

M25 junction 10/A3 Wisley interchange

TR010030

9.36 Statement of Common Ground with Guildford Borough Council

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M25 junction 10/A3 Wisley interchange Development Consent Order 202[x]

9.36 STATEMENT OF COMMON GROUND WITH GUILDFORD BOROUGH COUNCIL

VERSION UPDATED AT DEADLINE 5 ONLY IN RESPECT OF HIGHWAYS ENGLAND'S COMMENTS

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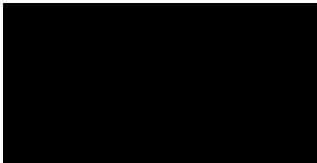
Version	Date	Status of Version
Rev 1	3 March 2020	Deadline 5 (Highways England's comments only)
Rev 0	28 January 2020	Deadline 3 (Agreed by Highways England and Guildford Borough Council)

STATEMENT OF COMMON GROUND

This Statement of Common Ground comprises the Version that was prepared and agreed by (1) Highways England Company Limited and (2) Guildford Borough Council and submitted at Deadline 3 on 28 January 2020.

It has been further updated only in respect of Highways England's comments.

As at Deadline 5 (3 March 2020) Guildford Borough Council has yet to update its position or agree any of Highways England's updated comments.



Signed.....

Jonathan Wade

Project Manager

on behalf of Highways England

Date: 03 March 2020

This statement has been approved by the Officers of Guildford Borough Council, except in respect of any of Highways England's updated comments made subsequent to Deadline 3.

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1. Introduction

1.1. Purpose of this document

- 1.1.1 This Statement of Common Ground ("SoCG") has been prepared in respect of the proposed M25 junction 10/A3 Wisley interchange improvement scheme ("the Application") made by Highways England Company Limited ("Highways England") to the Secretary of State for Transport ("Secretary of State") for a Development Consent Order ("the Order") under section 37 of the Planning Act 2008 ("PA 2008").
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties to it, and where agreement has not (yet) been reached. SoCGs are an established means in the planning process of allowing all parties to identify and so focus on specific issues that may need to be addressed during the examination.
- 1.1.3 The SoCG covers the position as agreed with Guildford Borough Council (GBC) as at 28th January 2020 [REP3-011] and incorporates further comments made by Highways England to clarify its position on certain matters. Unfortunately, Guildford Borough Council has not been able to contribute to this updated version, despite Highways England's best endeavours to engage. Nonetheless, Highways England considers that it would be helpful to the Examining Authority to share this updated version and for Highways England to set out its understanding of the position as regards the various issues identified in Table 3.2. Highways England will continue to seek to engage with Guildford Borough Council and to resolve outstanding matters. A final version of the SoCG will be provided at Deadline 8 in accordance with the Examining Authority's timetable or as otherwise requested by the Examining Authority as the examination proceeds. Although the SoCG relates to the DCO examination period only, it is acknowledged that there will be a need for further agreement between the parties during detailed design and the execution of works.

1.2. Parties to this Statement of Common Ground

- 1.2.1 This SoCG is based on the version that was agreed by (1) Highways England as the Applicant and (2) Guildford Borough Council as at 28 January 2020. As noted above, it has been updated to incorporate Highways England's further comments, however these have not been agreed by Guildford Borough Council as at Deadline 5.

1.3. Terminology

- 1.3.1 In the tables in the Issues chapter of this SoCG, "Not Agreed" indicates a final position, and "Under discussion" where these points will be the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. "Agreed" indicates where the issue has been resolved.

- 1.3.2 It can be taken that any matters not specifically referred to in the Issues chapter of this SoCG are not of material interest or relevance to Guildford Borough Council, and therefore have not been the subject of any discussions between the parties. As such, those matters can be read as agreed, only to the extent that they are either not of material interest or relevance to Guildford Borough Council.

2. Record of Engagement

2.1.1 A summary of the meetings and correspondence that has taken place between Highways England and Guildford Borough Council in relation to the Application is outlined in Table 2.1.

Table 2.1: Record of Engagement

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
Local Authority Liaison Meetings		
27.07.2018	Meeting	This was the first LA Liaison Meeting, where all 3 LAs attended together. The DCO process and a list of DCO deliverables were discussed, with an action to send a comprehensive list to each LA. The LA responses to Statutory Consultation were discussed and it was agreed that Highways England would send Surrey County Council (SCC) and GBC response letters. Speed limits and bus stop designs were discussed, with the action on SCC to provide written comments. SCC comments on the PIER were acknowledged by Highways England, with an action on Highways England to provide a response to Elmbridge Borough Council (EBC)'s PIER comments.
27.09.2018	Meeting	A scheme and programme update were provided. Drawings of replacement land would be shared with the LAs once available. It was agreed that once the PCF Modelling report was drafted, a modelling meeting would take place prior to Feltonfleet School liaison. Side road agreements were discussed, with the action on Highways England to provide further information to SCC. The proposed Targeted Consultation dates and content were discussed. Highways England agreed to share the consultation summary report which includes the regards table with all 3 LAs. The requirement for Planning Performance Agreement was discussed, with an action on all 3 LAs to respond to Highways England with a preferred option and business case.
16.11.2018	Meeting	A high-level overview of the scheme changes was provided, outlining the new alignment of the Wisley Lane overbridge through the airfield and summarising the conversations with RHS Wisley for changing the bus route to utilise the existing infrastructure. The moving of the NMU route from the south to the north side of the A3, the widening of the Old Lane left in/out and NMU route changes were justifiable in order to follow land contours. Changes to the M25 northbound slip lane, and the reduced J10 roundabout elongation were discussed. Noting that Redhill bridge was now an NMU access only and there was the potential for a small amount of land for an NMU route near to Feltonfleet school. The small changes to obtain the

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		<p>correct amount of replacement land were discussed.</p> <p>GBC queried a section of SPA replacement land believed to be within the 400m buffer zone for Wisley Airfield. Noting that the airfield development programme is advanced and may take precedence over the M25 J10/A3 scheme. There was an action for Highways England to share CAD file of Red Line Boundary with GBC for further assessment to be undertaken.</p>
22.01.2019	Meeting	<p>A scheme update and revised programme was provided, with an expected DCO submission date of Spring 2019. A summary of the targeted consultation responses was presented, with 85% of the responses received from members and supporters of The Girl Guide Association.</p> <p>GBC expressed the desire to seek legal advice on adequacy of consultation, due to the small changes that had been made to the scheme that were not present in the targeted consultation materials.</p>
15.03.2019	Meeting	<p>An update of Design Fix 3.1 was presented, specifically: Heyswood Campsite NMU (route moved to the north side of the A3), Seven Hills road south, at the junction all movements are permitted from Seven Hills Road South, left turn only from Seven Hills Road and right turns are banned from the A245 Eastbound. This design improves the junction but does move some traffic to the Painshill roundabout. There are no additional noise/air quality impacts, thus the proposal is being taken forward. In addition, it was explained that the SPA replacement land field, near to Wisley Airfield, had been replaced by a field currently owned by RHS Wisley. RHS Wisley are willing to sell this land and discussions over acquisition will take place. This parcel gives the scheme enough land to meet the SPA compensation and mitigation land requirements.</p> <p>It was noted there was concern about the EBC emerging local plan, this parcel of land will be checked to ensure it is not within 400m of any proposed developments. An action for Highways England was set to check the land parcel is not within 400m of any proposed developments in the emerging EBC local plan.</p>
23.04.2019	Meeting	<p>The consultation changes at Seven Hills junction were discussed. Feltonfleet School (FFS) are keen to extinguish highway rights on Old Byfleet Road, which has been discussed and agreed by Surrey County Council (SCC), FFS and HE. Banning the right and straight-ahead movements from Seven Hills Road (North) allows a traffic signal stage to be removed, reducing congestion on the A245. The forecasting shows that removing these movements</p>

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		<p>does not displace a significant number of vehicles, though it may have more of an impact on those living at the base of Seven Hills Road. Each of the Local Authorities received an issues log specific to their correspondence prior to this meeting. For the majority of points raised Highways England have provided a response, with the remaining responses being “in progress”. These logs show high level information which will provide the basis for the statements of common ground (SoCG).</p> <p>Highways England wanted to hold a meeting with SCC to present a draft paper which concerned various scheme land parcels and their future maintenance. If possible, the paper will be released in draft for SCC to have early sighting. It was suggested that Surrey Wildlife Trust be invited as they are land managers for SCC.</p> <p>SCC asked if a councillor briefing would be held post DCO submission. Highways England agreed that 3 separate presentations could take place.</p>
21.05.2019	Meeting	<p>A land management update and overview was provided, outlining Highways England’s approach to the environmental issues that need to be addressed. In view of the need to acquire and/or use land within the SPA for the purposes of the Scheme it is necessary, in order to protect its integrity as a SPA to enhance some land already in the SPA and also provide additional land to (in effect) form part of the SPA by way of compensation for that to be used. As the Scheme also includes land that is designated as common land and open space, replacement for this land also has to be provided. The ratios of land take and replacement were explained and that the ratios are based on discussions with key stakeholders (NE, RSPB, SWT) (for the SPA land) and precedent established on other schemes including the M25 in this location when it was built in the late 1970s/early 1980s (for the common land/open space).</p> <p>EBC raised concern over the proposed cyclists’ route alongside the A245 in terms of safety and segregation between motorists and cyclists. Highways England explained that this route was selected due to safeguarding issues at Feltonfleet School and to provide cyclists with a clear route and avoidance of steps, he acknowledges this did make the route slightly longer.</p> <p>It was agreed that all three LAs are to provide JW with some available dates to hold a presentation at an existing council planning meeting. GB suggested once the DCO submission has occurred he could schedule a Q and A session with councillors.</p>
24.07.2019	Meeting	<p>GBC did not attend this meeting; however, they received a copy of the minutes.</p>

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
		An update was provided on: the DCO application, the Project, commuted sums, PPA, land management workshop & councillor presentation. SCC stated that they had concerns regarding the lack of detail in the Road Safety Audit and agreed to provide feedback in due course.
26.09.2019	Meeting	<p>GBC did not attend this meeting; however, they received a copy of the minutes.</p> <p>SCC were the only LA in attendance; however, the minutes were sent to all LAs.</p> <p>Topics covered included</p> <ul style="list-style-type: none"> • Way forward with SCC SoCG and the inclusion of the Relevant Representations. • Commuted Sums update. • Land Management update, and agreement for SCC to share existing management contract with HE Legal. • Common Land, history and way forward.
29.10.2019	Meeting	<p>All 3 LAs were in attendance.</p> <p>Topics covered included:</p> <ul style="list-style-type: none"> • Way forward with SoCG approach for all 3 LAs, using headings from Rule 6 Letter. • Design changes under BBA. • Arranging further meetings with each LA to review draft SoCGs.
03.12.2019	Meeting	<p>Elmbridge Borough Council and Guildford Borough Council attended the meeting. Surrey County Council sent their apologies. Key topics covered included:</p> <ul style="list-style-type: none"> • Painshill Park and Surrey Fire and Rescue – Engagement • Green Bridge Update • Side agreement update • HE and SCC collaboration on ExA written questions • SoCG approach and programme
Councillor Presentations – Scheme Update post DCO submission		
23.07.2019	Presentation and Q&A	Scheme & DCO Update with Q&A session.
Technical Meetings		
08.03.2018	Meeting	EIA scoping minerals and waste
26.03.2018	Workshop	NMU design
01.11.2018	Meeting	Traffic modelling.
13.09.2018	Meeting	Land acquisition.

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
01.02.2019	Meeting	Replacement and SPA compensation land.
15.02.2019	Meeting	Traffic modelling
25.02.2019	Meeting	Highways classification
12.03.2019	Meeting	M25J10 scheme structures
17.01.2020	Meeting	SCC SoCG meeting
Shared Documentation (not including Consultation materials)		
09.10.2017	Email	SOCC Memo of Information (Informal information on the SOCC approach)
26.01.2018	Email & Post	SOCC response letter
25.01.2018	Email & Post	SMP incorporation letter (letter informing of the inclusion of J10-16 smart Motorways programme).
02.02.2018	Email & Post	Statement of Community Consultation
25.09.2018	Email	HGV layby results (surveys of HGV layby usage)
12.10.2018	Email & Post	HE response to GBC statutory consultation submissions
25.10.2018	Email	HE Traffic forecasting report (advanced draft)
25.10.2018	Email	HE Operational report (advanced draft)
31.10.2018	Email	Links and nodes (peak flows) scheme modelling
12.11.2018	Email	Notification of development safeguarding letter and PDF (Drawing to include the land acquisition requirements of the scheme and the area to be safeguarded ahead of development.)
13.11.2018	Email	Targeted consultation letter, brochure and general arrangement drawings
15.11.2018	Email	Red line boundary comparison drawings
16.11.2018	Email	DCO works plans
16.11.2018	Email	DCO draft work and requirements schedules 1- 4
29.11.2018	Email	DWG of Route protection plan
03.12.2018	Email	CAD files of Red Line Boundary
04.12.2018	Email	Speed Survey Data
21.12.2018	Email	Full draft DCO and schedules
25.01.2019	Email	GIS Mapping Files
25.01.2019	Email	Scheme papers for the 4 NMU routes near J10
05.02.2019	Email	A1 scheme plans (in lieu of the Statement of reason)
21.02.2019	Email	Speed limit, rights of way and scheme layout plans

Date	Form of correspondence	Key topics discussed and key outcomes (the topics should align with the Issues tables)
11.03.2019	Email	Road Safety Audit and designer's response
03.04.2019	Email	General Arrangement Drawings
09.04.2019	Email	SPA buffer shapefiles
16.04.2019	Email	SPA, Ecology and Compensation dataset
17.05.2019	Email	Draft of Issues Log.
30.07.2019	Email	A selection of DCO hard copy drawings. Drawings only, and not the entire documents of 2.1 – 1 page of drawings 2.3 – 32 pages of drawings 2.4 – 32 pages of drawings 2.5 – 33 pages of drawings 2.7 – 10 pages of drawings 2.8 – 35 pages of drawings
27.11.2019	Email	Early oversight of the documentation that HE submitted to the Examining Authority (ExA)
17.12.2019	Email	RHS Wisley Data
19.12.2019	Email	Documentation submitted to ExA for Deadline 2.
21.01.2020	Email	Statement of Common Ground (1 st draft)
29.01.2020	Email	Documentation submitted to ExA for Deadline 3
09.02.2020	Email	Statement of Common Ground Outstanding Matters
12.02.2020	Email	Documentation submitted to ExA for Deadline 4
25.02.2020	Email	Statement of Common Ground (updated version for agreement)

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Highways England and (2) Guildford Borough Council in relation to the issues addressed in this SoCG.

3. Table of issues and matters to be agreed

3.1.1 The list below states the relevant examination documents used in Table 3.2.

Table 3.1: Examination Documents

Reference	Title
RR-062	Guildford Borough Council Relevant Representations
REP1-012	Guildford Borough Council Deadline 1 Submission – Written Representation
REP1-048	Wisley Property Investment Limited Deadline 1 Submission – Written Representation
REP2-002	Highways England Deadline 2 Submission – 3.1 Draft Development Consent Order (Revision 1)
REP2-011	Highways England Deadline 2 Submission – 9.16 Transport Assessment Supplementary Information Report
REP2-013	Highways England Deadline 2 Submission – 9.18 Applicant’s Response to Written Questions
REP2-014	Highways England Deadline 2 Submission – 9.19 Applicant’s Comments on Written Representations
REP2-022	Highways England Deadline 2 Submission – 9.27 Response to RHS Comments on Air Quality
REP2-032	Guildford Borough Council Deadline 2 Submission – Response to Examining Authority’s First Written Questions
REP2-047	Surrey County Council, Elmbridge Borough Council and Guildford Borough Council Deadline 2 Submission – Joint Council Local Impact Report
REP3-007	Highways England Deadline 3 Submission- 9.32 Applicant’s comments on Joint Local Impact Report (Rev 0)
REP3-008	Highways England Deadline 3 Submission- 9.33 Applicant’s comments on IP responses to Examining Authority’s First Written Questions (Rev 0)
REP3-011	Highways England Deadline 3 Submission – 9.36 Statement of Common Ground with Guildford Borough Council (Rev 0)
REP3-014	Highways England Deadline 3 Submission- 9.39 Statement of Common Ground with Wisley Property Investments Limited (Rev 0)
REP3-015	Highways England Deadline 3 Submission – 9.40 Statement of Commonality (Rev 0)
REP3-023	Highways England

Reference	Title
	Deadline 3 Submission – 9.48 Applicant’s Response to Guildford Borough Council’s Relevant Representation RR-062 (Rev 0)
REP3-038	Surrey County Council Deadline 3 Submission – Annex C – Strategic Highway Assessment Report for Guildford Local Plan
REP3-039	Surrey County Council Deadline 3 Submission – Annex D – Strategic Highway Assessment for Guildford Local Plan: Burnt Common/Ripley
REP4-005	Highways England Deadline 4 Submission – 9.51 Applicant’s comments on RHS’s Deadline 3 submission

Table 3.2: Statement of Common Ground (SoCG) Between Highways England and Guildford Borough Council (GBC) – Table of Issues and Matters to be Agreed – Version as at 03 March 2020

3.1.2 Table 3.2 has been agreed with GBC on 28 January 2020 and has been updated to incorporate Highways England’s further comments and understanding of the position as at 03 March 2020.

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England’s response or further actions being taken to address outstanding matters
1. LOCAL PLANNING CONTEXT				
1.1 Relevant statutory development plan				
1.1.1	REP2-047 (para 5.8.1)	The current statutory development plan for Guildford Borough comprises the Guildford Borough Local Plan: Strategy and Sites which covers the period between 2015 and 2034 and was adopted on 25 April 2019 together with the extant Local Plan 2003 policies.	Agreed. (Agreed as a matter of record).	
1.2 Policy A35: Former Wisley airfield, Ockham				
1.2.1	REP2-032 (ExQ1 1.12.8)	Policy A35 of the Guildford Borough Local Plan 2019 requires the developer of the former Wisley Airfield site to provide the following transport mitigations: <ul style="list-style-type: none"> 1. “Primary vehicular access to the site allocation will be via the A3 Ockham interchange; 2. A through vehicular link is required between the A3 Ockham interchange at Old Lane 3. Other off-site highway works to mitigate the impacts of the 	Agreed. (Agreed as a matter of record).	

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England's response or further actions being taken to address outstanding matters
		<p>development. This will include mitigation schemes to address issues:</p> <ul style="list-style-type: none"> (a) On the A3 and M25 and at the M25 Junction 10/A3 Wisley interchange (b) On B2215 Ripley High Street (c) At the junctions of Ripley High Street with Newark Lane/Rose Lane (d) On rural roads surrounding the site (e) At junction of Old Lane with A3 on-slip (Guildford bound). <p>4. The identified mitigation to address the impacts on Ripley High Street and surround rural roads comprises the two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management</p> <p>5. A significant bus network to serve the site and which will also serve Effingham Junction railway station and/or Horsley railway station, Guildford and Cobham. This will be provided and secured in perpetuity to ensure that residents and visitors have a sustainable transport option for access to the site;</p> <p>6. As off-site cycle network to key destinations including Effingham Junction railway station, Horsley</p>		

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England's response or further actions being taken to address outstanding matters
		railway station/Station Parade, Ripley and Byfleet to be provided with improvements to a level that would be attractive and safe for the average cyclist".		
1.3 Policy A42 Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common				
1.3.1	REP2-047 para 6.21	Policy A42 of the Guildford Borough Local Plan 2019 allocates 4ha of land on both sides of the A3 and north of the A247 for the development of the new north facing slip roads. The Local Plan requires these slip roads to be delivered in connection with the development of the former Wisley Airfield site (under Policy A35).	<p>Under discussion.</p> <p>Highways England is not aware of any reason as to why this statement cannot be agreed.</p> <p>Policy A42 is entitled, 'Land for new north facing slip roads to/from A2 at Send Marsh Burnt Common' and the wording of Policy A35 which relates to the Former Wisley Airfield, Ockham has been agreed at item 1.2.1 of this SoCG above, including the requirement in paragraph (4) of Policy A35 which states that 'the identified mitigation to address the impacts on Ripley High Street and surrounding rural roads comprises two new slip roads at A247 Clandon Road (Burnt Common) and associated traffic management'.</p> <p>The Inspector's Report for the Wisley Airfield appeal (reproduced in REP1-048) at paragraph 8.16 makes specific reference to the Burnt Common slips</p>	Highways England will continue to seek to engage with GBC to establish why this matter cannot be agreed as a matter of fact.

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England's response or further actions being taken to address outstanding matters
			and associated traffic management being included in the Local Plan as essential mitigation for the former airfield development.	
1.4 Implications of Policies A35 and A42				
1.4.1	Page 1 of RR-062	Guildford Borough Council (GBC) considers that the Burnt Common slip roads would provide the most effective means of mitigating the impact of Wisley Airfield development traffic on Ripley as they would offer more traffic benefit than the option of south-facing slips at Ockham Park junction (as reaffirmed at the ISH for the Scheme held on 15 January 2020).	Agreed. (Agreed as a matter of record).	
1.4.2	N/A	The former Wisley Airfield allocation (Policy A35) is the only allocation in the Guildford Borough Local Plan 2019 that is contingent upon the delivery of the Burnt Common slips. There are no other policy commitments requiring the delivery of north facing slip roads at Burnt Common and there is no requirement that they be delivered as part of the Scheme.	Under discussion. Highways England is not aware of any reason as to why this statement cannot be agreed. It is a matter of record that Policy A35 is the only allocation in the Guildford Borough Local Plan which specifically requires the Burnt Common slips to be provided.	Highways England will continue to seek to engage with GBC to establish why this matter cannot be agreed as a matter of fact.
1.4.3	REP2-047 (para 6.13)	GBC has confirmed that it is now satisfied that the traffic impacts on Ripley associated with the development of the former Wisley Airfield site can be fully mitigated by the provision of the Burnt Common slips and associated traffic management and that there is no requirement for any additional traffic measures to be	Under discussion. Highways England is not aware of any reason as to why this statement cannot be agreed. Paragraph (4) of Policy A35 (as agreed in item 1. 2.1 of this SoCG above) states that 'The identified mitigation to address the impacts on Ripley High Street and surrounding rural	Highways England will continue to seek to engage with GBC to establish why this matter cannot now be agreed.

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England's response or further actions being taken to address outstanding matters
		implemented in Ripley under Policy A35 (3)(b) and (c).	roads comprises two new slip roads at A247 Clandon Road/Burnt Common and associated traffic management. Reference should also be made to the Inspector's Report for the Wisley Airfield appeal (a copy of which is provided in REP1-048). Paragraphs 7.42 to 7.48 of the Inspectors Report refer to GBC and Surrey County Council being supportive/entirely content with the highway mitigation package offered by the developer and that the Ripley mitigation was no longer considered necessary in addition to the Burnt Common slips.	
1.4.4	REP2-047 (Paras 7.2.1.4 and 7.2.1.12))	The timing of the delivery of the Burnt Common slips is a matter to be agreed in connection with a planning application for the former Wisley Airfield site. No timing requirement is specified in the wording of Policy A35, although the potential for 1,000 dwellings to be allowed ahead of the slips was discussed at the planning appeal for former Airfield site.	Under discussion. GBC (and the Joint Councils) are concerned about the time period between the opening of the Scheme, the commencement of development on the former Wisley Airfield site and the completion of the Burnt Common slips. Highways England is not aware of any reason as to why this statement cannot be agreed by GBC. It is a matter of fact that there is no timing stipulated within Policy A35. As to GBC's point about potential impacts on Ripley that may arise before the Burnt common slip roads are completed, this will continue to be a matter for negotiation between GBC and	The modelling and assessments carried out by Highways England make no allowance for the delivery of the Burnt Common slips but demonstrate that the Scheme would have a limited effect on overall traffic flows through Ripley in both the opening and design years and that the predicted flows can be accommodated without significant loss of operational performance on the local road network through Ripley. The decision as to how much development to allow on the former Wisley Airfield site before requiring that the Burnt Common

SoCG Reference Number	Relevant examination document	Relevant Issue	Current position as regards agreement between Highways England and Guildford Borough Council and reasons for any differences in views	Highways England's response or further actions being taken to address outstanding matters
			<p>the developer of the Former Wisley Airfield site once a planning application comes forward, as it always has been.</p> <p>During the Wisley Airfield appeal, both GBC and Surrey County Council agreed that up to 1,000 dwellings could be built on the former Airfield site before the Burnt Common slips would need to be provided. This is explained in the Inspector's Report for the Former Wisley Airfield Appeal (appended to REP1-048- see paragraph 7.64 of the Inspector's Report).</p> <p>It is important to note that this 1,000 dwellings trigger was not determined by reference to traffic impacts in Ripley as may be inferred in paragraphs 7.2.1.12 to 7.2.1.15 of the LIR [REP2-047] but was instead agreed by reference to development viability considerations.</p> <p>Clearly, if consent for the M25 junction 10/A3 Wisley interchange DCO Scheme is granted, then the developer of the Former Wisley Airfield Site will no longer be required to fund works on the A3 and M25 (as currently required in paragraph (3)(a) of Policy A35) which will be a matter that GBC will need to take into account when negotiating an acceptable threshold for the Wisley Airfield development.</p>	<p>slips be provided is a matter to be addressed by GBC when a planning application for the development of the former Wisley Airfield site is submitted.</p> <p>Highways England will therefore continue to seek to engage with GBC to establish with this issue cannot now be agreed.</p>

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1.4.5	REP2-047 (paras 6.17, and 7.2.1.20) and RR-062 (page 1)	The assessment work needed to support the development of the Burnt Common slips as contemplated in Policy A42 of the Guildford Borough Local Plan 2019 is a matter to be addressed as part of the town and country planning process when a scheme comes forward for the former Wisley Airfield site allocated under Policy A35.	<p>Under discussion.</p> <p>As set out in GBC's relevant representation (RR-062) GBC is seeking Highways England's approval in principle for the Burnt Common slips in connection with the examination of the M25 junction 10/A3 Wisley interchange Scheme.</p> <p>Highways England is not aware of any reason as to why this statement cannot be agreed. The position was clearly summarised in the Inspector's Report for the Wisley Airfield appeal, a copy of which is provided in REP1-048. Paragraphs 7.48 and 7.63 of that report explain that the slip roads would be the subject of a separate process and that Highways England's position on the matter is neutral at this point in time. This continues to be the case until the promoter of the development brings forward the relevant technical evidence to confirm their feasibility.</p>	<p>Highways England has accepted the principle of a Grampian condition on any grant of planning permission for the development of the former Wisley Airfield site (in the context of the dismissed planning appeal). However, as the Burnt Common slips will require Highway Orders, their feasibility will still need to be demonstrated in accordance with webTAG procedures, (including taking into account the effects on the A3 as well as the local road network). As at this point in time, no submissions have been made by the relevant developer since the appeal was dismissed.</p> <p>Highways England encourages the developer of the former Wisley Airfield site to progress the feasibility work as soon as possible to support delivery of the Local Plan.</p> <p>Highways England will therefore continue to seek to engage with GBC to establish why this matter cannot now be agreed.</p>

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1.4.6	REP2-032 (1.13.5) And REP2-047 (paras. 6.12 and 7.2.4)	Under the access arrangements provided for in Policy A35 of the Guildford Borough Local Plan 2019, traffic generated by the former Wisley Airfield development and seeking to travel to and from the south, will either access the A3 at the Burnt Common junction (travelling via the Ockham Park junction and Ripley) or will access the A3 at the Old Lane junction (using the through-site link to Old Lane). There are no restrictions in Policy A35 as to which access point may be used.	<p>Under discussion.</p> <p>GBC shares Surrey County Council's concern that the closure of Old Lane to southbound traffic south of the Pond Car Park has not been modelled within the Scheme transport assessments.</p> <p>Highways England is not aware of any reason as to why this statement cannot be agreed as it accurately reflects Policy A35 paragraphs (1) and (2), the wording of which is a matter of fact. Surrey County Council (SCC) has agreed (see item 2.9.1 of the SoCG between Highways England and SCC [REP3-012] that there is no planning policy commitment that specifically requires the closure of any part of Old Lane.</p> <p>Highways England's traffic modelling assumes that the points of access to and egress from the former Wisley Airfield site will be via the Ockham Park junction and Old Lane.</p> <p>If Old Lane were to be closed to southbound traffic, this is likely to have the effect of reducing modelled flows on Old Lane. However, there is no reason to expect that it would reduce the flow of traffic predicted to be exiting the former Airfield site to head south on the A3, as this is likely to continue being the quickest route to join the A3 especially for southbound traffic. The majority of</p>	<p>As noted in Highways England's comments on Surrey County Council's written representations (REP2-014 – see comment on REP1-020-12 on page 30) the introduction of a closure on Old Lane is a matter to be addressed when a planning application for the former Wisley Airfield site is submitted as this measure is not required for the purposes of the Scheme.</p> <p>Highways England will therefore seek to continue to engage with GBC to establish why this issue cannot be agreed as a matter of fact.</p>

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			<p>the reduction in WPIL flows through Ripley predicted in the 2037 DS scenario relates to traffic flows bound for the A3 southbound for which the closure of Old Lane is highly unlikely to materially change.</p> <p>Highways England strongly defends the robustness of its modelling and no evidence has been put forward to demonstrate that it has under-estimated any likely impacts on the local road network.</p>	
2.0 DRAFT DEVELOPMENT CONSENT ORDER (dDCO)				
2.1 dDCO articles & associated schedules				
2.1.1	1.15.4 of REP2-032	The articles in the draft DCO (dDCO) as amended [REP2-002] are appropriate for the Scheme, including articles concerning arbitration and that Schedule 8 correctly identifies all relevant Tree Preservation Orders of relevance to the Scheme as they relate to trees within the boundary of Guildford Borough Council's administrative area.	<p>Under discussion.</p> <p>GBC has in its response to ExQ1 (REP2-032) expressed concerns about the definition of maintain, how it would be enforced and who would adjudicate should there be a materially different impact from that identified in the ES.</p> <p>GBC has made no further comments as regards the articles, schedules and provisions of the dDCO.</p> <p>Highways England has responded on this point in REP3-008 (see comment made on point 1.15.4 on page 21) and in REP3-007 (comment on DCO3 on page 30). It considers that the definition</p>	No further action is proposed. Highways England assumes that with the exception of GBC's concern on the definition of 'maintain' and adjudication on materially different environmental effects, in the absence of any further representation from GBC specifically all other articles and schedules in the dDCO are agreed.

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			<p>is more restrictive than in other DCOs because it contains a tailpiece limiting maintenance activities to environmental limits. It will be for the undertaker to check that it is building the Scheme within the permitted environmental limits set by the DCO, given that it would be a criminal offence to breach its terms.</p> <p>Highways England notes that GBC has raised no other issue with any of the DCO articles proposed.</p>	
2.2 dDCO requirements				
2.2.1	REP2-032 (1.15.11) and REP2-047 (DCO3)	The requirements as set out in Part 1 of Schedule 2 of the dDCO (as amended see REP2-002) are appropriate and provide an appropriate framework for securing the necessary and relevant environmental mitigation measures and other environmental control measures.	<p>Under discussion.</p> <p>As set out in GBC's response to ExQ1 [REP2-032] GBC considers that the tailpiece in Requirement 5(1) could be too wide reaching and is seeking further justification.</p> <p>As set out in REP2-013 (see answer to question 1.15.10 on page 130), in REP3-007 (comment on DCO3 on page 3) and in REP3-008 (see comments on 15.1.11 on page 23) Highways England considers that the use of the tailpiece is both proportionate and precedented.</p> <p>Highways England note's that GBC has not raised concerns with any of the other requirements in the draft Development Consent Order (dDCO) [REP2-002].</p>	No further action is proposed. Highways England assumes that with the exception of the tailpiece in requirement 5(1) or any issue yet to be confirmed under item 9.1.1 of this SoCG below, in the absence of any further representation from GBC specifically all other DCO requirements are agreed.

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2.2.2	N/A	The procedures for discharging requirements as set out in Part 2 of Schedule 2 of the amended dDCO [REP2-023] are appropriate and involve GBC appropriately.	<p>Under discussion.</p> <p>GBC has not made any comments on the procedures. Highways England therefore assumes that there are no matters of contention between the parties in this regard.</p>	Highways England awaits confirmation from GBC as to its position on this matter.
3.0 SCHEME DEVELOPMENT AND ENGINEERING DESIGN				
3.1 Need/in principle support for the Scheme				
3.1.1	REP2-047 para 1.6	In principle, GBC supports the need for the Scheme, including to provide sufficient capacity for the traffic likely to be generated by planned growth, including the former Wisley Airfield development.	<p>Agreed.</p> <p>GBC wishes to ensure that the development does not however result in unacceptable impacts on the residents, businesses or the environment.</p>	
3.2 Scheme objectives				
3.2.1	REP2-047 (para 2.2)	The Scheme objectives as set out in Table 2.1 in APP-002 are appropriate as regards the need for the Scheme and the nature of the environment in which it is located.	<p>Agreed.</p> <p>GBC, as one of the Joint Councils has commented that its focus is on minimising impacts on the surrounding local network objective.</p>	
3.3 Alternatives				
3.3.1	N/A	Highways England has appropriately considered a range of Scheme alternatives and its reasons for selecting the preferred Scheme are robust and reasonable.	<p>Agreed.</p> <p>GBC has not submitted any comments on this matter.</p>	
3.4 Engineering design				

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3.4.1	N/A	The engineering design of the Scheme, including the alignment of the proposed Wisley Lane diversion will not jeopardise the delivery of any committed or allocated development, including development allocated on the former Wisley Airfield site.	Agreed.	
4.0 TRAFFIC AND TRANSPORT AND NON-MOTORISED USERS				
4.1 Traffic Modelling and Transport Assessment				
4.1.1	REP2-032 (ExQ1 1.4.3)	The list of proposed developments contained in Tables 3.1 and 3.2 of the Transport Assessment [APP-136] correctly reflect the scale, type and location of planned growth within the modelled network area relevant at the time of the assessment.	Agreed.	
4.2 Impact on Strategic Road Network				
4.2.1	N/A	There are no matters of contention between Highways England and GBC as regards the operation of the Strategic Road Network with the Scheme.	Agreed.	
4.3 Impact on the Local Road Network/Local Communities				
Ripley				
4.3.1	RR-062 REP2-047 paras 7.2.1.10 and 7.2.4.4	Highways England has modelled a reasonable worst-case scenario as regards changes in future traffic flows through Ripley, because its model makes no allowance for any potential mitigation benefits associated with the Burnt Common slips and it predicts that all of the	Under discussion. GBC has questioned whether the predicted traffic flows through Ripley are accurate and has also questioned whether the assessment has	Highways England will continue to seek clarification from GBC as regards its final position on this matter and the specific reasons as to why GBC questions the

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		<p>Wisley Lane traffic on a busy RHS Wisley Garden event day would reroute via Ripley and not via the M25 junction 10 signposted route.</p>	<p>underestimated likely flows through Ripley.</p> <p>Highways England strongly defends its approach to traffic modelling and is confident that the traffic flows that are predicted in Ripley have not been under-estimated. None of the submissions made by interested parties, as at deadline 4, including GBC, Surrey County Council and RHS Wisley have put forward any compelling evidence to demonstrate that the traffic modelling has under-estimated the likely changes in flows through Ripley on account of the Scheme, including due to the closure of Wisley Lane.</p> <p>Highways England notes Surrey County Council's response to ExAQ1.13.17. [in REP2-045], which asserts that traffic flows would be greater than assessed. However, this appears to be entirely based on the argument set out in section 7.2.1 of the LIR [REP2-047] that Highways England has not fully taken into account the effects of Wisley Lane traffic rerouting through Ripley. This clearly is not the case.</p> <p>Firstly, the traffic model assumes that 100% of trips travelling to and from Wisley Lane from and to the south will</p>	<p>accuracy of the modelled traffic flows.</p>

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			<p>route through Ripley. In practice, some of these trips may follow the signposted route via M25 junction 10 rather than travel through Ripley, given that the difference in journey times between the two routes will not be significant (approximately 1 minute)</p> <p>Secondly, as explained in REP3-007 (see comment on paragraph 7.1.2 on page 13, the traffic modelling is based on a busy weekday event day being held at Wisley Garden, which can generate up to twice the volume of traffic compared with a typical non-event day. This means that Highways England has modelled and assessed a far higher volume of RHS Wisley traffic than is likely to be the case on most days and indeed higher than the flows the Joint Councils refer to as a likely worst case (see Table 1 on page 30 of the LIR [REP2-047].</p> <p>As shown in Table 4.1 of [REP2-011] Highways England's traffic model assumes that the Scheme will result in approximately 1,620 additional two-way trips from Wisley Lane traffic routing through Ripley in the 2022 do-something scenario and 1,880 two-way trips in the 2037 do-something. These</p>	

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			<p>flows are significantly greater than the range of 1,200-1,500 trips referred to as worst case in paragraph 7.2.1.10 of the Joint Council's Local Impact Report (LIR) [REP2-047] and which were derived from RHS Wisley's own modelling and assessments.</p> <p>On a more typical weekday, the number of additional RHS Wisley trips likely to reassign through Ripley on account of the Scheme could be in the order of approximately 1,000 trips in 2022 and 1,100 trips in 2037, far less than the 1,620 to 1,880 flows that have been assessed for the 2022 and 2037 do-something scenarios.</p> <p>Thirdly, no allowance has been made for the Burnt Common slips in the model and as confirmed in paragraph 4.7.9 of the Strategic Highway Assessment Report (SHAR) produced by Surrey County Council (SCC) for Guildford Borough Council [REP3-038] and in the extracts submitted by SCC [REP3-039], these slips would have the effect of significantly reducing traffic through Ripley. In this regard, the predicted flows through Ripley are therefore likely to be overstated.</p>	

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			<p>Highways England acknowledges that the modelling for the 2037 do-something scenario (see Figure 4.1 of the TASIR [REP2-011]) does show a reduction in the volume of Wisley Airfield development traffic routing through Ripley with the Scheme. This effect is largely on account of WPIL traffic accessing the A3 via the Old Lane junction rather than travelling through Ripley to access the A3 at Burnt Common. The majority of the reduction in WPIL flows through Ripley in the 2037 DS scenario relates to traffic flows bound for the A3 southbound for which the closure of Old Lane is highly unlikely to materially change.</p> <p>Overall, Highways England strongly defends its position that it has not under-estimated the likely traffic flows through Ripley. On the contrary, it has for the reasons set out above modelled a reasonable worst-case scenario for assessing traffic impacts at Ripley and even with this robust approach, significant effects on the operation of the local road network are not predicted.</p>	
4.3.2	RR-062 page 1;	The Scheme will have a limited effect on overall traffic flows through Ripley, including allowing for any routing of traffic likely as a	<p>Under discussion.</p> <p>As set out in GBC's response to ExQ1 [REP2-032] GBC remains to be</p>	As 4.3.1 above.

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	REP2-032 (1.3.3) REP2-047 para 7.2.1.20	result of the proposed closure of the Wisley Lane junction.	<p>convinced that the predicted traffic flows through Ripley are accurate.</p> <p>See 4.3.1 above.</p> <p>Highways England strongly defends the robustness of its traffic modelling for Ripley. As set out in the Transport Assessment [APP-136] and in paragraph 4.1.4 of the Transport Assessment Supplementary Information Report (TASIR) [REP2-011], the additional volumes of traffic through Ripley on account of the Scheme (even taking a reasonable worst-case approach to the assessment) are not sufficient to give rise to any significant adverse impacts.</p> <p>In the year of opening (2022 DS scenario) the Scheme will result in a 4.9% increase in AADT (see Table 4.1 of the Transport Assessment Supplementary Information Report) [REP2-011]. Traffic flows in the busiest morning peak will not increase by more than 2% as is shown in Table 7-9 on page 86 of the Transport Assessment (APP-136] (as amended by the Errata [REP1-003]). These increases in flows can be accommodated without material deterioration in traffic congestion and delay and no evidence has been put</p>	

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			forward by any interested party to demonstrate otherwise.	
4.3.3	REP2-047 (para 7.2.1.20)	The Scheme is not expected to give rise to a severance effect at Ripley.	<p>Under discussion.</p> <p>GBC share's Surrey County Council's view that the Scheme will cause severance at Ripley predominantly during the inter-peak.</p> <p>No agreement has been reached between GBC and Highways England as to a definition of the term 'severance'. As set out in Highways England's response to the LIR [REP3-007] (see comment made in relation to para. 7.2.1.20 on page 15) Highways England considers that an increase in two way flows of 30% is commonly held to be the threshold at which a severance effect is considered possible (based on the threshold identified in the Guidelines for the Environmental Assessment of Road Traffic, published by the Institute of Environmental Assessment). Those Guidelines refer to a 30% increase being likely to give rise to a minor severance effect, with thresholds for moderate and major severance effects being 60% and 90% respectively.</p> <p>Clearly the predicted 5% increase in two-way flows (AADT) and 12%</p>	Highways England is in discussions with GBC and Surrey County Council to establish whether agreement can be reached on the threshold for a severance effect. However, Highways England does not consider that there will be a significant increase in traffic flows through Ripley on account of the Scheme or any significant severance effect as a result of the Scheme.

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			<p>increase in inter-peak flows will be significantly below these thresholds, including that for a minor effect.</p> <p>Reference should also be made to Highways England's response provided in REP3-007 (see comment on paragraph 7.1.2 on page 12) which explains that whilst the Scheme will result in a proportionately greater increase in traffic flow through Ripley during the interpeak periods (approximately 12%), as the overall volume of traffic passing through Ripley between peak periods is considerably less (approximately 28% less than the morning peak (2022)), the potential for a traffic related severance effect will be lower.</p>	
4.3.4	RR-062 (page 2) and REP2-047 para 7.2.1.20)	The predicted changes in traffic flows through Ripley on account of the Scheme are not of sufficient magnitude to warrant the provision of highway/transport measures at Ripley as mitigation.	<p>Under discussion.</p> <p>GBC shares Surrey County Council's view that the Scheme should fund a comprehensive mitigation package in Ripley to address its traffic impacts.</p> <p>Highways England does not accept that there is a need for the Scheme to fund a comprehensive package of improvement measures at Ripley as mitigation for the Scheme's impact on the operation of the local road network</p>	<p>As 4.3.1 above.</p> <p>Highways England will continue to seek to engage with GBC as regards the traffic modelling and the implications for Ripley. However, Highways England does not accept that there will be a significant increase in traffic flows through Ripley on account of the Scheme specifically and thus a need for Highways England to fund a comprehensive package of measures to address the</p>

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			<p>nor as mitigation for its environmental effects.</p> <p>Highways England has put forward a range of evidence which demonstrates that the overall increase in traffic flows directly attributable to the Scheme will be small (5% AADT and less than 2% in the morning peak periods) and this assessment takes account of any possible rerouting of RHS Wisley traffic, based on one of their busier event days. On a typical RHS day, the volume of traffic that may route through Ripley on account of the Scheme will be notably less than assessed.</p> <p>Given the limited changes in traffic flows, the Scheme will not adversely affect the operational performance of the local road network through Ripley. Neither are the predicted increases traffic flows assessed as being likely to give rise to any significant environmental effects, including noise and air quality on any receptors in the village.</p> <p>In contrast, traffic flows through Ripley without the Scheme (when compared against the 2015 base flows) are predicted to increase far more</p>	<p>Scheme's effects on the operation of the local road network.</p>

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			<p>significantly than the small increase likely to be attributable to the Scheme.</p> <p>For example, it can be deduced from the flows presented in Table 4.1 of the TASIR [REP2-011], that do-minimum traffic flows through Ripley in the 2022 opening year, are expected to increase by approximately 23% compared with the base case, a far greater increase than is likely to be attributable to the Scheme. Should GBC and SCC accept the same 1,000 dwellings trigger for the Burnt Common slips (which paragraph 7.2.1.14 of the LIR [REP2-047] indicates will add 735 AADT through Ripley), it is possible that traffic flows through Ripley could increase by as much as 28% compared with 2015 base flows, without any requirement for mitigation to be provided.</p> <p>Highways England considers that it would be unreasonable to require its Scheme to mitigate impacts that are likely to occur regardless of whether the Scheme comes forward or not.</p>	
Old Lane				
4.3.5	REP2-047 (para 7.2.4)	There is no dispute between Highways England and GBC as regards the assumption in the traffic modelling that traffic from the	Under discussion.	Highways England is not aware of any reason as to why this statement cannot be agreed (as

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	REP2-032 (ExAQ1.13.5)	former Wisley Airfield site will be able to exit on to Old Lane and access the A3 southbound carriageway via the A3/Old Lane junction.	<p>GBC shares Surrey County Council's concern about the projected increase in trips along Old Lane and that the closure of Old Lane to southbound traffic south of the proposed access to the former Wisley Airfield site is seen as a key mitigation for the Local Plan allocation.</p> <p>As commented under item 1.4.6 of this SoCG above, Highways England is not aware of any reason as to why this statement cannot be agreed. This statement accurately reflects the principle that there will be a connection between the Wisley Airfield development site and Old Lane as stipulated in Policy A35 paragraph (2) of the Guildford Borough Local Plan. The wording of Policy A35 has already been agreed by GBC at item 1.2.1 of this SoCG above.</p> <p>It should be noted that Surrey County Council (SCC) has agreed that there is no planning policy commitment which specifically requires the closure of Old Lane to southbound traffic (see item 2.9.1 of REP3-012). This means that Highways England's approach to the modelling in this regard is sound and emphasises why Highways England is</p>	regards to traffic exiting the former Wisley Airfield development site). Nonetheless, it will continue to seek to engage with GBC to establish whether agreement can be reached on this point.

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			<p>surprised that this statement cannot be agreed.</p> <p>Highways England's traffic modelling assumes that the points of access to and egress from the former Wisley Airfield site will be via the Ockham Park junction and Old Lane, in accordance with the Local Plan.</p> <p>As set out in REP2-013 (see comment on REP1-020-12 on page 30), AADT traffic flows on Old Lane (between the A3 and Ockham Lane) are predicted to increase by 12% in the 2022 do-something case. Numerically, this will equate with one additional vehicle every two minutes which can be easily accommodated without any impact on the operation of the local road network.</p> <p>The larger increase in flows (100%) predicted in the 2037 do-something scenario will be attributable primarily to Wisley Airfield traffic accessing the A3 via Old Lane. Nonetheless, SCC has agreed that the improvements to the A3/Old Lane junction proposed as part of the Scheme will provide sufficient capacity to accommodate the predicted traffic flows without loss of operational</p>	

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			<p>performance [see SoCG REP3-012-item 2.9.3.]</p> <p>If Old Lane were to be closed to southbound traffic, this is likely to have the effect of reducing modelled flows on Old Lane. This is confirmed in the Inspector's Report on the Wisley Airfield appeal (see paragraph 20.64 of the Inspector's Report, included in REP1-048). However, this is a matter that Highways England considers should be determined as part of the mitigation for the development of the former Wisley Airfield site (as GBC comments directly above) and is not for Highways England's scheme to assess. Highways England strongly defends the robustness of its modelling and assessments.</p>	
4.3.6	REP2-047 (para 7.2.4.2)	<p>At this stage, no design details are available as regards the off-site cycle network required by Policy A35 of the Guildford Borough Local Plan 2019 and which is to be provided between the former Wisley Airfield site and Effingham Junction. Whilst the principle of closing Old Lane (to southbound traffic) south of the former Wisley Airfield site is supported by GBC (and SCC) as a means of reducing traffic flows on Old Lane, there is no firm policy commitment to this solution at this stage. Accordingly, it is reasonable that the Scheme has not made provision for such a measure.</p>	<p>Under discussion.</p> <p>GBC considers that this requirement was addressed at the appeal relating to the former Wisley Airfield site and the expectation is now that the off-site cycle network referred to in Policy A35(6) is taken to mean an on-road cycle lane along Old Lane.</p> <p>Highways England has confirmed in its comments on Surrey County Council's written representations (see REP2-014</p>	<p>Highways England considers that the need for measures to reduce traffic flows should be a matter to be addressed when a planning application for the development of the former Wisley Airfield site is submitted. Nonetheless, Highways England will continue to seek to engage with GBC to establish whether agreement can be reached on this point.</p>

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			<p>comments on REP1-020-12 and on REP1-020-13 on pages 30-31) that the Scheme will not result in any significant change in traffic flows on that section of Old Lane between Ockham Lane and Effingham Junction in the 2022 opening year.</p> <p>For 2037, the modelling predicts that traffic flows on Old Lane between Ockham Lane and Effingham Junction, will increase by approximately 30%. It is evident that once development on the former Wisley Airfield is implemented, there will be greater reassignment of local traffic accessing the A3 via Old Lane to avoid congestion elsewhere on the local road network. As such reassignment is not predicted to occur in the 2022 do-something scenario, there is no logical reason for the 2037 increases to be attributed to the Scheme specifically.</p> <p>Overall, Highways England considers that the closure of Old Lane to southbound traffic is a matter that should be addressed in connection with any planning application that comes forward for the development of the former Wisley Airfield site. Particularly having regard to the fact that significant</p>	

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<p>growth in traffic flows on Old Lane are predicted between 2022 and 2037 whether the Scheme comes forward or not. As noted in 4.3.5 of this SoCG above, if Old Lane were to be closed to southbound traffic, this is likely to have the effect of reducing modelled flows on Old Lane, but could potentially disrupt other patterns of use on the local road network. However, without any firm policy commitment to this measure it is not appropriate for this to be included within Highways England's traffic modelling as the closure is not directly necessary for the delivery of the Scheme.</p>				
<p>Ockham Lane</p>				
4.3.7	REP2-047 para. 7.2.5	Policy A35(2) of the Guildford Borough Local Plan requires the development of the former Wisley Airfield site to provide a 'through vehicular link' between the Ockham Park junction and Old Lane to mitigate against the Scheme increasing traffic flows on Ockham Lane. This through vehicular link will have the effect of reducing traffic flows on Ockham Lane.	<p>Agreed.</p> <p>However, GBC shares Surrey County Council's concern that this mitigation has not been modelled by Highways England.</p>	Details of the design for the through vehicular link design have yet to be confirmed meaning that there is insufficient confidence as to how this feature can be modelled with any degree of accuracy. A reasonable worst-case approach to the traffic modelling has therefore been taken in this regard.
<p>4.4 Ockham South-Facing Slips</p>				
4.4.1	N/A	There is no policy requirement in the Guildford Borough Local Plan 2019 for south-facing slip roads at the Ockham Park junction to facilitate	<p>Agreed.</p> <p>(Agreed as a matter of record).</p>	

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		development on the former Wisley Airfield site or in connection with any other development allocated in the Plan in the period up to 2034.		
4.4.2	REP2-047 para. 6.6	GBC (and the Joint Councils) has stated that the Burnt Common slips would provide the most effective solution for mitigating the impacts of proposed development on the former Wisley Airfield site (in terms of transport benefits) when compared with the provision of south-facing slips at the Ockham Park junction.	Agreed. (Agreed as a matter of record).	
4.4.3	RR-062 page 2; REP2-032(1.13.7)	There is no highway related justification for the provision of south-facing slips at Ockham Park junction as mitigation for the Scheme's effects, including as mitigation for effects arising from the closure of the Wisley Lane junction or to provide sufficient capacity for the operation of the Ockham Park junction.	<p>Under discussion.</p> <p>As set out in GBC's relevant representation (RR-062) GBC considers that further evidence should be provided by Highways England to demonstrate why the slip roads are not required.</p> <p>Highways England's traffic modelling and assessments provide robust evidence to support its view that south-facing slips at the Ockham Park junction are not required as mitigation for the effects of the Scheme.</p> <p>As set out in REP2-014 (see comment on REP1-020-20 on page 33) the Ockham Park junction will operate within design capacity in the future, with the Scheme in place and taking into</p>	<p>Highways England has submitted its evidence to the examination setting out the reasons why it considers the slips are not required. The Scheme will not prejudice the delivery of the slip roads in the future should funding become available and their feasibility/benefit be demonstrated.</p> <p>Highways England assumes that this matter will not be agreed with GBC, but will continue to seek to engage with GBC on this point, so that a final position between the parties can be confirmed</p>

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			<p>account any forecast traffic likely to be generated by the Wisley Airfield development and other forecast or planned growth.</p> <p>The assessments predict that the Scheme will increase traffic flows through Ripley by approximately 5% AADT (and 2% in the am peak), which are not significant or sufficient to justify the need for south-facing slips to be provided by the Scheme. In addition, any requirement for the Scheme to provide the south-facing slips as mitigation for the relatively small changes in journey times for the 21.4% of RHS Wisley visitors (affected by the closure of Wisley Lane travelling to and from the south) would be completely disproportionate and contrary to the statutory tests on planning obligations as regards being fairly and reasonably related in scale and kind. The signposted route will be just one minute longer than routing through Ripley and the number of trips involved would be well below that required to justify such a level of investment.</p> <p>As noted in paragraph 6.6 of the LIR [REP2-047] GBC considers the Burnt Common slips would be the most effective means of dealing with mitigation for the development of the</p>	

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			<p>former Wisley Airfield site and not south-facing slips at the Ockham park junction. However, should that view change, the Scheme does not prejudice the provision of the slips in the future should funding become available and their feasibility be confirmed.</p> <p>Overall, there is no evidence to suggest that the provision of south-facing slips at the Ockham Park junction would be necessary to make the Scheme acceptable in planning terms. Moreover, there is no funding available for the slips to be provided as part of the Scheme. If a decision were to be taken contrary to Highways England's view, then the current DCO could not proceed, which would have a very significant detrimental effect on the ability of GBC to deliver its Local Plan development strategy.</p>	
4.5 Loss of HGV Lorry lay-by				
4.5.1	REP2-047 (paras 3.2 and 7.3.1 to 7.3.3)	The closure of one designated HGV layby (comprising approximately five HGV parking spaces) on safety grounds is reasonable and appropriate.	<p>Agreed.</p> <p>It is accepted that there are reasonable grounds for closing the HGV layby for safety reasons and that the loss of approximately five HGV spaces is a matter that will need to weigh in the balance against the Scheme.</p>	

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4.5.2	REP2-047 (para 7.3.3)	There are no suitable sites within the vicinity of the M25 junction 10/A3 Wisley interchange on which to build replacement HGV parking facilities as part of the Scheme.	<p>Agreed.</p> <p>Given the sensitive environmental designations surrounding the M25 junction 10/A3 Wisley interchange it is acknowledged that there are no suitable sites which can be used for the provision of replacement of HGV parking places.</p>	Highways England will consider the need for HGV laybys and parking/resting places as part of its wider Strategic Road Network remit.
4.6 Impact on non-motorised users				
4.6.1	N/A	There are no matters of contention between Highways England and Guildford Borough Council as regards the Scheme's effects on non-motorised users (NMU) or in relation to any of the proposed improvements for NMUs included within the Scheme.	<p>Under discussion.</p> <p>GBC has raised concern about the future implications for NMUs from the former Wisley Airfield development.</p> <p>Highways England continues to await further clarification from GBC as to the reasons why this matter cannot be agreed. No comments were made on this matter in GBC's relevant representation [RR-062.</p>	Highways England will continue to seek clarification from GBC as to its concerns, so that any matters raised can be resolved wherever possible.
5.0 ECONOMIC AND SOCIAL IMPACTS AND POLICY ACCORDANCE & IMPLICATIONS FOR POLICY A35				
5.1 Facilitating planned growth				
5.1.1	REP2-047 (para 5.8.1)	The Spatial Vision of the Guildford Borough Local Plan 2019 (on page 19 of the Local Plan) references the delivery of the M25 junction 10/A3 Wisley interchange scheme.	<p>Agreed.</p> <p>(Agreed as a matter of record).</p>	Improved journey times and reduced congestion as a result of the Scheme will bring economic benefits for businesses and will improve access to employment opportunities.

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5.1.2	REP2-047 (para 5.8.2)	Policy ID2: Supporting the Department for Transport's Road Investment Strategy sets out Guildford Borough Council's commitment to facilitating major, long-term improvements to the A3 trunk road and the M25 motorway in terms of both capacity and safety. The reasoned justification for Policy ID2 states that the implementation of the Scheme (along with Highways England's other M25 junctions 10-16 and A3 Guildford RIS schemes) are required to accommodate future planned growth both outside and within the borough.	Agreed. (Agreed as a matter of record).	The Scheme will provide the additional highway capacity that is required to facilitate the delivery of new development being planned to meet local housing and other community needs in this part of Surrey.
5.2 Implications for Policy A35 delivery				
5.2.1	7.2.4.4	The Scheme will support the delivery of development on the former Wisley Airfield site allocated under Policy A35 by providing sufficient highway capacity at the Ockham Park junction, on the A3 and at the M25/junction 10 interchange to accommodate the traffic likely to be generated by that development.	Under discussion. GBC is concerned that an increase in traffic flows on Old Lane between Ockham Lane and Effingham Junction would prejudice the ability to secure suitable cycling provision along this route as mitigation for the development of the former Wisley Airfield site and as required by Policy A35(6). Highways England awaits GBC's further response. It notes that paragraph 5.8.1 of the LIR [REP2-047] refers to Highways England's 3 RIS schemes, including the M25 junction 10/A3 Wisley interchange Scheme as being crucial for the delivery of development in the Guildford Borough Local Plan.	Highways England will continue to seek to engage with GBC on this matter. The implementation of Policy A35 is contingent upon improvements to the A3 and to the M25 junction 10/A3 Wisley interchange which are provided for in the DCO Scheme. See also Highways England's comments on matter 4.3.6 above.

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			<p>As noted in item 4.3.6 above, the Scheme will not result in a significant increase in traffic flows on that section of Old Lane between Ockham Lane and Effingham Junction in the 2022 opening year. Only once the former Wisley airfield site is fully developed, does the modelling predict a larger increase in traffic flows (30%). This is most likely attributable to the reassignment of local traffic avoiding congestion elsewhere on the local road network once both the airfield and the Scheme are built, rather than as a result of the Scheme specifically, as is the case elsewhere on Old Lane.</p> <p>This supports Highways England's view that this is a matter that should be addressed once a planning application comes forward for the former Wisley Airfield site, which may include mitigation in the form of closure of Old Lane southbound as well as other measures at the junction of Ockham Lane and Old Lane for reducing traffic flows, assuming an off-road cycle route between the Airfield site and the railway station at Effingham Junction cannot be achieved. As is evident from the 2022 do-something results, these measures are not directly related to the delivery of Highways England's scheme or</p>	

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			necessary to make the Scheme acceptable in planning terms.	
5.2.2	N/A	The engineering design of the Scheme, including the alignment of the proposed Wisley Lane diversion will not compromise the ability to develop the former Wisley Airfield site in accordance with the Guildford Borough Local Plan 2019.	Agreed.	
5.2.3	REP2-047 (para 4.4.8)	The location of the proposed SPA replacement land will not extend the 400m exclusion zone or the 5km zone of influence in such a manner so as to prejudice or constrain any planned housing delivery in the Borough.	Agreed.	
5.3 Impact on the RHS Wisley Garden Master Plan development				
5.3.1	REP2-047 (paras 7.1.5 and 7.2.1.4)	It is not appropriate for the Scheme to retain a direct connection between Wisley Lane and the A3 if this would increase the risk of road casualties or collisions, both for people travelling on the A3 as well as those seeking to gain access or exit Wisley Lane.	GBC has no comments on this matter. However, GBC is concerned about the long term impacts of RHS Wisley traffic using the B2215 through Ripley to access Wisley Lane to and from the south. See Highways England's response to issues 4.3.1 to 4.3.4 of this SoCG above.	No further action is proposed. Retention of a direct connection between Wisley Lane and the A3 would conflict with relevant standards for trunk roads and would present a significant safety risk.
5.3.2	RR-062 page 2	As set out in the Transport Assessment in support of RHS Wisley's planning application, most of RHS visitors travel to the Gardens	Under discussion. As set out in GBC's relevant representation (RR-062) GBC	Highways England will continue to seek clarification from GBC as

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		<p>from the north. Their journeys will increase by no more than 1.6 miles in total (for each return trip) as a result of the Scheme. For the 21% of trips made between RHS Wisley and the south, journey distances will increase by up to 5.2 miles in total (for each return trip). The inconvenience of these additional journey distances is a matter that will need to be balanced against the need to ensure the safety of all road users, both on the A3 and those seeking to access Wisley Lane.</p>	<p>recognises that an increase in travel distance/time must be balanced against highway safety and capacity considerations.</p> <p>Highways England has responded on these points in documents REP2-014 and in the Transport Assessment Supplementary Information Report (TASIR) [REP2-011] (see Tables 2.2-2.9). A further summary of changes in distances and times is provided in Highways England's response to the LIR [REP3-007] (see comments made under item 4.9.12 on pages 9 and 10).</p> <p>Reference should also be made to the SoCG between Highways England and RHS Wisley which is being updated and submitted at Deadline 5.</p>	<p>to why GBC is unable to agree this issue.</p>
6.0 ENVIRONMENTAL IMPACT ASSESSMENT				
6.1 Methodology of assessment, baseline and robustness of assessment				
6.1.1	REP2-032 (1.8.1 and)	<p>The methodology for the environmental assessment is robust, is predicated on appropriate baseline information, addresses a suitable study area and identifies the likely significant environmental effects of the Scheme.</p>	<p>Agreed.</p> <p>GBC has not raised any issues as regards the robustness of the environmental assessment or the baseline data.</p>	

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6.1.2	RR-062 page 2; REP2-032 (1.4.3 and 1.8.18))	The application documentation provides sufficient detailed information to enable robust conclusions to be drawn as regards the visual impact of the Scheme, without the need for photomontages.	<p>Not agreed.</p> <p>As set out in GBC's response to ExQ1 [REP2-032] GBC shares Surrey County Council's view that the applicant should have submitted photomontages as part of its application documentation. GBC's relevant representation (RR-062) expresses concern about the Scheme having a significant impact in local views.</p> <p>Highways England has responded to this issue in REP3-007 (see comment regarding para 4.6.1 of the LIR [REP2-047] on page 7) and in REP3-008 (see page 10).</p>	<p>No further action proposed. The submission of photomontages is not a requirement under the Design Manual for Roads and Bridges IAN135/10 and as no significant views were identified that would be likely to experience a notable change, Highways England consider that photomontages would offer little benefit to the assessment process.</p> <p>Highways England notes that the ExA has asked the local authorities to comment further on this matter further in their ExQ 2.8.3 published on 18 Feb.</p>
6.2 Cumulative effects / in combination effects				
6.2.1	N/A	The ES (Table 9.14 of APP-054), the HRA, the WFDA, the FRA and the TA appropriately assess the effects of the Scheme in combination with other planned and committed developments known at the time of the assessment as being likely to take place in the study area and makes suitable provision to mitigate the identified significant effects.	GBC has no comments on this matter.	
6.3 Adequacy of environmental mitigation and compensation measures and proposed management and monitoring				
6.3.1	REP2-032 (1.8.23) and	The package of environmental mitigation and compensation measures for the Scheme	Agreed.	

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	REP2-047 (para 4.4.10)	appropriately addresses the Scheme's likely significant effects.		
6.3.2	REP2-047 (para 4.4.10)	The measures identified in the SPA management and monitoring plan and the Landscape and Ecology Management and Monitoring Plan provide an appropriate framework for the future maintenance, management and monitoring of the environmental mitigation measures.	Agreed. Subject to provision being made to include provision for badger sett and botanical monitoring.	Highways England will update the SPA management and monitoring plan when applying to discharge requirement 8 of the DCO.
7.0 NOISE, AIR QUALITY AND DISTURBANCE				
7.1 Noise and Vibration effects - Ripley				
7.1.1	RR-062 (page 2)	The methodology for the assessment of noise and vibration effects is robust and appropriate.	Agreed.	
7.1.2	N/A	The provision of low noise surfacing as part of the Scheme is appropriate and will bring noise benefits for receptors.	GBC has no comments on this matter. No comments have been made by GBC as regards proposals for low noise surfacing on the A3.	
7.1.3	N/A	The location and extent of new and replacement noise barriers to be provided as part of the Scheme along the A3, M25 and at the M25 junction 10/A3 Wisley interchange is appropriate and will bring noise benefits for receptors.	GBC has no comments on this matter. No comments have been made by GBC as regards proposals for noise barriers alongside the M25 junction 10/A3 Wisley interchange.	
7.1.4	RR-062 page 2 and	The assessment conclusions that there would be no significant noise or vibration effects on	Under discussion. As set out in GBC's relevant representation (RR-062) and in the LIR	Highways England has carried out a full environmental impact assessment of the Scheme and no significant noise and vibration

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	REP2-047 (para 4.2.4)	receptors at Ripley, including as a result of traffic, are sound and appropriately justified.	<p>[REP2-047 GBC is concerned that the increase in traffic would have the potential to increase noise and vibration.</p> <p>Highways England has carried out a full environmental impact assessment of the Scheme and no significant noise and vibration effects at Ripley have been identified. The assessments are based on a reasonable worst case as regards future traffic flows through Ripley.</p>	effects at Ripley were identified. Highways England will continue to seek clarification from GBC as to its reasons why this issue cannot be agreed or the reasons why it disputes the conclusions in the environmental statement
7.2 Air Quality effects - Ripley				
7.2.1	RR-062 (page 2) and REP2-047 (paras 4.2.4 and 4.2.6) and REP2-032 (ExQ1 – 132)	The methodology for carrying out the air quality modelling is robust and appropriate and is predicated on the most up to date data available at the time of the assessment.	Agreed.	
7.2.2	RR-062 page 2 and REP2-032 (ExQ1 – 1.3.3)	The assessment conclusions that there would not be an overall significant adverse air quality effect including at receptors at Ripley during the operation of the Scheme or due to an increase in traffic flows on the B2215 Portsmouth Road and Ripley High Street as a result of the Scheme are sound.	Under discussion. As set out in [REP2-032] GBC supports Surrey County Council's view that the predicted traffic flows through Ripley (and upon which the air quality assessment is predicated) are not sufficiently accurate to have enabled air quality effects to be adequately assessed.	Highways England will continue to seek clarification from GBC as to its reasons why this issue cannot be agreed. The assessment was based on a reasonable worst-case approach as regards future traffic flows through Ripley.

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			<p>Highways England considers that a reasonably worst-case approach has been adopted to the traffic modelling and no compelling evidence has been put forward by any interested party to demonstrate that Highways England's modelling has under-estimated likely traffic flows through Ripley. On this basis, the assessment of effects on air quality is robust. This is further explained in paragraphs 4.2.3 to 4.2.5 of REP2-022.</p> <p>The air quality assessment contained in the Environmental Statement did not consider that there would be an overall significant adverse effect on air quality, including at receptors at Ripley that would be likely as a result of the Scheme, and that concentrations would be below relevant national air quality objectives.</p> <p>Further assessment was carried out to respond to RHS Wisley's objections to the air quality modelling for Ripley and in the light of GBC commencing monitoring of NO₂ concentrations in Ripley in July 2016. This additional work was reported in REP2-022, which concluded at para 4.3.2 that it would be highly unlikely that there would be a</p>	

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			<p>significant adverse effect on receptors in Ripley as a result of the Scheme.</p> <p>Further reference should also be made to REP4-005 (see Highways England's comments on page 59 under issue 4.2.2) which confirms that the annual mean nitrogen dioxide concentrations at all receptors would be below the air quality objective.</p> <p>Highways England strongly defends the robustness of its traffic modelling and the basis upon which the air quality assessments have been carried out.</p>	
7.3 Other environmental effects on local communities				
7.3.1	RR-062 (page 2) and REP2-047 (para 4.2.4)	The conclusions of the environmental assessment that the Scheme would not result in any significant amenity or environmental disturbance effects at Ripley are robust.	<p>Under discussion.</p> <p>GBC's relevant representation expresses concern about the modelled increase in traffic movements through Ripley giving rise to increased noise, vibration, air quality and general disturbance to people, businesses and properties along the B2215. GBC considers that a highway and environmental enhancement scheme will be required to mitigate these environmental impacts.</p> <p>Highways England is awaiting further clarification as to why GBC disputes the conclusions of the Environmental Statement. It considers that there is no justification for the Scheme to fund</p>	As 7.1.4 and 7.2.2 above.

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			<p>measures to mitigate the Scheme's environmental effects at Ripley as no significant adverse environmental effects are likely. Highways England's response as regards the Scheme not giving rise to any significant air quality effects in Ripley is set out at item 7.2.2 of this SoCG above.</p> <p>Reference should also be made to REP3-007 (see comments on paragraphs 4.2.2 to 4.2.5 on page 5), which explains that any predicted changes in noise levels at Ripley as a result of the Scheme would be negligible.</p>	
8.0 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN AND CONSTRUCTION IMPACTS				
8.1 Outline CEMP, CEMP and HEMP				
8.1.1	RR-062 page 2; REP2-032 (1.15.8)	The CEMP (approval of which will be required under DCO requirement 3) will provide suitable and enforceable safeguards as regards environmental protection measures to be applied during the construction of the Scheme and for the preparation of a handover environmental management upon completion of the authorised development.	Agreed. In line with GBC's response to the ExA Written Questions ExQ1 [REP2-032], GBC consider that the documents will provide sufficient safeguards.	
8.1.2	REP2-032 (ExQ1 - 1.10.8)	The Undertaker/Principal contractor will be required to obtain consent from GBC under S61 of the Control of Pollution Act 1974 and this will provide a further mechanism for the	Agreed.	

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		control of construction noise as regards the Scheme.		
9.0 LAND REINSTATEMENT				
9.1.1	RR-062 (page 2)	Requirement 17 of Schedule 2 of the dDCO makes suitable and enforceable provision for any land used temporarily during construction to be fully reinstated.	Under discussion. Highways England continues to await clarification from GBC as to why it is unable to agree this matter.	Highways England will continue to seek clarification from GBC as to its reasons why this matter cannot be agreed and to seek to resolve any points that GBC may have.
10.0 PLANNING PERFORMANCE AGREEMENT				
10.1.1	REP2-047 (para 1.4)	Highways England and GBC are in discussions on the terms of a planning performance agreement to address issues raised in paragraph 1.4 of the Local Impact Report.	Under discussion. GBC has as part of the Joint Councils' Local Impact Report [REP2-047] expressed disappointment that terms have yet to be agreed.	
11.0 PROPOSED SCHEME CHANGES				
11.1.1		There are no points of contention between GBC and Highways England as regards proposals to make a number of changes to the dDCO as set out in (AS-023).	Agreed.	

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