

**M25 junction 10/A3 Wisley interchange
TR010030**

**9.33 Applicant's comments on responses
to Examining Authority's first written
questions**

Rule 8(1)(j)

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Infrastructure Planning (Examination Procedure) Rules 2010

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The Infrastructure Planning (Examination Procedure) Rules 2010

M25 junction 10/A3 Wisley interchange

Development Consent Order 202[x]

9.33 Applicant's Comments on Responses to Examining Authority's First Written Questions

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1. Structure of Comments on Interested Parties' Responses to Examining Authority First Written Questions

- 1.1.1 This document sets out Highways England's comments on the responses provided by Interested Parties to the Examining Authority First Written Questions submitted at Deadline 2 (18 December 2019).
- 1.1.2 The table is structured to include columns for the Examining Authority Questions, the responses provided by the Interested Parties at Deadline 2, and Highways England's comments on these responses. Subheadings are provided within the table to separate the responses by Interested Party.
- 1.1.3 Highways England has sought to provide comments on responses where it is helpful to the Examination to do so, for example where clarification is required on a statement made by an Interested Party 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.
- 1.1.4 Where issues raised within a question 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, Highways England response to written representation 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
- 1.1.5 In order to assist the Examining Authority, Highways England has not provided comments on every point made within a response, as stated in 1.1.3 it may have been addressed already. 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.

| Question Number | Question to: | Question | IP Response | Highways England Response |
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| Surrey County Council (SCC) | | | | |
| 1.4.3 | Local Authorities | Are you aware of any other plans or developments that should be taken into account in the in-combination assessment? | Planning Application SCC Ref 2019/0125 Land at Silvermere Haven Pet Cemetery and Crematorium, Byfleet Road, Cobham, Surrey KT11 1DZ | <p>The in-combination assessment comprises an assessment of the intra-project effects that arise between different environmental topics within the same proposal and as a result of the development's direct effects, i.e. combined effects from a single project (the Scheme). The cumulative effects assessment comprises an assessment of the inter-project effects that arise as a result of the combined action of a number of different projects cumulatively with the Scheme on a single resource or receptor. It is therefore assumed that the question refers to the cumulative effects assessment rather than the in-combination effects assessment.</p> <p>The development noted by Surrey County Council was validated on the 19 September 2019. The M25 junction 10 DCO application was submitted on 19 June 2019, and therefore has not been considered in this assessment. This approach is consistent with paragraph 3.4.9 of Advice Note seventeen: <i>Cumulative effects assessment relevant to nationally significant infrastructure projects</i>, the Planning Inspectorate acknowledges that applicants are required to stop assessment work at a particular point in time in order to be able to finalise and submit an application.</p> |
| 1.4.9 | Applicant, NE and Surrey Wildlife Trust (SWT) | Noting the information in the HRA Reports and the SPA MMP [APP-105] around existing management plans and countryside Stewardship arrangements for land proposed as SPA compensation land, can the Applicant, NE, and SWT comment on whether the compensation | Surrey County Council considers that the compensation and enhancement measures are appropriate to the Thames Basin Heaths SPA but the proposals are at a larger scale and in a shorter time period than the normal planned management. | <p>The SPA currently consists of heathland and woodland habitats that will require habitat management in perpetuity. The SPA is already owned by Surrey County Council and managed by Surrey Wildlife Trust, with the management of heathland areas being funded under a Stewardship Scheme.</p> <p>The length of time for monitoring and management is sufficient in order for the habitats within the SPA</p> |

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| | | measures and the enhancement measures can be considered to be in addition to the actions that are normal practice for the Thames Basin Heaths SPA. | | <p>compensation land, SPA enhancement areas and the reinstated temporary land take areas to have established and to provide the invertebrate resource that may have been reduced as a result of the Scheme.</p> <p>As stated in Natural England's response to Examining Authority Written Question 1.4.34 and request for information [REP2-034], Natural England have confirmed that they have reviewed the SPA management and monitoring plan [APP-105] and are satisfied with the proposed management and monitoring periods as set out in table 7.2.1 of the SPA management and monitoring plan [APP-105].</p> <p>Natural England have also confirmed in paragraph 3.2.1.6 of their Relevant Representation [RR-020] that the proposed SPA enhancement works are additional to existing plans for habitat maintenance and management for the site.</p> |
| 1.4.34 | Local Authorities, Natural England, SWT | Are you satisfied with the duration of management/monitoring for each management type as set out in Table 7.2.1 of [APP-105]? | <p>Surrey County Council is generally satisfied with proposed durations of the management and monitoring. We have suggested an amendment that the replacement badger sett should also be monitored. Also, we have recommended that the detailed botanical monitoring, table 7.4.7, should commence in year 5 rather than year 10 to provide an earlier measure of progress. We have suggested that tree and plant diseases should also be added to the schedule.</p> <p>Regarding the duration of the monitoring of different habitats, these have been the subject</p> | <p>The monitoring proposals are described in the Landscape and ecology management and monitoring plan [APP-106]. There will be an opportunity for SCC to provide its views on the SPA compensatory and enhancement measures as part of the consultation process under requirement 8 of schedule 2 to the dDCO [REP2-002].</p> <p>Highways England can confirm that the artificial sett will be monitored once it has been installed. This is a requirement of the 'Letter of No Impediment' that Natural England issued for the draft badger licence (receipt of LONI for badgers has been recorded on page 16 of the Natural England SoCG [APP-138]).</p> |

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| | | | <p>of discussion and are generally agreed. However, research shows that the proposed monitoring of the habitats as part of HS2 states a period of 50 years for the translocation of ancient woodland soils;</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672401/E26 - Indicative Periods Management and Monitoring of Habitats v1.2_2 .pdf</p> <p>The proposed monitoring duration is 25 years and Surrey County Council would like to see this extended to 50 year which would allow for the comparative assessment of the success of both schemes. For example, after an additional year 30, monitoring could be carried out in year 40 and 50.</p> | <p>With regards to detailed monitoring, it is assumed that this is with reference to Table 7.4.4 of the Landscape and ecology management and monitoring plan [APP-106]. This table refers to the frequency of detailed botanical monitoring of the ancient soil translocation area. As explained in paragraph 7.4.6.7 of APP-106, the aim of the detailed botanical monitoring is to detect major changes in the ground flora which can be done by surveying at five yearly intervals. As the ancient woodland soil receptor site will be planted with young trees, it is not proposed to commence this monitoring until Year 10, when some degree of canopy closure will have been achieved. The botanical monitoring will include an assessment of tree and plant disease. The monitoring proposals in the final Landscape and ecology management and monitoring plan will be agreed with Natural England.</p> <p>The mitigation and monitoring proposals for HS2 have not set a precedent for all future projects. It is considered that a 25 year period of monitoring of success of the ancient woodland soil translocation is sufficient to enable the canopy to develop and to determine if plant species have established. This period of time is in line with best practice guidance (Anderson, P. (2003) Habitat translocation, a best practice guide. CIRIA). Natural England have reviewed the Landscape and ecology management and monitoring plan, including the proposals for the translocation of ancient woodland soil and has agreed with the proposals, confirming that Anderson (2003) is recommended as best practice (refer to Section 3.2.6 of Natural England's relevant representation [RR-020]).</p> |

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| 1.6.1 | SCC and EA | Are you satisfied with the surface water mitigation measures (attenuation ponds and ditches) that are discussed ES Chapter 8 [APP-053] and do you agree with the conclusions drawn by the Applicant in regard to the residual effects on surface water and groundwater? | <p>Surrey County Council is satisfied with the overall plans but have the following comments that need to be addressed:</p> <p>In point 8.9.1 (Surface Water), the bullet points refer to temporary works to watercourses. We would like to reiterate that any works to any watercourse (not just key/WFD watercourses) will need to be assessed and approved as per our recommended Protective Provisions.</p> <p>This should also include plans for the prevention of silt pollution during works. In point 8.9.1 (Flood Risk) it is stated that the drainage systems should comply with Schedule 3 of the Flood and Water Management Act 2010. This schedule was not enacted so the standards the drainage systems should meet is actually the Non-Statutory Technical Standards for Sustainable Drainage Systems (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf).;</p> <p>In point 8.9.8 (point 2) it is says that where the low points do not correlate with outfalls, soakaways are proposed. Where these are proposed, it is essential that discharge and contaminant risk is adequately considered including pollution control valves.</p> <p>Likewise in point 8.9.14, the ability to soak up contaminants in soakaways will differ</p> | <p>On Point 8.9.1 (Surface Water) any works to watercourses will be carried out in line with the Protective Provisions as secured in the dDCO [REP2-002] and Section 23 of the Land Drainage Act 1991.</p> <p>On Point 8.9.1 (Flood Risk), drainage systems will meet the requirements of the Non-Statutory Technical Standards for Sustainable Drainage Systems 2010.</p> <p>In response to point 8.9.21, a sensitivity test for 40% climate change shall be carried out and the appropriate course of action to be implemented shall be determined based on the results of this sensitivity test.</p> |

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| | | | <p>depending on what materials are used in the soakaway. For example, gravel filling will have no absorption.</p> <p>Surrey County Council would expect to see the assessment methodology for mitigation measures for surface water. Chapter 7.3 (REAC document) provides some detail of this but we would expect to see more detail within the DCO in reference to chapter 8, section 8.9 including evidence showing that there will be no increase in flood risk.</p> <p>Point 8.9.21 says that a climate change factor of 20% will be used for the assessment of the drainage design for SuDS features. While the EA guidance suggests using a climate change factor of 20%, a factor of 40% should also be used as a sensitivity test to ensure that flooding will not occur.</p> | |
| 1.8.6 | Local Authorities | Please comment on the 1.5km study area adopted for the assessment of landscape and visual impacts | <p>Surrey County Council would comment that whilst we have previously indicated broad agreement with the 1.5km study area adopted for the LVIA, there remains a concern regarding the absence from the methodology of a Zone of Theoretical Visibility (ZTV) model, which complements site surveys as an objective aid to the identification of potentially sensitive visual receptors, and in defining the study area.</p> <p>As the Scheme is a linear infrastructure project, a ZTV could have been constructed for a</p> | <p>A ZTV was produced during the scoping stage, but was not submitted. This assisted in defining the extents of the study area. The surrounding area is heavily wooded with few (relative to the size of the scheme) sensitive receptors. Further ZTV information was not submitted as part of the Environmental Impact Assessment as it was considered that it would have little further value to add. This would still be the case following removal of vegetation during vegetation clearance.</p> |

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| | | | <p>sequence of points along the route, incorporating the taller elements such as overbridges and gantries, as well as construction elements such as compounds. The applicant states in Appendix 1.1 of the ES that 'A computer generated ZTV model was not deemed necessary due to the extensive mature woodland in which the scheme is located, and which severely restricts views from the surrounding area'. However, ZTV analysis is a typical best practice element of LVIA for EIA development, as recommended in GLVIA3 and the current DMRB LA 107.</p> <p>The ZTV could show the 'bare earth' worst-case visibility scenario, and/or include existing screening features, refined by field survey. As the Scheme involves extensive felling of surrounding woodland, this may open up views of some parts of the development during construction and operation, and should be taken into consideration.</p> | |
| 1.8.18 | LAs and HistE | Are you content with the justification provided by the Application in Appendix 1.1 of [APP-078] as to why photomontages of the Proposed Development as viewed from key visual receptors have not be provided despite these being | <p>Surrey County Council is not content with the applicant's justification for omitting photomontages of the Scheme. The LVIA identifies significant effects during construction and/or operation for a number of landscape and visual receptors.</p> <p>We consider it is reasonable and proportionate that photomontages are produced for a selection of key viewpoints representative of</p> | Photomontages are not a required deliverable under Design Manual for Roads and Bridges IAN 135/10. Given the wooded and contained character of much of the landscape surrounding the Scheme, no significant views were identified that would be likely to experience a notable change in view and which would justify the production of photomontages. Photomontages were not produced as it was thought that there were no significant views |

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| | | requested in the Scoping Opinion. | <p>affected receptors, as an important means of representing how the Scheme would give rise to a change in the visual environment, and could show not only construction activities, new and widened structures, gantries, earthworks and the alignment of new slip roads, but also loss of trees and the impact of replacement planting over time. This would accord with current best practice for LVIA as set out in GLVIA3 and the supporting Landscape Institute Technical Guidance Note 06/19. Whilst the DCO documentation includes illustrative material such as plans, elevations and sections, photomontages would be a significant aid to visually representing and communicating the Scheme in its surrounding context, and would enable a direct comparison against the baseline photography.</p> <p>The applicant states (Appendix 1.1) that Photomontages have not been produced partly because scheme development objections have been overcome and partly because of the lack of significant viewpoints affected, due to the surrounding dense woodland'. We would question how the 'lack of significant viewpoints affected' correlates with the significant effects identified within the LVIA, since the key viewpoints are supposed to be representative of the view(s) from relevant receptors. Again, photomontages may help visualise not only the built form of the Scheme, but also its visibility</p> | (residential and/or recreational) or receptors which would have shown noticeable changes in view. |

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| | | | (or lack thereof) due to associated changes in woodland screening at key stages of construction and operation. | |
| 1.8.20 | SCC | Further to your RR [RR-004] please provide details of what other landscape mitigation you would wish the Applicant to consider apart from/in addition to tree screening. | Surrey County Council would like the Applicant to consider adding scrub planting as well as tree planting to help the screening of passing traffic | Space for mitigation planting within the road corridor is limited and the replacement planting for vegetation removed during construction in the form of tree and shrub planting has been prioritised. The mitigation planting will also provide screening. |
| 1.13.5 | WPIL, SCC and GBC | By reference to a map please provide details of all of the intended, agreed or otherwise, vehicular and non-motorised user access points for the redevelopment of Wisley Airfield. | WPIL have provided a map showing access points. However, the ExA should note that the scheme considered at appeal involved the closure of Old Lane between the two car parks for southbound traffic. This means that whilst traffic could egress the site both left to the A3 and right to Martyr's Green, ingress off Old Lane would only be via the Black Swan / Mucky Duck crossroads: there would be no access into the site off Old Lane from the A3. Surrey County Council and Highways England agreed the southbound closure of Old Lane as part of the access strategy for the scheme being considered. | Highways England did not object to the access arrangements that were proposed for the redeveloped Wisley Airfield as part of the previous planning application. Highways England's position on a new planning application will be dependent upon the detail of the application but it is unlikely that Highways England will take a view on the principles of access between the Wisley Airfield site and Old Lane. |
| 1.13.10 | RHS and SCC | In the light of the on-going plans to increase visitor numbers from 1.0 million to 1.4 million per year (the latter being referred to on page 30 of [APP-026]) what daily increase in daily vehicular movements to and | The development proposals would result in an additional 1,478 two way vehicles from 7am – 7pm weekdays (staff and visitors) and an additional 1,728 vehicles from 7am-7pm at weekends (staff and visitors) at Wisley Lane. | The Transport Assessment and traffic modelling for the Scheme are based on the assumption that RHS Wisley Garden generates an additional 4,000 and 5,360 two-way vehicle movements per day in 2022 and 2037 respectively compared to the 2015 baseline. This approximately represents the traffic generated by a September weekday |

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| | | from RHS Wisley has been planned for? | <p>On event days the additional traffic could be in the region of 3,218 vehicles between 8am and 7pm. The conclusion of the TA was that planned improvement works to Junction10 of the M25 and the A3 corridor will act to increase the capacity of highway network and will act to reduce exiting congestion and increase safety.</p> <p>It concluded that no highway improvements were required for the increase in traffic expected from this expansion and increased trips. The TA had no reason to assess the impact on Ripley, as this was not being caused by RHS's proposals at the time. As the DCO states, the impact on Ripley is now being caused by the loss of the left in and left out junction of Wisley Lane with the A3.</p> | <p>special event (flower Show) held at RHS Wisley, based on information available when the traffic model was developed. Consequently, the assessment of the Scheme is based on a robust (worst-case) scenario regarding RHS Wisley traffic generation. The RHS Wisley Garden traffic generation on a typical weekday is therefore likely to be less than modelled and the associated traffic impacts are also likely be less than assessed for the Scheme on a typical weekday.</p> <p>The ANPR survey, which is described in Section 3.3 of the Transport Assessment Report [APP-136], indicated that 6% of RHS Wisley Garden generated traffic currently routes through Ripley. It is therefore likely that increased traffic demand generated by the RHS Wisley Garden development proposals would have an adverse impact on Ripley without the Scheme, albeit a relatively small impact.</p> |
| 1.13.1 1 | Applicant, SCC and RHS | Without south facing slips at the Oakham Park junction what would be the route or routes for vehicular traffic originating from the south and arriving at RHS Wisley or departing from RHS Wisley and having a southern destination? The responses to this question should include any routes being drawn on a map base. | <p>It is most likely that traffic arriving from the South on the A3 will come off the A3 at Burnt Common, and travel through Ripley village, to then access the new Wisley Lane via the overbridge from the Ockham roundabout. Signage to the contrary (to encourage U turning around the improved M25Junction 10) would not prevent this from happening, given the significant diversion of 5.5 additional kilometres travelled via the U turn facility.</p> <p>The same would apply for the return journey southwards, with another additional 5.5 kilometres being driven to again U turn around junction 10.</p> | <p>Traffic modelling has indicated that with the Scheme, all Wisley Lane/RHS Wisley Garden traffic to and from the A3 south routes through Ripley rather than following the signposted route via J10. This is because the route via Ripley will be shorter and quicker. The impact assessment of the Scheme is therefore based on all Wisley Lane/RHS Wisley Garden traffic to and from the A3 south routing through Ripley.</p> <p>However, Highways England calculates that with the Scheme the difference in the return journey distances via J10, compared to via Ripley is 8.4 kilometres, not 11 kilometres as stated by RHS.</p> <p>Furthermore, traffic modelling has also indicated that with the Scheme the difference in inter-peak journey times for</p> |

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| | | | This total additional 11 kilometres would be unacceptable to most drivers, who instead would use the much more direct alternative of driving through Ripley village for both inbound and out bound journeys instead. | RHS Wisley Garden traffic to and from the A3 south is only approximately 1 minute longer each way via J10 than via Ripley. Consequently, some visitors may choose to follow the signposted route via J10, since the additional journey time is relatively small. |
| 1.13.1 7 | Applicant and SCC | Without south facing slips at the Ockham Park junction for the Do-Something scenario what would the estimated additional daily weekday and weekend twoway traffic flow through Ripley be in 2022 and 2037? | <p>The additional daily weekday and weekend two-way traffic flows through Ripley High Street caused by the DCO scheme are likely to be higher than predicted by Highways England in both 2022 and 2037 for the reasons set out in the Joint Councils' Local Impact Report.</p> <p>Providing facilities for the average cyclist as part of the requirement to deliver a sustainable development at Wisley Airfield (GBC Local Plan allocation A35) is likely to require Old Lane, Ockham Lane, Ockham Road North and B2215 Ripley High Street to have traffic flows reduced from existing traffic levels let alone the higher flows predicted in the Do-Something Scenario. This could only be achieved by the implementation of traffic management measures along these lanes to reduce vehicle numbers and speeds to enable the off-site cycling facilities to be provided that would enable average cyclists to use them.</p> <p>The implications of this reduction of flows on the adjacent parallel lanes to Ripley High Street is that more traffic would inevitably be using B2215 Ripley High Street as this would be the only local alternative to access the</p> | Traffic modelling to assess the impact of the Scheme has been developed, calibrated and validated in compliance with best practice and Department for Transport (WebTAG) requirements and is therefore fit for purpose. There will inevitably be less confidence in predicted changes in traffic flows on the smaller country lanes predicted by the traffic model compared to those on the Strategic Road Network, A-roads and B-roads, where there is a high level of confidence. This is due to it being a strategic model covering a large geographical area and focused on the SRN, A-roads and B-roads. However, the absolute changes in traffic flows on the smaller country lanes are generally very small compared to the traffic flows on the rest of the network, even if the proportional changes can be notable. Therefore, any variation or uncertainty in the modelled changes in traffic flows on these lanes does not materially undermine the confidence in the modelled changes in traffic flows on the SRN, A-roads and B-roads, including Ripley High Street. The traffic modelling is based on a weekday event held at Wisley Garden, which can generate up to twice the volume of traffic compared to a non-event day. Consequently, on a typical weekday the increase in traffic through Ripley due to the Scheme is likely to be less than indicated, especially during the inter and PM peak periods. The traffic modelling also assumes all RHS Wisley Garden traffic to and from the A3 south routes via the B2216 |

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| | | | <p>A3south. The need to reduce traffic flows on the lanes around Wisley Airfield is not modelled by Highways England despite this being a consequence of the A35Policy requirements and therefore the implications forB2215 Ripley High Street is unknown and raises uncertainty about the Do-Something scenario and the scale of traffic using B2215 Ripley High Street.</p> <p>The RHS Wisley potential number of additional vehicles through Ripley High Street can be calculated using Table5.5 (page 21) of the Motion TA for April and applying 23% to the numbers as follows (see the Council's Local Impact Report for more information):</p> | <p>through Ripley and results in up to 2,330 vehicles a day two-way using this route. This is substantially higher than the 1,200-1,500 vehicles per day suggested in the LIR [REP02-047] and therefore represents a robust (worst-case) scenario.</p> <p>The impact assessment of the Scheme, including the impact on Ripley, and the conclusions drawn are, thus, based on this robust assumption regarding RHS Wisely Garden traffic in combination with the diversion of Wisely Lane included in the Scheme.</p> <p>The traffic modelling also accounts for the Wisely Airfield development and predicts that this will result in up to an additional 4,150 vehicles a day travelling through Ripley in 2037 with the Scheme. This is also significantly greater than the 735 vehicles per day suggested in the LIR [REP02-047] and further demonstrates the robustness of the traffic modelling undertaken to assess the impacts of the Scheme.</p> <p>It is the responsibility of the Wisley Airfield developer/promoter to propose and develop appropriate and safe facilities for cyclists that provide acceptable sustainable access for the proposed development.</p> |

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Surrey County Council (SCC)

| Time Period | Vehicle Trips – 1.4 Million Visitors per year (23% of customers additional through B2215 Ripley) | | | | | |
|--------------------|--|--------------------------------|------------------|--------------------------------|------------------|--------------------------------|
| | Wednesday | | Saturday | | Sunday | |
| | Additional Flows | Additional vehicles per minute | Additional Flows | Additional vehicles per minute | Additional Flows | Additional vehicles per minute |
| 09:00-10:00 | 40 | 0.7 | 59 | 1.0 | 77 | 1.3 |
| 10:00-11:00 | 170 | 2.8 | 114 | 1.9 | 144 | 2.4 |
| 11:00-12:00 | 159 | 2.7 | 124 | 2.1 | 181 | 3.0 |
| 12:00-13:00 | 149 | 2.5 | 125 | 2.1 | 190 | 3.2 |
| 13:00-14:00 | 152 | 2.5 | 125 | 2.1 | 188 | 3.1 |
| 14:00-15:00 | 169 | 2.8 | 155 | 2.6 | 202 | 3.4 |
| 15:00-16:00 | 160 | 2.7 | 143 | 2.4 | 164 | 2.7 |
| 16:00-17:00 | 120 | 2.0 | 139 | 2.3 | 154 | 2.6 |
| 17:00-18:00 | 64 | 1.1 | 126 | 2.1 | 129 | 2.2 |
| 18:00-19:00 | 33 | 0.6 | 71 | 1.2 | 58 | 1.0 |
| 09:00-19:00 | 1216 | 1.7 | 1181 | 1.6 | 1487 | 2.1 |

The figures come from the Motion TA for RHS Wisley's planning consent 16-P-01080. Tables 5.7 (page 22) and 5.8 (page 23) have been used.

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| 1.13.19 | Applicant and SCC | Would any additional traffic flows through Ripley justify any or all of the funding of the mitigation measures referred to in paragraph 2.3.2.5.3 of SCC's RR [RR004]? | Yes – As the TA clearly states, it is RHS Wisley traffic diverted through the village of Ripley as a result of the closure of the direct junction with A3 that generates the need for the full funding of the mitigation measures outlined for the B2215/Ripley Village. It is the additional traffic flows and impact of RHS Wisley traffic caused by faster journey times and reduced distances | Most of the forecast growth in traffic on the B2216 Portsmouth Road through Ripley between the 2015 base year and the forecast future years is due to a combination of background traffic growth and traffic generated by proposed Local Plan developments, including Wisley Airfield – a 23-29% increase to 2022 and a 66-74% increase to 2037. The Scheme only increases daily traffic |
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| | | | <p>by using the B2215 compared to the 11 additional kilometres undertaking the U turn via Junction 10 which requires the mitigation. Such mitigation would go some way to reducing the impact of this traffic until such a time as the proposed slips (as required by the Guildford Local Plan) are implemented at Burnt Common on the A247.</p> <p>Providing facilities for the average cyclist as part of the requirement to deliver a sustainable development at Wisley Airfield (GBC Local Plan allocation A35) and the implications of these reduction of flows on the adjacent parallel lanes to Ripley High Street is that more traffic would inevitably be using B2215 Ripley High Street as this would be the only local alternative to access the A3 south. The need to reduce traffic flows on the lanes around Wisley Airfield is not modelled by Highways England despite this being a consequence of the A35 Policy requirements and therefore the implications for B2215 Ripley High Street is unknown and raises uncertainty about the Do-Something scenario and the scale of traffic using B2215 Ripley High Street.</p> <p>This alongside the RHS Wisley increased flows through Ripley High Street justifies the mitigation measures requested by SCC. The speed reduction measures proposed are intended to slow traffic speeds through the village of Ripley to encourage more RHS</p> | <p>flow on the B2216 Portsmouth Road through Ripley by up to 5% compared to without the Scheme [see REP2-011].</p> <p>It is the responsibility of the Wisley Airfield developer/promoter to develop and model appropriate measures to mitigate the impacts of traffic generated by the proposed development, including reducing the traffic flows on the lanes around Wisley Airfield. See response to 1.13.18 regarding cyclists.</p> |

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| | | | <p>Ripley and general Wisley Lane traffic to use Highway England's signed 'U' turn route through the M25 J10 roundabout.</p> <p>Please note that the asks in relation to bus stops were referenced within the Ripley section in the County Council's RR given the location but more detail is provided in the Public Transport section of the Joint Councils Local Impact report.</p> | |
| 1.13.2 4 | Applicant and SCC | <p>In the light of SCC's comments about bus stop locations and bus services [RR-004]:</p> <p>a) With respect to the siting of any retained and/or repositioned bus stops would they be conveniently located for bus users and does the Applicant intend that these would be equipped with real time passenger information displays?</p> <p>b) Would there be a need to provide any additional footways to enhance pedestrian accessibility to any retained or repositioned bus stops?</p> <p>c) Would any temporary bus stops during the construction works be optimally located?</p> | <p>a) While there is an ambition that some bus journeys will access RHS Wisley via the realigned Wisley Lane link road this will add journey time to the service and may not be financially viable, hence the County Council seeks pump priming from HE to fund this diversion – see below. The bus stops at the Ockham roundabout and at the entrance to RHS Wisley, off Wisley Lane should all be of the same standard. That is accessible kerbing, appropriate traffic management (bus stop clearways as necessary), safe passenger waiting area, bus stop pole/flag/timetable case, bus shelter (wooden) with lighting, and a real time passenger information display. Installing a RTPi display close to the main entrance of the RHS Wisley Visitor Centre would also give confidence to intending passengers prior to embarking on the walk to the bus stops.</p> <p>Where passengers are expected to wait in remote locations where they are unfamiliar with</p> | <p>Refer to Highways England response to ExA First Written Questions [REP2-013]question number 1.13.24.</p> <p>The Scheme makes provision for a replacement bus stop facility at the entrance to RHS Wisley Garden. This will be more convenient for visitors and staff alike which will help encourage more bus patronage than at present and in turn could improve bus revenues. As noted in Highways England's response on these matters (see REP2-014 on page 37), the diversion of buses to the proposed new turnaround facility will increase bus journey times (by approximately 30 seconds) but this would be more than offset by the benefits that the Scheme would deliver in terms of improved journey times along the A3 and through the M25 junction 10/A3 Wisley interchange and at Painshill. On this basis, there cannot be any reasonable justification for the financial compensation now being sought and Highways England notes that SCC has yet to provide any evidence to justify the sums being requested.</p> <p>The Applicant does not intend to provide real time passenger information displays at any bus stops. This is because the Applicant does not consider it necessary to</p> |

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| Surrey County Council (SCC) | | | | |
| | | | <p>the bus routes and geography, such as passengers who are visiting the area, it is vital that they are given the confidence that they are at the correct bus stop and that the bus is on its way. Recent passenger insight research by a large multinational bus operator has reinforced the value of RTPi at bus stops.</p> <p>Usage of real-time bus information via mobile apps and text messaging is generally low outside of city regions.</p> <p>b) Safe pedestrian walking routes need to be provided between the bus stops and RHS Wisley. It is reasonable that a bus service may use both sets of bus stops at Ockham/RHS Wisley, or indeed only serve the Ockham bus stops. This will be subject to network planning and operational needs. Passengers using the Ockham bus stops will have to walk along the realigned Wisley Lane to access RHS Wisley Gardens which is some distance away (circa 1.2km) which they are unlikely to do. As a minimum to help mitigate the impact on bus users, it is the County Council's view that the scheme must include the construction of a pedestrian footway from these bus stops to access RHS Wisley Gardens via Mill Lane (this will require agreement with RHS Wisley).</p> <p>It may also be possible for the County Council to approach the bus operator to divert their routes into the bus turnaround at RHS Wisley</p> | <p>provide these as mobile applications that provide real time bus information are readily available for free and make real time passenger information displays at bus stops largely redundant.</p> <p>It would be RHS's responsibility to install real time passenger information displays at the bus stop close to RHS Wisley Garden entrance to promote sustainable travel by their visitors and staff, in line with their Travel Plan, if it were considered appropriate to provide the displays.</p> |

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| | | | <p>Gardens. The bus operators, however, have to meet required timetable and so this would not be attractive to them unless there was an incentive for them to do so. To address this it would be helpful if Highways England could provide funding to the County Council to use to incentivise this bus diversion (perhaps of the order of £30,000-£50,000/year for 2 years) The County Council would welcome a discussion with Highways England on this aspect of the scheme.</p> <p>c) Bus stops will be unavailable during the construction period. HE propose to provide shuttle buses to RHS Wisley Gardens from existing stops at Ockham Park Junction. The County Council would suggest that it would be more attractive to passengers if a shuttle bus to RHS Wisley Gardens is provided from existing stops in Ripley Village (see also responses to WQ 1.13.19 regarding improvements to bus stops in Ripley included in the Ripley mitigation package being sought).</p> <p>The County Council would recommend this as the Ripley stops are less remote for users and would pick up more bus services, including passengers travelling from Woking. Until the Ockham bus stops are upgraded under the proposed Highways England scheme the waiting environment is not pleasant. Temporary bus stops will be located at the most convenient and safe position that can be</p> | |

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| | | | identified. The nature of the works means that there will be detriment to bus passengers during the construction in terms of additional walking distance/time. | |
| 1.15.4 | LAs | "Are you content with the definition of 'maintain' in the Part 1(2) Interpretation, and in particular the Applicant's intention that this would include terms such as adjust, alter, improve reconstruct and replace within this definition provided that such works do not give rise to any materially different effects to those identified in the ES? " | The definition is broad and the County Council query what is meant by a number of the terms. The County Council has specific concern at the use of the tailpiece as there is no clarity on the process that would be followed to determine if works do give rise to any materially different effects to those identified in the ES. | <p>The list of elements within the definition of maintain has been based on other made Highways England DCOs, c.f. The A14 Cambridge to Huntingdon Improvement Scheme Development Consent Order 2016, The M20 Junction 10a Development Consent Order 2017 and The A19/A184 Testo's Junction Alteration Development Consent Order 2018.</p> <p>The definition of 'maintain' in this dDCO is more restrictive than that contained in the 3 Highways England made DCOs cited above in an important respect. This is because the dDCO [REP2-002] contains a tailpiece to the effect that none of the activities constituting the maintenance of the authorised development may be carried out to the extent that they would give rise to materially new or materially different environmental effects compared with those identified in the environmental statement. This 'environmental envelope' thereby constrains the scope of the power in article 5 for Highways England to maintain the authorised development by restricting what may be carried out within the purview of the dDCO to those activities which would not have significant new or different environmental effects.</p> <p>It will be for Highways England to check that it is building the Scheme within the physical and environmental limits set by the DCO and to consider and determine whether a particular maintenance activity would result in a materially</p> |

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| | | | | <p>new or materially different effect and, where appropriate, Highways England would consult with relevant bodies to ensure compliance with any legal requirements.</p> <p>An effect which is materially new relates to an effect which was not reported in the Environmental Statement (ES) certified by the Secretary of State but which is significant in EIA terms. An effect which is materially different relates to an effect which was reported in the ES but in respect of which there is a change in the significance attributed to the effect from that reported in the ES. This wording is considered important to distinguish from effects which are merely “new or different”, which would capture all new effects, irrespective of significance, and all different effects, whether or not they are such as to alter the level of significance attributed to the effect from that reported in the ES.</p> <p>At the time of undertaking the work, Highways England would carry out a screening exercise and where appropriate consult with relevant bodies to ensure compliance with any legal requirements. The local planning authorities have an existing policing role under the Planning Act 2008 that already applies.</p> <p>It would also fall upon Highways England to ensure that any proposed maintenance activity complies with the terms of the DCO and/or legislative requirements and it would therefore need to make an informed and responsible determination about whether a particular maintenance activity (individually or collectively) would result in a materially new or materially different effect to that reported in the ES.</p> |

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| Surrey County Council (SCC) | | | | |
| | | | | It is a criminal offence to breach the terms of a DCO and so there would be a strong incentive on Highways England to stay clearly within its terms; this would additionally be policed by local planning authorities under their enforcement powers in the Planning Act 2008. |
| 1.15.1 1 | LAs and NE | "Please comment on the proposed wording of R5(1) having particular regard to the tailpiece that would potentially allow for an amended scheme that has not been subject to this Examination process to be approved by the Secretary of State. " | Surrey County Council is concerned with this wide-reaching tailpiece which provides a route to approval of a potentially fundamental change to the detailed design of the scheme applied for and to be examined which circumvents the statutory process and is contrary to advice note fifteen. It is noted that the Explanatory Memorandum does not provide an explanation but simply reiterates it | As stated in the Applicant's response to the ExA's First Written Questions [REP2-013], the Applicant considers that the use of the 'tailpiece' in requirement 5 (Detailed design) of the dDCO [REP2-002] is both proportionate and precedented and that the tests in Advice Note 15 have been respected. Requirement 5 provides that the authorised development (i.e. the Scheme) must be designed in detail and carried out so that it is compatible with the preliminary scheme design shown on the Works Plans, the Scheme Layout Plans and the engineering drawings and sections. This is subject to the ability of the Secretary of State, following consultation with the relevant planning authority, to approve variations to the detailed design of the Scheme, provided that any such variations cannot give rise to any materially new or materially different environmental effects (i.e. environmental effects which have not been assessed in the environmental statement). Requirement 5 therefore provides the Applicant with a proportionate level of flexibility in the detailed design of the Scheme, which is necessary and indeed appropriate in the delivery of complex major infrastructure projects. It is also in the public interest that the Applicant is provided with a degree of flexibility, within the envelope of the environmental statement, to develop the detailed design of the Scheme in the most appropriate manner. |

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| | | | | <p>Advice Note 15 states at paragraph 17.3 that 'it is not acceptable to circumvent the prescribed process in Schedule 6 by seeking to provide another route to approving such changes or variations, by a person other than the Secretary of State who made the DCO, for example by applying the provisions of section 73 and/ or section 96A of the TCPA 1990. Therefore, adding a tailpiece such as the one below would not be acceptable because it might allow the discharging authority to approve a change to the scope of the Authorised Development applied for and examined, thus circumventing the statutory process: "The authorised development must be carried out in accordance with the principles set out in application document [x] [within the Order limits] unless otherwise approved in writing" Requirement 5 does not offend against the provisions of Advice Note 15, as it does not permit a person other than the Secretary of State (as the maker of the DCO) to approve changes to any details approved under requirement 5. Thus the drafting of requirement 5 respects Advice Note 15.</p> <p>Such a provision has been included in other made development consent orders, c.f. The M20 Junction 10a Development Consent Order 2017 and the A19/A184 Testo's Junction Alteration Development Consent Order 2018.</p> |

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| Elmbridge Borough Council (EBC) | | | | |
| 1.3.2 | Applicant, Elmbridge Borough Council (EBC) and Guildford Borough Council (GBC) | For the purposes of assessing the operational effects of the Proposed Development on air quality is the baseline monitoring data that has been relied on the most up to date that could be used? | <p>Highways England (HE) have listed in their response the use of the Environmental Statement for 2017 for the baseline monitoring.</p> <p>The most up to date results for air quality in Elmbridge are in the published Annual Status Report (ASR) 2019, which is available on the EBC website. The ASR 2019 can be found using this link https://www.elmbridge.gov.uk/pollution/local-airquality/</p> <p>EBC would like to also draw attention to the CERC Air quality modelling to support the Elmbridge Local Plan – Final Report dated 22nd July 2019. CERC was commissioned to carry out air dispersion modelling to identify the baseline air quality profile across the area and to assess two future (2035) scenarios, with and without proposed developments in the Elmbridge Local Plan in place.</p> <p>The July 2019 report describes only the baseline modelling, carried out for the year 2017; the data required as input to the 2035 modelling is expected to be provided early 2020. The report is available on the Council's website - https://www.elmbridge.gov.uk/_resources/assets/attachment/full/0/5945.pdf</p> | Applicants are required to stop assessment work at a particular point in time in order to be able to finalise and submit an application. It is inevitable that additional data for more recent years will be available after the assessment is completed, given the time periods involved in the process. The 2017 baseline data was the most up to date ratified data at the time of undertaking the air quality assessment, which was largely undertaken in 2018 and finalised in early 2019. |

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| Elmbridge Borough Council (EBC) | | | | |
| 1.4.3 | Local Authorities | Are you aware of any other plans or developments that should be taken into account in the in-combination assessment? | <p>The data provided by EBC to inform the Biodiversity and HAR was correct at the time however, the positioning of the new Local Plan has moved forwards during the development of the DCO scheme. EBC is currently in the process of preparing a new Local Plan which will set out the growth strategy for the Borough over a 15-year period up to 2036. The Plan will include the allocation of sites that will help to meet the development needs of the Borough. As part of the Plan's preparation, the Council recently consulted on five options (Local Plan Options Consultation, August 2019) that could, individually or through various combinations, form the development strategy for the Borough. Potential development opportunities (sites) that could be developed under each option were identified on an interactive map.</p> <p>Each option included the development / redevelopment of sites in the existing built-up areas whilst two options also considered the release of land from the Green Belt. Under one option (Option 3) there was a considerable amount of land around the Cobham area that could be released for development.</p> <p>Whilst the Council has not yet determined its preferred option, throughout the preparation of its evidence base the Council has always considered / modelled the 'worst case</p> | <p>The in-combination assessment comprises an assessment of the intra-project effects that arise between different environmental topics within the same proposal and as a result of the development's direct effects, i.e. combined environmental effects from a single project (the Scheme). The cumulative effects assessment comprises an assessment of the inter-project effects that arise as a result of the combined action of a number of different projects cumulatively with the Scheme on a single resource or receptor. It is therefore assumed that the question refers to the cumulative effects assessment rather than the in-combination effects assessment.</p> <p><i>Within Advice note seventeen: Cumulative effects assessment relevant to nationally significant infrastructure projects</i>, in paragraph 3.4.9, the Planning Inspectorate acknowledges that applicants are required to stop assessment work at a particular point in time in order to be able to finalise and submit an application. The Local Plan Options Consultation noted by Elmbridge Borough Council was opened on the 19 August 2019. The M25 junction 10 DCO application was submitted on 19 June 2019, and therefore has not been considered in the assessment.</p> <p>Even if the Local Plan Options Consultation was available at the time of the assessment, the five Options as proposed in the consultation are high-level strategic options for Borough-wide development. At this stage no formal or draft site allocations have been made, and it is not known which of the five Options is likely to form the Council's preferred approach to development. Therefore,</p> |

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| Elmbridge Borough Council (EBC) | | | | |
| | | | scenario' (Option 3). EBC strongly advocate that as part of the HRA potential development sites as set out under Option 3 contained within the Local Plan Options Consultation, August 2019 are included. This is particularly pertinent given the close proximity of some potential development sites to the DCO scheme. | <p>these developments are not considered to be 'reasonably foreseeable' and 'committed', in line with the guidance in DMRB Volume 11, Section 2, Part 5 HA 205/08, which informs the methodology of the assessment. As such, there is not an adequate degree of certainty that development would come to fruition, to justify its inclusion within the cumulative effect assessment.</p> <p>Individual sites have been identified for each Option, including for the worst-case scenario Option 3. Elmbridge Borough Council has provided (via its interactive map) site area, high-level phasing within the plan period and capacity for dwellings/commercial space for each site. Further details of the nature of development at each site have not been provided, including environmental constraints, proposed mitigation measures, access arrangements and site availability, amongst other factors pertinent to the assessment. Therefore, there is insufficient information provided to estimate with any precision the potential cumulative effects which may arise from these sites in conjunction with the Scheme.</p> |
| 1.8.18 | LAs and Historic England | Are you content with the justification provided by the Application in Appendix 1.1 of [APP-078] as to why photomontages of the Proposed Development as viewed from key visual receptors have not be provided despite these being requested in the Scoping Opinion. | EBC supports the comments made by SCC regarding the omission of photomontages. | Please refer to Highways England's comments on Surrey County Council's response to ExAQ 1.8.18 above. |

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| Elmbridge Borough Council (EBC) | | | | |
| 1.15.8 | LAs and NE | <p>Are you satisfied with the relationship between the CEMP and the HEMP, and that the HEMP would provide sufficient safeguards in regard to environmental protection measures? If not, then please detail what measures you would wish to see specifically included in the HEMP?</p> | <p>EBC would expect the EMP process to be subject to review periodically throughout the detailed design, construction and handover periods. The timing of reviews will be agreed with the Client's Scheme Manager.</p> <p>The final agreed CEMP should set out the mechanism for the provision of a HEMP (and Maintenance & Operation) when the construction of the Scheme is nearing completion. The CEMP should provide a detailed environmental strategy for the Scheme from the design stage, maintenance and operation through to handover, including for example;</p> <ul style="list-style-type: none"> • the current environmental risks associated with the Scheme, mitigation measures to remove or reduce the risks and; assigned responsibilities for the risks; • the key Scheme roles and procedures for staff training, monitoring and the complaints procedures to be adopted • provides a commentary on the specific environmental topics and associated plans/strategies required within the outline and final CEMPs. • A Pre-Handover Checklist to include identification of; <ol style="list-style-type: none"> 1. Any long-term environmental liabilities 2. Any permits or consents that need to be | <p>Please refer to Highways England response to ExAQ 1.15.7 [REP2-013].</p> <p>The outline Construction Environmental Management Plan (CEMP) [AS-016] links the environmental issues between the design, construction and maintenance and operation stages of the Scheme. As detailed in the outline CEMP, one of the purposes of the CEMP is to provide a review, monitoring and audit mechanism to determine the effectiveness of and compliance with the environmental control measures. This will include review of any design and construction methodology changes; reviewing of the Environmental Control Plans and any method statements. The final agreed CEMP will be prepared by the principal contractor once in post, and the detailed design and construction plans have been finalised. The final agreed CEMP will provide handover information to the responsible body for operational management, including management and monitoring requirements and commitments in accordance with requirement 3 of the dDCO [REP2-002].</p> <p>Requirement 3(4) of the dDCO [REP2-002] requires Highways England to prepare a Handover Environmental Management Plan (HEMP) in accordance with the process set out in the approved CEMP. The HEMP must, under requirement 3(5), address the matters set out in the approved CEMP as relevant to the operation and maintenance of the Scheme. The HEMP will effectively act as the equivalent of the CEMP for the operational</p> |

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| Elmbridge Borough Council (EBC) | | | | |
| | | | <p>transferred/surrendered</p> <p>3. Any outstanding complaints or enforcement notices</p> <p>4. Copy of Project Environmental Plan and other supporting documentation available for handover (Copies of licences, agreements, permits. Risks. Complaint log. Installed equipment operating instructions, logs and commissioning reports(boilers/lifts. Calibration of monitoring equipment before handover)</p> <p>5. Site inspection checks (general housekeeping. No signs of pollution or contamination in drains/watercourses or land. Waste storage area acceptable. No lasting adverse environmental/wildlife impacts)The HEMP would be produced by the relevant main contractors in consultation with the Highways Agency and/or the employer's representative. This would be passed to the organisation responsible for the long term management of the route.</p> | <p>period of the Scheme to be prepared and approved as part of Requirement 3.</p> |

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| Guildford Borough Council (GBC) | | | | |
| 1.4.3 | Local Authorities | Are you aware of any other plans or developments that should be taken into account in the in-combination assessment? | <p>GBC is shortly expecting to receive a planning application of the development of the land known as Garlicks Arch.</p> <p>This is expected to be for c.500 residential units and is a site allocated in our Local Plan for development.</p> | <p>The Site Allocation A43 Land at Garlick's Arch was considered within the Cumulative Effect Assessment [Section 16.9 of APP-061], finding that there would be no/neutral cumulative effects between the two schemes.</p> <p>Any planning application at Garlick's Arch, as noted by Guildford Borough Council, has not yet been submitted and therefore has not been considered in this assessment.</p> |
| 1.13.5 | WPIL, SCC and GBC | By reference to a map please provide details of all of the intended, agreed or otherwise, vehicular and non-motorised user access points for the redevelopment of Wisley Airfield. | <p>GBC understand that WPIL have provided a map showing access points.</p> <p>GBC would also agree that the ExA should note that the scheme considered at appeal involved the closure of Old Lane between the two car parks for southbound traffic. This means that whilst traffic could egress the site both left to the A3 and right to Martyr's Green, ingress off Old Lane would only be via the Black Swan / Mucky Duck crossroads: there would be no access into the site off Old Lane from the A3.</p> <p>SCC and Highways England previously agreed that the southbound closure of Old Lane as part of the access strategy for the scheme was being considered.</p> | <p>Highways England did not object to the access arrangements that were proposed for the redeveloped Wisley Airfield as part of the previous planning application. Highways England's position on a new planning application will be dependent upon the detail of the application but it is unlikely that Highways England will take a view on the principles of access between the Wisley Airfield site and Old Lane.</p> |
| 1.15.4 | LAs | Are you content with the definition of 'maintain' in the Part 1(2) Interpretation, and in particular the Applicant's intention that this would | <p>GBC consider that this is somewhat vague and has concerns as to how this will be enforced and who would judge / adjudicate when a materially different impact on the ES</p> | <p>Please refer to Highways England's comments on Surrey County Council's response to ExAQ 1.15.4 above.</p> |

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| Guildford Borough Council (GBC) | | | | |
| | | include terms such as adjust, alter, improve reconstruct and replace within this definition provided that such works do not give rise to any materially different effects to those identified in the ES? | would occur | |
| 1.15.8 | LAs and NE | Are you satisfied with the relationship between the CEMP and the HEMP, and that the HEMP would provide sufficient safeguards in regard to environmental protection measures? If not, then please detail what measures you would wish to see specifically included in the HEMP? | GBC considers that subject to the final wording of the requirements / obligations that the combination of the documents would provide sufficient safeguards in regard to environmental protection | Highways England welcomes confirmation from GBC that subject to the final wording of the requirements / obligations that the combination of the documents would provide sufficient safeguards in regard to environmental protection. |
| 1.15.1 1 | LAs and NE | Please comment on the proposed wording of R5(1) having particular regard to the tailpiece that would potentially allow for an amended scheme that has not been subject to this Examination process to be approved by the Secretary of State. | GBC shares SCC's concerns in respect of the wide-reaching tailpiece and further information / justification is required. | Please refer to Highways England's comments on Surrey County Council's response to ExAQ 1.15.11 above. |

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| Natural England (NE) | | | | |
| 1.4.33 | Local Authorities, Natural England, RSPB, SWT | Please confirm whether or not you are satisfied with the amount, nature and proposals for long-term management of both the SPA compensation land and the SPA enhancement areas. If not, then please state why and explain any other measures you would wish to see included? | <p>The applicant acknowledges that the document setting out the proposals for management and monitoring of the SPA compensation and enhancement areas is a 'working document' subject to further discussion with stakeholders, including Natural England. We will welcome further discussion. Whilst the detail of management in these areas has not yet been provided by the applicant Natural England is in agreement over the broad objectives and principles set out in APP105. We have been engaged with site meetings alongside other stakeholders to discuss appropriate management with the applicant, so that this provides the desired functions for Annex 1 bird species, such as expansion of open heathland, provision of improved linkage between blocks of habitat, improved habitat structure and better habitat conditions for feeding nightjar. Natural England is confident that the applicant has clear understanding of the importance of achieving these objectives within a reasonable timescale in the SPA compensation and enhancement areas.</p> <p>It will be important to ensure that the applicant properly estimates the cost of achieving the long-term management and monitoring objectives, and that sufficient funding is allocated in the project budget. Natural England has not yet seen information on this</p> | <p>The SPA Management Plan is secured under Requirement 8 of the dDCO [REP2-002], which sets out Highways England's obligations to agree and carry out maintenance, management and monitoring of the SPA compensatory measures. Highways England is working with the Surrey Wildlife Trust and the appointed construction contractor to refine the management details for the suite of compensatory measures within the SPA. Highways England will continue to consult with Natural England on these matters. This work is ongoing, but has included:</p> <ul style="list-style-type: none"> • agreeing which activities should take place within the SPA compensation land parcels before authorised development within the SPA may commence (was discussed and agreed in a meeting with Natural England on 03 December 2019); • refining the details of the timings of works within the SPA enhancement areas. This is still to be finalised and will be agreed with Natural England; • refining the details of the work activities within the SPA enhancement areas and associated costs. This is still to be finalised and will be agreed with Natural England; • agreeing the time periods for management by the construction contractor of SPA compensation land, SPA enhancement areas and reinstated SPA temporary land take, and appropriate hand over timings to Surrey Wildlife Trust. This is ongoing and will be agreed with Natural England; |

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| Natural England (NE) | | | | |
| | | | <p>aspect but it is our understanding that there is work in progress to address this. Natural England is able to assist the applicant in this regard.</p> | <ul style="list-style-type: none"> refining the monitoring proposals, including methods and timings for monitoring habitat establishment, SPA qualifying species populations and invertebrate abundance. This is ongoing and will be designed and agreed with Natural England; determining the costs for the management and monitoring of the SPA compensation land, SPA enhancement areas and reinstated SPA temporary land take over the proposed time periods. |

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| Wisley Property Investments Ltd. (WPIL) | | | | |
| 1.13.6 | Applicant | "Having regard to the representations made by SCC [RR-004], RHS [RR-024] and WPIL [RR-030] if the Secretary of State was to grant the DCO and then the authorised scheme was to be implemented, could south facing slips at the Oakham Park junction subsequently be installed without detriment to either the free or safe operation of the A3?" | <p>It would be difficult to retrofit the south facing slips at the Ockham Park junction existing roundabout as the existing roundabout would need either the large-scale junction improvement proposed by RHS Wisley Gardens in the past, or a new roundabout on B2215 Portsmouth Road and a new bridge over the A3 for the southbound on slip. In either case, this could potentially clash with the existing slip roads for the Ripley Service areas by leaving insufficient distance between them to satisfy DMRB design standards for grade separated junctions.</p> <p>2.14. There is no requirement in the GBLP for south facing slips at Ockham Interchange, and the infrastructure is not required to deliver allocation A35. WPIL would therefore not support the implementation of this infrastructure as it is not necessary. It is also not thought that HE would support the implementation. Hence the DCO cannot have a bearing on this unplanned infrastructure</p> | <p>Please see Highways England's previous response to ExAQ 1.13.6, as set out in the Applicant's Responses to ExA's First Written Questions [REP2-013].</p> <p>It would be just as difficult to include south facing slips at the Ockham Park junction in the Scheme as it would be to retrofit them subsequently, since the environmental, design and land-take constraints and issues would be the same or very similar.</p> |

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| Royal Horticultural Society Wisley (RHS Wisley) | | | | |
| 1.13.1 2 | Applicant and RHS | What proportion of the visitors to RHS Wisley arriving by motorised vehicles originate from the south and currently use the left turn from the A3 into Wisley Lane? | As noted in Appendix E of Written Representation RHS/MH/2, the proportion of traffic originating from the south using the left turn from Wisley Lane onto the A3 Northbound is 37%. | <p>The Applicant's ANPR survey indicates that the proportion of all traffic generated by RHS Wisley Garden originating from the south and currently using the left turn from the A3 into Wisley Lane is 34%, rather than the 37% of visitors stated by RHS [see REP2-011].</p> <p>RHS's proportion is based on the place of residence of members. Consequently, it does not account for visitor who are non-members, nor does it account for staff and delivery vehicle trips. It also assumes that the frequency that members visit Wisley Garden is the same regardless of how far away they live. Whereas it would be reasonable to assume that the nearer to RHS Wisley Garden that members live, the more frequently they would visit, which is likely to alter the distribution of vehicle trips.</p> <p>RHS's approach is therefore less reliable than the ANPR survey for estimating distribution of vehicle trips generated by RHS Wisley Garden.</p> |
| 1.13.1 3 | Applicant and RHS | <p>a) For 2022 (ie the theoretical opening year for the Proposed Development) in the absence of south facing slips at the Oakham Park junction what additional distance, in vehicle kilometres and miles per year, would visitors arriving at and departing from RHS Wisley need to travel compared with the current situation?</p> <p>b) RHS is requested to explain how it</p> | <p>a) The 2.7 million figure was based on the pre-DCO version of the proposals and on the basis of the projected 1,400,000 visitors per annum. As noted above, for the purpose of the Written Representation RHS/MH/1 & 2, this calculation has been updated to accord with the DCO Scheme and with 1,494,000 vpa (by 2024) in order to reflect the most recent projections. This results in a new saving of 3.3 million miles per annum saved when compared to the DCO Scheme.</p> | <p>Based on 1.494 million visitors per annum, the Applicant calculates that the total additional distance that RHS Wisley Garden visitors will need to travel due to the Scheme will be between approximately 214,000 and 1,165,000 miles per annum, depending on whether RHS Wisley Garden visitors to and from the A3 south choose to route via J10 (signposted route) or via Ripley.</p> |

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| Royal Horticultural Society Wisley (RHS Wisley) | | | | |
| | | has calculated its estimate for visitors to its gardens generating 2.7 million extra vehicle miles should the Proposed Development be granted consent [paragraph 5 of RR-024]. In doing that RHS should state whether the estimated figure of 2.7 million extra vehicle miles relates to current visitor numbers or to those arising from the planned visitor growth. | b) See above | |

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| Painshill Park Trust | | | | |
| 1.12.1 | Painshill Park Trust | Please explain what you consider the effects on visitor safety and the visitor experience at Painshill Park as a result of the Proposed Development would be, in particular, affected by the loss of the western access on to the A3 without a replacement access track being provided. | <p>(b) Emergency Services</p> <p>The Trustees believe that the Emergency Services and Highways England have misunderstood the circumstances at Painshill and so have seriously underestimated the risk to its visitors. This is true both now and in the future when we expect many more visitors to Painshill. Painshill is a 158 acre, Grade1 registered landscape garden which measures over a mile from east to west. Other than the entrance at the west end of the landscape, which Highways England proposes should be permanently closed, the only vehicular entrance to the whole landscape is through the trade entrance at the eastern end. This is through a locked gate onto a single-tracked path which is narrow and rough towards the western end with low overhanging branches, steep climbs and descents and sharp corners. From the entrance to the Temple of Bacchus it measures approximately 1 mile, (1.61 kilometres), to the Grade 11* listed Gothic Tower 1.25 miles (2.01 kilometres) and 1.58 miles (2.54 kilometres) to the Grade 11 listed Waterwheel.</p> <p>The attached email dated 19th November 2019, (Appendix 2), from the Assistant Group Commander, Surrey Fire and Rescue Service sets out in the bullet points of the second paragraph "the factors that influenced my</p> | <p>(b) Highways England does not consider that the risk to visitors was underestimated in the revision of the Scheme involving the closure of the western access onto the A3. The decision for the closure was informed by the DMRB guidance (TD 42/95) on the grounds of safety and Surrey Fire and Rescue Services assessment.</p> <p>As confirmed by Surrey Fire and Rescue Services, prior to their final recommendation, a detailed assessment was undertaken whereby a fire appliance was driven through Painshill Park to ensure a standard fire appliance can gain access to the Gothic Tower using the internal access route across the Park. Furthermore, Surrey Fire and Rescue Services noted that 'on balance the likelihood of fire is low and the risk to life is low' (Email from Tim Readings, Assistant Group Commander SFRS, 19th November 2019) and that 'utilising the A3 access gate creates an additional hazard on the road network due to appliances having to slow and turn into an unmarked junction on a national speed limit road' (Email from Tim Readings, Assistant Group Commander SFRS, 24th April 2019).</p> <p>(c) Highways England consider that if a fire appliance can drive through the park to the Gothic Tower via the existing internal road network at Painshill Park then an ambulance will also be able to get through the park as the vehicle is much smaller in size compared to a fire appliance vehicle.</p> |

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| Painshill Park Trust | | | | |
| | | | <p>decision with regard to access and fire risk...". A number of them are wrong:</p> <p>Bullet point 1. The Gothic Tower cannot be accessed by a fire appliance through the main entrance. There is no vehicular access to the park from the main entrance to Painshill. Other than the western entrance, the only vehicular access is through the locked trade entrance.</p> <p>Bullet point 2. The Gothic Tower is a "sleeping risk". It has been gutted by fire in the past. It has been used for many years as living accommodation for staff to supplement the Trust's income and provide security at the west end of the landscape and it is intended that it should be again.</p> <p>Bullet point 10. This is particularly worrying. There is no access to the park through the main entrance. There is an entrance through the locked gate at the trade entrance but in the event of the park being closed or the telephone not being attended, the only entrance for emergency vehicles is through the western entrance, to which they have a key.</p> <p>The third paragraph states that the risk of fire and to life is low. The points listed above call that judgement into question. However it does state that "if a safe junction could be incorporated into the new plan we would support that...". We have the confirmation of</p> | <p>(d) As stated above, Highways England does not agree that closure of the western access onto A3 would pose any additional risk to the visitors of the Park. Highways England cannot comment on any terms or changes to the terms of Painshill Park's insurance policy as a result of the Scheme. Painshill Park Trust should seek advice of an independent specialist for example a member of Royal Institution of Chartered Surveyors for any matters regarding financial implications, if any, resulting from the execution or operation of the Scheme for Painshill Park.</p> |

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| Painshill Park Trust | | | | |
| | | | <p>the Project Manager that there is no technical reason why the access path should not be extended to provide a safe entrance and the only reason why it has not proposed was that Highways England ran out of time.</p> <p>(C)We note that there is no assessment of the ability of an ambulance to get to the west end of the park. Ambulances have been called to Painshill three times in the last year.</p> <p>(d)The threat to Insurance Cover The attached expert assessment, (Appendix 3), assesses the threat that the closing of the western entrance poses to the Trust's insurance cover. The withdrawal of insurance cover from the west end of the park, forcing the permanent closure of a substantial portion of a Grade 1 registered landscape is unthinkable.</p> <p>The best-case scenario of a substantial increase in premium is almost equally threatening. Painshill Park Trust has no endowment capital and in its 39 years of existence has never broken even. In the past, it has been able to rely on the support of public or private benefactors. That support is no longer available and it now has to make itself financially self-sustaining. To do so next year</p> | |

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| Painshill Park Trust | | | | |
| | | | <p>will prove a challenge. A development of this kind could be the straw that breaks the camel's back. In that event one of the foremost gardens in England would be lost to the public.</p> <p>If the western part of the landscape were to be closed to the public, Charles Hamilton's original design would be compromised and the visitor's experience substantially impoverished. Several of the most striking and iconic of the original buildings would be lost.</p> <p>Restoration and Management The next phase of the Trust's programme to restore the landscape and buildings concentrates on the west end of the park and will include a £400,000 reconstruction of the interior of the Temple of Bacchus, the refacing to the Gothic Tower, completion of the Hermitage, timber harvesting and major works to the landscape and river bank close to the Waterwheel. There is also a continuous programme over many years of felling and planting to open up Hamilton's original views and restore Hamilton's original tree species which were so characteristic of the Alpine Valley. This will require the regular but infrequent use of large service vehicles to support restoration and management.</p> | |

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| Girlguiding Greater London West (GGLW) | | | | |
| 1.12.7 | Applicant & Girlguiding Greater London West | <p>a) Would the proposed access for the Heyswood Girl Guide Camp, including the location of the secure gate and fencing, provide an appropriately secure access for the camp site?</p> <p>b) If not, how could the access arrangements be amended to improve the security of the access to and from the camp site?</p> | <p>See response here: https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000466-Girlguiding%20Greater%20London%20West%20-%20Response%20to%20ExQ1%20and%20Comments%20on%20Written%20Representation.pdf</p> | <p>Please refer to Highways England's comments on the Written Representation from Girlguiding Greater London West. This can be found on pages 62 to 66 of REP2-014.</p> <p>In response to point 8 raised by GGLW in their response to ExAQ 1.12.7, Highways England provides the following response:</p> <p>8. (1) Utility companies will have a right of access along the PMA for maintenance. Maintenance access to the gantries on A3 between M25 junction 10 and Painshill junction will be accessed from the PMA. Maintenance vehicles will drive as far as the gas valve compound and continue on-foot along the verge to the base of the gantries, therefore not passing through the security gate at the boundary of Heyswood campsite. They will however pass through the first security gate of the PMA. Maintenance access proposals will be confirmed during detailed design.</p> <p>As stated in National Grid Deadline 1 Submission – Written Representation (REP1 – 015), maintenance access to Towers ZM022, ZM023, and ZM024 will be via the PMA. National Grid will require access through the security gates on occasions when maintenance is undertaken, this is expected to be infrequent.</p> <p>As the provision of screening and security measures in order to further screen and safeguard the Heyswood Campsite will be in place, Highways England do not consider maintenance access to compromise safeguarding.</p> |

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| Girlguiding Greater London West (GGLW) | | | | |
| | | | | 8. (2) Highways England are not promoting to extend the PMA to Painshill Park and the Gothic Tower therefore there will be no increase in traffic or people travelling along the PMA due to this. |

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