

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:	
3.	Air quality and human health		Surrey County Council response
2.3.6	Applicant and Local Authorities	<p>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?</p> <p>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.</p>	This is not a matter on which SCC can comment. Air quality monitoring and management is a District and Borough responsibility and therefore GBC and EBC are the planning authorities with access to the relevant expertise to comment on the adequacy of the submitted assessment.
4.	Biodiversity and Habitats Regulations Assessment		
2.4.3	LAs, NE and Royal Society for the	Are you content with the Species Monitoring Programme that is set out in Table 7.11.1 of the SPA	Yes, the coverage seems appropriate but it is suggested that year 7 monitoring might be started in year 6 to give an earlier indication that the heathland recreation is establishing as planned.

Question to:		Question:	
	Protection of Birds (RSPB)	Management and Monitoring Plan [AS-015]?	
2.4.7	NE and Surrey County Council (SCC)/Surrey Wildlife Trust (SWT)	<p>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:</p> <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>As stated in response to question 2.3.6 air quality monitoring and management is a District and Borough responsibility and therefore GBC and EBC are the planning authorities with access to the relevant expertise to comment on the adequacy of the submitted assessment.</p> <p>From the information the applicant has provided and SCC's limited role in this respect it appears that the applicant appears to have followed the currently accepted guidance on air quality and Surrey County Council has no further comments to make.</p>

Question to:		Question:	
		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?	
7.	Historic environment		
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	Historic England in their role as advisor to the Department for Digital, Culture, Media and Sports (DCMS) are the responsible authority for advising on the implications of proposals related to designated heritage assets. SCC will therefore defer to their advice on this matter.

Question to:		Question:	
		<p>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?</p>	
2.7.5	<p>LAs, HistE and Painshill Park Trust</p>	<p>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.</p>	<p>Historic England in their role as advisor to the DCMS are the responsible authority for advising on the implications of proposals related to the 2* listed park. We will therefore defer to their advice on this matter.</p>
2.7.7	<p>SCC and HistE</p>	<p>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?</p>	<p>SCC can confirm that the timescales for delivery of the Archaeology WSI are acceptable and that this is appropriately secured by the Requirement 14 of the DCO. An outline WSI should be provided that sets out the overall approach to the assessment, methodology and mitigation of any archaeological remains that will then provide a framework and methodology for commissioning the detailed site specific WSIs that will then be required for each part of the scheme. SCC would welcome confirmation from Highways England as to when this information will be available for SCC to comment upon? To date SCC has seen a copy of the consultants brief for an Outline for Archaeological Management and Mitigation Strategy (AMMS) – Overarching Written Scheme of Investigation.' However this document is merely an outline of what the actual Management and Mitigation Strategy will contain and so SCC are unable to provide detailed comment. It does, however appear to cover the areas which SCC would expect at this stage.</p>

Question to:		Question:	
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> ".	SCC has no comment to make apart from the fact that the surveys may give more information as to the potential tree loss from root impaction.
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.	Having considered the applicant's response, SCC has no further comments in respect of the Zone of Theoretical Visibility. With regard to photomontages, SCC would re-iterate earlier comments that these are a typical visualisation type for communicating the visual effects of a scheme of this scale, under current best practice set out in GLVIA3, DMRB LA 107 and the Landscape Institute Technical Guidance Note 06/19. The assessment has predicted significant effects/noticeable changes in the view at a number of the representative viewpoints, and therefore SCC consider it is reasonable and proportionate that photomontages are produced to help communicate the predicted changes in the landscape, views and visual amenity in comparison with the baseline photography, which may include construction activities, earthworks, loss of and changes to woodland and planting, and new structures such as overbridges, gantries and slip roads.
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	Elmbridge BC would be the authority that grants licences for Painshill Park events. If the event warranted it a borough led Safety Advisory Group (SAG) would be called to advise on whether the events could safely take place. SCC may input at this time from an emergency management perspective. These groups only provide advice and do not have the

Question to:		Question:	
		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?	<p>power to stop or turn down an event. Any advice at these meeting regarding access is likely to come from Police or SFRS.</p> <p>There are no set criteria for events to go to SAGs as some can be small but have a big impact and some are large but don't have a large impact. New events are more likely to be requested to attend a SAG. As they are district and borough led they all have slightly different criteria and processes for SAGs. Most SAGs deal with one event at a time with the event organiser in attendance.</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?	It is not for SCC as the Highway Authority to determine or comment on the acceptability or otherwise of the form of re-development of any site. The Proposed Development's re-configured access arrangements via the Seven Hills Junction will provide adequate access for the current A3 use. A transport assessment would need to be undertaken to assess the suitability of this means of access for any other uses on the site.
13.	Traffic, transport and road safety		
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	<p>The exact routing of traffic that would be expected to route via B2215/High Street Ripley would need to be determined as part of a future planning application for the site, which would take account of whether the Proposed Scheme is consented or not.</p> <p>However, a first principles approach can be used to estimate the level of traffic using Figures 2.2 and 2.3 from REP2-052. Using Figure 2.2, it is estimated that the following destinations would access/egress the site from the south of the site accesses:</p>

Question to:		Question:																																														
		<p>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.</p> <table border="1"> <thead> <tr> <th>Origin/Destination</th> <th>Residential Proportion to/from the south</th> <th>Employment Proportion to/from the south</th> </tr> </thead> <tbody> <tr> <td>Guildford</td> <td>34%</td> <td>43%</td> </tr> <tr> <td>Woking</td> <td>22%</td> <td>13%</td> </tr> <tr> <td>Hampshire</td> <td>2%</td> <td>5%</td> </tr> <tr> <td>West Sussex</td> <td>1%</td> <td>2%</td> </tr> <tr> <td>Total</td> <td>59%</td> <td>63%</td> </tr> </tbody> </table> <p>Proportion of traffic with destinations south of the site access</p> <p>Figure 2.3 shows the amount of development traffic that will access/egress the site via the Ockham Park roundabout. The peak period arrivals and departures are shown in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">AM Peak</th> <th colspan="2">PM Peak</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Arrivals</th> <th>Departures</th> </tr> </thead> <tbody> <tr> <td>Ockham Park roundabout</td> <td>167</td> <td>447</td> <td>581</td> <td>158</td> </tr> </tbody> </table> <p>Assuming that B2215 Ripley High Street would be the main route for traffic accessing/egressing Ockham Park roundabout from the south (including to/from Woking), the following development traffic flows would be expected through Ripley High Street:</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th colspan="2">AM Peak</th> <th colspan="2">PM Peak</th> </tr> <tr> <th>Arrivals</th> <th>Departures</th> <th>Arrivals</th> <th>Departures</th> </tr> </thead> <tbody> <tr> <td>Assuming 59% of Ockham Park development traffic uses B2215 Ripley High Street</td> <td>99</td> <td>264</td> <td>343</td> <td>93</td> </tr> </tbody> </table> <p>Therefore, in summary, applying the principles above would result in Wisley Airfield generating 363 AM Peak vehicles and 436 PM Peak vehicles through B2215 Ripley High Street. However, the exact numbers would need to be determined and agreed as part of a future planning application.</p>	Origin/Destination	Residential Proportion to/from the south	Employment Proportion to/from the south	Guildford	34%	43%	Woking	22%	13%	Hampshire	2%	5%	West Sussex	1%	2%	Total	59%	63%		AM Peak		PM Peak		Arrivals	Departures	Arrivals	Departures	Ockham Park roundabout	167	447	581	158		AM Peak		PM Peak		Arrivals	Departures	Arrivals	Departures	Assuming 59% of Ockham Park development traffic uses B2215 Ripley High Street	99	264	343	93
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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</p>	<p>a) The promoter of the Burnt Common slips would be either Guildford Borough Council or Wisley Property Investments Limited. Surrey County Council supports the provision of the slips but cannot comment on the timescale for completion of the assessment.</p> <p>b) The 2015 base traffic flows for B2215 Ripley High Street are 17410 AADT (Table 4.1 REP2-011). These increase to 22,520 AADT in the Do-something scenario in 2022. This is a 29% increase in traffic flows compared with 2015.</p> <p>The 2037 Do-something scenario traffic flows are 30,360 AADT. This is an increase of 74% compared with 2015.</p> <p>These are significant increases in traffic flows compared with the existing situation in 2015. It is the Highway Authority’s view as described in the Local Impact Report (REP2-047) that these levels of increases will have an unacceptable impact on the community of Ripley both in terms of the ability of the B2215 Ripley High Street to accommodate the traffic flows alongside the junctions that join the High Street, but importantly it will affect the place making of Ripley High Street and create significant severance for pedestrians and cyclists using the High Street.</p> <p>To put this in perspective, 2015 flows on the A3 Ripley bypass between Burntcommon and Ockham junctions are 99,000 AADT on a purpose built dual carriageway with 6 lanes of carriageway and slip roads to enable traffic to join and no pedestrian or cyclist traffic. This is comparable to the 30,000 AADT proposed on B2215 in 2037 with the Proposed Development with two lanes of carriageway. This is clearly an undesirable situation on a B road with a historic village and significant pedestrian and frontage activity.</p>

Question to:		Question:	
		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.	
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 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?	<p>SCC believes that the logic still remains valid overall that the requested traffic management for the NSIP scheme through Ripley with the Burnt Common slips in place would reduce flows compared to the Do-Nothing scenario even though Wisley Lane would be diverted to the Ockham interchange.</p> <p>However, this could only be demonstrated through modelling of the Burnt Common slips roads and the mitigation which SCC considers that the Applicant should have undertaken as part of their sensitivity testing for the Proposed Development.</p>
2.13.5	SCC	In the LIR [REP2-047] and REP3-036 you have referred to the volume of	The comment on REP3-036 (1.5) about the growth in the volume of vehicular movements through Ripley was made to illustrate that the increase in flow arising from the proposed NSIP scheme is equivalent to the trips generated by a housing development of 1500 homes.

Question to:		Question:
		<p>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?</p>
		<p>In such circumstances, SCC would expect the development to provide mitigation to both reduce the trip generation and the impact. Consequently, SCC expects Highways England to provide suitable mitigation to reduce the associated impacts of the scheme through the village. It is also noted that the PM peak increase in traffic flows through the village are similar to the flows predicted for a thousand dwellings at Wisley Airfield.</p> <p>SCC as the highway authority did not comment on the Transport Assessment accompanying RHS Wisley's planning application related to the proposed investment programme: this was because most of the associated increase in vehicle flows were forecast to be on the SRN and so were for Highways England to comment on. However the NSIP scheme and associated modelling illustrates that trips to and from RHS Wisley with an origin/destination to the south-west will re-route through Ripley as a result of the NSIP. Consequently, it is SCC's view that Highways England should provide appropriate mitigation to in Ripley to address the impact the increase in RHS Wisley trips that will pass through Ripley as a result of the M25 Junction 10 scheme.</p>
2.13.6	Applicant and SCC	<p>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</p>
		<p>No, a flow of 13,000 vehicles is not an appropriate standard. This figure is from TD 46/97 which is "for new trunk roads". Annex A provides descriptions of the road types considered in the document. In this case, a new rural road (S2) is one which is 7.3m wide with the addition of 1 metre wide hard strips on either side, designed in accordance with DMRB standards set out in TD9/93.</p> <p>Old Lane is not as wide as this, most of its length being between 5 and 5.9m metres wide and without any hard strips or appropriate forward visibility/side road visibility as set out in</p>

Question to:		Question:	
		<p>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?</p>	<p>TD9/93. As such, the capacity is likely to be significantly less than the top of the range indicated in TD 46/97.</p> <p>Carriageway widths have been measured as follows: At Ockham Bites access – 5.3m At Ockham Forest car park – 5.3m 100m east of Elm Lane – 5.0m At Hatchford End – 5.9m At Cedar Cottage, Carlmere and Ockham Grange access – 5.4m</p>
2.13.11	Applicant, SCC and RHS	<p>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</p>	<p>SCC consider that it is likely that either only a very small proportion of southbound traffic or minimal vehicles will take this route. This is because the through route is likely to be subject to a 20mph speed limit, traffic calmed and circuitous with motorised vehicles subject to other modes (pedestrians, cyclists and buses) having priority.</p>

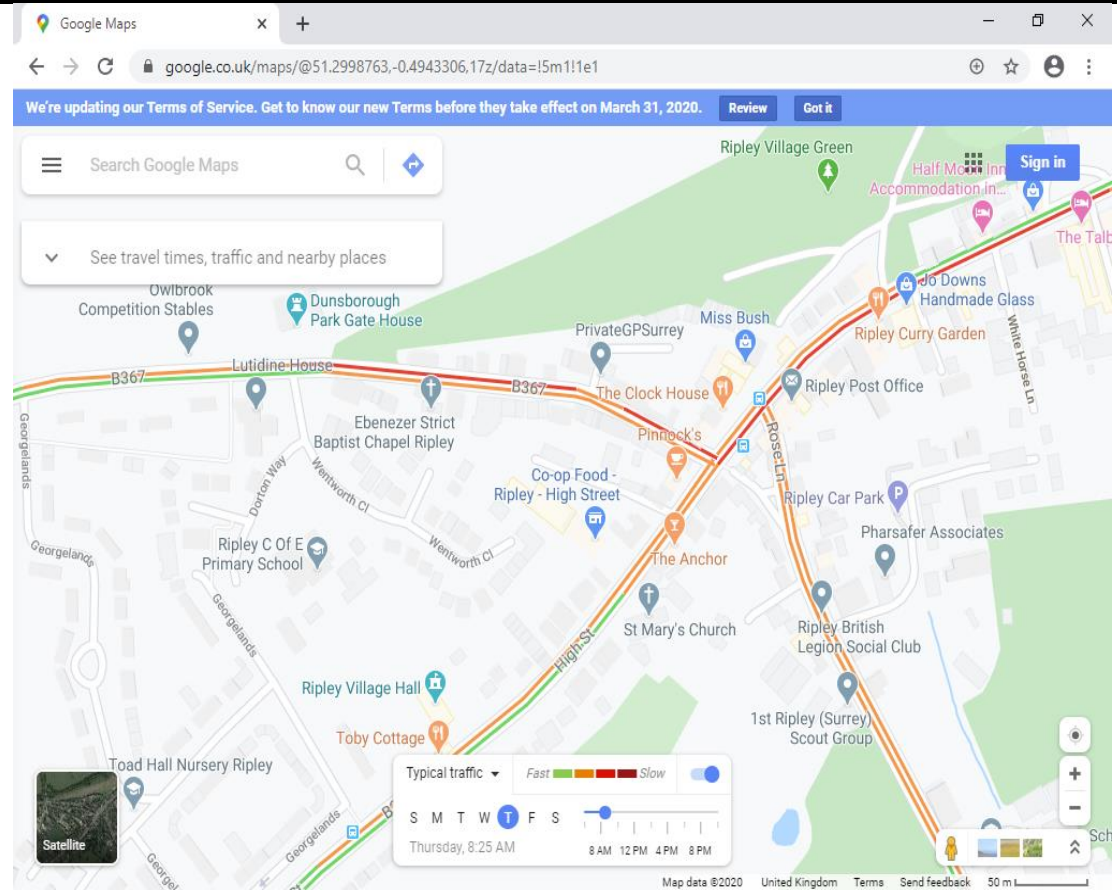
Question to:		Question:	
		manoeuvre at J10 of the M25 or routing via Ripley (the B2215)?	
2.13.15	Applicant, SCC and RHS	Where there is a junction between a multi lane dual carriageway and a side road how does the number of lanes on the dual carriageway affect the propensity for weaving to take place? The answer to this question should be given in general terms and should therefore disregard any local circumstances relating to the Proposed Development.	In general terms, the advice provided in Design Manual for Roads and Bridges (DMRB) should be followed to ensure that the propensity for weaving is minimised. If DMRB is followed, this will determine whether it is safe having a side road junction with a four lane dual carriageway.
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?	<p>It is not possible to give an accurate estimate of the likely increase in road traffic collisions as a result of more traffic, because every stretch of road is different and has a unique pattern of collisions, mix of road users and range of hazards. However the document submitted as annex B plots Collisions Over the Last Five Years (from 1/1/2015 to 31/12/2019) by severity, shows that there was a total of 46 collisions resulting in injury, with nine of these resulting in serious injury on the stretch of road between the northbound off-slip off the A3 towards Send, to the Ockham Roundabout. These 46 collisions resulted in 56 casualties, with nine of these suffering serious injury. The plot excludes any collisions on the Ockham Roundabout.</p> <p>It would be assumed that with an increase in traffic there would be an increased exposure to risk, and an increase in the number of collisions and casualties (unless mitigating measures that improve safety can be implemented). In addition once routes/links get close to capacity, accident rates increase as people take greater risk.</p>
2.13.29	Applicant, SCC, WPIL and RHS	In submitting your respective updated SoCG at Deadline 5 (D5) please ensure that the following matters are addressed in those SoCGs:	<p>See also SoCG submitted at deadline 5.</p> <p>a) The base year (2015) traffic flows are not agreed at present for B2215 (Portsmouth Road/Ripley High Street), Newark Lane and Rose Lane. SCC is in the process of checking observed data but the sharing of ATC data by the Applicant for Ripley would</p>

Question to:		Question:
		<p>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.</p> <p>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.</p>
		<p>assist in SCC taking a view. SCC agree that the calibration and validation of the model is satisfactory for the purpose of the model in the context of NSIP scheme.</p> <p>b) The Do-minimum and Proposed Development predicted 2022 and 2037 AM peak, Inter-peak and PM peak traffic flows are not agreed by SCC. This is because of the uncertainty in traffic flows modelled as set out in paragraphs 7.2.1.12 to 7.2.1.18 of the Joint Council Local Impact Report (REP2-047), uncertainty in how growth has been applied in the model and the lack of a mitigation scheme for Ripley as set out in paragraph 7.2.1.20 of REP2-047. SCC and the Applicant are working on clarifications to seek agreement on these matters.</p> <p>c) SCC considers that the links are currently operating within theoretical capacity along B2215 between A3 and A247. However, this is not the only criteria that should be applied to B2215 especially where the road passes through Ripley. The current traffic flows have a significant impact on the place making and severance that occurs within Ripley High Street and the environmental and social impact is more applicable than applying theoretical capacity of a link. SCC considers that the B2215's junction with Newark Lane currently operates at capacity particularly during peak periods. Significant queuing and delays currently occur on Newark Lane and along B2215. This is shown in the attached Google extracts for AM Peak and PM peak periods.</p>

Question to:

Question:

- 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.
- 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

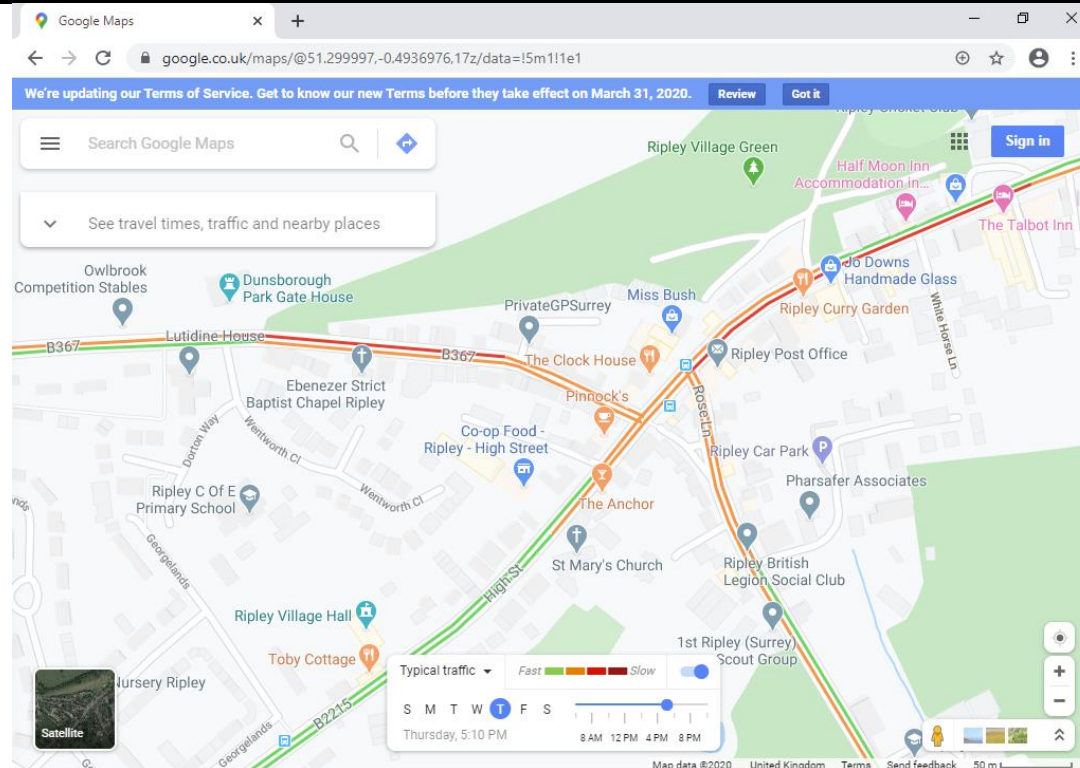


Question to:

Question:

exceedance would be.

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.



- d) At the Newark Lane/B2215/Rose Lane junction, Highways England predict that in 2022 with the scheme in place compared with 2015, traffic flows will increase through this junction by 25% during the AM peak and 39% during the PM peak (Table 7-9 of APP-136 Transport Assessment Report). In 2037 with the scheme in place traffic flows are predicted to increase compared with 2015 by 58% in the AM Peak and 80% in the PM peak. They also consider that in 2022 and in 2037 with the scheme in place the junction will continue to operate within capacity (Table 7-10 of APP-136). SCC does not accept that this junction will be operating with reserve capacity in the future given the proposed increases in traffic flows. SCC considers that this junction operates at capacity in 2020. The capacity exceedance is likely to be caused by

Question to:	Question:																																		
			<p>traffic growth and/or the increased traffic from the proposed scheme, for example all of the Wisley Lane traffic from the A3 south diverting through B2215 Ripley High Street.</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</p>	<p>a) Visibility splays are referenced to DMRB CD123 Geometric Design of At Grade Priority and Signal Controlled Junctions and CD109 Highway Link design which shows the stopping sight related to speeds (which are in kph) 50kph is approx. 30mph and 60kph is approx. 40mph.</p> <p>Table 2.10 Design speed related parameters</p> <table border="1" data-bbox="904 647 2002 762"> <tr> <td>Design speed kph</td> <td>120</td> <td>100</td> <td>85</td> <td>70</td> <td>60</td> <td>50</td> <td>V2/R</td> </tr> <tr> <td>Stopping sight distance (metres)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Desirable minimum</td> <td>295</td> <td>215</td> <td>160</td> <td>120</td> <td>90</td> <td>70</td> <td>-</td> </tr> <tr> <td>One step below desirable minimum</td> <td>215</td> <td>160</td> <td>120</td> <td>90</td> <td>70</td> <td>50</td> <td>-</td> </tr> </table> <p>b) The plots that SCC have seen do not meet the required standards, so SCC would like to see the mitigation measures that the applicant is proposing. Under Construction (Design and Management) regulations (CDM Regs), Highways England are the designer and measures are therefore to be determined by the proposer.</p> <p>SCC also consider that this is a consideration to measure on site for actual conditions, as the plans will not allow seasonal variations e.g. to vegetation.</p> <p>c). Vegetation clearance appears to be required beyond the red line. This raises a number of issues as the works are outside the DCO boundary. The proposed work to improve sight lines impact SCC land that is managed by Surrey Wildlife Trust on SCC's behalf. It is SSSI and SPA and the proposed works are not covered in the EIA or HRA. SCC assume these need to be assessed and included as an addendum to each document. SCC would also like to be assured that Natural England have no issues with these proposals as a local authority, we have a duty to engage with the Habitats Regulations.</p> <p>Regarding the works themselves, SCC assume these could take the form of tree and scrub removal across the inside of the bend. SCC acknowledge that this could improve light reaching the pond and reduce leaf fall into it, both being beneficial. There is a mix of pines and deciduous trees, the pines can be simply felled and they will not regrow. However, the</p>	Design speed kph	120	100	85	70	60	50	V2/R	Stopping sight distance (metres)								Desirable minimum	295	215	160	120	90	70	-	One step below desirable minimum	215	160	120	90	70	50	-
Design speed kph	120	100	85	70	60	50	V2/R																												
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One step below desirable minimum	215	160	120	90	70	50	-																												

Question to:		Question:
		<p>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</p>
		<p>deciduous trees will coppice and form dense regrowth very quickly after cutting unless the stumps can be removed or treated. They will be difficult to treat due to the proximity to water and this may not be possible. This dense regrowth will effect visibility and will require more regular maintenance. These are maintenance responsibilities that will fall to SCC and so SCC would require suitable maintenance monies to be provided to cover this ongoing maintenance.</p> <p>d) .SCC consider that the main issue is right turning traffic entering Elm Lane not being seen by following southbound traffic (i.e. drivers of following vehicles with restricted sightlines will not be able to view a stationary vehicle waiting to turn right).</p> <p>Before any meaningful measures can be suggested, the available stopping sight distance/visibility envelope should be measured to confirm what can be achieved. If the stopping sight distance is one, or even two or more steps, below desirable minimum then it is a creating a known concern / setting a precedent. Typical remedial measures that SCC's Safety Engineering team could employ in such situations on an existing highway concern would be high friction surfacing, appropriate junction warning signing with distance plates, slow road markings.</p> <p>In addition, an issue which has not been raised is the concern for two-way traffic in Elm Lane. If a vehicle attempts to enter Elm Lane at the same time a vehicle wishes to exit, there does not appear to be with width in the side road to accommodate two lanes of traffic. This could result in stationary traffic waiting to turn right, waiting in Old Lane (potentially for prolonged periods if several vehicles exit Elm Lane at once). Also it could result in vehicles reversing back from Elm Lane onto Old Lane. SCC query whether the bellmouth needs to be widened to allow two-way traffic as well as passing places in Elm Lane.</p> <p>SCC also has concerns regarding the achievable forward sight stopping distance/visibility envelope at the A3 northbound off slip to A245 Byfleet Road within the red line boundary due to the change from a signal controlled arrangement to a free flow jet lane. This concern is also stated in our covering letter.</p>

Question to:		Question:	
		plots 24/4 and 24/4a, what measures would need to be implemented to ensure that drivers emerging from Elm Lane or approaching this junction would be provided with adequate levels of forward visibility?	
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.	Highways England and Surrey County Council are negotiating a side agreement covering the following matters: 1. Detailed design input – a mechanism whereby SCC is consulted on the detailed design at an early stage; 2. Works to the local highway network – the provision of detailed information to SCC prior to commencement of works that will interfere with the local highway network; 3. Traffic regulation and management – a mechanism to reach agreement to co-ordinate traffic signals; 4. Inspections and testing of materials – a mechanism under which SCC is to inspect and test materials; 5. Road safety audits – a mechanism whereby road safety audits affecting the local highway network are provided to SCC; 6. Defects – a mechanism to require Highways England to make good any defects in the works; 7. Provisional certificate – upon completion of a section of works to SCC’s satisfaction, a provisional certificate it to be issued; 8. Maintenance – Highways England to be responsible for maintaining the works during the maintenance period; 9. Final certificate – mechanism for SCC to adopt the works to the local highway network following the maintenance period. Highways England and SCC are also discussing issues related to Ripley, commuted sums and the possibility of Highways England undertaking or paying for certain works in relation to the Ockham Bites Car Park.

Question to:		Question:	
			Highways England is working with SCC with a view to ensuring that the side agreement is executed prior to the close of the examination, but in the event this is not achieved, Highways England has indicated that they are likely to include protective provisions in the dDCO for SCC as the local highway authority.
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?	<p>HE's REP3-007 page 12 states that paragraph 7.1.1 issues are addressed in HE's REP2-014 (see pages 24-28, reference number REP1-020-9).</p> <p>SCC has considered the responses and still consider that the B2215/Newark Lane/Rose Lane junction will operate significantly over capacity in the future with the proposed scheme creating significant queuing and delay. The impact of all of the Wisley Lane traffic from the south using B2215 Ripley High Street during all time periods is a significant concern which has not been addressed by the Applicant/Promotor.</p> <p>The proposed Burnt Common slip roads are the key solution to preventing significant increases in traffic through Ripley from occurring as part of Local Plan growth but the slip roads do not address the Wisley Lane issue (and therefore RHS Wisley traffic impact through Ripley). SCC consider that the Applicant/Promoter should be providing traffic management in Ripley High Street as part of the NSIP proposals which if implemented from opening of the Scheme provide a deterrent to Wisley Lane traffic from the south diverting along B2215 Ripley High Street. This in combination with signage on the A3 is the best solution for ensuring that Ripley High Street has none or little impact from the Scheme.</p> <p>In terms of additional information, SCC would ideally like to see Highways England provide sensitivity modelling of the implications of Old Lane being downgraded as per previous submissions and the impacts of the Burnt Common slip roads on traffic flows through B2215 Ripley High Street.</p> <p>Highways England has stated that this information will not be provided so SCC's comments still stand that they consider that there will be an unacceptable impact from the Scheme on B2215 Ripley High Street. In the absence of this additional information to prove what future impacts on Ripley would be, SCC consider that the Applicant/Promoter should implement the traffic management scheme at Ripley to address SCC's objection.</p>
2.13.35	SCC	Having regard to what has been said about bus stop provision at the Ockham	SCC requested that bus passengers who are required to board/alight buses at the Ockham Park junction bus stops and wish to access RHS Wisely are provided with a suitable footpath to support a safe pedestrian route to/from RHS Wisley. This requirement was predicated upon

Question to:	Question:	
	<p>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?</p>	<p>circumstances where a bus service would not be using the proposed new access over bridge into RHS Wisley. As set out previously there is no firm commitment from any bus operator to divert bus services into RHS Wisley.</p> <p>SCC's recent correspondence with Stagecoach, bus operator of service 715 Guildford – Ripley – Cobham – Kingston has established that they do not support a diversion of any journeys on Service 715 into RHS Wisley. Stagecoach advise that additional journey time and potential loss of patronage elsewhere on the route due to unattractive journey times (i.e passengers on the bus but have no need to visit RHS Wisley) make this proposal financially unsustainable.</p> <p>On the basis that Stagecoach are unable to agree to a diversion existing and future bus passengers will experience inconvenience and dis-benefit due to the additional walk distance from the Ockham Park junction bus stops to RHS Wisley.</p> <p>Below is a summary of the correspondence from Stagecoach outlining their position:</p> <p><i>"Since taking over the 715 three years ago we have worked hard to improve operational performance and whilst we have made great strides, the nature of the route means it is subject to unpredictable & significant traffic variation at both the Guildford and Kingston ends and maintaining punctuality remains very challenging. Whilst 5 minutes extra running time to serve Wisley could be accommodated within the current vehicle cycle on paper, this would simply reduce the amount of layover and especially at the Kingston end this will simply mean that we have less scope to recover time on days of high traffic volumes/congestion. The result will be a worsening of punctuality which would affect virtually all passengers. One solution is to simply increase the vehicle cycle time to maintain current recovery time, but there would certainly be a cost to this.</i></p> <p><i>Our clear evidence and all the wider research that I have ever seen shows that diversions of bus services from the logical and direct routing acts as a significant disincentive to through patronage and our view is that the proposed new routing/diversion to serve Wisley Gardens will reduce the volume of through passengers and undo the good work we have accomplished over the past 3 years in building ridership on this route. One could argue that 'what does 5 minutes matter' but our experience clearly shows that it does matter to people making through journeys and it is perhaps the perception that the bus is indirect and therefore uncompetitive with the car that matters much more than the precise number of minutes taken for the diversion. Just turning off the main road is the disincentive.</i></p>

Question to:		Question:	
		<p><i>For example, you will be aware that we changed our 65 bus service a couple of years ago to stop making a 5 minute detour via Runfold village off the A31 and we changed it to instead run direct via the A31 between Guildford and Farnham. We saw a significant increase in patronage as a result of this; the bus was now competitive with the car between Guildford and Farnham in terms of journey time and directness of route and this attracted new users to the route.</i></p> <p><i>I am therefore extremely concerned at the negative impact the proposed diversion to Wisley will have on overall patronage on the 715 and this would add to the cost of making the diversion. We have not been able in the time available to look in any detail, but I would estimate that this could cost an additional £30-£40k per annum in lost revenue”.</i></p> <p>SCC’s view is that there will still be a need for a bus passenger transport service to access RHS Wisley. With no other regular conventional bus services in the locality Highways England funding could be secured to deliver a more bespoke bus solution, such as a community transport type service.</p>	
15.	Content of the draft Development Consent Order (dDCO)		
2.15.5	LAs, NE, RSPB, SWT, EA	<p>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</p>	<p>SCC does not agree that the following activities should be excluded from the definition of commence: site clearance and the erection of any temporary means of enclosure. Both activities would necessitate the enactment of controls set out within other DCO documents. For example the erection of temporary means of enclosure should be subject to the Traffic Management Plan.</p> <p>SCC also query what activities would fall within the definition of pre-constructional ecological mitigation.</p>

Question to:		Question:	
		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.	
16.	Compulsory Acquisition (CA)		
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.	<p>SCC have instructed external solicitors to carry out this work. They have previously advised that it is not possible to provide a fixed date for completion due to the unpredictability of the work that is involved and due to the amount of land in question. As a rough guide, work could possibly be completed within 9 – 12 months but they have stressed that this timescale is an estimate only.</p> <p>To provide clarity in this matter SCC have produced a table of outstanding issues in regard to this matter with a column which Highways England can then complete to respond on the matter in question (similar to a Statement of Common Ground format) This was sent to Highways England on 6th December 2019 and SCC are currently awaiting Highways England's response. A copy of this table can be provided if required by the ExA.</p>