

## APPENDIX 1 to Overview – REP3-xxx

### RHS Summary of Oral Submission to ISH2 on Highways Matters

ExA Agenda Items	Summary of Oral Submissions to Hearings on Highway Matters
<p>3. Selection of the NSIP scheme, Access Alterations, Traffic Generation and other Transportation issues, including a review of policy compliance matters raised in the written representations and responses</p> <p><i>Alternative scheme options considered by the Applicant and alternative means of access suggested by IPs</i></p>	
<p>3. f) The role that the potential provision of north facing slips at the Burnt Common junction, in association with the redevelopment of the former Wisley Airfield, would play in relieving existing and future traffic on the local road network.</p>	<p>MH explained that the previous testing by SCC of the Burnt Common slips and south facing slips (SFS) at Ockham, did not include the stopping up of Wisley Lane, as the DCO Scheme proposes. This explains why traffic demand for the SFS (in the previous SCC tests) was low. MK (SCC) confirmed the position described by MH, noting also that their model test assumed HE's previous free-flowing scheme for J10.</p>

## APPENDIX 1 to Overview – REP3-xxx

<p>3. g) The RHS alternative scheme, i.e. retention of left turn out of Wisley Lane and provision of south facing slips at the Oakham Park junction/roundabout. To include consideration of any implications for complying with highway design standards stated in the DMRB and any other relevant guidance.</p> <p>Levels of service - strategic and local road network capacity and safety and effects on non-motorised users</p>	<p>In response to ExA question to the parties regarding the need for SoCGs, MH explained that with regard to distances, the parties were not far apart with regard to the key distances (north and south) and that once CAD plans have been received from HE, the RHS expects to agree these. However, MH noted that where there was more work to be done in respect of journey time information and traffic modelling. MH noted that ExA had made reference to their struggles in getting to grips with the traffic model information. MH noted that RHS had had similar issues, including having access to the GIS information which not all the parties have had access to – as this is not part of the Examination library. Having reviewed that also, RHS had struggled to track how numbers have been arrived at.</p> <p>Although he hadn't been appointed at the time, MH provided some clarification re the RHS Application for Investment. MH explained the off-peak nature of visitors to the Garden and that whilst the growth projection was significant there were no significant peak hour impacts that required mitigation as most arrivals and departures were inter-peak.</p> <p>MH explained that with respect to traffic distribution, the differences between HE and the RHS with regard to the respective 'tests' were a result of the different sources of information and data used. MH noted that Mr Bunney required visitor numbers rather than general traffic, staff numbers, servicing etc (the sort of information which the ANPR data might have obtained on that particular day of the HE survey). It was considered more appropriate to use Membership database and a more recent visitor survey to inform a visitor-based calculation.</p> <p>MH countered HE's position regarding standards to be used for the left slip from Wisley Lane onto the A3 – the RHS has met the correct standards. We propose a slip road with an auxiliary lane which assists with dealing with the weaving length and fully accords with CD122. With regard to the merging and crossing manoeuvre of the two lanes (for traffic heading to London rather than the M25) the majority of the RHS traffic undertaking this manoeuvre is off-peak and the proportion of RHS traffic leaving the Garden and undertaking this movement is relatively small at approximately 24%.</p> <p>The RHS has struggled to pin down the HE position in respect of the weaving-related accidents it attributes to the Wisley Lane connection with the A3. The Side Road Addendum Report (to be submitted by HE to the Examination Library) provides HE's early (pre-DCO) position. SRA doc (4<sup>th</sup> paragraph of section 3.1.1) refers to six accidents between 2010 and 2015 as being directly related to the Wisley Lane junction. The SRA also suggests that the retention of the left turn would result in 1 accident per annum (4<sup>th</sup> paragraph of section 6.1.2). However, more recently, in the BDB Pitman letter of the 24/12/19, it has now been suggested by HE that accidents specifically related to weaving from the Wisley Lane connection with the A3 have amounted to some 20 accidents for the five year period 1/12/13 to 30/11/18. A check against the Accident Plot provided by HE on the last page of its September 2019 Technical Note (Appendix B of REP1-044) shows that with the exception of just 1 accident, HE has incorrectly assumed that every accident which has occurred on the A3</p>
---	--

## APPENDIX 1 to Overview – REP3-xxx

	<p>between Wisley Lane and a point 900m north has been a result of the Wisley Lane junction, which clearly cannot be the case – as set out above, most of these are “shunt” type accidents related to queuing back from Junction 10.</p> <p>The RHS’s reasoning for the retention of this movement is that it provides for a logical turn onto the A3 northbound (towards London and the M25) rather than turning in the opposite direction to then u-turn at Ockham and head back northbound onto the A3 passing where the current Wisley Lane junction exists.</p> <p>When predicting the accidents which would occur with the retention of a Wisley Lane junction, HE has only ever considered the junction in isolation and not having regard to the savings in accidents as a consequence of the reduced travel which its retention would result in.</p> <p>With regard to the HE’s original claim that there would be ‘Improved access for RHS’, MH noted that based on submission now made by HE, in terms of both travel distance and journey in the important inter-peak period, all of those from primary routes north and south are worse.</p> <p>With regard to Event Days, MH noted that larger events increase length of stay and catchment increases (wider network) and so more traffic would travel on the wider Strategic Road Network.</p> <p>In response to questioning from ExA re which direction is the primary concern, MH said that the RHS was concerned with <u>both</u> directions. The RHS had been concerned from the start that the signed route from the South would be so unattractive that visitors would potentially route via Ripley and Send, an alternative that exists now but is not taken. The RHS is particularly concerned with access from the South and the damaging effects on the Garden but also impacts from the North. From the South, there is an interesting position set out in REP2-011 Table 4.1 – in the table there is a 2015 Base AADT flow for the High Street in Ripley. This is 17,410 two way. Along the row – 2037 DoSomething AADT is 30,360 – these are HE figures, a 75% increase on daily volumes through Ripley, we don’t believe that’s sustainable.</p> <p>Responding to comments made by MH(QC) for the Applicant, MH referred the ExA to comments made in ref to Table 2.8 of REP2-011 – MH suggested looking at also Table 2.9 which showed the round trip and the increases.</p> <p>Also, re Table 4.1 (REP2-011) MH’s reference to the 2015 Base scenario was to put the increase in traffic numbers in context. Ripley suffers from congestion at present. HE has struggled to produce validated junction models – they’ve been unable to replicate the congestion and the 2015 position. HE is not providing any mitigation and yet future forecast is for RHS and other Wisley Lane traffic to route via Ripley and ultimately an increase of 75% in traffic over the day.</p>
--	--

## APPENDIX 1 to Overview – REP3-xxx

<p>3. i) Predicted peak hour traffic volumes joining the A3 from the M25 or joining the M25 from the A3 under the following scenarios:</p> <p>1) Do-minimum in 2022; 2) NSIP as proposed in 2022 inclusive of RHS Wisley traffic, based on an anticipated visitor number of 1.35 million (figure taken from Table 1 of REP1-039); and 3) NSIP as proposed in 2037 inclusive of RHS Wisley and anticipated Wisley airfield redevelopment traffic.</p> <p>3. j) The volume of traffic generated by visitors to RHS Wisley and the difference in the vehicle distance (mileage) travelled that would arise in getting to and from RHS Wisley were the NSIP scheme to be implemented.</p>	<p>With respect to a question from the ExA regarding the potential for RHS traffic to route via Airfield site to head south on the A3, MH added that this was possible but not necessarily desirable.</p> <p>The ExA noted that they had received a lot of material from RHS and that they understood these submissions but asked whether there were any other points which team wanted to raise. MH added that, to round off, we are looking at implications of RHS traffic routeing through Ripley, through the Airfield development, which brings us back to how we started with the RHS Alternative. The RIS Redline limit essentially constrains how the Wisley Lane traffic could be dealt with but the RHS feels the consequences of this constraint go beyond the RIS boundary which is why it feels it is necessary to extend the DCO Scheme so that other options could be looked at, primarily SFS at Ockham along the lines of the RHS Alternative Scheme.</p> <p>With respect to HE modelling, MH noted that in respect of the Paramics model to assess implications more locally, this has only been built for the peak hours – MH reminded the ExA of his earlier comments regarding the RHS traffic and inter-peak period. Therefore, this period was more reliant on the local junction models, which is a further tier down, and I in this regard MH repeated his concerns that there are no validated junction models for Ripley, and that we know in the HE modelling that RHS traffic will forced through Ripley as a consequence of the scheme.</p> <p><b>DAY 1 CLOSE/DAY 2</b></p> <p>In the context of a general discussion re the modelling, MH contributed that following on from Day 1, the RHS had been trying to track the flows through the reports but have been unable to understand how these have been produced from the model output. The RHS is going to discuss what might be agreed as part of the SoCG discussions but there may be matters outstanding at the end of the process</p>
---	--

## APPENDIX 1 to Overview – REP3-xxx

3. k) Adequacy of the traffic modelling for the effects of the NSIP scheme on the Local Road Network, including: 1) the status of the validation for the junction modelling that has been undertaken by the Applicant; and 2) The extent that the modelling that has been undertaken is subject to any omissions and errors.

3. l) The effect of the Proposed Development on public transport and non-motorised users.

## APPENDIX 1 to Overview – REP3-xxx

### RHS Summary of Oral Submission to ISH2 on Ecology and Habitat Regulations Assessment

ExA Agenda Items	Summary of Oral Submissions to Hearings on Highway Matters
<p>Habitats Regulations and Biodiversity</p> <p>a) Air quality considerations and the SPA, including an assessment of policy compliance matters raised in written representations and responses and the findings reached in the Statement to Inform Appropriate Assessment [APP-043].</p>	<ol style="list-style-type: none"> <li data-bbox="584 316 2016 451">1. Mr Baker emphasised that both Mr Hibbert and Professor Laxen have highlighted fundamental flaws in the data that has informed the SIAA presented by HE and that therefore the degree of nitrogen deposition is unknown. The gaps in the evidence mean that it cannot be concluded ‘beyond reasonable scientific doubt’ that the integrity of the SPA will not be harmed.</li> <li data-bbox="584 496 2016 667">2. Prof Laxen explained that ammonia must be included in the assessment. Prof Laxen explained that if ammonia had been included the N dep arising from the project would increase from 4.6% to 9.2% (i.e. almost doubling the N deposition). The ExA must therefore conclude that the SIAA has not assessed the correct loading of Nitrogen deposition on the Thames Basin Heaths SPA and cannot conclude that there is not adverse effect upon the integrity of the site from this impact pathway.</li> <li data-bbox="584 711 2016 775">3. Professor Laxen has demonstrated that the in-combination assessment has not been carried out correctly. Ms Sykes’ oral evidence gave no clarification on this issue.</li> <li data-bbox="584 820 2016 1056">4. With regard to HE’s reliance on the “buffer” zone, Mr Baker made three points in response to this:               <ol style="list-style-type: none"> <li data-bbox="645 890 2016 954">(i) HE cannot rule out beyond reasonable scientific doubt that the SPA species do not forage in the buffer woodland.</li> <li data-bbox="645 962 2016 994">(ii) There is no legal basis for varying the legal protection afforded to one part of a SPA as opposed to another.</li> <li data-bbox="645 1002 2016 1056">(iii) The assessment must take into account the potential for the buffer zone to be converted back to heathland in the future i.e. the baseline must reflect the legal requirement for restoration to be carried out.</li> </ol> </li> </ol>

## APPENDIX 1 to Overview – REP3-xxx

### RHS Summary of Oral submissions to ISH2 on Socio-economic matters

ExA Agenda Items	Summary of Oral Submissions to Hearings on Socio-economic Matters
<p>9. Socio-economic matters</p> <p>With respect to the Relevant and Written Representations received from the RHS consideration of the questionnaire design and conclusions drawn in the economic forecast contained in the Hatch Regeneris representation [REP1-039].</p>	<ol style="list-style-type: none"> <li>1. On behalf of the RHS, Mr Bunney emphasised the assessment of socio-economic impacts comprises two elements:               <ol style="list-style-type: none"> <li>(i) the economic cost of increased journey distances and times of travelling to and from RHS Wisley Garden resulting from the construction and operation of the DCO scheme; and</li> <li>(ii) the loss of economic activity caused by a reduction in overall visits to RHS Wisley Garden resulting from the construction and operation of the DCO scheme.</li> </ol> </li> <li>2. Mr Bunney explained that the purpose of the questionnaire survey was to provide a mechanism through which to forecast the behavioural responses of visitors to the RHS Wisley Garden resulting from DCO Scheme. It represents the best available evidence by which to undertake this forecasting process. The survey design is unbiased, with the questions accurately reflecting the scenario of visitors facing an increase in journey times to access the RHS Wisley Garden.</li> <li>3. The Survey was a simple sample survey – questions unambiguous and conversational – without bias and conducted by an independent market research accredited agency which ensured a random stratified sample technique was deployed to ensure that the data collected was not skewed toward a particular time of day or a type of visitor.</li> <li>4. All research and modelling has a degree of uncertainty (for example the HE model) so it is important to understand the range of likely responses and how this relates to the entire population that is being represented. Therefore, using standard deviation sampling tolerance for this survey with a sample representing roughly 644 people can be used to accurately predict how the wider visiting population will be responding to the inconvenience, delay and potential stress caused by the DCO Scheme.</li> <li>5. These tolerances have been used in the Hatch / Regeneris analysis and two scenarios are reported: mid case and the RHS anticipated case. Both show considerable impact on the RHS business model, and the potential impact on the wider economy, the supply chain and the impact on direct and indirect jobs.</li> <li>6. Mr Bunney explained the importance of accurate traffic data to the assessment of the socio-economic impacts. He referenced points raised by Mr Hibbert, in Item 3, around the robustness of outputs from the HE traffic</li> </ol>

**APPENDIX 1 to Overview – REP3-xxx**

	<p>modelling, particularly in relation to parts of the local road network, and why journey times from the model may not be reliable.</p> <p>7. The HE model is based on data collected on one day and does not account for the daily, weekly, monthly and seasonal fluctuations in visitor volume and audience profile.</p>
--	---