

Application by Highways England**M25 Junction 10 / A3 Wisley Interchange Improvement project****The Examining Authority's second written questions and requests for information (ExQ2)****Issued on 18 February 2020**

The following table sets out the Examining Authority's (ExA's) second written questions and requests for information – ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Annex B to the Rule 6 letter of 15 October 2019. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies. Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number which starts with a 2 (indicating that it is from ExQ2) and then has an issue number and a question number. For example, the first question on air quality and human health is identified as Q2.3.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team, please contact:

M25junction10@planninginspectorate.gov.uk and include 'M25Junction/ExQ2' in the subject line of your email.

Responses are due by Deadline 5: 3 March 2020

Abbreviations Used

AEOI	Adverse Effects on Integrity
ALC	Agricultural Land Classification
Art	Article
BoR	Book of Reference
CA	Compulsory Acquisition
CEMP	Construction Environmental Management Plan
CPRE	Campaign to Protect Rural England
CRoW	Countryside and Rights of Way
dDCO	Draft Development Consent Order
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EBC	Elmbridge Borough Council
EM	Explanatory Memorandum
ES	Environmental Statement
ExA	Examining Authority
GBC	Guildford Borough Council
GGLW	Girlguiding Greater London West
HE	Highways England
HistE	Historic England
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Public Interest
ISH	Issue Specific Hearing
ISH2	Issue Specific Hearing on transportation, environmental and socio-economic matters held on 15 and 16 January 2020
LAs	Local Authorities in whose areas the Proposed Development is located, i.e. Elmbridge Borough Council, Guildford Borough Council and Surrey County Council
LEMP	Landscape and Ecology Management and Monitoring Plan
LIR(s)	Local Impact Report(s)
NE	Natural England
NFU	National Farmers Union
NMU	Non-Motorised Users

NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OTMP	Outline Traffic Management Plan
PA2008	Planning Act 2008
Proposed Development	The NSIPs comprising the M25 junction 10/A3 Wisley interchange Scheme (TR010030)
PRoW	Public Right of Way
R	Requirement
RHS	Royal Horticultural Society
RR(s)	Relevant Representation(s)
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SCC	Surrey County Council
SIAA	Statement to inform an Appropriate Assessment
SoCG(s)	Statement(s) of Common Ground
SPA	Special Protection Area
SPA MMP	Special Protection Area Management and Monitoring Plan
SWT	Surrey Wildlife Trust
TA	The Applicant's submitted Transport Assessment
TP	Temporary Possession
WPIL	Wisley Property Investments Limited

Question to:		Question:
1.	General	
2.1.1	Applicant	<p>At ISH2 the ExA asked the following question of the Applicant further to the answers the Applicant had given to the ExA's first written questions 1.13.1 and 1.13.2 at page 101 of REP2-013:</p> <p style="text-align: center;"><i>If there was no NSIP scheme programmed within the Road Investment Strategy, would any additional lane running on the mainline of the M25 at J10 be introduced under the Do-minimum scenario, bearing in mind that in the recent past four lane running was to have been included in the Smart Motorway scheme for J10 to J16 (see paras 3.5.8 and 3.5.9 of the TA [APP-136])?</i></p> <p>The response to this question was that there would be some sort of works at junction 10 even if the M25 junction 10 and A3 scheme was not being promoted and that the junction 10 to junction 16 scheme would still include the junction 10 smart motorway running elements. As recorded in paragraph 3.1.9 of [REP3-009] it was further stated that '... the Applicant would discuss this with senior members of its team and reply in writing'.</p> <p>The reply given to the ExA at ISH2 to its question suggests that were there to be no submitted NSIP application some works at Junction 10 would be undertaken to provide additional traffic capacity and to respond to this junction's accident record. The ExA considers that the undertaking of any such works could have implications for the comparisons that have been made between the Do-minimum and Do-something scenarios referred to in the submitted TA [APP-136] and chapters of the ES.</p> <p>The Applicant is requested to give the written reply to the ExA's question it undertook to provide at ISH2. In doing that the Applicant should:</p>

Question to:		Question:
		<p>a) clarify what works would otherwise be undertaken at Junction 10 as part of the smart motorway scheme for Junctions 10 to 16 had the NSIP application for the Proposed Development not been submitted; and</p> <p>b) explain what the implications of undertaking those works would have for the Do-minimum and Do-something comparisons set out in the TA and any of the conclusions stated within the ES which are affected by traffic flows.</p>
2.1.2	Applicant	In regard to any potential impacts on air quality considerations or any other relevant issues, and further to your response to the EXA's first written question 1.4.5 [REP2-013], please comment on the Government's recently announced intention to bring forward the date from which the sale of petrol, diesel and hybrid cars are to be banned from 2040 to 2035.
2.	Principle and nature of the development, including need and alternatives	
2.2.1	Applicant	At Deadlines 1 and 2 in responding to the written representations that have been made by the RHS and the residents of Painshill, reference has been made to the current design standards no longer permitting direct accesses to dual 3-lane all-purpose roads and that '... it is implied that this is also not permitted for dual 4-lane all purpose roads ...' (for example as stated on page 139 of REP1-009). The use of the phrase 'implied' suggests that there may not be a specific set of design standards for dual 4-lane all purpose roads set out in the Design Manual for Roads and Bridges or any other highway design guidance. Please identify what design standard guidance has been used in formulating the design for the dual 4-lane sections of the A3 that form part of the Proposed Development. In replying to this question please submit the design guidance documentation that has been relied upon.
2.2.2	Applicant	Please respond to the contention made by Mr Eve in [REP3-067] that the Proposed Development would have an adverse effect on climate change as it would have the effect of increasing capacity for road users and thus would help to discourage more sustainable alternative forms of travel.

Question to:		Question:
3.	Air quality and human health	
2.3.1	Applicant	Provide explanation as to why the Secretary of State can be confident they have sufficient evidence relating to NO _x concentrations within the Thames Basin Heaths Special Protection Area (SPA) to be able to undertake an Appropriate Assessment for the purposes of the Habitats Regulations (in the event of being minded to grant a DCO for the Proposed Development).
2.3.2	Royal Horticultural Society (RHS) and Natural England (NE)	Please provide the relevant guidance or scientific rationale for the need to include, or not include, an assessment of Ammonia concentrations in the assessment of air quality effects on the SPA.
2.3.3	Applicant	With reference to your submission in REP3-009 please explain how doubling deposition rates is an appropriate way of estimating the effect of ammonia emissions. Please provide an explanation of how this estimation would affect the conclusions of the SIAA [APP-043].
2.3.4	RHS	What do you consider the NO _x concentrations in the SPA arising from the Proposed Development would be when assessed against the critical level of 30µg/m ³ ?
2.3.5	Applicant	Do you accept that if the Proposed Development was amended to incorporate the provision of south facing slips at the Ockham Park junction and the retention of a left turn exit from Wisley Lane that the amount of Carbon Dioxide emissions could be reduced by the order of 12% [paragraph 4.2 of REP1-041]? If not, then justify your reasoning.
2.3.6	Applicant and Local Authorities	Have the air quality implications of the Proposed Development for Ripley been robustly assessed within the ES, having particular regard to the number and suitability of receptor properties that have been used [paragraphs 5.3 and 5.4 of REP1/041] and the extent to which the Applicant's modelling has been verified and modified against the monitoring data that is available for Ripley?

Question to:		Question:
		With regard to the statement in REP2-022 that the largest change was assessed to occur at Receptor 6 but was classed as 'small', please explain the significance of this change in EIA terms and whether it affects the conclusions of the ES.
2.3.7	RHS	What do you consider would be the appropriate IAQM descriptors that should be applied to the modelled air quality effects of the Proposed Development upon human health within Ripley [paragraph 5.6 of REP1-041]?
2.3.8	Applicant	Having regard to the provisions of paragraph 5.13 of the NPS for National Networks does the Proposed Development have any potential for a 'zone/agglomeration' which is currently reported as being compliant with the Air Quality Directive becoming non-compliant
2.3.9	Elmbridge BC (EBC) and Applicant	At ISH2, Elmbridge BC offered to share further information derived from air quality modelling for its Local Plan with the Applicant. Please provide an update on any progress on this point.
2.3.10	EBC	Please provide more detail on your concerns about the potential effect on air quality: a) around the Painshill roundabout and at Cobham; and b) the Cobham, Esher High Street and Painshill Air Quality Management Areas. What evidence do you have to support your concerns, given the results of the air quality assessment in the Applicant's environmental statement?
4.	Biodiversity and Habitats Regulations Assessment	
2.4.1	Applicant	In your response to written representations [REP2-014, p88] you refer to the possibility of providing a culverted underpass under the Wisely Lane diversion to facilitate the passage of wildlife including for badgers and amphibians. Please can you provide an update on this,

Question to:		Question:
		including how a decision on this would be reached at the detailed design stage and whether or not this has been accounted for in the ES and any other relevant submitted documents?
2.4.2	Applicant and NE	Table 7.2.1 of the SPA Management and Monitoring Plan [AS-015, page 9] lists 'heathland (restored)'. Please clarify if this is referring to the enhancement areas E1, E2, E3, E5 and E6 that are to be converted from mixed woodland to heathland?
2.4.3	LAs, NE and Royal Society for the Protection of Birds (RSPB)	Are you content with the Species Monitoring Programme that is set out in Table 7.11.1 of the SPA Management and Monitoring Plan [AS-015]?
2.4.4	Applicant	Further to your response to written representations [REP2-014, page 56] please provide an update on progress on the agreement that is being sought between yourselves and SCC and SWT under which SWT would undertake the necessary measures in regard to the SPA compensation land and SPA enhancement areas.
2.4.5	Applicant	Further to your response in [REP3-007] please indicate how you are going to ensure that all the proposed long-term management and monitoring is adequately funded. Please confirm how this would apply to the other green measures and environmental elements, not just those that are Habitats Regulations related (as per the LIR [REP2-047]).
2.4.6	NE	Please provide into the Examination full copies (not hyperlinks) of the citation, the conservation objectives and the conservation objectives supplementary advice for the Thames Basin Heaths SPA.
2.4.7	NE and Surrey County Council (SCC)/Surrey Wildlife Trust (SWT)	Please comment on the matters raised by the RHS in its and the Baker Consultants submissions [REP1-043 and REP3-044] in regard to the potential air quality impacts of the Proposed Development on the Thames Basin Heaths SPA. In particular please comment on whether in your view:

Question to:		Question:
		<p>a) the consideration of alternatives has been fully and properly addressed by the Applicant as required by the Habitats Regulations;</p> <p>b) the Applicant has adequately modelled the nitrogen deposition levels for both the scheme alone and in-combination with other plans and projects (having regard to the Applicant's comments on responses to the ExA's FWQ 1.4.3 in [REP3-008]);</p> <p>c) ammonia should be included in the assessment of nitrogen deposition;</p> <p>d) in contending that the nitrogen deposition would only affect the woodland buffer element of the SPA and not areas of heathland the Applicant has correctly applied the tests required in the Habitats Regulations and Birds Directive. Is restoring the woodland buffer to heathland necessary to achieve or maintain the SPA in favourable conservation status? If so, how have you accounted for the future impacts of nitrogen deposition on areas within the SPA that would become heathland rather than woodland, or would become any other habitat that would be of importance for any of the bird species for which the SPA has been designated?</p>
2.4.8	RHS	If the Proposed Development was to be implemented what do you calculate would be the Nitrogen deposition rates within the SPA for 'short vegetation' and 'forest'?
2.4.9	Applicant	Given the statutory duty to be discharged under the provisions of the Habitats Regulations is it appropriate for possible alternative scheme options to be discounted on costs grounds notwithstanding the scheme funding allocation included within the Road Investment Strategy, as referred to in various places in the Habitats Regulations Assessment Stage 3-5: Assessment of alternatives, consideration of imperative reasons of overriding public interest (IROPI) and compensatory measures [APP-044]?
2.4.10	Applicant	Further to your response to the RSPB's written representations in [REP2-014] please comment on the RSPB's comments [REP1-035 and REP3-060] that the derogation tests

Question to:		Question:
		must be applied sequentially and that compensatory measures cannot be used as a justification for the scheme.
2.4.11	Applicant	Please set out what, if any, weight has been given to the proposed Replacement Land in terms of providing biodiversity mitigation and/or enhancement. The ExA notes in the 'Applicant's comments on the RSPB's deadline 3 submission' [REP4-007] you indicate that the replacement land is a compensatory measure. If a lesser area of Replacement Land was provided then what effect would this have on the biodiversity considerations contained within the ES.
2.4.12	Applicant	In your response to written representations [REP2-014] you state that the Proposed Scheme " <i>may increase recreational activity in the wooded fringes of the SPA and along a track already well used but will not facilitate increased public accessibility into the open heathland parts of the SPA.</i> " You provide additional clarification of this in [REP4-007]. However, please explain why increased provision for non-motorised users would not have an increased potential for increased recreational access to other parts of the SPA beyond the wooded fringes and provide a plan to indicate where the location of the public access point(s) in or adjacent to the wooded fringes of the SPA would be.
5.	Construction	
2.5.1	Applicant	The Streets, rights of way and access plans [APP-008] depicts permissive path BW 544 running through the eastern part of the proposed construction compound on the former Wisley Airfield. Please clarify whether and how you would keep this path open during construction operations, and if not, then explain what alternative measures you intend to put in place.
2.5.2	Applicant	Please provide illustrative layout plans for each of your proposed construction compounds, to include an explanation of the full range of activities that would take place at each of these compounds.

Question to:		Question:
		<p>With respect to the proposed construction compound at the former Wisley Airfield please justify your reasoning for its exact location within the overall former Wisley airfield site and advise:</p> <ul style="list-style-type: none"> a) Precisely where it is expected topsoil and other materials would be stockpiled within the compound? b) What the expected duration would be for the placing of topsoil and other materials within the stockpile? c) How long it is expected that it would take to remove the stockpiled topsoil and other materials from the compound? <p>What measures would be used to mitigate for the potential generation of noise and dust in order to safeguard the living conditions of the residents of Elm Corner? Please confirm how all of these matters would be secured in the dDCO.</p>
2.5.3	Applicant	Assuming the potential for there to be some overlap between the construction phases for the Proposed Development and the redevelopment of the Wisley Airfield, have your submitted ES and TA fully assessed the cumulative and/or in-combination effects for traffic, air quality, habitats and protected species and noise.
6.	Flood risk, drainage and water management	
2.6.1	Environment Agency (EA)	In paragraph 1.1.1 of Appendix B of your [REP3-026] submission you refer to section 6 of Appendix A of that response. However, section 6 of Appendix A of your written representations [REP3-026] would appear to be missing. Therefore, please provide this and any other missing sections of Appendix A.
2.6.2	Applicant	Please comment on the EA being unwilling to agree under the terms of the DCO to the disapplication of the need to apply to the EA for Water Impoundment Licences under the

Question to:		Question:
		Water Resources Act 1991 [see Appendix A of REP3-026], and the EA's updated position on this matter as detailed in paragraph 1.4 of [REP4-047]?
7.	Historic environment	
2.7.1	Applicant	Figure 3 of the Appendix 11.2 Archaeological Desk Based Assessment [APP-122] and also para 1.2 indicates the SAM comprising the late Roman bath houses at Chatley Farm (1005923) as being located within the Site Boundary for the Proposed Development. This is indicated as being adjacent to the River Mole. However, this would appear to be some distance outside the red line boundary for Proposed Development as indicated on the Scheme Layout Plan submitted at D1 [REP1-007] and the Works Plans [APP-007]. Please can you confirm whether or not the Chatley Farm SAM lies within the scheme boundary?
2.7.2	Applicant	Please indicate which parts of the Grade II listed building Westwood House East and West Lodge (1191810) lie within the Scheme red line boundary?
2.7.3	Applicant	The Heritage Gazetteer [APP-121] refers to the Grade I listed Church of St Mary the Virgin (1378241). Please confirm that this is the Grade I listed building referred to in paragraph 11.7.11 of ES Chapter 11 [APP-056] and please confirm whether it is located in Church Rd, Byfleet and whether or not it lies within the 500m Study Area buffer
2.7.4	LAs and Historic England (HistE)	In Table 11.5 of Chapter 11 of the ES [APP-056] the Applicant finds that there would be a 'Slight Adverse' residual effect for seven designated heritage assets. At ISH2 the Applicant confirmed that in terms of paragraphs 5.131 to 5.134 of the National Policy Statement on National Networks 'Slight Adverse' would equate to these residual effects as giving rise to 'substantial' or 'less than substantial harm'. Please comment on this?
2.7.5	LAs, HistE and Painshill Park Trust	At ISH2 [EV-005a to EV-005d] the Applicant stated that the proposed access road for the gas compound, Heyswood camp site and Court Close Farm that runs through part of Painshill Park would not be in an area that contributes to the significance of the Park and therefore the proposed route would not affect its significance. Please comment on this.

Question to:		Question:
2.7.6	Applicant	Please set out your timescales for the submission to SCC of an Archaeological Written Scheme of Investigation (WSI) and for the delivery of the approved WSI, and justify your reasoning.
2.7.7	SCC and HistE	Are you satisfied with the timescales for delivery of the Archaeology WSI and that this is adequately secured in R14 of the dDCO [REP2-002], and also that the specific details of this would only be required under R14 rather than having an Outline WSI provided in advance?
8.	Landscape and Visual Impact	
2.8.1	Applicant and LAs	In RHS Wisley's RR [RR-024] and in [REP4-049] reference is made to the possible loss of redwood trees close to the boundary due to tree root impact and this issue not yet being resolved. Please comment on the current situation in regard to your assessment of this as in [REP2-014, page 85] you refer to tree root surveys " <i>still being analysed</i> ".
2.8.2	Applicant	Please provide into the Examination a full copy of the 'Targeted non-statutory consultation' document, an extract of which is provided in Appendix E of [REP4-040].
2.8.3	LAs	Please comment on the response made in the 'Applicant's comments on Joint Local Impact Report' [REP3-007] in regard to concerns you had raised about the absence from the methodology of a Zone of Theoretical Visibility, and also and absence of photomontages of the Proposed Development.
2.8.4	Applicant	Please provide into the Examination a copy of the guidance in DMRB Vol 11 Section 3 Part 5 'Landscape Effects' that is referred to in your response to the ExA's First Written Questions [REP2-013].
2.8.5	Applicant	Have the effects on local residents of operational lighting been adequately assessed? Please include reference to where this information is provided.
9.	Land use, recreation and non-motorised users	

Question to:		Question:
2.9.1	Applicant	Further to your response in [REP3-007] please respond specifically to the comments in paragraph 4.9.3 of the LIR [REP2-047] regarding the need for the NMU route to incorporate a split provision for cyclists and equestrian users. Please also clarify when construction details would be provided to SCC for consultation.
2.9.2	Applicant	REP1-009 states that Ockham Village Green is a low sensitivity receptor. Could you explain why the village green has been classed as being of low sensitivity?
2.9.3	Applicant	The ExA notes your response to question 1.1.16 in [REP2-013]. However, Chapter 13 of the ES [APP-058] refers to the assessment of magnitude being based on a bespoke set of criteria which have been used to assign a level of significance to effects arising from the impacts to community land and facilities. What are these criteria?
10.	Noise, vibration, dust and lighting	
2.10.1	Applicant	Please explain the rationale for retaining a concrete surface on the mainline carriageway through Junction 10 rather than replacing that surface with a quieter road surfacing material.
2.10.2	Applicant	Please clarify whether you intend to use acoustic fencing along any sections of the proposed construction compounds. If not, then justify your reasoning as to why such fencing should not be provided.
2.10.3	Applicant	With reference to your response to FWQ 1.10.2 [REP2-013] and the surfacing plan contained within [REP2-017] please confirm that this is the surfacing design on which the noise assessment in the ES has been based.
11.	Pollution, contaminated land, geology and ground conditions	
		<i>The ExA has no questions regarding Pollution, contaminated land, geology and ground conditions at this stage.</i>

Question to:		Question:
12.	Socio-Economic impacts	
2.12.1	Painshill Park Trust and LAs	Please comment on Painshill Park's expansion plans in terms of hosting events and increasing visitor numbers, and in particular, any concerns that the lack of a western access may jeopardise these plans, having regard to the comments made by Surrey Fire and Rescue Service that are cited in [REP3-063]. What is the likelihood of licences for certain large-scale events being refused due to concerns over the lack of adequate access alternatives in the event of an emergency?
2.12.2	Painshill Park Trust	Please comment on the likelihood of any future agreement being reached with the relevant landowner(s) that would allow for the provision of a 'western access' into Painshill Park and set out how you consider this could be funded.
2.12.3	Painshill Park Trust	Further to the ExA's question at ISH2 for the purposes of the Building Regulations what is the current recognised use for all of the floors of the Gothic Tower?
2.12.4	Wisley Property Investments Limited (WPIL) and Guildford Borough Council (GBC)	Given that to date there is no extant planning application concerning the airfield's redevelopment before GBC for determination, how realistic is the proposition that works associated with the airfield's redevelopment would commence in 2022, with first occupations in 2022/23 [Table 2.1 of REP1-048]?
2.12.5	Applicant and WPIL	What degree of overlap is there likely to be between the construction phases for the Proposed Development and the airfield's potential redevelopment were the former to be consented and the latter was to be granted planning permission?
2.12.6	GBC	When is it expected that the Wisley Airfield Garden Village bid will be determined by the Government?

Question to:		Question:
2.12.7	Girlguiding Greater London West (GGLW)	In the event that the Proposed Development was to be consented and implemented without being amended to incorporate a private means of access following your preferred alignment, what operational changes do you consider would you need to make to facilitate the operation of the Heyswood campsite?
2.12.8	Applicant, GGLW and the owner of Court Close Farm	<p>a) Further to the meeting that took place between the Applicant, GGLW and the owner of Court Close Farm on 6 February 2020 to discuss an 'alternative solution' for access to the Heyswood campsite and Court Close Farm [paragraph 2.2.1 of REP4-010], please provide an update on how discussions have progressed since the 6 February meeting.</p> <p>b) For the Applicant – Should an alternative solution be agreed upon between yourself and the GGLW and the owner of Court Close Farm, how do you consider any such alternative solution might be progressed within the time remaining for the examination of this NSIP application? In replying to this question please advise if a change were to be made to the submitted application, whether this could be progressed without the CA Regulations being engaged.</p>
2.12.9	Applicant, Monte Blackburn/Euro Garages, EBC and SCC	Having regard to the proposed access for the San Domenico site, what forms of development would be suitable for this site in the event of the Proposed Development being consented, implemented and then being returned by the Applicant to the owner for re-use?
2.12.10	RHS	Would the projected annual reduction in visitor numbers of 6.5% (paragraph 3.10 of the note prepared by Hatch Regeneris [REP1-039]) that has been attributed to the implementation of the Proposed Development be within the range of the annual variations in visitor numbers that have historically arisen at the gardens?
2.12.11	RHS and Applicant	For the purposes of drawing conclusions from the attitudinal survey undertaken on the RHS's behalf, is it statistically legitimate to treat the 293 completed questionnaires as though they represent responses from 645 individuals [paragraph 1.15 of REP1-039]?

Question to:		Question:
2.12.12	RHS and Applicant	<p>Please comment on the following questions asked in the attitudinal survey [Appendix A within the note prepared by Hatch Regeneris [REP1-039] in terms of exhibiting any statistical bias and/or ambiguity:</p> <p>a) Question 4 – could this question be subject to statistical bias as there is no neutral type response, ‘reasonable’, ‘ok’, with ‘unsure’ not be comparable with reasonable or ok?</p> <p>b) Question 5</p> <p>i. Does this question have any real meaning as it requires respondents to be aware, as a matter of course, of the duration and/or length of the trips that they ordinarily make in travelling ‘to’ RHS Wisley?</p> <p>ii. Given the reference to ‘journey to RHS Wisley’ will respondents have appreciated that possible additions of an ‘extra 10 minutes and five miles’ to their journeys would relate to the duration/length of round trips and not just to the journey to the gardens, as could be implied by the sole reference ‘to’? Could the absence of a reference to ‘from’ as well as ‘to’ affect the weight that should be attached to the responses to this question?</p> <p>c) Question 6 – could the format for this question be subject to any statistical bias with the neutral type answer being worded ‘unsure’ rather than something like ‘no effect’?</p> <p>d) Question 7 – what weight can be attached to the responses made to this question, given that respondents would have needed to undertake a calculation to determine any percentage reduction in visits made by them rather than expressing a reduction in the number of visits made as a simple whole number, ie 1, 2, 3, 4 etc?</p> <p>e) Question 8 – is the wording of this question meaningful, given that the predicted increase of ‘12 million additional vehicle miles’ travelled is not set within the context</p>

Question to:		Question:
		of either a specified time period or the overall number of vehicle miles travelled by visitors to RHS Wisley during whatever the relevant time period is for the purposes of answering this question?
2.12.13	Applicant and RHS	<p>With respect to the potential for there to be a lengthening of travel distances and times for visitors journeying to and from RHS Wisley:</p> <p>a) When making travel route planning decisions and/or decisions about whether to make a journey or not, is equal weight applied to the time taken and the distance travelled or is greater weight given to one of these factors compared to the other? If unequal weight is attributed to the time taken or the distance travelled please identify the proportion of weight that is applied to each factor and explain why that is the case.</p> <p>b) In paragraph 3.52 of the Motion Transport Assessment of May 2016 prepared for the RHS [REP2-040] the average duration of the visitor stay at RHS Wisley is identified as being between 3 and 4 hours. Given that average duration of stay, how significant would a predicted travel time increase of up to 10 minutes be to visitors making a round trip with an origin to the south of RHS Wisley when they were making decisions as to whether or not to visit these gardens?</p> <p>c) Has the RHS' attitudinal survey and the subsequent evaluation of its results adequately evaluated the relative significance of the duration of stays at RHS Wisley relative to the increase in journey times predicted to arise were the Proposed Development to be consented and implemented?</p>
2.12.14	RHS	With respect to the estimation of the behavioural changes amongst visitors of RHS Wisley that have been attributed to the implementation of the Proposed Development [Section 3 of REP1-039], please explain the statistical basis for arriving at the 'factors' that have been applied to the degree of 'frustration' that respondents have identified in responding to Question 5 of the attitudinal survey.

Question to:		Question:
13.	Traffic, transport and road safety	
2.13.1	WPIL	Does Figure 2.3 on page 6 of your responses to the ExA's FWQs [REP2-052] continue to be your best estimate of the distribution of the traffic that would exit or enter an airfield redevelopment scheme via either Old Lane or the Ockham Park junction?
2.13.2	WPIL and SCC	Of the proportion of the traffic exiting or entering any redevelopment of Wisley Airfield (pursuant to Local Plan allocation A35) via the Ockham Park junction, please provide a projection for the traffic expected to route via the B2215/High Street Ripley, having regard to the trip distribution shown in Figure 2.2 on page 5 of REP2-052.
2.13.3	Applicant, SCC and WPIL	<p>The ExA notes that currently the Applicant is '... encouraging the promoter of the Burnt Common slips to progress their assessments so that the feasibility of the north-facing slips can be demonstrated ...' (item 2.8.1 on page 25 of the draft SoCG between the Applicant and SCC [REP3-012]):</p> <p>a) When is it expected that the above-mentioned assessment will be completed by the promoter for the Burnt Common slips?</p> <p>b) If the completion of the above-mentioned assessment is to post-date the closure of the Examination for this NSIP application or the assessment concludes that the provision of the Burnt Common slips would be unfeasible, please comment on the implications that might have for the ability of the B2215 to accommodate the traffic it is predicted to receive as a consequence of the Proposed Development were it to be consented and implemented.</p>
2.13.4	SCC	Given the Strategic Highways Report for the Guildford Local Plan of June 2016 [REP3-038] predates the 'RHS growth proposals' and is based on the operation of Wisley Lane without the proposed diversion of that road [section 1.4 of REP3-036], do the findings/conclusions with respect to the introduction of north facing slips at the Burnt Common junction continue

Question to:		Question:
		to remain valid in terms of any reduction in traffic flows on the B2215 through Ripley in the event that the Proposed Development was to be consented and implemented?
2.13.5	SCC	In the LIR [REP2-047] and REP3-036 you have referred to the volume of additional traffic arising from the implementation of the investment programme at RHS Wisley being in excess of that which is expected to necessitate the installation of the north facing slips at the Burnt Common junction, ie the occupation of the thousandth dwelling at Wisley Airfield. As the bulk of the traffic generated by RHS Wisley arises during the inter-peak period rather than during the AM and/or PM peak periods and it appears that it is during the peak hours that mitigation for traffic associated with the airfield's redevelopment would be most required, is it appropriate to make a comparison between the need to mitigate the effects of the airfield's traffic and that arising from visitor growth at RHS Wisley?
2.13.6	Applicant and SCC	With respect to future projections of traffic using Old Lane, at paragraph 8.1.9 of REP2-011 reference is made to the DMRB (TD 46/97) indicating that 'new rural single carriageway roads' are suitable for carrying annual average daily traffic (AADT) flows of up to 13,000 vehicles at the opening year. As Old Lane is an existing (rather than new) rural road, which would be subject some modification under the Proposed Development, is an AADT flow of 13,000 vehicles an appropriate standard against which to assess the capacity of Old Lane to accommodate future flows of traffic were the Proposed Development to be consented and implemented?
2.13.7	Applicant	For the inter-peak period please provide traffic flow comparisons for the Core Scenario Do-something versus Do-minimum, in tabulated and drawn forms, similar to those shown for the AM and PM peaks in Tables 4-6 and 4-7 and Figures 4-6 and 4-7 set out in 'Traffic Forecasting Report' [REP1-010].
2.13.8	Applicant	With respect to the predictions for RHS Wisley traffic routing via Ripley, please clarify why in the AM peak period some traffic is shown to be heading in a westerly direction (ie away from the Gardens) under the Do-something scenarios for 2022 and 2037, as depicted in Figures 2.4 and 2.12 in REP2-011, given that predicted traffic would appear to be arising

Question to:		Question:
		prior to the Gardens being open to visitors and at a time when staff might be expected to be arriving at work rather than departing from it.
2.13.9	Applicant	Had you been consulted by GBC when it was considering planning applications 16/P/00976 and 16/P/01080 concerning the investment programme for RHS Wisley [see REP3-030 and REP3-031], and having regard to the RHS's Slip Road Merge/Diverge Analysis set out in the Transport Assessment of May 2016 identifying the need for the provision of a fourth lane on the A3 within the vicinity of Wisley Lane [paragraph 7.13 onwards of REP2-040], would you have recommended that GBC secure any mitigation for the effects of the predicted additional visitor traffic on the operation of the strategic highway network. If so, what form might any such recommended mitigation have taken?
2.13.10	Applicant and RHS	Given the assessment of the side road options, which includes 'the RHS Alternative' under the headings of 'WIS12+WIS-10+OCK04' (section 2.2.5), 'Ockham south facing slip roads' (section 4.2), 'Ockham Interchange: South-Facing Slip Roads' (section 5.3.3) and 'Amendments to WIS12' (section 6.1.2) in the Applicant's 'Scheme Assessment Report Side Roads Addendum of November 2017 [REP3-017], a document which was contemporaneous with the making of the Preferred Route Announcement in November 2017, is it reasonable or unreasonable to say that the alternative access arrangements for RHS Wisley promoted by the RHS is an 'option' that was or was not assessed prior to the submission of the application for the Proposed Development?
2.13.11	Applicant, SCC and RHS	Notwithstanding that SCC would not wish to promote the use of a vehicular route from RHS Wisley via Wisley Airfield and Old Lane onto the A3, as stated at Issue Specific Hearing 2 and in REP3-036, given that allocation A35 of the Guildford Local Plan 2019 requires a through route to be available between the Ockham Park junction and Old Lane, what proportion of the southbound vehicular traffic exiting RHS Wisley might route via the airfield as an alternative to either making a U-turning manoeuvre at J10 of the M25 or routing via Ripley (the B2215)?

Question to:		Question:
2.13.12	Applicant	Under the Proposed Development what proportion of the anticipated additional capacity within J10 of the M25 would be absorbed by U-turning vehicles routing to or from RHS Wisley?
2.13.13	Applicant	<p>Please provide:</p> <ul style="list-style-type: none"> a) a definition for 'weaving' from the DMRB or any other relevant published highway design guidance. In answering this question please provide an extract or extracts from the DMRB or any other relevant design guidance. b) an explanation for what is meant by 'D3+' and 'D2' when reference is being made to COBALT accident rates on page 28 of [REP4-005]. c) an explanation for the phrase 'late swooping' referred to on page 29 of [REP4-005].
2.13.14	Applicant and RHS	The RHS in its written submissions concerning the retention of a left turn from Wisley Lane and weaving distances, for example in REP1-044, has referred to DMRB document CD122 (Geometric Design of Grade Separated Junctions) as containing relevant design standards. Under the RHS alternative would a left turn from Wisley Lane be a grade separated junction or an at grade junction with the A3, and is CD122 therefore the relevant design guidance?
2.13.15	Applicant, SCC and RHS	Where there is a junction between a multi lane dual carriageway and a side road how does the number of lanes on the dual carriageway affect the propensity for weaving to take place? The answer to this question should be given in general terms and should therefore disregard any local circumstances relating to the Proposed Development.
2.13.16	Applicant	On pages 28 and 29 of REP4-005 as part of the collision assessment that has been undertaken reference is made to 20 personal injury collisions having occurred between 1 December 2013 and 30 November 2018. With respect to the data for those 20 collisions please plot on a plan where each of those collisions occurred, identifying each collision with

Question to:		Question:
		some form of identifying reference number and provide written summaries setting out the details for each of those incidents.
2.13.17	Applicant	On the day of the Accompanied Site Inspection (14 January 2020) while the visits to RHS Wisley and Elm Lane/the Former Wisley Airfield were taking place there was an incident on the M25 that was causing vehicles seeking to exit the A3 to tail back on the A3 northbound to its junction with Wisley Lane. Please provide details of the incident that was causing the tail back, ie what the incident involved, where the incident was, when it commenced and when it ended.
2.13.18	Applicant and RHS	<p>With respect to the RHS alternative scheme [REP1-044] if a left turn from Wisley Lane onto the A3 was to be retained:</p> <ul style="list-style-type: none"> a) Would the available 'LAct' weaving length meet the extant published DMRB standard or would there need to be a departure from the standard for an improved left turn junction to be provided? For the Applicant – in responding to this question please provide any relevant extracts from the DMRB? b) Are weaving lengths affected by the speed limit applying to an all-purpose dual carriageway? c) With respect to the consideration of the potential for weaving to occur and whether the provision of a side road access would or would not be safe, what significance is to be placed on the time of day, ie during peak or inter-peak hours, when the majority of the weaving may arise? d) With respect to traffic departing from RHS Wisely, is the RHS's proposition that the majority of traffic performing a weaving manoeuvre would be off peak [page 2 of REP3-043] applicable to event days given that in Table 5.8 of the Motion TA [REP2-040] 36% of traffic is shown departing the gardens between 16.00 and 19.00 hours?

Question to:		Question:
		e) For the Applicant - If a departure from standard was necessary, please explain the process for obtaining such a departure and the likelihood of such a departure being granted.
2.13.19	Applicant and RHS	Should the 'RHS Alternative Scheme' be described as an option or a variant of Option 14 (the Applicant's preferred scheme), given that it appears that it is only the proposed Wisley Lane diversion together with the absence of south facing slips at the Ockham Park junction that the RHS has an objection to?
2.13.20	Applicant and RHS	With respect to the potential for road traffic accidents to arise, comparing: a) travelling further and making a U-turning manoeuvre at Junction 10 and b) weaving associated with the use of a retained left turn from Wisley Lane which of scenarios a) or b) might be expected to give rise to the greater number of accidents and why?
2.13.21	Applicant and SCC	Given the predicted traffic flows through Ripley associated with the Proposed Development, as set out in REP1-010, what implications might there be for the accident rate for the B2215 through Ripley?
2.13.22	Applicant	On the approach to the Ockham Park junction via the proposed Wisley Lane diversion what directional signage would be available to drivers travelling in the direction of Guildford or further south and using the A3 corridor?
2.13.23	RHS	a) Please explain how the projected increases in visitor numbers referred to in Table 1 in the note prepared by Hatch Regeneris [REP1-039] have been calculated, as it appears that for each year after 2018 a figure of the order of 70,500 has simply been added year on year between 2018 to 2024.

Question to:		Question:
		<p>b) In calculating anticipated visitor growth should any allowance be made for the potential for a busier/more crowded attraction acting as a deterrent to visitors? If so what allowance for that has been included in the projections for visitor growth referred to in REP1-039?</p> <p>c) What allowance has been made for increases in road traffic and possible delays, and therefore potential deterrence to people visiting RHS Wisley, in the absence of the Proposed Development?</p>
2.13.24	RHS	Table 3 in REP1-039 and Appendix M in REP1-044 identify the estimated 'southerly' entry to/exit from RHS Wisley as being of the order of 37% of visitors. However, in Figure 7.1 of the TA of May 2016 prepared by Motion [REP2-040] the distribution of the southerly exit from RHS Wisley for the PM peak hour on Wednesdays is identified as being 23%, with a further 4% of vehicles each turning into Portsmouth Road or Mill Lane and Ockham Road (North) at the Ockham Park roundabout. Why is there a difference in visitor distributions referred to in REP1-039 and REP2-040?
2.13.25	RHS	<p>With respect to the estimates of future growth in visitor numbers stated in the note prepared by Hatch Regeneris [REP1-039], which culminate in a figure of 1,494,000 visitors in 2024 and the implications that the implementation of the Proposed Development might have on visitor numbers:</p> <p>a) what assumptions have been made about the geographical distribution for the additional visitors that are expected to visit RHS Wisely, ie an even distribution across the established catchment area for the Gardens or weighting for some locations within the catchment area?</p> <p>b) how robust are those assumptions?</p>
2.13.26	Applicant and RHS	Given the projected growth in visitor numbers at RHS Wisley, what would be the anticipated driver delay and economic impact upon the Garden's operation in the absence of any

Question to:		Question:
		changes to M25 J10 and the A3 between the Ockham Park junction and the Painshill junction.
2.13.27	Applicant and RHS	In terms of any effects on visitor numbers at RHS Wisley during the construction period for the Proposed Development, is it appropriate to use the reductions in visitors numbers that have arisen while on-site works have been undertaken at the gardens as a sensitivity measure for any 'extended impacts' that there might be on visitors numbers were the Proposed Development to be consented and implemented, as referred to in paragraph 3.14 of REP1-039?
2.13.28	Applicant	Does the first paragraph in the response to the first written question 1.13.15 [page 111 of REP2-013] state what you intended to say, given that reference is being made to RHS Wisley traffic U-turning at J10 and making use of Old Lane?
2.13.29	Applicant, SCC, WPIL and RHS	<p>In submitting your respective updated SoCG at Deadline 5 (D5) please ensure that the following matters are addressed in those SoCGs:</p> <ul style="list-style-type: none"> a) Confirmation as to whether the base year (2015) traffic flows identified by the Applicant in the submitted application documentation for the B2215 (Portsmouth Road/Ripley High Street), Newark Lane and Rose Lane are or are not agreed. b) Assuming the Proposed Development were to be consented and implemented, confirmation as to whether the predicted AM peak, Inter-peak and PM peak hour traffic flows for the Do-minimum and Do-something scenarios in 2022 and 2037 identified by the Applicant in the submitted application documentation are or are not agreed. c) Confirmation as to whether any of the B2215's links between its junctions with the A3 and A247 and the B2215's junctions with Newark Lane and Rose Lane are or are not currently operating at capacity.

Question to:		Question:
		<p>d) For any link or junction referred to in c) above for which it is predicted that the capacity will be exceeded in the future (ie post-dating the operation of the Proposed Development should it receive consent), please provide an indication when it is expected the capacity of the link or junction would be exceeded and what the reason for the capacity exceedance would be.</p> <p>You are reminded in addressing the above listed matters in the SoCG that for any matter that is not agreed a full explanation for why there is disagreement shall be provided.</p>
2.13.30	Applicant and SCC	<p>With respect to the proposed alterations to Elm Lane at its junction with Old Lane:</p> <p>a) What would be the relevant visibility splay requirement for this junction for speed limits of 30 mph or 40 mph?</p> <p>b) Allowing for any tree removal that might be necessary, the geometry of Old Lane in the vicinity of its junction with Elm Lane and the extent of the land subject to the originally submitted application for the Proposed Development, ie land within the red line area appertaining to land plots 24/4 and 24/4a shown on sheet 24 of AS-002, what visibility splays could be provided on either side of Elm Lane’s junction with Old Lane?</p> <p>c) Drawing HE551522-ATK-HGN-XX-SK-CH-000036 within Appendix A of REP4-006 shows visibility splays drawn to accord with DMRB CD109 and CD123 standards inclusive of some vegetation clearance. To achieve the DMRB standards would the required vegetation clearance shown on drawing HE551522-ATK-HGN-XX-SK-CH-000036 be within or extend beyond the red line areas for land plots 24/4 and 24/4a shown on sheet 24 of AS-002?</p> <p>d) If visibility splays of the relevant standard would be unachievable within the extent of land plots 24/4 and 24/4a, what measures would need to be implemented to ensure</p>

Question to:		Question:
		that drivers emerging from Elm Lane or approaching this junction would be provided with adequate levels of forward visibility?
2.13.31	Applicant	Please set out your current position regarding the payment of commuted sums for the long-term maintenance burden that SCC considers would be placed on its resources as a result of the Proposed Development.
2.13.32	Applicant	Please provide an update on the discussions regarding provisions for the resurfacing of Seven Hills Road (south) that is referenced in the SoCGs with SCC [REP3-012] and EBC [REP3-010].
2.13.33	Applicant and SCC	Reference Number 1.5.1 of your most recent SoCG [REP3-012] indicates that a position statement on the legally binding side agreement as regards highways matters will be provided at Deadline 5. At a minimum please ensure that the position statement for the side agreement includes the heads of terms for the matters to be covered in the agreement. Please confirm that the aforementioned side agreement will be executed prior to the close of the Examination and if not then explain what alternative measures will be undertaken.
2.13.34	SCC	Has the information contained in the TA Supplementary Information Report [REP2-011] addressed the modelling output questions relating to the operation of the Local Road Network listed in para 7.1.1 of the Local Impact Report [REP2-047] and referred to in other written submissions that you have made? If not please advise what additional information you consider should be provided to address the modelling output concerns referred to in the Local Impact Report?
2.13.35	SCC	Having regard to what has been said about bus stop provision at the Ockham Park junction and RHS Wisley in the Local Impact Report [paragraph 7.6.6 of REP2-047], please explain why there would be a need to provide pedestrian access to RHS Wisley from the Ockham Park junction bus stop to walk to and from RHS Wisley, given the proposed installation of the turnaround at the RHS Wisley?

Question to:		Question:
14.	Waste management	
		<i>The ExA has no questions on Waste management at this stage.</i>
15.	Content of the draft Development Consent Order (dDCO)	
2.15.1	Applicant	<p>In regard to the 'Other relevant works' that refer to 'further development within the Order limits' as listed from (a) to (q) on pages 51 and 52 of the dDCO [REP2-002] please clarify the following:</p> <ul style="list-style-type: none"> • Please justify why some or all of these are not contained within the Works that are specifically listed in Schedule 1 of the dDCO; • Explain the differences between these 'Other relevant works' and those that are specifically listed in Work No. 1 to Work No. 65. For example, Work No. 53 lists seven ordinary watercourse diversions, but (j) also refers to 'works to alter the course of, or otherwise interfere with a watercourse, including private water supplies.'; • Explain whether/how these 'Other relevant works' are accounted for on the plans you have submitted, for example the Works Plans; • Please confirm whether or not all the potential effects of all the other relevant works that are described in (a) to (q) (for example means of access, tree felling, new and replacement highway lighting) have been assessed in the Environmental Statement and in the Habitats Regulations Assessment; • Explain how these 'other relevant works' would be covered within the wording of the Requirements of the dDCO, for example, are these matters specifically covered in the Outline CEMP, LEMP and SPA MMP?
2.15.2	Applicant	Please justify why the site compounds/construction compounds have not been allocated specific Works numbers on the Works Plans [APP-007] and are not specifically defined in either Part 1(2) 'Interpretation' or Schedule 2 Part 1(1) 'Interpretation' of the dDCO [REP2-002].

Question to:		Question:
2.15.3	Applicant	Having regard to National Grid Electricity Transmission PLC (NGET) written representation [REP1-015] would there be adequate protective provisions for NGET Tower ZM023 given that part of its foundations potentially fall within land outside the dDCO's limits?
2.15.4	Applicant	Further to your response to the ExA's first written question 1.4.8 [REP2-013] please provide a specific reference to the SPA Management and Monitoring Plan in Requirement 8 of the dDCO, or justify why this is not required.
2.15.5	LAs, NE, RSPB, SWT, EA	Further to the Applicant's response to the ExA's first written question 1.15.1 [REP2-013], the revised dDCO [REP2-002] has removed some activities from those not encompassed within the definition of commence. Nevertheless, a number of activities such as site clearance and the receipt and erection of construction plant and equipment remain outside the definition of commence. As such, these activities could take place outside the controls of the approved CEMP and the various management plans and method statements required by the CEMP. Please comment on this and indicate which, if any, activities that are currently excluded from the definition of 'commence' you consider should be included.
2.15.6	Applicant	Work No. 35(b) of the dDCO [REP2-002] defines the parameters of the replacement Cockcrow bridleway overbridge as "...comprising a two-span structure approximately 68 metres in length and incorporating a 10 metres wide soft verge wildlife crossing, as shown on Sheet 4 of the Works Plans". However, you state that any proposed green corridor element for the Cockcrow bridge is not yet guaranteed as it would be subject to a bid for additional funding [footnote 14 of APP-052]. Consequently, please indicate how you have accounted for such funding not being forthcoming and how a bridge without any soft verge wildlife crossing has been assessed in the submitted application documents and has been accounted for in the wording of the dDCO.
16.	Compulsory Acquisition (CA)	

Question to:		Question:
2.16.1	Applicant	Would the provision of enhanced SPA land at a ratio of 3:1 to address permanent and temporary land take associated with the NSIP scheme's implementation and the associated intended compulsory acquisition of land amount to a '... compelling case in the public interest for the land to be acquired compulsorily' (Section 122 of the PA2008)?
2.16.2	Applicant	Further to the submission of the Schedule of Statutory Undertakers Representations with regard to S138 [REP3-006] in response to the ExA's First Written Question 1.16.6 the Applicant is requested to ensure that when this document is submitted at future deadlines the entries in the final column 'Protective Provisions' correspond with the relevant undertaker because it appears from the entry for Sky Telecommunications onwards the comments concerning protective provisions do not correspond with the relevant undertaker.
2.16.3	Applicant	Please provide the date by which consent will have been obtained for the acquisition for each of the plots of Crown Land identified in Part 4 of the Book of Reference [APP-025].
2.16.4	Applicant and SCC	Please provide the date by which you will have concluded the exchange of Common Land and Replacement Land arising from the original construction of the M25 and associated alteration to the A3 covered by Compulsory Purchase Orders dating back to 1979 and 1982. SCC please additionally advise when you expect the associated amendments to the Common Land register will have been completed.
2.16.5	RHS	<p>The ExA notes that the RHS objects to the compulsory acquisition of plots 11/2 and 2/27 [REP1-038].</p> <p>a) Having regard to the condition for compulsory acquisition stated in Section 122(3) of the PA2008, namely '...that there is a compelling case in the public interest for the land to be acquired compulsorily' please explain why you consider that the compulsory acquisition sought by the Applicant with respect to plots 11/2 and 2/27 would or would not satisfy the previously mentioned condition in Section 122(3) of the PA2008.</p>

Question to:		Question:
		b) Additionally please confirm that the extent of your objection to the Compulsory Acquisition and/or Temporary Possession powers sought by the Applicant, insofar as they relate to the land owned by it, are limited to plots 11/2 and 2/27, given the previous reference in your relevant representation [RR-024] to in effect an objection in principle to compulsory acquisition of any RHS land.
2.16.6	Applicant and WPIL	Reference is made in the Deadline 3 draft SoCG [REP3-014] to various matters that are not currently agreed being addressed through the conclusion of a side agreement between the Applicant and WPIL. Please provide a position statement for the side agreement that has been referred to. The position statement should include, as a minimum, the heads of terms for the matters to be covered in the agreement. Please confirm that the aforementioned side agreement will be executed prior to the close of the Examination and if not then explain what alternative measures will be undertaken.