distance from road of receptor point (Receptor ID in brackets)</th> <th>2022 without Scheme at the distance where heathland occurs</th> <th>2022 with Scheme at the distance where heathland occurs</th> <th>Change in N dep rate</th> <th>Change as % of critical load (based on lower limit of 10 kg N/ha/ year)</th> </tr> </thead> <tbody> <tr> <td><b>Transect 1: running south from M25 at the A3 northbound off-slip (at M25 J10, to west of A3)</b></td> <td>155 m</td> <td>150 m (R163)</td> <td>16.12</td> <td>16.12</td> <td>0.00</td> <td>0.0%</td> </tr> <tr> <td><b>Transect 2: running south from M25 at the A3 southbound on-slip (at M25 J10, to east of A3)</b></td> <td>No heathland within 200 m</td> <td>200 m (R194)</td> <td>15.80</td> <td>15.77</td> <td>-0.03</td> <td>-0.3%</td> </tr> <tr> <td><b>Transect 3: running west from A3 at the A3 northbound off-slip (at M25 J 10)</b></td> <td>175 m</td> <td>150 m (R147)</td> <td>15.86</td> <td>15.83</td> <td>-0.03</td> <td>-0.3%</td> </tr> <tr> <td><b>Transect 4: running east from A3 at the A3 southbound on-slip (at M25 J10)</b></td> <td>No heathland within 200 m</td> <td>200 m (R156)</td> <td>15.68</td> <td>15.65</td> <td>-0.03</td> <td>-0.3%</td> </tr> <tr> <td><b>Transect 5: the A3 northbound, to the south of J10 (adjacent to Bolder Mere, to west of A3)</b></td> <td>180 m</td> <td>150 m (R132)</td> <td>15.10</td> <td>15.04</td> <td>-0.06</td> <td>-0.6%</td> </tr> <tr> <td><b>Transect 6: the A3 southbound, to the south of J10 (adjacent to Bolder Mere, to east of A3)</b></td> <td>No heathland within 200 m</td> <td>200 m (R140)</td> <td>15.13</td> <td>15.07</td> <td>-0.06</td> <td>-0.6%</td> </tr> </tbody> </table>	Transect	Approximate distance of heathland from the road (up to 200 m)	N dep rate			2022: no Scheme vs operational Scheme		Distance from road of receptor point (Receptor ID in brackets)	2022 without Scheme at the distance where heathland occurs	2022 with Scheme at the distance where heathland occurs	Change in N dep rate	Change as % of critical load (based on lower limit of 10 kg N/ha/ year)	<b>Transect 1: running south from M25 at the A3 northbound off-slip (at M25 J10, to west of A3)</b>	155 m	150 m (R163)	16.12	16.12	0.00	0.0%	<b>Transect 2: running south from M25 at the A3 southbound on-slip (at M25 J10, to east of A3)</b>	No heathland within 200 m	200 m (R194)	15.80	15.77	-0.03	-0.3%	<b>Transect 3: running west from A3 at the A3 northbound off-slip (at M25 J 10)</b>	175 m	150 m (R147)	15.86	15.83	-0.03	-0.3%	<b>Transect 4: running east from A3 at the A3 southbound on-slip (at M25 J10)</b>	No heathland within 200 m	200 m (R156)	15.68	15.65	-0.03	-0.3%	<b>Transect 5: the A3 northbound, to the south of J10 (adjacent to Bolder Mere, to west of A3)</b>	180 m	150 m (R132)	15.10	15.04	-0.06	-0.6%	<b>Transect 6: the A3 southbound, to the south of J10 (adjacent to Bolder Mere, to east of A3)</b>	No heathland within 200 m	200 m (R140)	15.13	15.07	-0.06	-0.6%
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<b>Transect 5: the A3 northbound, to the south of J10 (adjacent to Bolder Mere, to west of A3)</b>	180 m	150 m (R132)	15.10	15.04	-0.06	-0.6%																																																		
<b>Transect 6: the A3 southbound, to the south of J10 (adjacent to Bolder Mere, to east of A3)</b>	No heathland within 200 m	200 m (R140)	15.13	15.07	-0.06	-0.6%																																																		
REP1-038-6	The RHS Alternative Scheme is less damaging to the SPA and must be considered an 'alternative solution' under the Habitat Regulations.	<p>The RHS Alternative Scheme cannot be provided because the left-out merge junction from Wisley Lane to the A3 northbound is not safe, and it cannot be provided in accordance with DMRB design standards. Accordingly, it would not meet the Scheme objectives and is not a feasible alternative. Further, if it were possible to provide a compliant design, the RHS Alternative Scheme would require SPA land to be taken.</p> <p>The Scheme has been designed to minimise the amount of land take (both permanent and temporary) from the SPA, and an additional substantial permanent land take cannot be considered a less damaging solution.</p>																																																						
REP1-038-7	<p>The reduction in visitor numbers to the RHS arising from the DCO Scheme would cause severe economic impacts to the RHS.</p> <p>By assessing the distribution of visitor trips to the Garden, the overall impact of the DCO Scheme in increasing travel times and vehicle operating costs can be estimated. Over a 60-year appraisal period from 2019, the</p>	<p>Highways England does not agree with the level of reduction in visitor numbers to the RHS arising from the Scheme as set out in the Hatch Regeneris report included with the RHS Written Representation [REP1 -039] nor that the Scheme would have a severe economic impact on the RHS.</p> <p>In outline, the Hatch Regeneris report is flawed in a number of respects:</p>																																																						

Reference	Written Representation Issue	Highways England Response
	<p>transport impacts upon visitors, workers, and volunteers travelling to the Garden are estimated to equate to an economic value of €28.5 million, in 2019 prices.</p>	<ul style="list-style-type: none"> <li>The RHS data overstates distances and journey times. The journey distance and time changes in Table 4 and 5 do not accord with Highways England's data and Highways England hopes that the recent data sharing exercise will address this.</li> <li>Some of the key questions in the RHS survey were leading and have produced a misleading and in some instances exaggerated outcome. For example, the response to Question 9, states that over a third (36% of visitors) felt that it [the changes to the journey times] would impact how frequently they would visit. The response does not explain that approximately 58% of the respondents stated that the additional journey time would not affect how frequently they would visit the garden.</li> <li>On the basis that only those travelling along the A3 from the south would be affected on their journey to RHS Wisley, and that this represents approximately 24% of total visitors, the RHS forecast reduction in total visitor demand of 6.5% implies that a quarter of these visitors would cease to visit. This would be unlikely on account of such a small increase in journey distance and time.</li> <li>The additional distances that RHS Wisley Gardens visitors will need to travel to the Scheme (that does not include south facing slips at Ockham Park junction) is dependent on whether visitors from the south choose to follow the signposted route to and from the A3 via Junction 10 or choose to route via Ripley. RHS has estimated that Wisley Gardens will attract approximately 1.494 million visitors a year due to their 10-year investment plan [Appendix M of REP1-044], which will generate approximately 626,650 vehicle arrivals and departures annually. Although Highways England does not know the expected growth profile of RHS Wisley, if all this growth is assumed to occur by 2022, then the total annual additional distance due to the Scheme would be approximately 355,400 kms (213,700 miles) if visitors to and from the south choose to route via Ripley, or approximately 1.9 km (1.16 miles) if visitors to and from the south choose to route via J10 (the signposted route). Note that these figures include visitors travelling to/from other directions as well as from the south.</li> <li>The RHS analysis overlooks the significant improved road safety provided by the Scheme.</li> <li>The Hatch Regeneris report is based on a worst case scenario and therefore cannot be relied upon as evidence of the likely economic impact on the RHS Wisley.</li> </ul> <p>Highways England is considering the Hatch Regeneris report in more detail and will be providing a response as soon as possible.</p>
<p>REP1-038-8</p>	<p>The wider economic impacts of the DCO Scheme, in terms of reduced visitor numbers to the Garden, and associated indirect and induced impacts, have been estimated over a 10-year appraisal period, from 2019. This analysis forecasts an economic present value (in 2019 prices) of at least £44 million and, potentially, as high as £100m.</p>	<p>Highways England does not agree with the wider economic impacts associated indirect and induced impacts to the RHS arising from the Scheme as set out in the Hatch Regeneris report included with the RHS Written Representation [REP1 -039] nor that the Scheme would have a severe economic impact on the RHS.</p> <p>In outline, the Hatch Regeneris report is flawed in a number of respects:</p> <ul style="list-style-type: none"> <li>The sample was small and taken in late autumn and so the responses may differ from those that would be received in peak season. Whilst the report notes that the sample matches well with typical Wisley visitors; it does not provide details on the similarities and account for scaling the result up from the sample of 645 (from 293 questionnaires) to represent impacts on annual trips.</li> <li>The questionnaire as reported asked visitors about the impact of an additional journey time of 10 minutes on journeys to Wisley, implying a 10 minute increase on a 1 way trip to RHS. However, the calculations appear to use the survey responses about the impact of the 10 minute increase on visit numbers in relation to the estimated increase in round journey time to and from Wisley, thereby overstating the impact.</li> <li>The questionnaire only asked for respondents' reaction to one potential increase in journey time (10 minutes). As noted in the report, it is likely that visitors' response to increased journey time will not be linear and responses to shorter increases in journey time should have been asked.</li> <li>The phrasing of the questionnaire tended to invite negative responses by presuming the additional journey time would cause frustration rather than asking a more neutral question such as how respondents would feel about the increase in journey time.</li> <li>The report doesn't give sufficient information to fully replicate the calculations and it seems there may be some additional uplift factors included. Indeed, the basis for the 15% reduction in trips for the additional RHS anticipated scenario is not clear. The report refers to the view that the disruption of construction impacts may be more off putting to visitors than their current estimate allows for (but this would apply</li> </ul>

Reference	Written Representation Issue	Highways England Response
		only to the years of construction whereas the example applies the higher rate of visit reduction to operational years too.
REP1-038-9	The proposed RHS Alternative Scheme, with south-facing slips at the Ockham Roundabout and retention of the left-turn egress from Wisley Lane onto the A3, would reduce the negative wider economic impacts to around £7m (over 10 years) and generate positive direct transport user benefits for visitors, workers, and volunteers of around £6m (over 60 years).	Highways England has raised a number of points above that show it does not agree with the economic analysis provided in relation both to those points above as well as this one.
REP1-038-10	No firm programme or procurement sequence has been put forward by HE and without this the Society cannot comment on the economic and legacy impact. Assumptions are made in our Economic Impact Assessment RHS/JB/I until a Construction Programme and sequence has been confirmed.	A construction sequence and programme is set out in section 2.4 of the Environmental Statement, Chapters 1-4: Main Report [APP-049]. Following the appointment of the principal contractor, Highways England will facilitate discussions between the appointed contractor and the RHS regarding the construction programme.
REP1-038-11	<p>The issue of tree root damage to historic redwood trees along the RHS Garden boundary of the A3 remains in contention. The trees in question are shown on the attached plan.</p> <p>The RHS remains very concerned that the construction works will harm these trees and their roots. The RHS believes that survey work is still ongoing.</p> <p>The RHS seeks assurances from HE that these trees will not be harmed either during or following the construction of the DCO Scheme.</p>	Tree root surveys have been undertaken and the results are still being analysed to inform on the potential to retain the trees. This analysis will include detailed design reviews in these locations to see if any bespoke engineering solutions can be used to enable their retention should the survey results show that to be necessary.
REP1-038-12	<p>The RHS objects to the compulsory acquisition of the following plots.</p> <p>Plot 11/2 The RHS opposes the compulsory acquisition of Plot 11/2 and regards the landtake for replacement land as excessive. No justified reason or calculation has been submitted for this plot.</p>	<p>RHS has not explained why it considers the land take to be excessive.</p> <p>Plot 11/2 is included to provide permanent rights to enable works to be undertaken and maintained to improve the biodiversity of this field and woodland fragment to ensure that it is suitable to be considered as part of the SPA compensation land.</p> <p>The field at Plot 11/2 has been selected due to its location and potential to be enhanced as an invertebrate resource (which would benefit the qualifying features of the SPA). The size of the plot (6.1 ha) is appropriate to provide a 1:1 ratio to compensate for the loss of permanent land take from the SPA (5.9 ha). An additional SPA compensation land parcel (Old Lane Compensation Land, 2.0 ha) has been provided to ensure that the adverse effects of the permanent loss of 5.9 ha of SPA are offset and to ensure that a 1:1 ratio is maintained. Further detail on the selection process of the SPA compensation land is provided within the HRA Annex C Report [APP-042].</p>
REP1-038-13	Plot 2/27 As the "left out" at Wisley Lane is not included as a component of the DCO Scheme, then the new bridge over the A3 need not be 'skewed'. 'Straightening' the bridge would reduce the necessary "landtake" to the boundary of the garden under plot 2/27.	It is not possible to remove the skew from the orientation of the bridge and keep the existing access to and from Wisley Lane and Elm Lane open during construction. Furthermore, the bridge cannot be straightened without taking more land from the SPA. The RHS alternative would not, therefore have a lesser effect on the SPA and so cannot be regarded as a feasible alternative solution for the purposes of the assessment required under the Habitats Directive.

## REP1-048 Wisley Property Investment Limited

Reference	Written Representation Issue	Highways England Response
REP1-048-1	<p><b>Land and the avoidance of the need for compulsory purchase</b></p> <p>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 run 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.</p> <p>In response, the Written Representations proposes changes to:</p> <ul style="list-style-type: none"> <li>• The Land Plans 1 and 2 (APP-006);</li> <li>• Amendments to Schedules 5 and 7 of the DCO; and</li> <li>• Inclusion of text within the DCO to provide for the legal licences enabling HE to build over WPIL land.</li> </ul>	<p>Highways England recognises that the Scheme requires some land-take from WPIL. Highways England has engaged with WPIL from an early stage to minimise the effects of the Scheme upon the allocation of the former Wisley Airfield site in policy A35 of the Guildford Borough Local Plan.</p> <p>Highways England notes that, at this stage, WPIL has not made a formal application for planning permission. Accordingly, in the absence of a detailed development proposal for the former airfield site, it is not possible for Highways England to understand the precise effect of its Scheme upon the GBLP allocation.</p> <p>Highways England requires two principal areas of land-take from WPIL for the Scheme. Firstly, an area of land (plot 1-18) is required permanently for the construction of the Wisley Lane diversion. Highways England understands that WPIL wishes to use the Wisley Lane diversion as an access point into the site as part of its proposed planning application. Highways England and WPIL are in discussions as to a possible side agreement in relation to the use of the Wisley Lane diversion prior to its opening for traffic in connection with the construction of a development on the former Wisley Airfield site, subject to the development receiving planning permission (please see further below).</p> <p>Highways England also requires temporary possession of an area of land within the former Wisley Airfield site for use as a construction compound and topsoil storage area (plot 2-1). The compound is required to be located within the airfield site as it is needed in connection with the Wisley Lane diversion works. As explained further below, Highways England understands that the area of the proposed compound overlaps with an area of suitable alternative natural green space (SANG) which WPIL has proposed as part of its emerging planning proposals.</p> <p>As explained further below, Highways England has been engaging with WPIL in order to reach a mutually acceptable solution for the location of the construction compound within the WPIL site.</p> <p>In the absence of such an agreement, however, it is necessary for Highways England to secure the land required for the Scheme by way of compulsory powers.</p>
REP1-048-2	<p><b>Highways Modelling</b></p> <p>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.</p>	<p>The traffic modelling methodology is described in the Transport Assessment Report [APP-136] and the Traffic Forecasting Report [REP1-010]. The traffic modelling outputs and the assessment of the traffic impact of the Scheme, which accounts for the redevelopment of Wisley Airfield along with other planned strategic developments, is also reported in the Transport Assessment. This work demonstrates that the Scheme does not result in any significant adverse traffic impacts that trigger the need for mitigation measures related to the proposed development of Wisley Airfield.</p> <p>A Transport Assessment Supplementary Information Report (Volume 9.16) has also been provided at Deadline 2 that will include more specific detailed information on the implications of strategic developments such as the redevelopment of Wisley Airfield on the local road network.</p> <p>With regard to the matters raised by SCC, Highways England's response to SCC's written representation has also been provided at Deadline 2.</p>
REP1-048-3	<p><b>To secure and not prejudice the future primary site access into allocation A35</b></p> <p>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).</p> <p>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.</p> <p>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).</p>	<p>a) Highways England wishes to continue to work collaboratively with WPIL in view of WPIL's intention to redevelop the airfield site. Discussions are on-going between Highways England and WPIL with a view to appropriate provision being made for a future access from the Wisley Lane diversion to serve a future redevelopment of the airfield site. Highways England would have no objection to the speed limit along the Wisley Lane diversion being adjusted on account of an access to the airfield site being in place, once it is in place, but this will be a matter for the local highway authority in due course. The dDCO makes provision for a speed limit of 40 mph along the relevant part of the Wisley Lane diversion in Part 5 of Schedule 3 of the dDCO (see page 73). This does not take into account the possibility of a future and, at present, unconsented access to the airfield site nor would it be appropriate to do so at this stage.</p> <p>b) Discussions are on-going between Highways England and WPIL about arrangements under which access through the construction site required by Highways England on WPIL's land could be provided to WPIL for the purposes a redevelopment of the airfield.</p> <p>c) See the response to (b) above. Traffic management provisions are made in the dDCO as relevant to the Scheme including an obligation to prepare a Traffic Management Plan under requirement 4 of the dDCO [APP-018]. It is not appropriate for the dDCO to make traffic management provisions in respect of a proposed future development of the airfield, for which no planning permission at present exists. Traffic management in respect of</p>

Reference	Written Representation Issue	Highways England Response
	<p>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.</p> <p>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.</p> <p>In response to these concerns, WPIL'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.</p>	<p>the airfield redevelopment will be a matter for the traffic authority in due course taking into account the development as authorised on that site</p> <p>d) Highways England and WPIL are in discussions about the arrangements for this gas main diversion with a view to the diverted gas main being located and/or protected with a future access to the redeveloped airfield site in mind.</p> <p>Highways England is endeavouring to resolve these matters at this stage by agreement with WPIL rather than at the detailed design stage or by the use of protective provisions within the dDCO.</p> <p>It would not be appropriate for the dDCO to be amended specifically to accommodate a proposed redevelopment of Wisley Airfield planning permission for which has not been granted or which is the subject of a current application for planning permission.</p>
REP1-048-4	<p><b>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...</b></p> <p>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 top soil 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</p>	<p>Highways England acknowledges that a temporary works area proposed within land owned by WPIL, and which is needed by Highways England for the purposes of top soil storage and to construct the Wisley Lane diversion, occupies land that WPIL is considering for use as a SANG.</p> <p>There have been constructive discussions about this with a view to finding a mutually acceptable solution. Highways England's position is as follows:</p> <ul style="list-style-type: none"> <li>• Highways England does not believe that there is an alternative location for the temporary works area that does not involve the use of WPIL's land.</li> <li>• Highways England is prepared to consider the use of an alternative site within WPIL's land if WPIL can make such a site available.</li> <li>• Highways England does not believe that the size of the temporary works area can be reduced.</li> <li>• Highways England's current programme anticipates a three year long construction programme with this temporary works area likely to be needed for most, if not all of that time.</li> <li>• Highways England will endeavour to vacate the temporary works area as soon as reasonably practicable, but this is unlikely to be before the Scheme has been substantially completed.</li> <li>• Highways England is considering ways in which this duration could be reduced and acknowledges WPIL's concern that any use of the temporary works area beyond the Scheme opening date should be minimised or avoided or be as for a short a period as possible.</li> <li>• Highways England will take reasonable steps to ensure that any noisy or intrusive uses should not take place on the temporary works area following the substantial completion of the Scheme in circumstances where WPIL has established a SANG in proximity to the temporary works area or an alternative temporary works area on WPIL's land.</li> </ul> <p>Regarding the programme for 'biodiversity improvement measures to the south' Highways England assumes that this is referring to the proposed works along a section of Stratford Brook. The majority of the mitigation works to Stratford Brook will take place during the construction of the Scheme and will be completed prior to the Scheme becoming operational.</p>
REP1-048-5	<p><b>Species permeability of the diverted Wisley Lane, and appropriate mitigation for any impact on the SNCI, and on reptiles / amphibians and other species.</b></p> <p>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.</p>	<p>Highways England appreciates WPIL's offer to consider facilitating access for Highways England to carry out advanced ecological mitigation measures and will discuss with WPIL the programme of works for all environmental mitigation associated with the areas of land owned and managed by WPIL.</p> <p>Highways England's approach with regard to reptiles / amphibians affected by the Scheme is primarily to manage the very low risk to them during the construction phase through the implementation of appropriate working practices and safeguards detailed in a Precautionary Method of Working (PMW) statement. PMW statement is secured by requirement 3 of the dDCO [APP-018] which requires the CEMP to include, among other things, a management plan and method statement for protection of ecological habitats and species. The translocation of species is not necessary.</p> <p>Natural England have been consulted on this approach and are in agreement that this is an appropriate way of dealing with the matter – see Section 2.4 of 8.2 Statement of Common Ground with Natural England [APP-138].</p> <p>Highways England accepts that the Wisley Lane diversion could lead to increased fragmentation for some species. In this regard paragraph 7.11.32 of 6.3 Environmental Statement Chapter 7: Biodiversity [APP-052] states "To prevent fragmentation between Elm Corner Woods SNCI and Wisley Airfield SNCI as a result of the</p>

Reference	Written Representation Issue	Highways England Response
		<p><i>creation of a permanent side access road (Wisley Lane) at Wisley Airfield, the permeability of Wisley Lane will be maintained for amphibians and reptiles through the use of measures such as fencing, kerbs and wildlife friendly underpasses</i>".</p> <p>Further, as identified in Table 7.7 of 6.3 Environmental Statement Chapter 7: Biodiversity [APP-052] traffic on the Wisley Lane diversion could result in direct mortality or injury to badgers. As a result of both of these potential impacts, at the detailed design stage, Highways England will investigate the potential for providing a culverted underpass under the Wisley Lane diversion to facilitate the passage of wildlife (including amphibians, reptiles, badgers and other small mammals).</p>
REP1-048-6	<p><b>Detailed proposals for the proposed works to Stratford Brook and their future management.</b>            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.</p>	<p>Requirement 12 of the dDCO requires a scheme of mitigation in respect of the Stratford Brook environmental mitigation to be approved by the Secretary of State following consultation with the Environment Agency and the relevant planning authority.</p> <p>Highways England is in discussions about an agreement under which WPIL takes on responsibility for the future maintenance, management and monitoring of works undertaken by Highways England in respect of Stratford Brook.</p>
REP1-048-7	<p>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 DCO (APP-018).</p>	<p>As regards Requirement 3(2)(e) of the dDCO a community relations strategy put forward by Highways England will include WPIL as a landowner.</p>
REP1-048-8	<p><b>Recognition of the trees on-site and approach to mitigate any loss</b>            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).</p>	<p>Highways England acknowledges WPIL's request to reduce any loss of trees relevant to a future redevelopment proposal for the airfield. Highways England has no wish to remove trees unnecessarily.</p>
REP1-048-9	<p><b>Land: Compulsory Acquisition and /or Temporary Possession</b>            Notably where HE is seeking permanent acquisition, WPIL requests this work is instead undertaken via a temporary land transfer or licence to build or acquired by private treaty.</p>	<p>Highways England is in discussion with WPIL regarding land needed permanently or temporarily for the Scheme. In the absence of an agreement with WPIL it will be necessary for Highways England to secure the land required for the Scheme by way of compulsory powers.</p>
REP1-048-10	<p><b>Transport &amp; Access including Construction</b>            Highways England's proposals relating to WPIL's interests WPIL welcomes the confirmation given by HE during engagement that the scheme modelling specifically includes the likely traffic generation from the GBLP Allocation A35 residential-led allocation at Wisley Airfield, and that the scheme design is anticipated, subject to detailed assessment at the time of submission of a planning application for a scheme at the Airfield, to operate satisfactorily such that there will be no adverse impact on the Strategic Road Network arising from the Airfield's development.</p> <p>This confirmation applies to both of the north-facing slip roads at Ockham Park Junction, the A3 mainline between Ockham Park Junction and M25 Junction 10, Ockham Park Junction itself and Junction 10, all components that were relevant to the findings of the Wisley Airfield Planning Appeal held in 2017. The DCO scheme therefore addresses the concerns previously expressed by HE in the context of the Wisley Airfield planning application regarding the capacity and safety of the A3 north of Ockham.</p> <p>As outlined, agreement with HE with respect of the principle of the development of a new settlement at Wisley, as allocated in Allocation A35 was settled immediately prior to the Appeal Scheme decision (see Appendix 11), noting the compatibility of a new settlement with the DCO scheme (evidence agreed at Inquiry, see Appendix 12) and also through the adoption of the GBLP.</p>	<p>Highways England confirms that its modelling exercise includes traffic likely to be generated from a development of the airfield, but the modelling does not include north facing slips at Burntcommon nor a through vehicular link between the Ockham Park junction and Old Lane. As WPIL has not secured planning permission for a particular form or scale of development at the airfield, Highways England is not in a position to confirm definitively that there will be no adverse impact on the strategic road network arising from the airfield's development.</p>
REP1-048-11	<p><b>Access to Wisley Airfield allocation A35</b>            WPIL considers that it would be unacceptable if the DCO scheme took no account of the need for an access into the allocated Wisley Airfield development site, or even in the worst case scenario precluded such an access being formed without considerable avoidable cost to the developer and disruption to road users on Wisley Lane, who include visitors to the RHS Gardens Wisley.</p>	<p>Discussions with WPIL regarding this access are on-going. Highways England has no objection to an access to the Wisley Airfield site from the Wisley Lane diversion and Highways England is willing to make appropriate provision in designing and carrying out its Scheme to facilitate it by, for example, laying the diverted gas main at a greater depth than it would otherwise be laid. However, once the Wisley Lane diversion is open to traffic Surrey County Council will be the local highway authority for the road and so the formation of an access from it and any related highways and traffic issues (such as altering speed limits) will be a matter for the Council.</p> <p>As mentioned above Highways England is working in collaboration with WPIL with a view to making appropriate provisions as regards the DCO scheme with WPIL's future access in mind.</p>



Reference	Written Representation Issue	Highways England Response
REP1-048-12	<p>The Wisley Lane diversion will also form the route along which a large diameter gas main will be diverted. This significant item in the supporting works for the DCO scheme is costly to relocate and it would make good engineering and planning sense to ensure that the gas main was laid in a manner that:</p> <ul style="list-style-type: none"> <li>• avoided it having to be moved or diverted a second time; and</li> <li>• in this way avoided the inevitable disruption to gas supply that would result if it had to be moved or diverted a second time.</li> </ul>	<p>Highways England agrees that it would be desirable for the gas main to be located and/or protected with the WPIL future access in mind, such that no re-diversion is necessary and that WPIL is not put to additional cost on account of the gas main unnecessarily. Precisely how this is to be done is being discussed with WPIL.</p>
REP1-048-13	<p>WPIL seeks to reach an agreement by way of a legal undertaking satisfying the legal requirements set out in the CIL regulations to the effect that HE will provide or enable these measures in relation to the land controlled by WPIL that will be subject to a future planning application in line with its allocation in Policy A35 of the GBLP. No such undertaking has been given by HE at the time of submitting this Written Representation which places the realisation of this access in jeopardy by causing unnecessary additional extraordinary cost and delay to the developer and disruption to road users on Wisley Lane, who include visitors to the RHS Gardens Wisley. This is a matter that should be addressed at this DCO stage with appropriate protective provisions.</p>	<p>As mentioned above Highways England wishes to work collaboratively with WPIL with a view to a legal agreement being made by the end of the DCO examination period making appropriate provision in respect of these matters.</p> <p>Accordingly, protective provisions within the dDCO are not appropriate, particularly as no planning permission has been granted for the redevelopment of the airfield and at present there is no planning application before the local planning authority in respect of any such redevelopment.</p>
REP1-048-14	<p><b>Position of Surrey County Council</b> SCC raises a number of queries with HE regarding modelling and the central question is around the impacts in Ripley.</p>	<p>Discussions with Surrey County Council are on-going. Please see Highways England's response to Surrey County Council's Written Representation [REP1-020] above.</p>
REP1-048-15	<p><b>ES Chapter &amp;: Biodiversity</b> Broadly, the results of the ecological surveys carried out on WPIL land and its surroundings accord with our own findings and we agree with the overall conclusions of ES Chapter 7 (APP-052) and its associated figures and appendices (APP-068 to APP-070). However, WPIL wishes to raise the following points.</p>	<p>Highways England welcomes WPIL's broad agreement with the overall conclusions of Chapter 7 of the Environmental Statement [APP-052].</p>
REP1-048-16	<p>WPIL note that a Precautionary Method of Working (PMW) is only recommended within 250 m of confirmed GCN breeding ponds (see ES Chapter 7, paragraph 7.10.37). However, GCN are known to disperse much further than this and we have recorded terrestrial GCN on the Airfield at over 750 m from the nearest breeding pond. We therefore request that the PMW is extended to include all suitable habitat within the 'SE Quadrant' where the breeding ponds are located.</p>	<p>Highways England's approach with regard to reptiles and great crested newts (GCN) is to manage the very low risk to these species during construction through implementation of appropriate working practices and safeguards detailed in a PMW.</p> <p>A PMW specifically for GCN will be adhered to within 250 m of the ponds where breeding GCN occur. This is due to the presence of abundant suitable terrestrial habitat within 250 m of the ponds reducing the likelihood of them regularly occurring and/or being encountered further afield. However, a PMW for common reptiles will cover all areas of construction where suitable habitat for reptiles is present, including suitable habitats within the 'SE quadrant'. The reptile PMW will consist of measures that will also minimise the risk of harm to GCN.</p> <p>Natural England has been consulted on this approach and is in agreement that this is an appropriate measure for the Scheme, refer to Section 2.4 of 8.2 Statement of Common Ground with Natural England [APP-138].</p>
REP1-048-17	<p>Paragraph 7.10.43 of ES Chapter 7 (APP-052) states that <i>"the permeability of the Wisley Lane will be maintained for amphibians and reptiles. This may include the use of fencing, kerbs and wildlife friendly underpasses. However, the specifics will be subject to detailed design, and will be based on current good practice."</i> The successful delivery of these measures will be fundamental to the ability of the reptile and amphibian mitigation/enhancements that are planned for the Wisley Airfield proposals to be successful. We therefore request that HE is required to consult/ liaise with WPIL at the detailed design stage, to ensure that the mitigation measures anticipated with both schemes operate in conjunction with each other.</p>	<p>Highways England will liaise with WPIL during detailed design of any fencing, kerbs, and wildlife friendly underpasses for Wisley Lane diversion overbridge to with a view to ensuring that the mitigation measures of both schemes operate in conjunction with each other as far as practicable.</p>
REP1-048-18	<p>Replacement planting is proposed for the temporary loss of habitat within the Wisley Field SNCI. As this falls within the WPIL SANG area, we would again request that HE consult with WPIL on this at the detailed design stage to ensure that it aligns with the Airfield scheme proposals.</p>	<p>Highways England will liaise with WPIL during detailed design of replacement planting for the temporary construction areas within Wisley Airfield SNCI with a view to ensuring that the designs align with WPIL's scheme proposals as far as practicable.</p>
REP1-048-10	<p>We note that a residual "permanent negative effect of slight significance" on Wisley Field SNCI is identified, with no compensation proposed. It is not clear why this is the case, as paragraph 5.25 of the National Networks NPS states that <i>"Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought"</i>. Similarly, the DMRB (vol 11, section 1.42) states that: <i>"Where it is not possible to avoid or reduce a significant adverse effect, then measures to offset the effect should be considered"</i>. Indeed, the ES (APP-052) states in its Methods of Assessment chapter at para 7.6.34 that <i>"if there are significant residual adverse effects that cannot be mitigated, then compensation will be required"</i>. The DCO itself should</p>	<p>The permanent loss of 2.9 ha of the Wisley Field SNCI is required for the construction and operation of Wisley Lane diversion. Where temporary possession of land within the SNCI is taken it would be reinstated as appropriate.</p> <p>As the environmental compensation package as a whole provides benefits to habitats within and adjacent to the Scheme, further compensation specifically for the residual effect of slight significance on Wisley Airfield SNCI is not merited.</p>

Reference	Written Representation Issue	Highways England Response
	<p>recognise the opportunity that the delivery of allocation A35 presents to ensure long term mitigation/compensation.</p> <p>The compensation provided by HE for residual negative effects on the SNCI could comprise habitat creation and management within the proposed Wisley Airfield SANG area, in consultation with WPIL.</p>	
REP1-048-20	<p><b>Water Environment</b></p> <p>The Stratford Brook compensation proposals are acceptable from an ecological point of view and do not conflict with the ecological enhancements that the WPIL scheme would provide in this part of the proposed SANG associated with the delivery of allocation A35. We note the requirement to agree the scope of works with the Environment Agency.</p> <p>WPIL requires certainty with regard to the detailed scope and timing of the works and future management arrangements and funding to enable align between these and SANG proposals. WPIL would consider a transfer of future maintenance obligations to WPIL in order to provide certainty of alignment with WPIL's SANG future management proposals</p>	<p>Under Requirement 12 of the dDCO [APP-018] details of the mitigation measures to be undertaken in respect of the Stratford Brook environmental mitigation area must be approved by the Secretary of State following consultation with the Environment Agency and the relevant planning authority. Highways England is willing to discuss the proposed arrangements with WPIL with a view to ensuring that there is alignment between the scheme and a prospective redevelopment of the airfield so far as practicable. Highways England is also willing to enter into an agreement with WPIL in respect of future arrangements for the maintenance, management and monitoring of the mitigation measures in so far as they affect WPIL's land.</p>
REP1-048-21	<p><b>Effects of the Programme for the Delivery of the New Settlement</b></p> <p>The implementation of the DCO has the potential to alter the delivery of Wisley Airfield allocation A35. This can be avoided through ongoing Common Ground and the protective provisions WPIL seeks in the DCO. For ease the timetable specified in the HE Introduction to the Application and Scheme Description (Ref: APP-002) is set out below.</p>	<p>As explained in the above responses, Highways England is working collaboratively with WPIL as regards programming and other issues.</p>

## REP1-051 Robert J Brown

Reference	Written Representation Issue	Highways England Response
REP1-051-1	<p><b>Hazards</b></p> <p>Severe traffic congestion on the Painshill roundabout, particular during the morning and evening rush hours, already presents a significant hazard for Cobham residents. The current proposal for the additional A3 carriageways and in particular the alignment of the new access road for New Farm, The Guides Camp and Court Close farm, immediately adjacent to the roundabout, will make that problem far worse due to potential traffic back up to the Painshill Roundabout, Furthermore, nothing is envisaged in the overall scheme to substantially reduce the build up of traffic backing back, onto Painshill Roundabout from the A3 to the A245 Seven Hills Road and the downtown Cobham, Consultation with the local authorities needs to be undertaken as to how traffic jams on the local roads are to be avoided. In my opinion during the construction phase to avoid the disruption at M25 Junction 10 vehicles are going to use Junction 11 or 9, using the already congested A24. Accordingly could you please advise any mitigation proposed by the relevant local authorities.</p>	<p>Highways England has provided a response to this issue in the Applicant's Comments on Relevant Representations [RR-035] [REP1-009] at Deadline 1.</p> <p>Highways England is unable to comment on any mitigation proposed by Surrey County Council in respect of its role as the Local Highway Authority responsible for the local highway network.</p>
REP1-051-2	<p><b>Limiting Access to Painshill park and Painshill Estate</b></p> <p>Under the present proposal the formation of a hard surfaced new access road as indicated on Atkins Drawing HE551522-ATK-HGN-A3_L2_J2_SK-CH-000001 Rev P01_1 Painshill junction Scheme Layout with Aerial Photo Underlay, shows no fencing either security or acoustic to control unwanted access to Painshill Park and Painshill Estate limiting noise levels. There are potential encroachment concerns regarding Painshill dwellings in relation to the above proposal, with recent incidents involving group of Travelers setting up camp within the Park. The current proposal without adequate robust fencing, isolating the access road from the grade 1 listed landscape, would further compromise the residents of Painshill Estate.</p>	<p>Highways England does not consider that there is an inherent increased risk to security for residents at Painshill due to the Scheme. Design measures have been integrated into the Scheme to further ensure the security of residents and are shown on the Scheme Layout Plans [APP-012] sheets 7 and 8. For a description of the security measures incorporated into the design, refer to the Highways England response RR-035 in REP1-009. Highways England's response on noise issues is set out below.</p>
REP1-051-3	<p><b>d) Pollution</b></p> <p>The volume of traffic associated with the A3 widening and the New Guides Access Road is expected to increase the high levels of air pollution and noise pollution, experienced by residents, some of whom are elderly or have health problems. Has adequate consideration and due diligence been given to this factor with the particular regard to Government Climate Change and Pollution guidelines? Also affected by the new hard surfaced road is the cutting down of trees.</p>	<p>The air quality assessment, as documented in the Environmental Statement Chapter 5: Air Quality [APP-050], has included a number of sensitive receptors in proximity to the A3 north of junction 10, including receptors R24 to R30, as shown in Figure 5.10 within Environmental Statement: Chapter 5 Air Quality Figures 2 of 2 [APP-065]. Although some of these receptors show a small increase in annual average nitrogen dioxide concentrations with the Scheme compared to the without Scheme situation, actual concentrations, as documented in Table 5.7.9 in Environmental Statement Appendix 5.1 Air Quality [APP-080], are expected to be less than half of the 40 µg/m3 national air quality objective value, so air quality can be considered relatively good in this area, even with the expected increase in traffic on the A3.</p> <p>The air quality assessment has been carried out in accordance with Highways England's guidance, making use of the latest government data sources and tools available at the time of carrying out the assessment, and takes into account compliance with relevant air quality criteria.</p> <p>The air quality assessment does not consider trees when estimating pollutant concentrations at human health receptors. The widening of the A3 will inevitably result in the loss of some trees but this has been minimised as far as possible by the use of a retaining wall to reduce the extent of earthworks.</p> <p>The Scheme has considered climate change issues which has been assessed comprehensively in the Environmental Statement Chapter 15: Climate [APP-060]. The chapter assesses the effects of the Scheme on climate – particularly the impacts of greenhouse gas emissions (section 15.1); and vulnerability of the Scheme to climate change – particularly the resilience of the Scheme to climate change and extreme weather (section 15.2). Where issues have been identified, for example emissions, section 15.1.9 describes the mitigation and enhancement measures for this.</p> <p>Regarding noise levels at Painshill Estate, Highways England has provided a response on this issue in the Applicant's Comments on Relevant Representations [RR-035] [REP1-009] at Deadline 1.</p>
REP1-051-4	<p><b>Heritage, Conservation and the Environment</b></p> <p>Painshill Park and Painshill Estate have unique landscapes and buildings of considerable historical, architectural and environmental importance. The widening of the A3 and current proposals for the new access road would</p>	<p>The Environmental Statement Chapter 11 Cultural Heritage [APP-056] was undertaken in consultation with Historic England and the Painshill Park Trust. There is broad agreement that the area of landtake within this part of the park affects a section of the registered parkland that contributes little to the overall significance of the</p>

Reference	Written Representation Issue	Highways England Response
	<p>damage and impair the Grade 1 listed landscape and Grade 2 listed houses closest to the A3. It would also damage the local eco- system which is home to a diverse variety of wildlife including bats, badgers, dormice, deer, adders and bees.</p>	<p>registered park or the Listed Buildings that are associated with it. While there will be harm, it is identified in terms set out in the National Planning Policy Framework as less than substantial harm.</p> <p>The consideration of alternatives is set out in the Statement of Reasons [APP-22] and Chapter 3 of the Environmental Statement (contained in Environmental Statement (Chapters 1-4) [APP-049]).</p> <p>An assessment of biodiversity impacts from the construction and operation of the Scheme has been undertaken and is set out in Environmental Statement Chapter 7 Biodiversity [APP-052]. The assessment identifies potential impacts on species and habitats as a result of the creation of the private means of access to Pains Hill. Paragraph 7.11.101 identifies the potential for the road to provide a barrier to movement for common species of reptile. The following paragraph identifies an abundance of suitable habitats available adjacent to the Scheme considered sufficient to support the local populations of reptiles, including any displaced individuals. Paragraph 7.11.104 states that the compensation and enhancement measures will result in the creation of 22.5 ha of open heathland and will provide open glades within retained areas of woodland, resulting in habitats of higher suitability for reptiles over a larger area.</p> <p>The assessment of biodiversity impacts identifies no significant effects on the species described as a result of the proposed road to provide alternative access to Pains Hill.</p>
REP1-051-5	<p><b>Human Rights of Residents</b></p> <p>The right to a family/private life and enjoyment of property enshrined in European legislation is relevant in this context. I believe that the current proposals would violate the rights of approximately 30 people who live on the Painshill Estate. It also appears, that in the consultation process to date the rights of Painshill residents have been assigned a much lower priority than those of other interested parties such as the Girl Guides Association.</p>	<p>Highways England has provided a response to this issue in the Applicant's Comments on Relevant Representations [RR-050 [REP1-009] at Deadline 1.</p>
REP1-051-6	<p><b>Better Options Exist</b></p> <p>I believe that better options exist that avoid the problems highlighted above (items b to f). Has due consideration and due diligence been undertaken to review the proposed costs of the overall scheme compared to the implementation of a smart motorway system and clear carriageway signage from Painshill Roundabout down to Junction 10. Alternatively, siting the Access Road for the 3 properties (New Farm, The Guides Camp and Court Close Farm) further past the Gothic Tower towards Pointers Road. I appreciate that there is no perfect option but I believe that an objective analysis of the pros and cons of current proposals versus the options mentioned above would conclude that there are better cheaper options controlling the cost to the taxpayer, the potential escalation of the estimated current costs (e.g. Crossrail and HS2) and the interests of Painshill residents.</p>	<p>Highways England has provided a response to this issue in the Applicant's Comments on Relevant Representations [RR-035] [REP1-009] at Deadline 1.</p>

## REP1-056 Agnes Engelen

Reference	Written Representation Issue	Highways England Response
REP1-056-1	<p>Further to my letter dated the 4th November, I have set out below further points raised by my client regarding the proposed temporary and permanent rights and acquisitions as a result of the proposed M25 JCT 10/A3 Wisley Interchange Improvement.</p> <p>My client and I met recently with the Girl Guides (Heyswood Camp Site) to discuss the access provisions which are detailed in the DCO pack, currently with the Planning Inspectorate. It was clear that the lack of detail regarding how the suggested access (security barriers and gates) was to operate remains a significant concern. In my clients view, it is apparent that the current proposal needs to be reviewed at the earliest opportunity to address the concerns raised below.</p>	<p>A replacement access, a Private Means of Access (PMA), is required for Court Close Farm, Girl Guiding Greater London West's (GGLW) Heyswood Campsite, New Farm and the Southern Gas Network (SGN) compound. This is due to the closure of the existing unsafe direct access from the A3. The proposed route is from a new junction on the Painshill junction southbound slip road which will facilitate residents and tenants, service vehicles (postal/refuse vehicles) to the properties and maintenance vehicles for the A3 including the gantries.</p> <p>Please see the response to Girlguiding Greater London West above for further information concerning the proposed access road.</p>
REP1-056-2	<p>My client believes both her own needs and the safeguarding responsibilities of the guides are wholly compromised by the current proposal, with my client needing to rely on a new right of access being created through Heyswood Campsite. The Guides site is currently secure and currently satisfies their safeguarding requirements, restricting unrelated access to their site.</p> <p>My client has therefore raised the following concerns, which have been notified to the Acquiring Authority:            Safeguarding concerns around providing access to Close Court Farm:</p> <ul style="list-style-type: none"> <li>• Family &amp; Friends (Pat Engelen's and her lodgers)</li> <li>• Emergency Services</li> <li>• Postal workers</li> <li>• Delivery drivers</li> <li>• Gardner</li> <li>• Oil deliveries</li> <li>• Cesspit/sewage contractors</li> <li>• Utility company personnel</li> <li>• Gantry access (?)</li> </ul>	<p>Please see the response to Girlguiding Greater London West above for further information concerning the proposed access road.</p>
REP1-056-3	<p>Road safety concerns with vehicles needing to access Close Court Farm through Heyswood Campsite.</p>	<p>The PMA will have low volumes of traffic travelling at low speeds and will allow cars and coaches to pass safely. There will be laybys provided for the instances when two coaches will pass. There will be security fences along the boundaries of the Heyswood campsite therefore the Girl Guides will be within a secure boundary when vehicles are passing through to access Court Close Farm. If girl guides do cross the PMA, this is will be a supervised activity for a road crossing.</p>
REP1-056-4	<p>The complexities of documenting any subsequent changes in title required to accommodate the access which crosses the boundaries between the Close Court Farm and Heyswood Campsite.</p>	<p>The proposed land acquisition from the landowner is required to enable Highways England to provide the private means of access to Court Close Farm and the diversion of a gas pipeline. The land for the private means of access will be permanently acquired by Highways England, but it is proposed that necessary rights will be given to the occupiers of Court Close Farm to use the access road. The land for the gas pipeline diversion to the south of Court Close Farm will be subject to temporary possession. This will be returned to the landowner following construction, although rights will be retained by the operator of the gas pipeline to maintain the pipeline. Although the dDCO [APP-018] gives Highways England the powers to compulsory acquire the land required, Highways England will seek a negotiated agreement by negotiation, where possible.</p>
REP1-056-5	<p>The utter inconvenience together with the depreciation in the value of her property as a result of needing to engage 3 barriers/gates to access the property.</p>	<p>The type of security fencing and gates for the proposed access road is currently unspecified. Highways England is willing to have further discussions with the landowner to find an appropriate solution regarding security of access.</p> <p>Those with an interest in properties affected by the Scheme may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as 'Part 1 Claim'. A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such</p>

Reference	Written Representation Issue	Highways England Response
		<p>claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965. Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor.</p> <p>For further information on compensation more generally please see Government guidance documents on compulsory purchase:  <a href="https://www.gov.uk/government/collections/compulsory-purchase-system-guidance">https://www.gov.uk/government/collections/compulsory-purchase-system-guidance</a></p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to: <a href="https://www.gov.uk/compensation-road-property-value/make-a-claim">https://www.gov.uk/compensation-road-property-value/make-a-claim</a>.</p>
REP1-056-6	The impact this may have on her lodgers and the income this provides.	Arriving at Court Close Farm (from the North or South) will be almost the same distance as the existing layout. When leaving Court Close Farm there will be an additional approximate distance of 1.5km to travel to get to the same point as the existing access for the onward journey.
REP1-056-7	My client believes that rights for the Gantry access are being sought through Close Court Farm. This needs to be confirmed by the Acquiring Authority. If so, why can this not be maintained off the A3?	Maintenance access for the equipment on the A3 gantries is required from the PMA through Court Close Farm. Maintenance access via the PMA is a safer access than using the A3. Where possible, all A3 maintenance is to be gained away from the A3 for safety of the maintenance workers.
REP1-056-8	The routing of the gas main so far in to the field	<p>The route of the gas main is positioned to avoid the trees adjacent to the A3 which are ancient woodland. Section 5.32 of the National Policy Statement for National Networks (NPS NN) states that the: "<i>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</i>". Therefore, Highways England should seek to minimise the loss of ancient woodland as a result of the Scheme, and this has been achieved by selecting the PMA access option that requires the least loss of ancient woodland.</p> <p>After installation of the gas main the land will be returned to the owner however SGN will have rights to maintain their gas main in a similar way to the rights National Grid Electricity Transmission have to maintain their power lines at Court Close Farm.</p>
REP1-056-9	I understand that some earlier discussions related to the access being provided through land directly adjoining the A3 and that my client's preference would be that they consider this as an alternative.	Previous iterations of the design that showed the proposed private means of access. Redhill overbridge, past the Gothic Tower and North towards new Farm passing Court Close Farm and Heyswood campsite, this was presented during consultation. However, this route option was omitted from the Scheme due to strong objection from local landowners. This is illustrated in Section 6.4 of the Consultation Report [APP-026].

## **Part 3 - Members of, or representatives of, local communities within the vicinity of the Scheme**

## REP1-021 Chasemore Farm

Reference	Written Representation Issue	Highways England Response
REP1-021-1	<p>As an equine veterinarian living (KT11 1LS, 500m from M25) and working (KT11 3JT, contiguous with M25) in close proximity to Junction 10, I represent both a large equine owner-breeder, Chasemore Farm (a producer of young horses and a significant local employer) and the local community of Hatchford on Ockham Lane. Both the farm and the community currently experience significant (and steadily increasing) noise pollution due to 'road rumble' caused by the inferior concrete road surface on this section of the M25 and the lack of sound barriers. Sound levels at both locations frequently exceed 75 decibels (day and night) which is a chronic stressor for humans and horses alike, and from a business perspective deters potential clients. It is understood that replacement of the concrete M25 surface presents significant logistical challenges, therefore sound barriers are the logical approach for mitigation of this problem. Current published plans by the applicant detail the inclusion of such environmental barriers, but on an extremely limited and inadequate scale.</p>	<p>Please refer to the response to the previous Relevant Representation from Chasemore Farm [RR-008] within the Applicant's Comments on Relevant Representations [REP1-009].</p>
REP1-021-2	<p>Our submission therefore petitions to ensure that interchange improvements include the installation of acoustic barriers on both sides of the M25 and A3 where improvements are being made, in order to reduce noise pollution.</p>	<p>The scheme includes noise barriers, where assessment has been determined that they are required, on both sides of the M25 and A3 as shown on the Scheme Layout Plans [APP-012 and AS-004].</p>



## REP1-022 Elm Corner Residents

Reference	Written Representation Issue	Highways England Response
REP1-022-1	<p>All sixteen affected households:</p> <ol style="list-style-type: none"> <li>Accept the new access to be via BOAT 525 to Old Lane. This is accepted by HE.</li> <li>Reject all of other access options.</li> <li>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.</li> </ol> <p>On condition that:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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 behaviour a key design consideration. This does not appear to be delivered by the plans.</li> </ol>	<p>In response to the suggested conditions:</p> <ol style="list-style-type: none"> <li>Detailed plans for the BOAT 525/Old Lane junction are not yet available but will be prepared at detailed design stage. The Stage 1 Road Safety Audit (RSA) was undertaken in accordance with DMRB Standard HD 19/15 (revised recently to GG119) on the Scheme design in November 2018. A Stage 2 RSA will be carried out at the detailed design stage. The detail of the design of the junction between existing BOAT 525 and Old Lane will be subject to consultation with Surrey County Council as highway authority for this road.</li> <li>The section of Elm Lane running east-west that will form the new NMU route connecting BOAT 525 to the Wisley Lane diversion will be gated to the west of Orchard Cottage to prevent vehicles proceeding beyond this point, other than those maintenance vehicles accessing the drainage ponds adjacent to the A3 and to the north of Elm Lane.</li> </ol> <p>Elm Lane will be stopped up and fenced at the A3 and the existing gate at its southern end at the Wisley Airfield will be maintained. These fences and gates will prevent unauthorised vehicle access to the 'old' Elm Lane.</p> <p>The 'old' Elm Lane will be maintained as a bridleway.</p>
REP1-022-2	<p><b>ECONOMIC AND SOCIAL EFFECTS</b></p> <p><b>Elm Lane between Orchard Cottage and the A3 (old Elm Lane)</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 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.</p> <p>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 behaviour, whilst also reducing upkeep costs for local authorities and minimising habitat fragmentation.</p> <p>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.</p>	<p>Maintenance access is required to the drainage attenuation ponds either side of the new Wisley Lane overbridge, to the gantries on the A3 and for the Wisley Lane diversion, and for associated highway drainage. Given the significant difference in levels it is not possible to access these features via the Wisley Lane diversion. For safety reasons maintenance of the gantries on the A3 cannot be undertaken from the carriageway of the A3 itself. The drainage attenuation ponds and the drainage ditches are not accessible from the A3.</p> <p>Access from the A3 onto the existing Elm Lane will be permanently stopped with the Scheme and a fence installed as shown on Sheet 2 of the Scheme Layout Plans [APP-012]. The section of Elm Lane that will form the new NMU route will, between the former Wisley Airfield and the A3, will be utilised as a maintenance access, however the existing Elm Lane will be gated to prevent access from the Wisley Lane diversion as also shown on sheet 2.</p> <p>Vehicular access along Elm Lane through Elm Corner from Old Lane will be stopped with a secure gate or barrier in the vicinity of access to Twenty Twelve, as shown on Sheet 23 of the Scheme Layout Plans [AS-004] Orchard Cottage therefore, there will be no vehicular access to 'old' Elm Lane from Old Lane.</p> <p>These measures will prevent access to the redundant section of Elm Lane by all but authorised maintenance vehicles accessing the drainage ponds or gantries by the Wisley Lane diversion.</p> <p>Stopping up access at either end of the redundant section of Elm Lane will deter its use for those engaging in anti-social behaviour.</p>
REP1-022-3	<p><b>Hammerhead turn and other design considerations</b></p> <p>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?</p> <p>How will Elm Corner residents access their properties during the construction phase of the hammerhead? [Plan Ref 24/1; BoR p430].</p> <p>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</p>	<p>As indicated in paragraph 2.7.17 of Environmental Statement (Chapters 1-4) [APP-049] the connection to Old Lane will be completed prior to the stopping up of the access to the A3 and the construction of the new turning head. A permanent hammerhead to enable vehicles to turn will be provided just to the north east of Orchard Cottage in a small area off Elm Lane as shown on the Scheme Layout Plans, sheet 23 [AS-004]. The design will enable vehicles using it to turn safely. This will include larger vehicles such as refuse trucks and fire appliances. There will be no provision for stopping or parking in the hammerhead. There is no proposal to use the access to Orchard Cottage for turning vehicles.</p> <p>The construction of the Scheme is subject to a range of controls in the dDCO including a Construction Environmental Management Plan (CEMP) to be approved by the Secretary of State which must also include a community relations strategy (Requirement 3 of the dDCO). During the construction phase, there will be a dedicated Public Liaison Officer responsible for maintaining good stakeholder relations. He or she will be</p>

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	<p>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 &amp; 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 Ref24/1].</p>	<p>contactable via a dedicated phone number and/or email address which will be communicated via Highways England's project webpage / signage on site and made known to all stakeholders already held in the Stakeholder Records Database.</p> <p>The principal contractor will be required to keep local residents and other affected parties informed of the progress of the works via the Highways England project page and by the issuing of email updates. For specific issues relating to construction effects, the identified stakeholders/residents affected will be proactively contacted by the Public Liaison Officer to inform them of when and where the construction activities will be taking place and how long they are expected to last.</p> <p>In addition, a Traffic Management Plan in relation to the construction process must be approved by the Secretary of Stage under Requirement 4 (Traffic management during construction) of the dDCO.</p> <p>The location for the turning head and other road amendments is shown on the Scheme Plan Sheets 23 and 24 [AS-004].</p>
<p>REP1-022-4</p>	<p>Essential mitigation required:</p> <ul style="list-style-type: none"> <li>• Dig up old Elm Lane between Orchard Cottage and the A3 to remove the paved road, and;</li> <li>• Stop up old Elm Lane between Orchard Cottage and the A3 (for example with a permanent fallen tree), and;</li> <li>• 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;</li> <li>• 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]</li> </ul> <p>Additional mitigation requested:</p> <ul style="list-style-type: none"> <li>• 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</li> </ul>	<p>Response:</p> <ul style="list-style-type: none"> <li>• This is not included in Scheme because of the need for access for maintenance vehicles.</li> <li>• There will be no access to this part of Elm Lane from the A3 and there will be a secure gate installed in Elm Lane near Orchard Cottage.</li> <li>• A hammerhead turning is included in the Scheme – see above.</li> <li>• This is included in the Scheme.</li> </ul> <p>Response:</p> <ul style="list-style-type: none"> <li>• Due to existing public rights of way along BOAT 525, along with the number of properties that would require access, it is not appropriate for gates to be installed on the section of Elm Lane to be resurfaced.</li> </ul>
<p>REP1-022-5</p>	<p><b>AIR QUALITY AND EMISSIONS</b>  <b>Construction compound APP-002 25.2.9/10</b></p> <p>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.</p> <p>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.</p> <p>Essential mitigation required:</p> <p>We request that the compound [to be located immediately adjacent to Elm Corner properties on the Former Wisley Airfield] 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 night time light pollution.</p>	<p>The location of the construction compound has been chosen for its immediate proximity to the Wisley Lane diversion and due to the extensive existing hardstanding, requiring minimal work prior to use. Other locations would be further away from the proposed works requiring additional vehicle movements, and more extensive preparatory works in advance of the main works commencing.</p>
<p>REP1-022-6</p>	<p>RHS Wisley over bridge</p> <p>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.</p> <p>Essential mitigation required:</p>	<p>The results of the traffic modelling presented in the Transport Assessment Report [APP-136] demonstrates that with the Scheme the Ockham Park roundabout will operate within capacity in both 2022 and 2037. Consequently, no significant traffic queuing is forecast to occur on the Wisley Lane diversion. Any change in air quality at Elm Corner as a result of the Scheme would be imperceptible, as these properties in this location are beyond the limits of the affected air quality study area.</p> <p>Alternative options assessed were discounted in favour of a road bridge to connect Ockham Park junction due to the environment impacts in RHS Garden Wisley, Wisley Common and the safety of the travelling public.</p> <p>The consideration of alternatives is set out in Statement of Reasons [APP-22] and chapter 3 of the Environmental Statement (contained within Environmental Statement (Chapters 1-4) [APP-049]). The</p>

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	<ul style="list-style-type: none"> <li>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).</li> </ul>	<p>alternative solution WIS 01 was rejected at an earlier stage as it was assessed as being worse overall than the current proposal.</p>
REP1-022-7	<p><b>CLIMATE CHANGE IMPLICATIONS</b></p> <p>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 2019UN 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.</p>	<p>The effect on climate assessment was carried out in the context of the UK's carbon budgets as they are at the time of writing and preparation of the assessment, as agreed in the Scoping Opinion. Potential future amendments to the 3rd, 4th and 5th budgets cannot be predicted, and it would therefore not be appropriate to carry out review of the carbon impact against other percentage reductions.</p>
REP1-022-7	<p><b>NOISE, VIBRATION AND LIGHTING</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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-0424.3.7 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.</p> <p>Essential mitigation required:</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>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 nightworks and many heavy vehicles over a period of two to three years. The working hours stated for the construction period</p>	<p>It is not predicted that the Scheme will increase noise or air pollution levels in Elm Corner and it is outside the scope of the Scheme to address historic levels of noise or air pollution.</p> <p>The visual assessment in Environmental Statement Chapter 9: Landscape [APP-054] is further expanded in Environmental Statement Appendix 9.1 Landscape Assessment and Methodology [APP-109] and is the view of an experienced landscape architect of the effects of the Scheme in accordance with the methodology used. The assessment takes into account the existing conditions and the proposals.</p> <p>The lack of low-level vegetation in the woodland is acknowledged and proposals in the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015] indicate measures to manage the woodland here to provide more vegetation at lower levels to enhance screening.</p> <p>A strip of vegetation would be lost to accommodate the widening of the A3 and associated features. A belt of woodland would remain between the red line boundary and the nearest properties in Elm Corner.</p> <p>As set out in Environmental Statement Chapter 6: Noise and Vibration [APP-051] 6.8.24 for short-term impacts, a comparison is made between the Do Something and Do Minimum scenarios in 2022, the opening year of the Scheme. For long term impacts as a result of the Scheme, a comparison is made between the Do Minimum scenario in 2022 and the Do Something scenario in 2037. Long-term impacts without the Scheme have also been considered. As set out in paragraph 6.8.33 and Figures 6.11 and 6.12 in Environmental Statement: Chapter 6 Noise and Vibration Figures 2 of 2 [APP-067], minor decreases in traffic noise are predicted during operation over the short term. As indicated in paragraph 6.8.26 and shown on Figures 6.13 over the long-term a, long-term changes to road traffic noise of up to 3 dB were predicted without the Scheme, which the DMRB 11:3:7 classes as a negligible impact magnitude. Therefore the noise levels generated by the Scheme do not justify the provision of an environmental barrier in this location.</p> <p>As noted above the Environmental Statement: Appendix 7.19 SPA Management and monitoring plan [AS-015] provides details on the measures that would be taken to promote the development of low-level vegetation in this location to enhance visual screening.</p> <p>The proposals for monitoring and mitigating construction effects are set out in the Outline Construction Environmental Management Plan (oCEMP) [AS-016] and the Register of Environmental Actions and Commitments (REAC) [APP-135].</p> <p>Under Requirement 3 of the dDCO [APP-018] a Construction Environmental Management Plan (CEMP) is to be approved by the Secretary of State, following consultation with the relevant planning authority before the authorised development, or the relevant part of it, may commence.</p> <p>Measures included in the CEMP will include measures to control noise, air and dust, and light pollution.</p> <p>The compound is located in the place where it facilitates the efficient construction of the scheme.</p>

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	<p>suggest normal working hours of Monday to Saturday lunchtime. There will be the need for overnight works to take place on the M25/A3.</p> <p>Screening between the proposed compound and residential properties is comprised of only some deciduous trees.</p> <p>Essential mitigation required:</p> <ul style="list-style-type: none"> <li>We request the construction compound is located further away from residential properties.</li> </ul> <p>Timing of works and potential seasonal effects;</p> <p>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.</p>	<p>There is a band of mature deciduous vegetation of approximately 15 m to 50 m width between Elm Corner residents and the edge of the airfield where the compound is situated.</p>
<p>REP1-022-8</p>	<p><b>COMPULSORY ACQUISITION AND/OR TEMPORARY POSSESSION</b></p> <p>More defined detail is required with regards to Compulsory/Temporary Possession of land and the extent of works to be conducted at Elm Corner.</p> <p>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.</p> <p>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:</p> <p>The exact works proposed. There have been three different explanations as to the inclusion of the property in the site maps:</p> <ol style="list-style-type: none"> <li>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;</li> <li>To enable access to facilitate a temporary/permanent turning circle; and</li> <li>Access to electricity/phone lines as part of the overall works</li> </ol> <p>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 &amp; 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?</p> <p>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.</p> <p>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.</p> <p>Essential mitigation required:</p> <ul style="list-style-type: none"> <li>Both Orchard Cottage and Twenty Twelve (the latter not yet referenced as needing work) require accommodation works to realign driveways.</li> <li>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.</li> </ul>	<p>The accommodation works for Orchard Cottage (plot 23/2 on the Land Plans [AS-002]) will include realignment of the drive and replacement gate to allow vehicles to turn right out of the property towards Old Lane. This requires temporary possession of the land to undertake the works. The full extent of the accommodation works will be defined in the detailed design stage of the Scheme.</p> <p>The accommodation works for Twenty Twelve (no plot defined) will include realignment of the drive and replacement gate to allow vehicles to turn right out of the property towards Old Lane. Highways England will enter into discussions with the Interested Party regarding an agreement on these accommodation works. The full extent of the accommodation works will be defined in the detailed design stage of the Scheme.</p> <p>As set out in the Statement of Reasons [APP-022], land is required at Orchard Cottage as follows:</p> <p><b>Land to be used temporarily</b></p> <p>23/2 For modifications to the entrance to Orchard Cottage</p> <p>23/3 To provide working space for the construction of a turning head on Elm Lane</p> <p>23/7 For modifications to the entrance to Orchard Cottage and to provide working space for the construction of a turning head on Elm Lane.</p> <p><b>Land to be acquired</b></p> <p>23/4 For the construction of a turning head</p> <p>In order to provide a realigned access to Orchard Cottage parcel 23/2 on the Land Plans [AS-002] will be required. It is only proposed to use parcel 23/2 for the construction of the realigned access to Orchard Cottage. No works are proposed to electricity or telephone cables, however these are mentioned in the Book of Reference as the operators of these utilities have rights to pass under or over that parcel of land and so will have their rights affected, albeit temporarily.</p> <p>Those with an interest in properties affected by our proposals may be entitled to compensation under the Compensation Code.</p> <p>Highways England is committed to continuing engaging with residents throughout the development and implementation of the Scheme. Highways England has written to all affected parties listed in the Book of Reference [APP-025] offering engagement regarding temporary and permanent land requirements and are committed to ongoing engagement.</p>
<p>REP1-022-9</p>	<p><b>BIODIVERSITY, ECOLOGY AND NATURAL ENVIRONMENT</b></p> <p>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.</p> <p>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</p>	<p>As noted above this section of Elm Lane is being stopped up but retained to enable maintenance access.</p> <p>The Habitats Regulations Assessment Stage 2 [APP-043] concluded that it is not possible to ascertain that this habitat loss of land would have no adverse effect on the integrity of the Special Protection Area (SPA). This resulted in the requirement for compensatory measures.</p>

Reference	Written Representation Issue	Highways England Response
	<p>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.</p> <p>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.</p> <p>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'.</p>	<p>Natural England, Forestry Commission, RSPB, Surrey County Council and SWT were consulted on an appropriate suite of compensatory measures.</p> <p>A range of options were considered as SPA compensation land and were refined over the development of the Scheme and are described in Section 5 of 5.3 Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>The Elm Corner SPA Compensation Land referred to as an area of land close to the existing Elm Lane where it connects to the A3 which had originally been chosen as an area for SPA Compensation. It was subsequently removed as it lay within the 400m buffer around the Guildford Borough Local Plan allocation A35 and does not form part of the current Scheme.</p> <p>The decision making process behind refining the SPA compensation land parcels and SPA enhancement areas can be found in 5.3 Habitats Regulations Assessment Annex C [APP-042]. The consultation process throughout the HRA can be found in 5.3 Habitats Regulations Assessment Annex B [APP-041].</p> <p>The suite of compensatory measures includes two areas of SPA compensation land (totalling 8.1 ha), both of which are immediately adjacent to the SPA and therefore are contiguous with the SPA. The suite of compensatory measures also include eight SPA enhancement areas within the existing SPA (totalling 47.4 ha).</p> <p>The proposals for the SPA compensation land parcels and the SPA enhancement areas are described in paragraphs 5.1.25-5.1.31 and 5.1.46-5.1.69 of 5.3 Habitats Regulations Assessment Stage 3-5 [APP-044].</p> <p>The woodland buffer around the A3 and M25 will be retained.</p>
REP1-022-10	<p>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.</p> <p>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 No58(a). This area should no longer be within the DCO red line works area.</p> <p>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.</p> <p>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.</p>	<p>The SPA compensation land parcels have been refined, with the removal of the Elm Corner SPA compensation land and the increase of the size of C2 Wisley SPA compensation land.</p> <p>Sheet 3 of the Scheme Layout Plans (Sheets 1-10 of 31) [APP-012] shows the Elm Lane SPA enhancement area E4, which is one of the eight SPA enhancement areas. It does not show the originally proposed Elm Corner SPA compensation Land. This plan is correct, and these SPA enhancement areas are retained to be within the DCO red line works area and will consist of heathland restoration and woodland enhancement works to benefit the SPA qualifying species.</p> <p>The ancient woodland is further south towards Ockham Park junction and the loss of part of it is due to the widening of the A3, not the Wisley Lane Diversion or the new Wisley Lane overbridge. Efforts have been made to keep ancient woodland loss to an absolute minimum.</p> <p>The ancient woodland is already separated from the SPA/SSSI by Elm Lane. However, as identified in Table 7.7 of Environmental Statement Chapter 7: Biodiversity [APP-052] traffic movements on the new side roads could have the potential to result in direct mortality or injury to animals such as badgers due to traffic collisions. Highways England is willing to investigate the potential for providing a culverted underpass within the embankment on the new section of Wisley Lane during detailed design to facilitate the passage of wildlife.</p> <p>There is currently no direct link between the ancient woodland and the SPA.</p>
REP1-022-11	<p><b>DRAFT DEVELOPMENT CONSENT ORDER (DDCO)</b></p> <p>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.</p>	<p>See above. Work no. 58 in Schedule 1 of the dDCO [APP-018] forms an essential part of the suite of compensatory measures that form part of the Habitats Regulation Assessment [APP-039 to APP-044].</p>
REP1-022-12	<p><b>HISTORIC ENVIRONMENT</b></p> <p>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.</p>	<p>These will be re-located alongside the widened A3 and at Old Lane as part of the proposals.</p>
REP1-022-13	<p><b>TRANSPORTATION AND TRAFFIC</b></p> <p>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.</p> <p>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</p>	<p>Please also refer to responses above to RHS Wisley. The upgrading of the BOAT will be carried out at the start of the works so that access to Elm Corner will be achieved without conflict with construction vehicles using the Elm Lane access off the A3. Following the appointment by Highways England of a principal contractor detailed construction programme showing the timing of works near Elm Corner will be prepared and made available to the Elm Corner Residents. An outline construction programme is available in the Environmental Statement Chapter 2 (contained within Environmental Statement (Chapters 1-4) [APP-049]). Access to properties on Elm Lane will be maintained at all times.</p>

Reference	Written Representation Issue	Highways England Response
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Alternative design solutions to the very expensive and excessive RHS over bridge could have been:</p> <ul style="list-style-type: none"> <li>• A Park and Ride facility for the RHS Gardens.</li> <li>• 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.</li> </ul> <p>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.</p> <p>Essential mitigation required:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>	<p>The process of choosing the access to RHS Wisley took account of all factors and the proposed access was considered to be the best overall. This decision was taken in an earlier stage of the project and is summarised in Table 3.1 in Ch 3 of the Environmental Statement (contained within Environmental Statement (Chapters 1-4) [APP-049]).</p> <p>The Habitats Regulations Assessment [APP-039 to APP-044] sets out the impacts on the SPA and has been agreed with Natural England. It concludes the impacts are not excessive.</p> <p>The basis of the IROPI is set out in the Habitats Regulations Assessment Stage 3-5 [APP-044] and does not include road improvements for RHS Wisley Gardens.</p> <p>Widening into the central reserve was considered early in the development of options for access to Wisley but was discarded as it presented complex engineering challenges and did not offer sufficient advantages over other options.</p> <p>See above regarding responses regarding the assessment of alternatives.</p> <p>The phasing of the New Elm Lane works is as noted above.</p> <p>Improvements to the Old Lane/Elm Lane junction will be made to ensure the safe operation of the junction. The detail of the design of the junction between existing BOAT 525 and Old Lane will be subject to discussion with Surrey County Council as highway authority for this road.</p>
REP1-022-14	<p><b>DRAINAGE</b></p> <p>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.</p> <p>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.</p>	<p>A culvert to alleviate drainage issues will be included in the detailed design of the Scheme.</p> <p>Run off from the construction site will managed by the contractor in the Construction Environmental Management Plan (CEMP) which will be developed from the Outline CEMP [AS-016].</p>

## REP1-025 Gardens Trust and Surrey Gardens Trust

Reference	Written Representation Issue	Highways England Response
REP1-025-1	<p>We would like to refer back to our representation of August 24th 2019 (identification number 20022906) and reiterate that we strongly support the Painshill Park Trust in their requirement for a replacement access at the western end of their ownership for both emergency and land management purposes. This additional submission equally strongly supports the Painshill Park Trust Chairman's statement at the Open Floor Hearing on 12 November for all the reasons given therein. Mr Reay-Smith's expressed hope that Highways England and the Trust can work together to resolve the matter is also supported. Closure of the vital western access route would have a disastrous impact upon the nationally important Heritage Asset, directly conflicting with its conservation and placing a barrier upon further conservation of the Grade I landscape, its two Grade II* and seven Grade II listed garden buildings.</p> <p>We note that Additional Submissions published on 7 November from the County Commissioner and local representatives of the Guiding Association indicate a number of outstanding concerns for the access road, indicative of the need to seek a wider resolution.</p>	<p>Please refer to the Highways England response to the Painshill Park Trust Written Representation [REP2-026] and the Girlguiding Greater London West Written Representation [REP2-027].</p>

## REP1-027 Guildford Residents Associations

Reference	Written Representation Issue	Highways England Response
REP1-027-1	Support for concerns expressed by Surrey County Council, Guildford Borough Council, the Parish Councils of Ripley and Ockham (expressed in the Lovelace Neighbourhood Plan) about the future conditions in the villages, and Ripley in particular and concerns of RHS Wisley about the additional vehicles miles that visitors will be obliged to drive to access the gardens.	Please refer to Highways England's responses to the Written Representations from Surrey County Council [REP1-020], Ripley Parish Council [REP1-017], Ockham Parish Council [REP1-016] and Lovelace Neighbourhood Plan [REP1-029], in the sections above within this document, regarding impacts to the future condition of Wisley, Ripley and Ockham.  Highways England will also respond to any relevant issues raised by Surrey County Council and Guildford Borough Council in their Local Impact Reports at Deadline 3.
REP1-027-2	Infrastructure to facilitate the Guildford Local Plan and other strategic development <p>The traffic forecasts assume that the Guildford Local Plan will be implemented, along with other developments in surrounding boroughs. The Guildford Local Plan has stipulated that strategic developments can only take place with specified infrastructure in place, so surely such infrastructure should be assumed to be in place when preparing traffic forecasts for the A3 for 2037.</p> <p>The Planning Statement does refer to Policies ID1 and ID2 of the Guildford Local Plan (adopted in April 2019). And in para 5.7.45 the Strategic Road Network schemes are listed. But the Do-Minimum network does not include SRN7 and SRN8, which relate to the A3/A247 junction and the A3 Burpham junction.</p> <p>The one with probably most bearing on this scheme is SRN7, the north facing slip roads at Burnt Common. Irrespective of funding, which it is accepted is not committed at this point, in our view these should form part of the longer term future network if the developments at Wisley Airfield, Gosden Hill and Burnt Common are assumed to be completed.</p>	Please refer to Highways England's responses to the Written Representations from Surrey County Council [REP1-020] as to the approach to modelling of the proposed Burnt Common slip roads as part of the adopted Guildford Borough Local Plan.
REP1-027-3	We urge Highways England to modify the scheme to include south-facing slip roads on and off the A3 at Ockham Park roundabout, subject to detailed appraisal. It is not clear from the published evidence why these have not been included in the scheme. The provision of access at Ockham southbound onto the A3 would give more direct access for traffic from RHS Wisley, and Wisley Airfield. Similarly, a northbound off-slip would provide access to Wisley gardens from the south without having to go to J10.	Please refer to Highways England's responses to the Written Representations from Surrey County Council [REP1-020] and RHS Wisley [REP1-038] in the sections above within this document, regarding south facing slips at Ockham Park junction.
REP1-027-4	The Transport Assessment Report (ref APP-136 ) shows where flows increase on the network with the scheme, in Figures 7.3 and 7.4, and traffic forecasts are presented in Appendix E, Tables E-16 and E17 being particularly relevant. However, these do not show flows on the A3 south of Ockham. Highways England has provided the forecasts in the form of a table which is included in the Appendix hereto. In the absence of analysis including north facing slips at Burnt Common, and south facing slips at Ockham, we have to gauge what the effect might be on the A3 between these junctions if they were provided, taking into account the forecast flows through Ripley shown in Table 7-9 of the Transport Assessment Report (APP-136). The evidence available suggests that dual-3 carriageways would be sufficient.	Please refer to Highways England's responses to the Written Representations from Surrey County Council [REP1-020] as regards the approach which has been taken to traffic modelling for the Scheme, including the justification for the omission of north-facing slips at the Burnt Common junction and south-facing slips at the Ockham Park junction from the modelling.



## REP1-031 Painshill Residents Group

Reference	Written Representation Issue	Highways England Response
REP1-031-1	<p><b>The access road</b></p> <p>It is apparent with the widening of the A3 that a solution must be reached to enable the above properties to access their land.</p> <p>In early 2018 it was understood that an acceptable compromise had been reached, whereby the access road would be a bridge, that would traverse the A3. Despite individual households actively maintaining direct contact with HE at that time, Pains Hill residents were not consulted or informed of any change in access road location.</p> <p>Many months later, we discovered a change of plan and demanded a meeting with HE, which took place in August 2019.</p> <p>At that August meeting we were shown, on plans, the proposed access road through the Christmas tree field. Among the objections made to HE's proposal, (objecting to their proposal,) it was suggested that the earlier agreed bridge would have significantly less impact on a historic landscape. In the alternative, it was felt the earlier plan to use Pointers Road should be reconsidered. We were informed that it was too late to make any alterations and the Christmas tree field proposal would be advanced to the Planning Inspectorate.</p>	<p>Please refer to Highways England's response to RR-052 in REP1-009 as to the design development, consultation and impacts on the historic environment.</p>
REP1-031-2	<p><b>Safety</b></p> <p>The siting of the access road off the A3 slip road causes concerns in respect of safety with its proximity to the Pains Hill roundabout. The proposed barrier on the access road could create congestion on the slip road if there were several vehicles accessing the slip road simultaneously, in particular on Guiding event days. It could also create a potential hazard in respect of vehicles taking an accidental turn and it would provide insufficient security for the three properties, Pains Hill residents and the Park.</p>	<p>Please refer to Highways England's response to RR-052 in REP1-009 as to the safety of the proposed private means of access.</p>
REP1-031-3	<p><b>Security</b></p> <p>Opening up the access road on the proposed route would make our properties very vulnerable and the security afforded by our electronic gate at the entrance to the Pains Hill residences would be negated or at least reduced. Moreover, there are a number of children on the estate and their security and safety could be compromised by what is otherwise a very secure environment.</p>	<p>Please refer to Highways England's response to RR-048 in REP1-009 as to the security measures incorporated into the design.</p>
REP1-031-4	<p><b>Noise and Pollution</b></p> <p>The proposed access road would bring increased noise and air pollution from the A3, considerably closer to our community. Reduction of the trees, even on a temporary basis could impact the health of our residents. The pollution from all the building works and the substantial noise of the construction would affect the quality of life all people living here for a significant period of time.</p>	<p>Please refer to Highways England's response to RR-035 in REP1-009 as to the effects of the Scheme on Pains Hill residents in terms of noise and pollution.</p>
REP1-031-5	<p><b>Wildlife and conservation</b></p> <p>The intrusion of the proposed access road would significantly impact the abundance of wildlife in our environment namely, families of deer, bats, dormice, adders, badgers, and bees. Moreover, our delicate ecosystem would be damaged.</p> <p>The heritage of our properties should come into consideration. Pains Hill Park, in their oral submissions, contended that note should be given to the National Policy Planning Framework covering heritage assets as their landscape is Grade 1 and the buildings Grade 2 star. The same applies to the properties here at Pains Hill. All properties (here) are individually owned: this is not an organisation with a long list of public support, but a group of households who have paid a premium, not only to buy a dwelling in which to live, but also to take responsibility for a heritage and to commit to the upkeep of their properties to benefit future and to commit to the upkeep of their properties to benefit future generations. The curtilage of the residences is of equal importance as the buildings themselves and the slip road access would cause an impact on that environment, which could be avoided if the bridge decision was adhered to. The preservation and management of a historic landscape, its buildings and its environs would, in our view, be better served by protecting this estate.</p>	<p>Please refer to Highways England's response to RR-035 in REP1-009 as to wildlife and conservation matters.</p>
REP1-031-6	<p>Finally, but not least, European law provides that we have a right to a family/private life without interference and that those rights would be infringed.</p>	<p>Please refer to the Highways England response to RR-050, RR-056, RR-57 and RR-059 of REP1-009.</p>

## REP1-046 Wisley Action Group

Please refer to Highways England's response to the written representation made by Ockham Parish Council (REP1-016), the text of which is identical to that submitted by the Wisley Action Group.

## REP1-052 Regena Coult

Reference	Written Representation Issue	Highways England Response
REP1-052-1	<p><b>Toad tunnel network Boldermere / A3</b>            For illustration, please see the accompanying slides Boldermere Improvement for Amphibians_Rev1.pptx</p>	<p>Highways England wishes to install two toad underpasses at Old Lane and associated measures. These will form part of Highways England's forthcoming application for some scheme changes as set out in the Applicant's letter regarding request for changes to the DCO . It is not appropriate to use this Scheme to rectify any apparent issues which occurred as a result of the implementation of previous projects, such as the M25 or the A3 widening.</p>
REP1-052-2	<p><b>Green bridges network A3 / M25</b>            For illustration, please see the accompanying slides "M25Jnct10GreenBridges The M25 / A3 junction cuts the Wisley and Ockham Common SSSI into four sectors.            This prevents smaller animals such as reptiles and amphibians, hedgehogs and other small mammals from moving freely and mixing with the populations present in the other sectors.            Adders (<i>Vipera berus</i>), a nationally very vulnerable species, are found on Chatley Heath and Wisley Common, and they are likely to be present on the land to the north of the M25. Sightings of adders have diminished recently compared to earlier years and it is thought that this might be due to the impoverishment of the genepool as a result of habitat fragmentation.            Sandlizards (<i>Lacerta agilis</i>), a protected species, are present on Chatley Heath. Wisley Common has potential to support sand lizards but at the moment no movement is possible.            I am very pleased that the Cockcrow footbridge will be converted to a green bridge as part of the plans. This will form a very important connection between Chatley Heath and Wisley Common.            Please consider a network of green bridges that will enable each of the four sectors of the SSSI to be reconnected.            This could be done by building new bridges in the appropriate locations and / or by modifying existing bridges, where available.            Not only would these green bridges reverse the habitat fragmentation caused by the M25 / A3 road network, they would themselves create new habitats for small mammals, birds and reptiles.</p>	<p>As mentioned above, it is not appropriate for this Scheme to make provision for issues that have arisen in respect of previous projects</p>
REP1-052-3	<p><b>Reconsideration of Wisley bypass / access road</b>            I would like to ask Highways England to reconsider the Wisley bypass / access road scheme. The chosen scheme causes habitat fragmentation. It cuts off the ancient woodland from the adjacent grassland. It is some distance away from Boldermere but still inside the toadlet dispersion region.            The "snake field" lies nearby, which is being managed as a reptile habitat by the wildlife trust. Reptiles live in the vicinity of the proposed development.            Invariably, these animals will be killed on this road as a result of the habitat fragmentation.            I understand that RHS campaigned heavily to have the access road routed away from the southern border of their grounds.            I understand that there was much public interest aroused concerning the loss of trees.            But was the public really made aware of the implications of routing the access road along the disused airfield? That as a result, more land would be lost in comparison? And that, because of the habitat fragmentation, wildlife would be killed on this road, year after year after year?            Surely losing trees is very upsetting. But given a choice, shouldn't the lesser evil be chosen?            Is this the true spirit of conservation to save one's own property in exchange for more destruction elsewhere?            If the access road was run along the north of the A3, habitat fragmentation with the associated loss of wildlife could be avoided. One proposal included a wall along the new access road to reduce the number of trees needing to be felled (WIS-01a).            From what I am able to understand, this would have been the option with the least detrimental impact on the environment.</p>	<p>With regards to the new section of Wisley Lane at Elm Corner, as identified in Table 7.7 of Environmental Statement Chapter 7: Biodiversity [APP-052] traffic movements on the new side roads could result in direct mortality or injury to animals such as badgers due to traffic collisions. Highways England is willing to investigate the potential for providing a culverted underpass within the embankment on the new section of Wisley Lane during detailed design to facilitate the passage of wildlife.            The problem with toads crossing on Elm Lane refers to the existing toad population within Bolder Mere and the pond along Old Lane. It is understood that the dispersal of these breeding toads includes movements across Old Lane and Elm Lane, and according to the relevant representation by Regena Coult [RR-036] many toads are currently killed by traffic on Old Lane every year.            The traffic modelling predicts that the Scheme will increase daily traffic flows on Old Lane by 12% in the 2022 opening year and by 100% in the 2037 design year. The most significant increase is in 2037 and will be largely due to the Scheme improving the Old Lane/A3 junction, making this route more attractive for Wisley Airfield development traffic seeking access to the A3 southbound.            Environmental Statement Chapter 7: Biodiversity [APP-052] considers the impacts of the Scheme on Conservation Verges as identified in the Surrey Road Verge Habitat Action Plan. The citation for the Bolder Mere Conservation Verge, which includes Old Lane, notes that its biodiversity interest lies in its population of common toad (which it states is of county importance) and that it is a registered toad crossing. The environmental assessment concludes that there would be a neutral effect on the Conservation Verge as a result of the Scheme but does not report the effects due to predicted increases in traffic flows specifically.            It is, however, recognised that there is already a high mortality rate for toads at Old Lane and the predicted increases in traffic as a result of the Scheme are likely to exacerbate this situation further. Highways England therefore intends to bring forward mitigation proposals and to incorporate these measures within the Scheme, by way of a non-material change to the DCO.</p>

Reference	Written Representation Issue	Highways England Response
	<p>Why can this option not be implemented instead of WIS-11, which causes habitat fragmentation, significant land loss and wildlife deaths for many years to come?</p> <p>I'm not sure about this, but if WIS-01a were chosen, does it imply that the Elm Lane extension would no longer be needed? Which would mean that the entire problem with the toads crossing on that road, would disappear.</p>	<p>Elm Lane will serve 19 properties and will be subject to low levels of daily traffic movement, resulting in low levels of toad mortality predicted. Highways England will not bring forward mitigation proposals to be incorporated into the Scheme for Elm Lane, although toad crossing signs on Elm Lane will be considered.</p>

## REP1-053 Annie Cross

Reference	Written Representation Issue	Highways England Response
REP1-053-1	<p><b>Lack of publicity of the Examination</b></p> <p>Having submitted a written representation on behalf of the Lovelace Neighbourhood Plan, this is my separate written representation with my personal views, not those of the LNP. I know that many in the community share some or all of these views but as this examination has not been publicised in Ripley few, if any, are aware of it. I have been a Ripley resident since 1976 and know the problems and issues of traffic on the strategic and local road networks. Local knowledge is invaluable against 'desk ideas', e.g. Guileshill Lane.</p> <p><b>Better alternative solutions to the Scheme to resolve traffic issues</b></p> <p>Problems on the A3 from the service station south of Ripley to the M25 Junction 10 turnoff are exacerbated by a total lack of traffic management. This stretch is chaotic with cars travelling at speed, lane swapping from the outside and middle lanes into the nearside lane for the M25 slip road, regular braking as drivers try to squeeze in further up the queue or onto the slip road at the junction itself. Joining the A3 from the Ockham roundabout during rush hour sees the nearside and middle lane severely congested due to the above. The safest thing to do is to move into the outside lane as soon as possible to avoid the majority of the issues. Once past the M25 slip road, the road is clear and traffic entering the A3 from the M25 is not a problem, even though the Painshill junction is not far away. There is enough room for traffic to move into the relevant lane safely. From the north, traffic from the Painshill interchange travelling to the M25 slip road experiences the same problems and drivers take a chance on getting onto the M25 slip road at the last minute. If that is not possible, vehicles actually stop in the middle lane until they can get in, forcing vehicles behind to also stop or quickly move into the outer lane, a dangerous manoeuvre unless the outer lane is clear. Once past the M25 the road is clear, although drivers are impatient to avoid being in the nearside lane of the A3, so care is needed at this lane-swapping point. The HE proposal seems to be financial and construction overkill in an attempt to resolve these problems.</p>	<p>Please see responses to the written representations related to the Lovelace Neighbourhood Plan [REP1-029] and Councillor Cross [REP1-054] which address this point.</p>
REP1-053-2	<p><b>RHS Wisley and Ripley High Street</b></p> <p>The RHS Wisley flagship Gardens at Wisley are targeting a large increase in membership. The Gardens, by their nature, offer interest throughout the year and members make repeat visits. The RHS is the largest employer in the area and its location mean most travel to work by car. Anyone with local knowledge, or a sat-nav, will short-cut will avoid this longer route and come off the A3 at Burnt Common, Send, and drive through Ripley to the Ockham roundabout and on to the Gardens, probably returning on the same route.</p> <p><b>The Wisley Golf Club</b></p> <p>The Wisley Golf Club, a private golf club, is also one of the largest employers in the area and has repeat visits by members. It is accessed via the Ockham roundabout and Mill Lane.</p> <p><b>Ripley High Street and the Local Road Network</b></p> <p>Ripley High Street suffers severe congestion during rush hours at the Newark Lane junction in the centre of the High Street. This is the main route to Woking station for traffic from north of the village, i.e. traffic from the Ockham roundabout. A separate problem is accessing the High Street from roads and lanes either side. When not congested, traffic travels at speed and accessing the High Street can be very dangerous. The level of traffic will undoubtedly severely increase as projects commence.</p>	<p>Please refer to the response to Ockham Parish Council above on this issue.</p>
REP1-053-3	<p><b>Upgrades to the Burnt Common roundabout will not relieve traffic in Ripley</b></p> <p>Wisley Property Investments Ltd were refused a planning application to build 2,000+ dwellings on the former Wisley airfield in 2016 and an appeal was rejected by the Secretary of State in 2018. This site would have had approximately 4-5,000 cars and no public transport to Woking. (The airfield is directly opposite the RHS and located in Ockham, not Wisley). WPIL proposed financing the upgrade of the current 2-way junction at Burnt Common, Send, to a 4- way junction. This is approximately 2 miles south of Ripley village centre. Traffic will travel from the Ockham roundabout through Ripley Village and along the Portsmouth Road to access this junction. WPIL state upgrading the Burnt Common roundabout will 'relieve' traffic through Ripley. This is wishful thinking and as illogical and impractical as proposing the Guileshill Lane as a traffic route. They anticipate traffic from the proposed development will access the A3 southbound from Old Lane at one end of the site, a country road leading onto the A3 southbound, close to Junction 10. Presumably they think traffic from the A3 south will travel to the M25 junction and turn around to access Old Lane, or return south to the Ockham roundabout to the main site entrance. As with the RHS traffic, in reality drivers, and construction traffic, will short-cut through Ripley</p>	<p>Burntcommon junction improvements are not required as part of this Scheme to mitigate traffic impact in Ripley. Traffic modelling indicates that increase in traffic through Ripley directly attributable to the Scheme is insufficient to give rise to any significant adverse impacts without the need for junction improvements at Burnt Common. Please refer to responses above to Surrey County Council and others on this issue.</p>

Reference	Written Representation Issue	Highways England Response
	<p>village to access the Burnt Common and Ockham roundabouts as the most straightforward and convenient route. A proportion of traffic might use the Burnt Common roundabout to access Woking, but the proposed development to the south of Ripley at Garlicks Arch, near Burnt Common, (550 dwellings 1-1,500 cars) will quickly congest make that route. Human nature and sat-nav's will encourage drivers to take the most convenient route which will heavily increase, not 'relieve', traffic through Ripley village. Wisley Lane and the Ockham roads will also suffer</p>	
REP1-053-4	<p><b>Construction traffic through Ripley</b></p>	<p>Please see above response to Ockham Parish Council on this issue.</p>
REP1-053-5	<p><b>South-facing slips at the Ockham Park junction</b></p>	<p>As set out in detail in the Highways England response to the RHS written representation [REP1-038] there is no justification for the Scheme to provide south-facing slips at the Ockham Park junction, either to accommodate forecast traffic flows at the junction or as mitigation for the Scheme's effects on Ripley or due to the closure of the Wisley Lane/A3 junction. Further detail is given in the Transport Assessment Report [APP-136].</p>
REP1-053-6	<p><b>Options</b></p> <p>Rather than spend £250m ++ on changing Junction 10 which will feed extra traffic onto the almost ever present M25 traffic jam, perhaps HE could consider a less grand solution?</p> <p>HE must be realistic and take into consideration the severe traffic effects on the local communities, and the SRN and LRN. They must provide logical and sensible solutions.</p> <p>Possible solutions could include:</p> <ul style="list-style-type: none"> <li>• Traffic Management from A3 to M25 Slip Roads: Implement speed and lane management between the northbound A3 service station to the M25 and the Cobham slip road onto the A3 to the M25. A 50 mph speed limit, cameras and fines would reduce speed and lane hopping. This traffic management is used on the M6/M42 around Birmingham and even Guildford Borough Council now use cameras to monitor the 50mph speed limit on the A3 ring road.</li> <li>• Extra Lanes onto the M25 Junction: The slip road alongside the A3 at Wisley Lane could become an extra lane onto the Interchange. An extra lane from the Cobham slip onto the A3 onto the interchange would also be required.</li> <li>• RHS Dedicated Access from Junction 10: There could be a dedicated access road from Junction 10 A3/M25 to facilitate visitors from all directions. (This would not stop access through Ripley unless the Wisley Lane entrance closed, which would deny villagers access to Wisley village).</li> <li>• Ockham Roundabout: As I have written this, it become obvious that A 4-Way junction at the Ockham Interchange is essential. It would cater for all traffic accessing the Ockham roundabout and genuinely reduce traffic movement through Ripley. The Burnt Common roundabout upgrade would benefit Garlicks Arch and Send traffic, but not Ripley.</li> <li>• Ripley A3 Northbound. Yellow hatching across all three A3 lanes at the Ripley junction would allow safer access to the A3 for local traffic.</li> </ul>	<p>The assessment of alternatives is set out in responses above. The possible solutions raised are addressed below:</p> <p><i>Traffic Management from A3 to M25 Slip Roads</i></p> <p>The Scheme design incorporates new overhead gantries through this section of the A3, which will allow variable speed limits to be enforced as required by traffic conditions at that particular point in time. This will operate in a similar way to the Smart Motorway Sections (SMP) on the M25. For further details, please refer to the Scheme Layout Plans [APP-012] and [AS-004] and Engineering Drawings and Sections [APP-014].</p> <p><i>Extra Lanes onto the M25 Junction</i></p> <p>The Scheme includes an additional lane in both the northbound and southbound direction on the A3 between the Ockham Park junction and M25 junction 10, and also between M25 junction 10 and Painshill. This will see the A3 being widened to a dual-four lane all-purpose road (D4AP) between these junctions. The two northbound and two southbound lanes on the A3 through junction 10 will remain as present. There will therefore be two dedicated lanes on the A3 leading to and from the M25 junction in both the northbound and southbound direction. For further details, please refer to Part 2 Chapter 15 and 16 of the Introduction to the Application and Scheme Description [APP-002]</p> <p><i>RHS Dedicated Access from Junction 10</i></p> <p>Numerous options were developed and assessed for the Wisley Lane access onto the A3 during the development of the scheme. The assessments considered a wide range of factors including environmental effects, cost, buildability, safety and traffic matters. The proposed alignment was considered to be better overall than an option on the RHS Wisley side of the A3 and hence has been included in the Scheme as proposed. Further details on the selection of alternatives are found in Chapter 3 of the Environmental Statement (contained within Environmental Statement (Chapters 1-4) [APP-049]) with detail on the choice between the two options for Wisley Lane in Table 3.1.</p> <p><i>Ockham Roundabout</i></p> <p>There is no justification for the Scheme to provide south-facing slips at the Ockham Park junction, either to accommodate forecast traffic flows at the junction or as mitigation for the Scheme's effects on Ripley or due to the closure of the Wisley Lane/A3 junction. Further detail is given in the Transport Assessment Report [APP-136]. The Scheme does not preclude future implementation of south facing slips at Ockham Park junction. However, it is evident that there are several challenges and constraints associated with providing south facing slips at Ockham Park junction which would need to be overcome to demonstrate that they are deliverable without detriment to either the free or safe operation of the A3, affordable and offer the most appropriate solution to the identified problem.</p> <p><i>Ripley A3 Northbound</i></p> <p>The suggested yellow hatching would not comply with the legislation contained in the Traffic Signs Regulations and General Directions 2016 or guidance set out in the Traffic Signs Manual. The Scheme will include a new northbound A3 merge from the Ockham Park Junction, which will include a dedicated lane gain from the junction on to the A3 and up to J10.</p>
REP1-053-7	<p><b>Miscellaneous</b></p>	<p>The Funding Statement [APP-024] provides the estimated project cost.</p>

Reference	Written Representation Issue	Highways England Response
	Will the HE proposals make a real difference or just shift the traffic jams further down the road? What is the current cost of the HE proposal? Why was the most popular option rejected?	Environmental Statement Chapter 3 (contained in Environmental Statement (Chapters 1-4) [APP-049]) provides a narrative of the assessment of alternative options.
REP1-053-8	Highways England consultation failed to consider views of Ripley residents	Highways England received over 1900 responses to the statutory consultation held in 2018. All responses to the consultation were analysed and considered to help inform the Scheme design as shown in the Consultation Report [APP-026]. The views of the local residents who attended the consultation events and responded to the consultation were considered as part of this, and the Scheme was designed balancing views of the community, environmental and technical considerations and constraints, costs and deliverability.

## REP1-057 Harry Eve

Reference	Written Representation Issue	Highways England Response
REP1-057-1	<p><b>Air Quality and Emissions</b></p> <p><b>Adequacy of baseline Assessments</b></p> <p>The development will make it easier for journeys by private car to take place on the strategic road network in the region and history shows that this will generate additional traffic over and above that created through planned growth. This will have adverse impacts well beyond the close proximity of the DCO site area. (HCE 1)</p> <p>The Guildford Local Plan includes a desire for north-facing slip roads on the A3 at Burnt Common. If these slip roads are constructed they will impose a significant increase in emissions and reduction in air quality through the villages of West Clandon and Send. This will include vehicles tailing back from traffic lights, in Send, past the entrance to the Send C of E Primary School. Drivers queuing for traffic lights do not usually turn their engines off due to the need, and desire, to respond quickly to a green signal. The proposal for the slip roads will lead to extended periods of stationary vehicles, with engines running, beside the school. I believe this goes against government policy and any attempt to seek inclusion or agreement to these slip roads as part of the DCO should be resisted. (HCE 2)</p> <p>It may be argued that future emissions per vehicle will reduce but my understanding is that such reductions should not be allowed for because there is no guarantee that they will be realised. In particular, the main prospect of a significant increase in electric vehicles is questionable due to the environmental issues arising over increasing battery production – including destructive seabed mining. If you take the alternative view then you should also consider that the anticipated switch to autonomous vehicles (at least on the SRN) will greatly improve safety thus removing one of the drivers for the project as alternative approaches could be adopted to bridge the gap. (HCE 3)</p> <p>For these reasons I disagree with the current assessment.</p>	<p>HCE1</p> <p>The M25 junction 10/A3 Wisley is located on one of the busiest sections of the Strategic Road Network (SRN) and is of both national and international importance. The current configuration of the interchange limits its capacity to accommodate existing and forecast traffic flows and the resulting congestion is a significant contributory factor in it having one of the highest collision rates nationally.</p> <p>As reported in the Highways England Scheme Assessment Report November 2017 page 9 <a href="https://highwaysengland.citizenspace.com/he/m25-junction-10-a3-wisley-interchange-improvement/results/scheme-assessment-report.pdf">https://highwaysengland.citizenspace.com/he/m25-junction-10-a3-wisley-interchange-improvement/results/scheme-assessment-report.pdf</a>, traffic is forecast to increase by approximately 25% in the local authorities surrounding M25, while Section 4.3 reports on the annual average daily traffic increases without the interventions of the Scheme. The intervention proposed by the Scheme will serve to improve the performance of M25 junction 10 and each of the problems listed in the Traffic Forecasting Report [REP1-010], section 2.2, which describes the existing traffic problems in the area. Without the intervention of measures to improve junction 10, congestion on the approaches to, and through the junction will continue. This will become exacerbated by future traffic growth and would serve to discourage economic growth in the immediate surrounding areas, and along the A3 corridor.</p> <p>The modelling undertaken utilises a variable demand model, which incorporates responses to expected changes in modal choice, trip distribution, macro time choice and trip frequency in response to changes in the cost of travel. The model utilises the Highways England South East Regional Transport Model (SERTM) which covers the whole south east region. As such, the expected impact of the proposed scheme in terms of additional traffic generated is considered in the forecasts, is tiny (less than 700 extra trips per day out of over 72 million in the model) and is reported in Table 3-8 of REP1-010. The network beyond the DCO area has also been considered as in the analysis of impacts.</p> <p>HCE2</p> <p>The air quality assessment has been carried out in accordance with the Highways England guidance and examines the effect of the Scheme at sensitive receptors near roads affected by traffic changes as a result of the Scheme. This covers a wider study area than the immediate proximity of the DCO Scheme, as shown in Environmental Statement: Chapter 5 Air Quality Figures 1 of 2 [APP-064] Air Quality Figures 5.1 to 5.5. Taking the results from all receptors in the air quality study area into account, it was considered that there would not be a significant adverse effect on air quality, as documented in Environmental Statement Chapter 5: Air Quality [APP-050] Air Quality chapter paragraph 5.14.10.</p> <p>The north-facing slip roads at Burnt Common are not part of this Scheme, and have not been assessed. Emissions of oxides of nitrogen (NOx) have fallen by 72% since 1990, as noted on the <i>National Atmospheric Emissions Inventory</i> (NAEI) website (<a href="https://naei.beis.gov.uk/overview/pollutants?pollutant_id=6">https://naei.beis.gov.uk/overview/pollutants?pollutant_id=6</a>). The reduction in NOx emissions from road transport of 77% over this period is cited as being a result of the introduction of catalytic converters and stricter regulations. This provides supporting historic evidence of the effect of technological improvements in vehicle emissions.</p> <p>HCE3</p> <p>The UK Government is committed to further reducing air pollution from transport, as documented in the Clean Air Strategy 2019 (available at <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf</a>), with the intention of ending the sales of new petrol and diesel cars by 2040. On this basis, the current reduction in emissions of NOx is expected to continue, as older, higher emitting vehicles are retired from the fleet, and newer lower emitting vehicles replace them. There is already an effect as a result of this policy in the form of a reduction in new diesel vehicle registrations “<i>contrasted by increases for petrol and alternative fuel cars</i>” (<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812253/vehicle-licensing-statistics-january-to-march-2019.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812253/vehicle-licensing-statistics-january-to-march-2019.pdf</a>).</p>



Reference	Written Representation Issue	Highways England Response
		<p>The air quality assessment does not take into account emissions from connected and autonomous vehicles (CAVs). The potential impact of CAVs has been reported in numerous publications, each making different, and often contradictory, claims that they could have either positive or negative impacts of varying orders of magnitude. Most of these reports are generally based on speculation, rather than on any robust research. Predictions on when CAVs will be legalised and commonplace on the road network also vary greatly. Consequently, there is insufficient evidence and consensus to be able to make any confident predictions as to when CAVs will be legalised and commonplace or as to the likely impact they could have on the demand, capacity, road safety and operation of the road network, including for the proposed M25 junction 10 Wisley Interchange improvement scheme.</p>
<p>REP1-057-2</p>	<p><b>Biodiversity</b></p> <p>I thank Highways England for the additional measures proposed in their letter of 4 November 2019 – to widen the Cockcrow green bridge and provide toad crossings. (HCE 4)</p> <p>There is an opportunity, that could be taken under this project, to go further in establishing biodiversity network connectivity (nature recovery networks are part of the current environment bill) by developing the proposals for NMU crossings at junction 10 as green bridges or underpasses of sufficient width to enable wildlife movement. (HCE 5)</p> <p>I agree with the additional measures but more could be done.</p>	<p>Noted.</p>
<p>REP1-057-3</p>	<p><b>Climate Change Implications</b></p> <p>The proposed development will generate additional private car traffic, through easier journeys on the SRN, and this effectively ignores the Climate Change Emergency which has been declared during the progress of this project. The project does not encourage drivers to abandon their cars and contribute to Modal Shift. If we are to take the Climate Change Emergency seriously the project should either be abandoned altogether or undergo significant modifications that retain the benefits to existing NMUs and potential benefits for nature recovery networks. The modifications could remove the need for land take while introducing traffic control measures that have the potential to greatly improve road safety. (HCE 6)</p> <p>The carbon cost of the construction phase will be huge. This cost should take account of all aspects, from the concrete and other materials used, to the manufacture and use of the construction vehicles. The carbon cost of the additional traffic generated should be added to the result – also allowing for the manufacture of additional vehicles and the negative impact on modal shift. (HCE 7)</p> <p>For these reasons I disagree with the current project solution.</p>	<p>HCE6</p> <p>As reported above, the current configuration of the interchange limits its capacity to accommodate existing and forecast traffic flows. Predicated traffic levels will increase regardless of the Scheme. The intervention proposed by the Scheme will serve to improve the performance of M25 junction 10.</p> <p>The Scheme has not ignored climate change issues. Climate change has been considered in the Environmental Statement Chapter 15: Climate [APP-060], which assesses the effects of the Scheme on climate – particularly the impacts of greenhouse gas emissions (section 15.1); and vulnerability of the Scheme to climate change – particularly the resilience of the Scheme to climate change and extreme weather (section 15.2). Where issues have been identified, for example emissions, section 15.1.9 describes the mitigation and enhancement measures for this.</p> <p>Furthermore, the Scheme promotes localised modal shift through dedicated improvements to non-motorised user (NMU) facilities and safety. The Scheme is anticipated to maintain the connectivity offered by recreational routes for NMUs and will include new, altered and improved public rights of way (PRoWs) and overbridges which will improve conditions and accessibility for NMUs, a summary of this can be found in Environmental Statement (Chapters 1-4) [APP-049], section 2.5.19.</p> <p>Additionally, the effect on climate assessment was carried out in the context of the UK's carbon budgets as they are at the time of writing and preparation of the assessment, as agreed in the Scoping Opinion, and therefore could not account for the Climate Change Emergencies.</p> <p>HCE7</p> <p>A full assessment of the carbon impacts of the Scheme, including the embodied carbon as a result of construction materials and waste, and the emissions in operation, is given within the Environmental Statement Chapter 15: Climate [APP-060]. Also, as above where emissions issues have been identified, section 15.1.9 describes the mitigation and enhancement measures for this.</p>
<p>REP1-057-4</p>	<p><b>Economic and Social Effects</b></p> <p><b>Alternatives</b></p> <p>A 40 or 50 mph speed limit (enforced with speed camera and ANPR technology) on the A3 through the slip road areas would increase safety, reduce emissions, and improve flow without the damaging effects of the current project. Considering northbound A3 traffic the limited area should commence south of the Ockham Park Roundabout. (HCE 8) T</p>	<p>HCE8 - HCE13</p> <p>As reported in the Highways England Scheme Assessment Report November 2017 <a href="https://highwaysengland.citizenspace.com/he/m25-junction-10-a3-wisley-interchange-improvement/results/scheme-assessment-report.pdf">https://highwaysengland.citizenspace.com/he/m25-junction-10-a3-wisley-interchange-improvement/results/scheme-assessment-report.pdf</a>, following analysis and appraisal, we considered all potential design options and the proposed Scheme pursued at the Interchange provides optimum intervention in addition to significant traffic, safety benefits up to 2037 and a lower environmental impact.</p>

Reference	Written Representation Issue	Highways England Response
	<p>The Wisley Lane exit could be retained with removal of part of the physical island (separating the layby from the main road) to provide a longer, and hence safer, merge distance. (HCE 9)</p> <p>Ghost islands could be incorporated to help deter late lane changes with minimal, or no, road widening. (HCE 10)</p> <p>A further possibility would be to prevent traffic leaving, or joining, A3 lane 1 northbound from a point somewhere before the existing access from Wisley Lane and possibly before the access from the Ockham Park Junction. This would reduce the number of lane changes – effectively meaning that traffic in this lane would need to use the junction 10 roundabout to continue rather than straight through on the A3. The intention would be to prevent drivers attempting to access lane 1 from a slip road and from lane 2 at the same time. There could also be a solution involving the use of lane 2 for access to junction 10 as well as straight on. (HCE 11)</p> <p>Similar consideration would need to be given to northbound traffic beyond junction 10 and southbound traffic through the project area. (HCE 12)</p> <p>Another possibility would involve Highways England developing new means of lane change control that could be used here and elsewhere. (HCE 13)</p> <p>If the proposed NMU crossings are retained as part of a revised project it would still be possible to provide jet lanes to improve flow. (HCE 14)</p> <p>I disagree with the current proposal and believe that alternative, simpler and less costly solutions should be investigated.</p>	
REP1-057-5	<p><b>Planning Policy</b></p> <p>National and local planning policy has, at the time of writing, failed to catch up with the Climate Change Emergency and planning is one of the key areas where change is essential. (HCE 15)</p> <p>The Guildford Local Plan is still subject to judicial review at the time of writing. The Local Plan had a significant political impact locally and residents expect an urgent review whatever the outcome of the Judicial Review. This should lead to major changes that have not been taken into account in the modelling. (HCE 16)</p> <p>I consider the evidence backing the current proposal to be unrealistic in view of significant changes to national and local planning policy that I anticipate will be necessary.</p>	<p>HCE 15 - 16</p> <p>The National Policy Statement for National Networks (NPS NN) (December 2014) is the primary basis for decision making for the Scheme, although local and national planning policy are also material considerations. The Planning Statement [APP-133] 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.</p> <p>Highways England has taken the Guildford Local Plan into consideration in the proposed Scheme, however, the Scheme falls under a Development Consent Order, and the NPS NN takes precedence. On 4th December 2019 a judgement was issued by the High Court rejecting all three grounds for judicial review of the local plan. A review of the local plan is a matter for Guildford Borough Council but is unlikely to be completed prior to decision on the Scheme.</p>
REP1-057-6	<p><b>Transportation and Traffic</b></p> <p>The following references are to the Transport Assessment Report (TR010030/APP/7.4) except where stated.</p> <p>The Local Model Validation Report (HE551522-ATK-GEN-XX_Z-RP-TR-000003 – Table 6.2 – kindly provided to me by Highways England) shows poor validation results overall for Flow and GEH which should achieve &gt; 85% if my understanding of the WebTAG criteria is correct. Taking the Local Road Network (LRN) in isolation the model clearly does not validate for the PM period. Validation data is shown for 18 LRN Links and only 14 of these (78%) pass the GEH test. Also, for a number of the LRN links only one direction is considered (the direction is not indicated but I think the inflow to the junctions is included while the outflow is excluded for certain junctions). The question arises – why were the other directions not included in the validation? (HCE 17)</p> <p>I think the data in Table 7.13 (Ockham Park Junction) for 2015 should agree with the data for 2015 in Tables C8 &amp; C.9. I cannot think of any explanation for this other than model versions or perhaps averaging. I note that the difference for A3 SB Off-slip (PM) is in the opposite sign to the others which seems to rule out averaging. There may be a similar issue for the other junctions. (HCE 18)</p> <p>There seem to be discrepancies in the figures presented in Table 7.5 and Table E16/E17. Example Through J10 on M25 AM 2037DM : From Table E16 I think this should be 7696-1109-1382+7479-1072-400 = 11212. The equivalent figure in Table 7.5 is 9490. Is there an obvious explanation for this (the discrepancies are all one-way)? (HCE 19)</p>	<p>HCE17</p> <p>The modelling undertaken uses standards which are consistent with the Highways England SERTM and Department for Transport's Transport Appraisal Guidance, (TAG Unit M3.1). Regarding the link movement validation: the measures refer to both the absolute and percentage flow difference and the GEH statistic (less than 5). In section 3.2.7 of Unit M3.1 It states: "<i>The two measures are broadly consistent and link flows which meet either criterion should be regarded as satisfactory</i>". For both the wider and local road network links, for all time periods, the validation meets these standards. Standard practice it to report flows into each junction only.</p> <p>HCE18</p> <p>There is an error in the reporting of 2015 base model flows in the Transport Assessment [APP-136] in Tables 7-9, 7-13, 7-17, 7-20, 7-23, which incorrectly reports data from an outdated version of the base model. Note the values in the appendices are correct. It does not affect any of the conclusions of the report. The correct base model flows are included in the Transport Assessment Supplementary Information Report (Highways England document ref 9.16).</p> <p>HCE19</p>

Reference	Written Representation Issue	Highways England Response
	<p>7.5.18 suggests that Newark Lane flow reductions indicated in the model will result from rerouting along Wisley Lane, A245 Byfleet Road and M25 Junction 11. In other words traffic may prefer to take a longer route to its destination due to congestion on its preferred route. However, there is no evidence in this traffic assessment that the completion of those journeys on the LRN beyond the detailed modelling area is actually modelled to a satisfactory standard. Since journeys do not begin and end on the M25 or A3 the rerouting must depend on the LRN. Hence we need to be able to verify how well the model validates for all the roads that could be used under rerouting – including those beyond the Area of Detailed Modelling. We also need to understand the detailed junction treatment and completeness of the LRN, as included in the strategic model, as this affects the behaviour of the model when growth is allowed for. This information is not provided. (HCE 20)</p>	<p>Although not explicit in the text, the values in Table 7.5 are presented in total vehicles, whilst those in the appendices are in passenger car units (PCUs).</p> <p>HCE20          The model utilises the SERTM which has been regarded as suitable for wider strategic reassignment within the region. The model has been shown to calibrate well across the screen-lines (presented in Figure 3-5 of the Transport Assessment [APP-136] and outputs against observed data in Tables 6-3 to 6-5), which provide assurance that the regional highway demand patterns are reasonable. Thus, the statements regarding possible or likely re-routing as a result of changes to the network, described in section 7.5.18 and elsewhere, are evidence based.</p>
<p>REP1-057-7</p>	<p>The transport model (Strategic Highway Assessment Report 2016) used for the Guildford Local Plan was subject to criticism by Highways England in a letter to Guildford Council dated 18 July 2016. The intention to provide an improved model (Sintram 7), to address serious problems, such as the lack of dealing with the effect of backblocking and the use of averaging, was promised during the Local Plan Examination. I was advised that work on this ceased when the Local Plan passed examination. In my letter to the Local Plan Inspector I pointed out severe deficiencies in the detail of the modelling for the area to the south of Ockham Park Junction and these deficiencies may be replicated elsewhere. The realistic roads infrastructure deficit that will be generated by the Local Plan developments, and this project, is unknown and underestimated. If the proposed increase in traffic takes place the remedies that will be needed on the LRN will be severe in terms of land take and impact on local businesses, residents and the environment. The cost will be immense and will not be recognised until after the developments have taken place with the consequence that it will fall on taxpayers rather than those who profited from each development. (HCE 21)</p> <p>3.1.4 indicates that SERTM also uses averaging. While the effect of averaging is greater for the LRN it also obscures the effect that queuing may have on the baseline data for the SRN. Averaging is the opposite to stress-testing. (HCE 22)</p> <p>Table 3.2 assumes A3 will be widened through Guildford by 2037 in DM (i.e. minimum) but this will be a very difficult project to deliver and will bring traffic noise and pollution closer to residents and businesses where it passes through the urban area. It is questionable whether it is feasible in terms of cost or desirable from the point of view of social impact. However, it appears that it is assumed to be delivered by 2037 in the model. (HCE 23)</p> <p>I did not find any mention of the additional traffic in respect of the large Howard Of Effingham housing development that was approved on appeal despite not being a Local Plan site so it would appear that this has been excluded from the modelling work. It will add to Old Lane traffic and this could have the effect of rerouting some traffic to the Ockham Park Junction (HCE 24)</p> <p>The figures in 6.3.1 (AADT) relate to 2017 and are significantly lower than the 2015 baseline figures in Table 7.5 for daily flows involving the A3. It is not clear how this pattern of flow reduction is reflected in the peak hour periods, why it has occurred, or whether there is any associated change in the split of vehicle types. The answer might be found by analysing the Webtris data. (HCE 25)</p> <p>These points suggest to me that the evidence is not sufficient to support the current proposal.</p>	<p>HCE21          A description of the modelling undertaken and the reason for the choice of the model is described in both Section 3 of the Transport Assessment Report [APP-136] and Chapter 3 of the LMVR. The additional network and detail are presented in Figure 4-1 of the LMVR. Detailed Operational modelling of key individual junctions within the area of detailed modelling is described in the Transport assessment. The appropriateness of the software utilised and the level of detail of the area of network coverage is considered suitable, proportionate and adequate to assess the impact of the proposed scheme on the highway network.</p> <p>HCE22          It is standard for strategic models to utilise “averaging”. (i.e. the average conditions over a specified period of time, for example 07:00-10:00). The detailed operational modelling utilises profiles and individual vehicles operating in real-time. The does not utilise “averaging”</p> <p>HCE23          This infrastructure has been included, in agreement with Highways England as a scheme that will be included in both the Do-minimum and Do-something scenarios.</p> <p>HCE24          Location specific development scenarios included within the model, are based on the uncertainty log and were agreed by Highways England using planning information available at the time of model development. Wider housing growth has been included in accordance with the DfT’s Nation Trip End Model (NTEM) projections. The uncertainty log is provided in the Transport Assessment Report [APP-136]</p> <p>HCE25          WebtRIS data shows that there is a marginal reduction trend in trips travelling on the A3 though J10. This is potentially due to SMP works on the M3 which took place during the model validation period in 2015.          As required by the DfT, growth has been forecast using the development and infrastructure changes included as part of the uncertainty log and the growth incorporates NTEM forecasts for the region. This DfT mandated forecast results in an anticipated marginal increase in trips by 2022 in the Do minimum scenario.          The model meets all the requirements of the DfT TAG and has been agreed with Highways England as an evidence-based tool for suitable for assessment of the M25 J10 scheme proposal.</p>
<p>REP1-057-8</p>	<p><b>Ockham Park Junction</b></p> <p>Two of the NMU crossings at Ockham Park Junction are uncontrolled according to Figure 1.3. They are the exits to the proposed Wisley Lane access and to Ockham Road North. It is easy to see why these crossings have been left uncontrolled as the controlled crossings can for the most part fit in with a traffic signal cycle without impacting the flow on the roundabout. If these crossings were controlled they would lead to queues and sudden flow disruption in an area where three traffic arms join the roundabout in close proximity and drivers are seeking the correct lane for their journey. They could also add to the risk of tailbacks on the slip road to the southbound</p>	<p>HCE26          Please refer to Highways England’s response to the Relevant Representation of Harry Eve [RR-038] set out in the ‘Applicant’s Comments on Relevant Representations’ [REP1-009].</p> <p>HCE27          Noted.</p>

Reference	Written Representation Issue	Highways England Response
	<p>A3. However, the close proximity of the traffic arms, and uncertainty over the direction that drivers are taking will make these two crossings dangerous for NMUs. It seems that traffic flow is being given precedence over NMU safety at this location and this goes against the efforts to achieve modal shift. It also supports the view that the current solution for the Wisley Lane access is not satisfactory. (HCE 26)</p> <p>There are suggestions that south-facing slip roads should be included at Ockham Park Junction but I think this would also lead to too many junction arms in close proximity. (HCE 27)</p>	
REP1-057-9	<p>7.6.1 Mentions signals for the A3 off-slip in 2037(DM) and it is not clear whether this means a controlled NMU crossing or controlled traffic. If it means traffic control then there would need to be corresponding signals on the roundabout to hold traffic while the off-slip has priority. This would mean that traffic attempting to exit the Wisley Lane access and Ockham Road North would be at a significant disadvantage. This is made clear in Table G.55 where the MMQ figures are 138.9 (Wisley) and 91.9 (Ockham Road North) and in 7.6.10 . It is worth remembering that MMQ is only a mean value over a fixed period. Allowing for each PCU taking up 20 feet the MMQ figure for the proposed Wisley Lane access road is equivalent to a queue of over half a mile. (HCE 28)</p> <p>It seems clear to me, from the data presented for the DS Scenario, that the signalised junction will be vulnerable to backblocking, due to queues on the circulatory, with only a small increase in traffic above the modelled flows (including variation of the flow rates within the peak period). (HCE 29)</p> <p>I disagree with the current solution for the Wisley Lane Access and Ockham Park Junction.</p>	<p>HCE28 &amp; HCE29</p> <p>Please refer to Highways England's response to the Relevant Representation of Harry Eve [RR-038] set out in the 'Applicant's Comments on Relevant Representations' [REP1-009].</p> <p>The impact of the proposed signalling was assessed by traffic modelling, please see the response above.</p> <p>The safety of non-motorised users (NMUs) will be enhanced by the Scheme as NMU routes under the A3 at Ockham Park junction will now be provided in the road verges via signal-controlled crossings. Toucan crossings have been proposed at locations along these routes to allow pedestrians and cyclists to cross under the safety of signal control.</p> <p>The new bridge for Wisley Lane diversion also includes a bridleway provision to provide a safe route over the A3 for all NMUs, which will enhance connections in the public rights of way network near the Ockham Park junction</p> <p>In the Transport Assessment it is stated that green time for the circulatory stop lines has been prioritised in the S-Paramics model to prevent vehicle queues internally blocking the junction, this is achieved through low cycle times and managing the amount of traffic entering the junction on the approach stop lines.</p>

## REP1-059 Jan Jewers

Reference	Written Representation Issue	Highways England Response
REP1-059-1	I am shocked that Ripley Parish Council, our GBC local Councillor Colin Cross and the Lovelace Local Plan Group have not received any formal communication about this examination on the 12 November 2019. The proposal and the discussion has massive effects on our village of Ripley and as a local resident I want to make some points for you to consider:	Please refer to above responses to Councillor Cross and the Lovelace Local Plan Group on this issue.
REP1-059-2	<ol style="list-style-type: none"> <li>1. The RHS, and GBC's Local Plan for housing will increase traffic massively in this area and it seems illogical to build something that does not take these into account.</li> <li>2. The current queues are both north and south bound on the A3 and I think you might be better to consider how to improve the A3 as well as access on to the M25</li> <li>3. The proposed changes to the M25 naively assume that people will drive several extra miles rather than take a shortcut that any basic Sat Nav will show. It also assumes that people are not environmentally conscious and accept the cost to the climate of these extra miles.</li> </ol>	<p>The effects of the Scheme on the A3 and the Guildford Local Plan have been properly considered by Highways England as noted in the Planning Statement [APP-133] and the Transport Assessment Report [APP-136]. Full details of the methodology, baseline and assumptions made in the undertaking of the traffic modelling process can be found in Section 3 of the Transport Assessment Report [APP-136]. Table 3-1 highlights the local developments, including those from the Guildford Local Plan, that were included in the transport modelling, in order to inform the development of the Scheme. The traffic modelling also accounts for the traffic forecast to be generated by planned expansion of RHS Wisley Gardens as detailed in the Traffic Forecasting Report [REP1-010].</p> <p>Current traffic queues on the A3 are in part due to traffic queues on the exit slip roads to both J10 and the Painshill junction extending back onto the A3 mainline carriageway that reduces the number of available lanes for through traffic and thereby reduces capacity on the A3 which causes tailbacks. The queues on the exit slip roads currently extend back on to the A3 mainline because traffic demand at peak times exceeds available capacity at these two junctions. This situation is forecast to worsen in the future. The Scheme increases capacity at both J10 and the Painshill junction to accommodate future forecast traffic demand and thus remove queuing back on the exit slip roads. Consequently, the Scheme will remove traffic queuing on the A3 and this has been confirmed by the traffic modelling presented in the Transport Assessment Report [APP-136]. Improvements to the M25 between junctions 10 and 16 as part of Highways England's Smart Motorways Programme will further alleviate congestion on the M25.</p> <p>Traffic modelling has indicated that with the Scheme all RHS Wisley traffic to and from the A3 south will route via Ripley, rather than follow the signposted route via J10, since this will be the shortest and quickest route. However, the journey time for the signposted route via J10 is forecast to be only approximately 1 minute longer in each direction than the route through Ripley. Therefore, drivers may well choose to follow the signposted route as the journey time penalty will be minimal.</p> <p>There will be signage to direct Wisley Lane traffic via M25 junction 10 and signage for the Wisley Lane diversion, directing drivers away from the local roads.</p> <p>Please also see the response to RHS Written Representation [REP1-038] as regards the effect of the Scheme on journeys to and from RHS Wisley.</p>
REP1-059-3	<p>Please go back to the 'drawing board', not waste public money and consider:</p> <ol style="list-style-type: none"> <li>1. An RHS dedicated access</li> <li>2. Better traffic management on the A3 with a 50 mph limit near the junction of the M25</li> <li>3. An extra lane onto the M25 both north and south on the A3</li> <li>4. The Ockham roundabout should have a south bound exit on to the A3</li> </ol>	<p>Highways England has prepared a full Economic/Business case for the Scheme in accordance with Department for Transport Major Scheme Appraisal Guidance. This can be seen in Section 4 of the Planning Statement [APP-133]. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.2.</p> <p>This assessment of alternatives is outlined in the Environmental Statement Chapter 3 (contained in Environmental Statement (Chapters 1-4) [APP-049]) and Section 3 of the Habitats Regulations Assessment Stage 3-5 [APP-044].</p>

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