

M25 junction 10/A3 Wisley interchange

TR010030

9.78 Applicant's comments on Interested Parties responses to Examining Authority's second written questions

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M25 junction 10/A3 Wisley interchange

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1. Introduction

- 1.1.1. This document sets out Highways England's comments on responses, by various Interested Parties (IPs), to the Examining Authority's Second Written Questions (ExQ2) [PD-010].
- 1.1.2. Highways England has commented, in section 2 below, on a subsection of the responses to ExQ2 from the following Interested Parties:
- Royal Horticultural Society (RHS) [REP5-054]
 - Ockham Parish Council [REP5-041]
 - Royal Society for the Protection of Birds (RSPB) [REP5-043]
 - Elm Corner Residents Association [REP5-058]
 - Painshill Park Trust (PPT) [REP5-042]
 - Surrey County Council (SCC) [REP5-029]
 - Elmbridge Borough Council (EBC) [REP5-037]
 - Guildford Borough Council (GBC) [REP5-038]
 - Surrey Wildlife Trust (SWT) [REP5-044]
 - Natural England (NE) [REP5-032]
 - Environment Agency (EA) [REP5-036]
- 1.1.3. Where issues raised within the IPs' responses have been dealt with previously by Highways England within one of the application or other examination documents, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.4. In order to assist the examining authority, Highways England has not provided comments on every point made by Interested Parties in their responses to ExQ2, including for example statements which are matters of fact and those which it is unnecessary for Highways England to respond to. However, and for the avoidance of doubt, where Highways England has chosen not to comment on matters contained in the response, this should not be taken to be an indication that Highways England agrees with the point or comment raised or opinion expressed.

2. Applicant's comments on Interested Parties' responses to ExQ2

Question Number	Question to:	Interested Party Responding	Question	IP Response	Highways England Response
2.3.2	RHS & NE	RHS	Please provide the relevant guidance or scientific rationale for the need to include, or not include, an assessment of Ammonia concentrations in the assessment of air quality effects on the SPA.	The scientific rationale is set out in REP3-050, point 2.7, pages 5 and 6. Essentially, clear evidence has recently become available that ammonia from road traffic can make a significant contribution to Ndep alongside roads, probably more than doubling the Ndep. This is supported by a report just issued (attached at Appendix A) that makes clear the importance of ammonia from road traffic for Ndep. This report is supported by a freely available tool to allow current and future emissions to be calculated (published alongside the report in Appendix D). REP3-050, point 2.7, pages 5 and 6, also sets out that studies being carried out elsewhere are including ammonia from road traffic. The same approach should be taken in the SIAA.	Consideration of ammonia is not included in any guidance published by Highways England, Natural England or the Institute of Air Quality Management (IAQM) for the assessment of air quality effects from road schemes on ecological sites. The evidence presented by RHS in REP5-049 shows that ammonia concentrations fall rapidly away from the road source, such that by around 30 metres concentrations are similar to those measured at 100 metres [Figure 2, REP5-049]. At the distance of the key supporting habitats for the qualifying features of the Thames Basin Heaths SPA from the road (150 metres at the closest point), there would be no material difference to the nitrogen deposition rates as a result of ammonia emissions from vehicles.
2.3.4		RHS	What do you consider the NOx concentrations in the SPA arising from the Proposed Development would be when assessed against the critical level of 30µg/m3?	The NOx concentrations in the SPA are those set out in APP-050, the appendix to the Air Quality Chapter, in Table 5.7.10. There are many locations on the transects where the critical level of 30 µg/m3 is exceeded, by more than a factor of 3 in some cases (i.e. 90 µg/m3) and will therefore be damaging to vegetation. These exceedances, some of which are worsened with the Scheme, are not discussed in the SIAA.	The critical level for NOx is 30 µg/m ³ . According to the IAQM's Air Quality Impacts on Nature Sites guidance " <i>At concentrations above this critical level, both beneficial and adverse responses have been recorded</i> " (paragraph D.4.5, at https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2019.pdf). At the distance where the key supporting habitats for the qualifying features for the SPA would be present (150 metres at the closest point), concentrations of NOx are below the critical level, as shown in answer to question 2.3.1 in Response to Examining Authority's Second Written Questions [REP5-041].
2.3.1-4 & 2.3.7		Ockham PC	See questions in full in document PD-006.	Alternatively-fuelled cars make up a very small percentage of overall vehicles operating in the UK. The modelling used for anticipating the air quality in the SPA following implementation of the proposed scheme must be based on the existing split between fossil fuelled and alternatively-fuelled vehicles as habitats legislation does not allow for forecasting. We believe that air quality predictions have not been sufficiently thorough.	Highways England agrees that alternatively-fuelled cars make up a very small percentage of overall vehicles operating in the UK. According to Government's vehicle licencing statistics, they made up - around 0.5% of all vehicles in 2018, However, this sector of the fleet is growing, and will make up a larger proportion in future years, as a result of Government policies to ban petrol and diesel cars in future. The air quality assessment is a conservative one, as it is based on DEFRA and DfT data which assumes that alternatively fuelled vehicles make up only 0.4% of all vehicle kilometres travelled in 2022, the opening year of the Scheme. In addition to this, a long term trends approach is undertaken as standard for all Highways England's road schemes, to account for any uncertainty in future emissions. The statement that " <i>habitats legislation does not allow for forecasting</i> " is not correct. Application of the relevant legislation and guidance does allow for forecasting. For example, Natural England's guidance NEA001 notes that an assessment needs to " <i>take into account ... the best available evidence as to ... likelihood for future reductions</i> ". Assuming that there will be no improvements in emission levels over time is in contrast to government policy, and lacks scientific credibility, as noted by the Inspector when reporting on the HRA for the Wealden Local Plan (see paragraph 8, at https://www.wealden.gov.uk/UploadedFiles/Inspectors_conclusion_after_stage_one_of_the_Examination_of_the_Submission_Wealden_Local_Plan.pdf).
2.4.3	LAs, NE & RSPB	RSPB	Are you content with the Species Monitoring Programme that is set out in Table 7.11.1 of the SPA Management and Monitoring Plan [AS-015]?	The RSPB is not content with the Species Monitoring Programme in Table 7.11.1. The RSPB notes that no changes have been made to the Species Monitoring Programme set out in Table 7.11.1 of the SPA Management and Monitoring Plan [AS-015] since the original document was created [Revision 0] in June 2019. The RSPB also notes Highways England's response to REP1-045-8 regarding consideration to the proposed	Discussions with interested parties including Natural England, Surrey County Council and Surrey Wildlife Trust on the works proposed within the management plans have been ongoing since the initial DCO submissions. The SPA Management and Monitoring Plan [REP4-031] will be refined during detailed design, a process that will include further consultation with Natural England. A final version will be prepared for submission to the Secretary of State for

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				<p>frequency of monitoring SPA qualifying species and the refinement of the SPA Management and Monitoring Plan during the DCO process in consultation with Natural England. Consequently, as no changes have been made since the original document [Revision 0], we retain our concerns regarding the Species Monitoring Programme set out in Table 7.11.1, originally identified in the RSPB's Written Submission, paragraph 54 [REP1-045]. Our concerns are summarised below.</p> <p>The RSPB considers that the effectiveness of the compensatory measures through monitoring SPA bird and invertebrate prey populations can be assessed by setting an expected number of birds of each species that should be supported by the compensatory habitat save where one or more severe winters has caused the population numbers to decline significantly. However, the current frequency outlined in Table 7.11.1 for species monitoring to occur in years 3, 7, 10, and 15 is insufficient to be able to identify the extent to which one or more severe winters have caused the population to decline. Having reviewed the proposed monitoring frequency, the RSPB recommends that species monitoring for SPA birds and invertebrates should occur every 3 years to enable the impact of severe winters to be detected sooner and better inform any responses under the SPA Management and Monitoring Plan. We recommend that a definition of what constitutes severe weather is agreed and incorporated into the SPA Management and Monitoring Plan. Decisions on monitoring beyond this period should form part of the responsibilities of the Steering Group for the SPA Management and Monitoring Plan.</p>	<p>approval under Requirement 8 of the draft DCO [REP5-002]. This will include monitoring methodologies and frequencies, and details of the duties of the steering group.</p> <p>Natural England has confirmed that it is satisfied with the overall monitoring proposals in their responses to questions 1.4.11, 1.4.33 and 1.4.34 in Response to Examining Authority's First Written Questions and request for information [REP2-034]. However, Highways England has agreed with Natural England that increases in the frequency of monitoring of SPA bird species would be appropriate in order to detect population fluctuations that may occur as a result of environmental factors, such as severe winters (refer to Item 1 of the meeting minutes for 11 November 2019 in the Statement of Common Ground between Highways England and Natural England [REP5-003] for a reference to increasing monitoring frequency, with a particular focus on the construction phase). The frequency will be agreed with Natural England but is likely to involve surveys every three years, possibly with increased frequency during the first five years .</p> <p>Highways England has also agreed that the monitoring of invertebrate abundance within the SPA compensation land (C1 and C2) and areas of woodland enhancement within the SPA enhancement land will be required in order to measure the success of the suite of compensatory measures (refer to Item 6 of the meeting minutes for 24 January 2020, on page 153 of the SoCG between Highways England and Natural England [REP5-003]).</p> <p>Highways England is currently developing these monitoring methodologies and will consult with Natural England as part of the process. The monitoring methodologies will be recorded in the final management and monitoring plan.</p>
2.4.4	Applicant	<p>Ockham PC</p> <p>Elm Corner Residents</p>	<p>Further to your response to written representations [REP2-014, page 56] please provide an update on progress on the agreement that is being sought between yourselves and SCC and SWT under which SWT would undertake the necessary measures in regard to the SPA compensation land and SPA enhancement areas.</p>	<p>We have concerns about the plans to thin out woodland areas and most particularly the intention to thin out the area between Elm Corner and the A3. This will lead to increases in noise, light and air pollution as well as visual disturbance to the hamlet of Elm Corner. We request that we are included and consulted in the planning for the SPA land in this area.</p> <p>ECRG would like to be a party to agreements between HE, SCC and SWT regarding the implementation of enhancement works on E4 Bolder Mere/Elm Lane enhancement area, since we note within the detail of the scheme that thinning of woodland areas can amount to as much as 80%. We are very concerned about the impact on woodland screening between Elm Corner residents' houses and the A3 in respect of traffic noise, aerial pollution, nitrogen deposits, light pollution/visual disturbance. We note there is to be a steering group to oversee the management/monitoring on the SPA and wonder if there is the possibility of representation of ECRG on this group?</p>	<p>As indicated in response REP1-022-7 on page 99 of the Applicant's response to Written Representations [REP2-014], the intention of the woodland enhancement works proposed for the woodland area between the Elm Corner residents and the A3 will be to improve woodland structure and diversity.</p> <p>A monitoring target identified for this area, as stated in Table 7.5.4 of the SPA Management and Monitoring Plan [REP4-031], 'E4 Objective 3', is to ensure that the new planting (which is proposed for this area) provides sufficient screening between the existing Elm Corner properties and the A3.</p> <p>The details of this planting will be refined during the detailed design process, and the SPA Management and Monitoring Plan [REP4-031] will be updated with these details and submitted to the Secretary of State for approval under Requirement 8 of the draft DCO [REP5-002].</p> <p>Highways England will consult with the Elm Corner residents and Ockham Parish Council as part of this detailed design process.</p> <p>The Steering Group that is referred to in 7.2.1.11 of the SPA Management and Monitoring Plan [REP4-031] will consist of experts from nature conservation agencies and their remit will be to determine if the proposed management and monitoring measures are being carried out appropriately and are achieving the measures of success/objectives set out in the management plans. It would not be appropriate for a member of ECRG to sit on this group considering its technical remit.</p> <p>However, residents' views and opinions will be welcomed and Highways England will provide a contact where feedback and queries can be raised.</p>

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2.6	N/A	Ockham PC	N/A	<p>We would like to put on record that we believe the flood vulnerability of Ockham cannot be underestimated in relation to the proposed works.</p> <p>Storms Ciara and Dennis have both caused serious problems with rainwater pouring off Three Farms Meadow/Former Wisley Airfield and onto Elm Lane, Old Lane and the A3.</p> <p>At a time of minimal traffic due to half term holidays (16th & 17th February 2020) the A3 was reduced to one lane southbound creating maximum disruption. The delays tailed along the M25 and right up the A3 as far as the Esher/Oxshott interchange A244/A3 interchange.</p> <p>Water offrun through Elm Corner flooded the road completely making it impossible for some residents to get out and Old Lane was almost impassable in some places.</p> <p>We note that some mitigation for flooding has been planned within document APP-046 but seek further reassurance.</p>	<p>Highways England is aware of the existing flooding concerns and shall be working closely with both the Local Authority (as Lead Local Flood Authority) and Environment Agency. The Scheme will improve highway drainage performance in the form of new drainage collection systems and attenuation provided on the A3, Wisley Lane and a section of Elm Lane as described in the response to Ockham Parish Council's written representation [REP1-016]. Further details are provided in the Environmental Statement Appendix 8.1 Drainage Strategy [APP-107] and the Flood Risk Assessment [APP-046].</p> <p>The new drainage systems will not only attenuate the runoff from the proposed new road network but will also improve the drainage from the existing road network. This will reduce the frequency of the roads flooding and in extreme events (above the design standard for the Scheme) it will reduce the severity and duration of the flood events.</p> <p>There are no proposals to change the drainage network on Old Lane, however the Scheme will not adversely impact flooding at these locations, as there are no physical works that will alter flood flow paths here. The main works to the A3 are far enough downstream (i.e. downhill) from these locations so that they will also not affect flooding here.</p> <p>The flooding of the A3 near Bolder Mere is known to be influenced by the silted up condition of the culvert under the A3, and the inlet into this culvert becoming blocked. As part of the Scheme this culvert will be cleared to restore its full capacity, which will reduce the chance of flooding on the A3. The improved drainage collection systems will attenuate the road runoff before it discharges into the watercourse, therefore reducing the flow through the culvert and further reducing the risk of flooding on the A3.</p>
		Elm Corner Residents	<p>Storms Ciara, Dennis and Jorge have caused disruption and flooding to Elm Corner. The water running from the airfield directly onto Elm Lane flooded the road completely and then overwhelmed the ditches leading to Boldermere. Severe disruption was caused on the A3 on Sunday 23rd February 2020 when 2 lanes of the A3 southbound carriageway at Boldermere were closed due to flooding, we also have photographic evidence of the total closure of the southbound carriageway at this same point in December 2008. We feel the ExA should request a firm response from HE as to how they intend to prevent this in future.</p>		
2.7.5	LAs, HistE and PPT	PPT	<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>The Applicant has misunderstood the significance of the land required for the proposed access road. It is part of the Grade 1 listed landscape and was an integral part of the Hon. Charles Hamilton's design of Painshill.</p> <p>It formed part of the Open Views which Hamilton created in the northern part of Painshill which in the long run the Trust aims to restore.</p> <p>In the immediate future, the Trust would use this land to plant trees to create a more effective barrier to shelter the historic landscape from the noise of traffic on the A3. Currently traffic noise makes a significant impact on the landscape and restored buildings, especially on the elevated land in the northern part of the landscape.</p> <p>The only reason that the Trustees agreed to sacrifice this part of the listed landscape was because Highways England had assured them that it would enable them to provide a replacement for the western entrance, on which the survival of the Trust and Painshill Park depends. Now that the applicant has reneged on that assurance, the Trustees do not believe they would be justified in giving up this part of the Grade 1 listed landscape.</p>	<p>Environmental Statement Chapter 11: Cultural heritage [APP-056] and Environmental Statement Appendix 11.3 Statements of Significance [APP-123] provides the evidence base for the assessment of the significance within the Registered Park and Garden, including the contribution of the land required for the access road. In addition, consultations with Historic England have agreed with this assessment, as stated in the Applicant's Response to Examining Authority's Second Written Questions [REP5-039].</p>
2.7.7	SCC & HistE	SCC	<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</p>	<p>It appears from the comments that SCC consider the AMMS to be at the development level expected at this point in time. The AMMS will be further developed in detailed design and SCC (and Historic England) will be consulted on its development throughout that process. Highways England does not currently have a specific date for when this would be available for SCC to comment on.</p>

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				<p>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>	
2.12.1	PPT & LAs	PPT	<p>Please comment on Painshill Park’s expansion plans in terms of hosting events and increasing visitor numbers, and in particular, any concerns that the lack of a western access may jeopardise these plans, having regard to the comments made by Surrey Fire and Rescue Service that are cited in [REP3-063]. What is the likelihood of licences for certain large-scale events being refused due to concerns over the lack of adequate access alternatives in the event of an emergency?</p>	<p>This question covers three main points: 1. Events and visitor numbers. 2. Surrey Fire and Rescue Service’s comments as reported by the Applicant. 3. Possible refusal of licences.</p> <p>1. (no need to respond)</p> <p>2. The applicant’s comments on Painshill Park Trust’s Deadline 3 submission contain extracts from the report by Surrey Fire and Rescue Service which are selective and misleading, particularly in the light of a meeting on 23rd January 2020 with SFRS, PPT and the Applicant in which Paul Kenny, Group Commander, SFRS, expanded on his report.</p> <p>The report begins by saying clearly: “The following is based on considerations relating to access to the Gothic Tower in the event of removal of the A3 access point. Any other element relating to Painshill is deemed as out of scope”. Later in the report he says: “It is understood that Painshill Park hosts a number of public events, increasing the number of visitors during event dates. These will be out of scope for this feedback due to unknown specifics”.</p> <p>At the meeting on 23rd January, SFRS said that in the event of a fire at the Gothic Tower, they would need to attend with a minimum of four fire engines, three command vehicles and a number of water carriers. The latter would be too large to use the track in Painshill. The track which goes through the Grade I historic landscape would have to be provided with passing bays and a turning circle to accommodate the fire engines and command vehicles. To obtain water the water carriers would have to approach via the A3, which would have to be closed. They would then supply water to the fire engines by hose over the fence.</p> <p>Alterations to the track would damage the historic landscape, while the closure of the A3 would incur considerable delay. An alternative source of water would be the lake but this too would cause delay. Turning to the Applicants comments:</p> <p>2.1.1 The quote from SFRS is misleading as it is taken out of context, see the points above.</p> <p>2.1.2 The quote from SFRS is accurate but avoids the key point that made by Group Commander Paul Kenny that the closure of the access point will cause a “delay in attendance time”, an increase from 5 to 15 minutes against the Surrey standard of 10 minutes. These times were achieved in a single trial but would be lengthened if there were heavy traffic or more visitors in the park. There would be a further delay in accessing adequate water supplies. (See above).</p> <p>2.1.3 The fact that Painshill Fire Station is 350m from the main entrance to Painshill Park is irrelevant. Group Commander Kenny made it clear that emergencies at Painshill would be served from other stations if the Painshill station were to be occupied on another emergency or closed. Closure depends on crewing levels. As it happens, the station is closed</p>	<p>2. The Applicant’s comments on Painshill Park Trust’s Deadline 3 submission [REP4-008] contain information from the email received from Paul Kenny, Group Commander, SFRS on 22 January 2020 as set out in Response from Central Command, Community Safety and Risk Reduction, Surrey Fire and Rescue Service (SFRS) [REP3-063]. The quotations used in the Applicant’s comments on Painshill Park Trust’s Deadline 3 submission were directly taken from this email as they were relevant points to note with regards to access and fire risk.</p> <p>Subsequent to Paul Kenny’s email, a meeting was held on 23 January 2020 between Painshill Park Trust (PPT), SFRS and the Applicant, in which Paul Kenny, Group Commander, SFRS, expanded on his response on the current and proposed access points to the park. Minutes of this meeting are provided in Appendix A.</p> <p>2.1.1 The quote in REP3-063, that “<i>there is not a requirement to provide or maintain a second access point for fire service vehicles</i>” was taken directly from the conclusion provided. This is the overriding point as it continues “<i>however, closure of the A3 access point may have an impact on attendance times of required fire services resources in the event of fire and therefore effect operations</i>”. This latter half was not definitive and therefore was not included.</p> <p>2.1.2 REP3-063 states that “<i>It should be pointed out that this was a single trial of both routes and should not be seen as an average attendance time</i>” and “<i>The delay in attendance time via Access 2 [Access from A245 Portsmouth Road, this access services Mr Hamilton’s Tea Room and the access road within Painshill Park] is due to the conditions of the narrow, winding route with obstructions.</i>”</p> <p>At the meeting on 23 January 2020 Paul Kenny advised that in the recent test situation using the ‘tradesman’s entrance’/road in the Park was not found to be ideal. The time taken from the Fire Station to suitable distance from the Gothic Tower was 15 minutes. Trees were found to be growing in the way of the appliance. It was stated that the route needs to be 3.7 metres wide. Currently appliances would need to park behind each other. These factors delay response time.’ Improvements to the existing park are therefore also required to reach the Gothic Tower in the existing circumstances. Paul Kenny also noted at this meeting “that a sprinkler system in the Gothic Tower would help suppress a fire”.</p> <p>2.1.3 The information that other fire stations could be utilised in an emergency situation has not been communicated to Highways England by SFRS, either in REP3-063 or at the meeting on 23 January 2020 .</p> <p>2.1.4 REP3-063 states the email is “<i>relating to access to the Gothic Tower in the event of the removal of the A3 access point. Any other element relating to Painshill Park is deemed as out of scope</i>”. However, the conclusion refers to a wider scope.</p> <p>The meeting held on 23 January discussed events in the park. The minutes of that meeting report that “<i>PPT’s growing events programme was discussed with Paul Kenny advising each event is considered on its merits by the Safety Audit Group (SAG). SCC is the emergency planning lead and SFRS attends meetings.</i>”</p>

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				<p>today (21st February) as this response is being written and it is planned to close the station at night later this year.</p> <p>2.1.4 The Applicant knows that this comment is taken out of context as the SFRS report specifically says that special events are out of scope. (See above).</p> <p>3. The western entrance was required as an emergency exit for the 7,500 visitors to the Elmbridge Food Fair held in 2019. The Trust believes that the closure of the entrance would limit its ability to offer similar events. The Trust learnt at the meeting on 23rd January mentioned above that Surrey County Council is the emergency planning lead for events attracting over 5,000 people, advised by the Safety Audit Group.</p>	<p><i>The threshold for an event needing to be considered by SAG is 5000 people (this number may vary).</i>” SFRS also added “<i>that staff need significant training to manage traffic in these circumstances</i>” and that “<i>ideally events would have another access into the car park as the secondary access onto the A3 does not overcome the problems which have been highlighted.</i>”</p> <p><i>“Richard Ray Smith (PPT) confirmed access for maintenance vehicles remains very important to future land management and restoration of the historic landscape while access for the emergency services and visitor exit is vital for visitor safety and proposed increase in visitor numbers.” “Paul Kenny also commented that the A3 exit is unsuitable for visitors and that SFRS treat the A3 as a motorway.”</i></p> <p>3. Painshill Park Trust Ltd holds a premises licence under the Licensing Act 2003 for the provision of regulated entertainment and sale/supply of alcohol at Painshill Park (Licence No. LN/200500894). Highways England is unable to find any public record of conditions being attached to that licence which stipulate that the western access must be available as an emergency exit. Neither Elmbridge Borough Council (the licensing authority) nor Surrey County Council (in its capacity as Safety Advisory Group) suggested in their responses to ExQ2.12.1 that the closure of the direct access from the A3 would be likely to limit the potential for events to be held in Painshill Park in the future. Moreover, the routing of large numbers of vehicles out of Painshill Park directly on to the A3 in the vicinity of the Gothic Tower would represent a very significant safety concern for Highways England.</p>
2.12.2	PPT	PPT	<p>Please comment on the likelihood of any future agreement being reached with the relevant landowner(s) that would allow for the provision of a ‘western access’ into Painshill Park and set out how this could be funded.</p>	<p>At a meeting on 30th October 2019, Painshill Park Trust explained to Highways England that there is no basis on which they could have discussions with landowners on this point and that as promoters of the scheme Highways England should take the lead. It is still not clear what the route of the proposed access road would be and in any case the Trust has no money to finance any proposed acquisition of land to provide a ‘western access’.</p> <p>The Trust believes that it is the responsibility of Highways England to have discussions with landowners on both these points. It appears that the Project Manager had a meeting with the owner of Close Court Farm on 6th February.</p> <p>The only sources of funding to replace the access which Highways England had originally promised, would either be from the cost of implementing the scheme or from compensation paid to the Trust.</p>	<p>As stated in Applicant's Response to Written Questions [REP2-013, Question Number 1.12.2]:</p> <p>Notwithstanding this, to provide a replacement access to the western end of the park would entail providing a new route across third-party land to connect to the private means of access (PMA) at Court Close Farm. As the western part of Painshill Park can be accessed via the network of maintenance tracks within the park, there is no proper basis for Highways England to acquire rights across third-party land to provide the Trust with an access for emergency and or land management purposes.</p> <p>The Scheme does not preclude an access track linking the Court Close Farm PMA and Painshill Park. The scope for action in advance of the DCO Examination was discussed with the Trustees and it was suggested by Highways England that Painshill Park Trust facilitate a meeting with the Girlguiding Greater London West and the owners of New Farm and Court Close Farm to consider whether there is any common ground on the provision of an access to the Park and mechanisms for achieving it. However, it would not be appropriate for Highways England to seek to obtain compulsory powers to this end as there would not be a compelling case in public interest to do so.</p> <p>As indicated in Applicant's Comments on Written Representations [REP2-014, Highways England response to REP1-032-2]:</p> <p>As the western part of Painshill Park can be accessed via the internal network of maintenance tracks, there is no basis for Highways England to acquire rights across third-party land to provide the Trust with such an access for the Trust's work, including any restoration programme or occasional events, which is ‘used infrequently’, as stated by Mr Reay-Smith at the Open Floor Hearing on 12 November 2019 and as stated in Painshill Park Trust written representation</p>

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2.13.2	WPIL & SCC	SCC	Of the proportion of the traffic exiting or entering any redevelopment of Wisley Airfield (pursuant to Local Plan allocation A35) via the Ockham Park junction, please provide a projection for the traffic expected to route via the B2215/High Street Ripley, having regard to the trip distribution shown in Figure 2.2 on page 5 of REP2- 052.	<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.</p> <p>Using Figure 2.2, it is estimated that the following destinations would access/egress the site from the south of the site accesses:</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	<p>Wisley Airfield development generated traffic flows on the B2215 Ripley High Street in Highways England 2037 Do-something traffic model are similar to those estimated by SCC. They are 349 and 357 vehicles per hour (two-way) during the AM and PM peak hours respectively (Derived from Figures 3.4 & 3.8 of the Transport Assessment Supplementary Information Report [REP2-011]).</p>
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2.13.3	Applicant, SCC & WPIL	SCC	<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 abovementioned assessment will be completed by the promoter for the Burnt Common slips?</p> <p>b) If the completion of the abovementioned assessment is to post-date the closure of the Examination for this NSIP application or the assessment concludes that the provision of the Burnt</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</p>	<p>SCC's response to b) presents the comparison between the Do-something scenarios and the 2015 base. This is misleading since the fair comparison should be between the Do-something and Do-minimum scenarios that demonstrates the impacts of the Scheme. Most of the traffic growth through Ripley between 2015 and the future years of assessment is due to forecast background traffic growth in combination with traffic forecast to be generated by proposed developments in the Guildford Local Plan. The Scheme results in approximately a 5% increase in daily two-way traffic through Ripley (Table 4.1 of the Transport Assessment Supplementary Information Report [REP2-011]) and this is based on an event day at RHS Wisley Garden. Therefore, the increase in daily traffic through Ripley due to the Scheme will be less than this on a typical weekday.</p>																																														

Question Number	Question to:	Interested Party Responding	Question	IP Response	Highways England Response
			Common slips would be unfeasible, please comment on the implications that might have for the ability of the B2215 to accommodate the traffic it is predicted to receive as a consequence of the Proposed Development were it to be consented and implemented.	<p>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>	
2.13.5	Applicant & SCC	SCC	<p>In the LIR [REP2-047] and REP3-036 you have referred to the volume of additional traffic arising from the implementation of the investment programme at RHS Wisley being in excess of that which is expected to necessitate the installation of the north facing slips at the Burnt Common junction, ie the occupation of the thousandth dwelling at Wisley Airfield. As the bulk of the traffic generated by RHS Wisley arises during the inter-peak period rather than during the AM and/or PM peak periods and it appears that it is during the peak hours that mitigation for traffic associated with the airfield's redevelopment would be most required, is it appropriate to make a comparison between the need to mitigate the effects of the airfield's traffic and that arising from visitor growth at RHS Wisley?</p>	<p>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.</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>	<p>See response 2.13.5 within Applicant's Response to Examining Authority's Second Written Questions [REP5-014].</p> <p>Figure 2.1 of REP2-052 has a residential two-way trip rate of 0.52 vehicles per dwelling during the PM peak hour, which equates to 520 two-way vehicle trips for 1,000 dwellings. If 59% of these travel through Ripley as indicated by SCC's response to 2.13.2 above, then 1,000 dwellings at Wisley Airfield would result in 307 two-way vehicle trips through Ripley during the PM peak hour. This is nearly double the increase in traffic through Ripley during the PM peak hour due to the Scheme in 2022, which is 164 two-way vehicle trips (Derived from Appendix A of the Transport Assessment Supplementary Information Report [REP2-011]). So, SCC's statement that "the PM peak increase in traffic flows through the village are similar to the flows predicted for a thousand dwellings at Wisley Airfield" is incorrect.</p> <p>Highways England was not consulted on the RHS Wisley Garden planning application, as it should have been as a Statutory Consultee. They were therefore denied the opportunity to evaluate the impact of the planning application on the SRN, establish what measures might have been required to mitigate its impacts and thus, to determine its acceptability with reference to current access arrangements via Wisley Lane to and from the A3.</p>
2.13.6	Applicant & SCC	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 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>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 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>	<p>See response 2.13.6 within Applicant's Response to Examining Authority's Second Written Questions [REP5-014]. Old Lane is subject to a 40mph speed limit and vehicles over 7.5 tonnes are prohibited from using it, except for local access. Consequently, the width of Old Lane is sufficient to accommodate the free flow of two-way traffic and does not reduce its capacity, since vehicles generally larger than vans are prohibited from using it and traffic speeds are relatively low.</p>

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2.13.15	Applicant, SCC & RHS	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.	<p>The number of lanes do not affect the propensity for weaving to take place, The weaving flows are; (i) those movements which join a mainline and then cross into an offside lane or lanes, and (ii) those movements which cross from offside lanes into a nearside lane or lanes to diverge from the mainline. The propensity for weaving is therefore a function of the downstream destination of traffic, rather than how many lanes exist. If the weaving components are sufficiently high, then standards (CD122) promote the addition of lanes to accommodate weaving traffic.</p> <p>Whilst the ExA seeks through its question an answer in general terms, the RHS would respectfully note that the proposed four lane arrangement proposed by the DCO Scheme comprises a downstream two lane drop and so traffic merging onto the mainline would need to cross lane 2 (as counted from the nearside lane) in order to head in the direction of the offside lanes (A3 North). Those already on the mainline heading for the destinations served by the nearside two lanes are likely to be within those two lanes on the approach to the junction and this could be further encouraged with appropriate signage (so that the weaving component is reduced). The capacity improvements resulting from the additional A3 lane and the junction improvements which address the downstream congestion (at J10) would assist in providing gaps in traffic for weaving movements to take place.</p>	<p>Agreed in part but the type of upstream merge and downstream diverge will have an impact on the propensity for weaving as discussed in the Applicant's response to the same point in Applicant's Response to Examining Authority's Second Written Questions [REP5-014].</p> <p>The Applicant would like to clarify that in the RHS Alternative Scheme traffic merging from Wisley Lane on to the mainline would have to merge from an auxiliary lane and then cross lanes 1 and 2 in order to continue northbound on the A3 towards London.</p>
2.13.21	Applicant and SCC	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. 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>	<p>It is not necessarily the case that as routes and links get close to capacity that accident rates increase, and Highways England is unaware of any evidence that supports SCC's statement. In congested conditions when the road network is close to or at capacity, traffic speeds will be lower than in uncongested conditions. This is likely to mean that the risk of speed related accidents will be less when the road network is operation at or close to capacity compared to when it is operating well within capacity.</p>
2.13.29	Applicant, SCC, WPIL and RHS	SCC	<p>In submitting your respective updated SoCG at Deadline 5 (D5) please ensure that the following matters are addressed in those SoCGs:</p> <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</p>	<p>Surrey County Council's response to this question can be seen in full in document REP5-029 from page 15 onwards.</p>	<p>a) SCC has requested the traffic flow raw data, which Highways England can supply. SCC states in that it agrees that the calibration and validation of the model is satisfactory for the purpose of the model in the context of NSIP scheme [REP5-009 point 2.5.2]</p> <p>b) The model assumes 10% growth in Guildford between 2015 and 2022. This is based on the National Trip End Model (NTEM) which indicates 4,921 households being delivered in Guildford between 2015 and 2022, together with 3,800 additional jobs. This assumption is generally consistent with the overall quantum of growth indicated in the Local Plan trajectory (4,616 completions for the same period). We then used the Local Plan trajectory to locate projected completions more specifically and in accordance with the list as agreed at item 2.5.3 of the SoCG, including Burnt Common, Keens Lane and White Lane, Ash Green. Whilst the predicted 23% increase in traffic flow along the B2215 through Ripley between the 2015 base and 2022 (DM) therefore exceeds the 10% growth in Guildford more generally as per NTEM, the</p>

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			<p>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>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.</p> <p>d) For any link or junction referred to in c) above for which it is predicted that the capacity will be exceeded in the future (ie post - dating the operation of the Proposed Development should it receive consent), please provide an indication when it is expected the capacity of the link or junction would be exceeded and what the reason for the capacity exceedance would be.</p> <p>You are reminded in addressing the above listed matters in the SoCG that for any matter that is not agreed a full explanation for why there is disagreement shall be provided.</p>		<p>modelled flows correctly reflect the location and scale of development anticipated to come forward in the relevant time period. Accordingly, the 2022 DM flows reflect not only the proximity of proposed residential developments but also any rerouting that is likely to occur as a consequence, which the model shows will favour the B2215, no doubt reflecting traffic conditions elsewhere on the network at that point in time.</p> <p>c) SCC considers that the links are currently operating within theoretical capacity along B2215 between A3 and A247. Highways England agrees with this.</p> <p>SCC considers that the B2215's junction with Newark Lane currently operates at capacity particularly during peak periods. Highways England disagrees with this and it is evident from the modelling data presented in [APP-136- Table 7.9] that more traffic is forecast to be able to use this junction over time.</p> <p>SCC claim that capacity is not the only criteria that should be applied to B2215 and that 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. Should this be the case, Highways England has already demonstrated that the Scheme does not result in any significant environmental impacts in Ripley and nor is there any evidence of any social impacts.</p> <p>d) SCC's responses refers to increases between 2015 base and Do Something scenarios, whilst ignoring that the vast majority of the increase in traffic is attributable to Do-Minimum rather not Do-Something case.</p>
2.13.30	Applicant & SCC	SCC	<p>With respect to the proposed alterations to Elm Lane at its junction with Old Lane:</p> <p>c) Drawing HE551522- ATK-HGN-XX-SKCH-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-SKCH-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>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 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>A solution has been agreed with SCC with regard to the visibility splays and vegetation clearance along Old Lane at the junction with Elm Lane.</p> <p>c) This issue has been agreed with SCC; please see the Applicant's response to the same question in Applicant's Response to Examining Authority's Second Written Questions [REP5-014, 2.13.30 c)].</p> <p>Vegetation clearance is proposed beyond the DCO boundary along the north side of Old Lane past the Elm Lane junction. A visibility splay of 70m along the north side of Old Lane is proposed to permit shrub/vegetation clearance and lower-tree branch removal. Some isolated trees within the visibility splay would be retained. The extent of clearance has been agreed with SCC. The additional area beyond the DCO boundary will be temporary possession.</p> <p>The Applicant intends to submit imminently a request for a change to the DCO application incorporating the amendment of the DCO boundary and vegetation clearance at this location to allow for the appropriate visibility splay. Drawing HE551522-ATK-HGN-XX-SK-CH-00093_C01 is also attached in Appendix B.</p> <p>The proposed change will affect an area of approximately 590 m² (0.06 ha) of the Thames Basin Heaths SPA and Ockham and Wisley Commons SSSI and Ockham and Wisley LNR along the edge of Old Lane.</p> <p>This area mainly consists of trees including oak, sycamore and Scots pine, with a sparse understory. A number of these trees will be cleared. However, some trees will be retained, such as those which are considered to have moderate or high bat roost potential, but with pruned branches at a height of between approximately 0.2 m and 2 m above the road, in order to allow visibility. Within this area, vegetation will be cut and regularly maintained at a height of</p>

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			<p>d) If visibility splays of the relevant standard would be unachievable within the extent of land plots 24/4 and 24/4a, what measures would need to be implemented to ensure that drivers emerging from Elm Lane or approaching this junction would be provided with adequate levels of forward visibility?</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>	<p>approximately 0.2 m, allowing low-level scrub to establish (and retaining suitable terrestrial habitat for amphibians (including great crested newts) and reptiles).</p> <p>The proposed management changes are to take place approximately 25 m west of a great crested newt breeding pond. The works will not affect the pond itself, and the habitat management will encourage low level growth providing increased low-level vegetation for foraging and sheltering great crested newts. Therefore, providing that the works are undertaken following a precautionary method of working (PMW) in relation to great crested newts and that those mitigation measures detailed within paragraph 7.10.37 to 7.10.40 of the Environmental Statement [REP4-023], this proposed change will have no negative impact on great crested newts.</p> <p>It is considered that the proposed management changes on this small area will increase the structural diversity of the woodland at this location, and therefore be of benefit with regards to the invertebrate resource that the woodland provides.</p> <p>Due to the proposed area being approximately 0.06 ha in size, and leading to increased structural diversity within the woodland, this change will not have any negative impacts on the SPA, SSSI or LNR and the residual effects, as identified in Table 7.8 of the Biodiversity chapter of the Environmental Statement [REP4-023] will remain the same (Thames Basin Heaths SPA, Ockham and Wisley Commons SSSI and Ockham and Wisley LNR will all have a permanent positive residual effect).</p> <p>In addition, due to the retention of ground vegetation and avoidance of removing any trees with moderate or high bat roost potential, this proposed change will have no negative impacts on any protected species.</p> <p>This proposed change will not alter the findings of the HRA Statement to inform Appropriate Assessment (SiAA) [REP4-018], which determined that it is not possible to conclude no adverse effect to the integrity of the Thames Basin Heaths SPA as a result of land take by the Scheme. The SiAA follows a precautionary approach and is based on the potential for the woodland being lost to contribute to an invertebrate resource, even though it does not physically support the SPA qualifying species. The woodland area to undergo management changes as a result of the visibility splay also does not physically support the SPA qualifying species.</p> <p>The increase in temporary land take by 0.06 ha within the SPA as a result of the visibility splay, results in an increase from 8.68 to 8.74 and therefore would not change the overall temporary take, which would remain as from 8.7 ha (as identified in REP4-014). The overall permanent land take will also remain at 5.9 ha.</p> <p>It is important to note, therefore, that the overall ratios for the SPA suite of compensatory measures will still be adhered to (8.1 ha of SPA compensation land to provide 1:1 compensation for the permanent loss of 5.9 ha of SPA land, and 46.5 ha of SPA enhancement areas to provide 3:1 compensation for the permanent loss of 5.9 ha of SPA land and the temporary loss of 8.7 ha of SPA land).</p> <p>Natural England were also contacted on the 27th March 2020, and have confirmed via email (on 30 March 2020) that they are satisfied that the visibility</p>

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					<p>splay proposal is not likely to result in significant adverse effects on features of interest with regards to the Thames Basin Heaths SPA or the Ockham and Wisley Commons SSSI as detailed below:</p> <p><i>'In relation to Thames Basin Heaths SPA, I am satisfied that the proposal is not likely to result in significant adverse effects on the features of interest, particularly if it is planned to retain some of the tree cover and to allow some low scrub re-growth, so that there will be something of a structured edge to the heathland which may be utilised by nightjar for feeding.'</i></p> <p><i>'In relation to the SSSI, I am satisfied that the proposed change is not likely to result in significant adverse effects on any of the features for which the site is designated as SSSI.'</i></p> <p>d) This issue has been agreed with SCC; please see the Applicant's response to the same question in Applicant's Response to Examining Authority's Second Written Questions [REP5-014, 2.13.30 d)]. The available stopping sight distances with various visibility splays have been measured and various options have been discussed with SCC.</p> <p>The existing traffic currently travels at less than the posted speed limit of 40mph due to the narrow road and small radius bend by Elm Corner. It is proposed to obtain the current average traffic speed, which will inform a safety risk assessment to be undertaken. It is currently proposed to provide a forward visibility splay of 70m around the corner to improve the visibility from the current visibility of about 30m. An Old Lane 70m forward visibility would provide an Elm Lane junction visibility of in excess of 70m to the right and the left. Mitigation measures agreed with SCC include additional road markings "SLOW ", junction warning signs such as bend with distance plate and chevron signs, and also high friction surfacing on the eastbound approach to Elm Lane. The extent of visibility to be provided has been agreed with SCC. The departures from standard that will need to be prepared will be discussed and agreed with SCC. Drawing HE551522-ATK-HGN-XX-SK-CH-00093_C01 is attached in Appendix B.</p> <p>The issue of the approach width of Elm Lane is noted. The width of Elm Lane is currently 4.1m with a 1m verge both sides. SCC's concerns will be addressed during the detailed design. Elm Lane approach to Old Lane will be widened, to 5.5m with 0.3m verges for a length of 20m from the junction, to allow vehicles to pass easily at the junction. In addition, passing places will be provided at 100m centres along Elm Lane to provide a width of 5.5m. These changes can be accommodated within the DCO boundary.</p> <p>With reference to the SCC letter submitted at Deadline 5 [REP5-028], within Item 3a, SCC state:</p> <p><i>'SCC have great concerns about the junction of A3 London Bound off slip at Painshill, in terms of the forward visibility around the express lane into Seven Hills Road. SCC query whether there is mitigation that can provide for the potential safety issues here. A departure will be required at this location. Surrey County Council are of the view that approval for any departure should be agreed through the DCO examination process.'</i></p> <p><i>The County Council also has concerns that a number of SCC trees will be impacted at this location, either through impacting root protection areas or as removal will be required. SCC has not seen the tree survey area or tree protection plans referenced in the scheme arboricultural assessment to understand the impact in this area.'</i></p>

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					<p>The scheme proposal has a reduced forward visibility splay on the Painshill interchange northbound off slip road and on the segregated left turn lane. This is due to obstructions to the visibility of an existing retaining wall on the northbound slip road, the existing Feltonfleet School boundary and a proposed retaining wall on the A245 westbound. Mitigation measures to be agreed with SCC could include additional road markings such as "SLOW" / edge markings, vehicle activated junction warning signs such as bend with distance plate, and high friction surfacing. Ongoing discussion taking place with SCC. Any resulting departures from standard will be prepared and discussed with SCC.</p> <p>With reference to the SCC letter submitted at Deadline 5 [REP5-028], within Item 3a, SCC state, with regard to the Wisley Lane diversion forward visibility issue:</p> <p><i>'The drawing submitted within REP4-006 did not correctly show the required forward visibility for the 30mph speed limit. HE advise that a revised drawing will be submitted at deadline 5.'</i></p> <p>A revised drawing showing the forward visibility for both the 30mph and 40mph speed limit has been issued to SCC and is attached in Appendix B as drawing number HE551522-ATK-HGN-XX-SK-CH-00034_C02.</p>
2.13.35	SCC	SCC	<p>Having regard to what has been said about bus stop provision at the Ockham Park junction and RHS Wisley in the Local Impact Report [paragraph 7.6.6 of REP2-047], please explain why there would be a need to provide pedestrian access to RHS Wisley from the Ockham Park junction bus stop to walk to and from RHS Wisley, given the proposed installation of the turnaround at the RHS Wisley?</p>	<p>SCC requested that bus passengers who are required to board/alight buses at the Ockham Park junction bus stops and wish to access RHS Wisley are provided with a suitable footpath to support a safe pedestrian route to/from RHS Wisley. This requirement was predicated upon 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: <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</i></p>	<p>As shown on sheets 1, 2 and 3 of the Scheme Layout Plans [APP-012], the Scheme makes provision for an improved footway and/ or footway/ cycletrack between the bus stops at the Ockham Park junction and Mill Lane (the southern boundary of RHS Wisley). The Scheme also makes provision for a new bridleway along the entire length of the Wisley Lane diversion between the Ockham Park junction and the entrance to RHS Wisley. This includes a 3m wide sealed surface suitable for pedestrians. Highways England has previously explained in the Applicant's Comments on Written Representations [REP2-014] (see comment on REP1-020-34 on page 38) that the provision of an additional footpath connection between the Ockham Park junction and the entrance to RHS Wisley as requested by SCC would necessitate taking further land from RHS Wisley which cannot be justified when the Scheme already makes suitable provision for new and improved non-motorised user connections as well as for a new bus stop and turnaround facility conveniently sited at the entrance to RHS Wisley.</p> <p>Highways England is disappointed with Surrey County Council's current position on this matter. Whilst SCC states in Annex A - Key points from Surrey County Council's oral statements made at the Issue Specific Hearing 2 (ISH2) [REP3-036] that there have been no discussions with the applicant as regards bus timetabling issues, Highways England has held meetings with SCC to discuss the matter of the bus service and locations for relocating the bus stop, in both June and September 2018. At no point did SCC indicate that the bus stop relocation would not be supported. Indeed, SCC stated in REP3-036 that it regarded itself as the operator of the bus service 'de facto' and in that capacity had no issue with the principle of the proposed bus turn around. On this basis, Highways England considers that the routing of the bus via the proposed turnaround facility to be a matter entirely within SCC's control/decision making.</p> <p>Highways England has requested but has not yet been provided with copies of the correspondence between SCC and Stagecoach to which SCC's response</p>

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				<p>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.</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> <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>	<p>refers. Highways England is unclear whether Stagecoach had been provided with all of the relevant information on which to base its opinion. The diversion of the bus from Ockham Park junction to the entrance to RHS Wisley Garden, via the Wisley Lane Diversion, is estimated to add 3 minutes to the bus journey and not 5 minutes as cited in the extracts from Stagecoach's letter referred to in SCC's response to ExQ2.13.35. However, this additional time must also be balanced against the benefits that the Scheme will deliver in terms of reduced journey times through the M25 junction 10/A3 Wisley interchange. In peak times, when the benefits of the Scheme will be most pronounced, much of this additional time will be offset by reduced journey times through the junction, as is shown in Table 5.1 of the Transport Assessment Supplementary Information Report [REP2-011] (as amended by the Errata [REP512]). As a result, the Scheme will add no more than 2 extra minutes to the bus journey at peak times in 2022. By the design year 2037, the Scheme will add no more than 1.4 minutes to bus journey times in any peak period, with considerable journey time savings predicted for services heading northbound in the morning peak.</p> <p>In addition to the Stagecoach route 715 between Kingston and Guildford, existing White Bus routes 462 and 463 between Guildford and Woking both serve Ripley and explicitly travel from Ripley up to Ockham Park junction and back again via Ripley to reverse. Whilst these are more local services it is not clear whether SCC has investigated whether these services could potentially accommodate the small additional journey from Ockham Park junction RHS along Wisley Lane.</p> <p>The relocation of the bus stop at the entrance to RHS Wisley provides an opportunity for the bus to increase patronage, in the longer term there will also be opportunities for patronage associated with the occupation of development proposed on the former Wisley Airfield site. Neither of these points appear to have been considered.</p> <p>The request for a payment of £30-40K per annum has not been justified. The extract from Stagecoach's letter confirms that the impact has not been considered in any detail and appears to indicate that the benefits that the Scheme will deliver in terms of reduced journey times through M25 junction 10 have not been taken into account.</p>
2.15.5	LAs, NE, RSPB, SWT, EA	Multiple	Further to the Applicant's response to the ExA's first written question 1.15.1 [REP2-013], the revised dDCO [REP2-002] has removed some activities from those not encompassed within the definition of commence. Nevertheless, a number of activities such as site clearance and the receipt and erection of construction plant and equipment remain outside the definition of commence. As such, these activities could take place outside the controls of the approved CEMP and the various management plans and method statements required by the CEMP. Please comment on this and indicate which, if any, activities that are currently	Highways England has summarised the position of each Interested Party, based on their respective responses to this question, below:	Highways England has reviewed the responses to ExAQ 2.15.5 submitted by interested parties. Highways England's general approach to the drafting of the definition of "commence" is set out in its response to ExA question 1.15.1 (REP2-013). Having considered the comments made by interested parties on the drafting of the definition of "commence", Highways England has made two amendments to the definition of "commence" in Part 1 of Schedule 2 to the dDCO [REP5-002] The two amendments are to remove "receipt and erection of construction plant and equipment" and "site clearance" from the exceptions to the definition of "commence". Highways England is satisfied that the definition (as revised) strikes an appropriate balance between the need for certainty together with a proportionate degree of flexibility which is required to ensure the efficient implementation of a nationally significant infrastructure project. As the ExA will be aware, Highways England has previously amended the definition of "commence" in the light of the comments made by the ExA during issue specific hearing 1 on 12 November 2019. Specifically, the establishment of

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			<p>excluded from the definition of 'commence' you consider should be included.</p>	<p>Surrey County Council</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. SCC also query what activities would fall within the definition of pre-constructional ecological mitigation.</p> <p>Guildford Borough Council</p> <p>The Council considered that "commence" should include site clearance and the receipt and erection of construction plant and equipment as these works in themselves have the potential for a significant environmental impact.</p> <p>Elmbridge Borough Council</p> <p>EBC expects any activities that fall outside of the approved CEMP (site clearance, deliveries, hours of works, use of noisy machinery and so forth) that involve noisy works and would likely give rise to complaint, should be controlled through Sec 61 agreements.</p> <p>Natural England</p> <p>Natural England is satisfied that sufficient protective measures are in place, through the provisions of SSSI designation and SPA classification, to ensure that the risk of adverse impacts arising from activities such as site clearance and erection of construction plant are unlikely to result in unforeseen environmental impacts. Where these activities are to take place within the boundary of Ockham and Wisley Commons SSSI there is a legal requirement for the applicant to obtain formal assent from Natural England. This process provides Natural England an opportunity to discuss the proposal with the applicant on means of avoiding or minimising adverse environmental effects. In practice, there is regular communication between the applicant and Natural England so that we are kept informed of planned activities and able to provide advice. Where planned activities</p>	<p>replacement land and the diversion and laying of underground apparatus were excluded from the definition of "commence".</p> <p>Turning to the specific comments made by interested parties on the definition of "commence", Highways England responds as follows.</p> <p>Highways England response</p> <p>The exclusion of site clearance and the erection of temporary means of enclosure from the definition of commence is appropriate in this case, having regard to the nature of the Scheme as a nationally significant infrastructure project. In particular the erection of temporary means of enclosure has very recent precedent in The A30 Chiverton to Carland Cross Development Consent Order 2020. Site clearance is excluded from the definition of "commence" in the draft development consent orders in respect of the M42 junction 6 and A303 Amesbury to Berwick Down schemes which are both currently before the Secretary of State for determination. Accordingly, the definition in the dDCO for the Scheme is reflective of current and emerging precedent as regards highways DCOs.</p> <p>Highways England response</p> <p>In relation to "the erection of construction plant and equipment", it is appropriate that the dDCO excludes these non-material activities in order to facilitate the implementation of a nationally significant infrastructure project. Moreover, the exclusion of these activities from the definition of "commence" in the M42 junction 6 and A303 Amesbury to Berwick Down schemes which are both currently before the Secretary of State for determination. In relation to "site clearance", please see the comment above in relation to SCC.</p> <p>Highways England response</p> <p>Highways England notes that EBC has not requested any amendments to the definition of "commence" in the dDCO [REP5-002].</p> <p>Highways England response</p> <p>Highways England notes that Natural England has not requested any amendments to the definition of "commence" in the dDCO [REP5-002].</p>

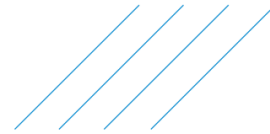
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				<p>may affect specially protected species there is a legal obligation on the applicant to take this into consideration.</p> <p>RSPB</p> <p>The RSPB notes that the Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures (section 8 (3) of Schedule 2) within the dDCO [Revision 1] states that 'Unless otherwise approved by the Secretary of State in writing, following consultation with Natural England, the compensatory habitat creation measures on the proposed Thames Basin Heaths SPA compensation land must be begun before any part of the authorised development within the boundary of the SPA may commence.'</p> <p>Commencement of work in areas where temporary and permanent loss of SPA is identified prior to compensatory habitat creation measures commencing would result in an undefined period of time in which SPA land could be exposed to unmitigated or compensated negative impacts from works in the Scheme. In Schedule 2 of the dDCO [Revision 1], the following activities fall outside the definition of "commence":</p> <ul style="list-style-type: none"> • non-intrusive investigations and surveys; • ecological surveys and pre-construction ecological mitigation; • investigations for the purpose of assessing and monitoring ground conditions and levels; • erection of any temporary means of enclosure; • receipt and erection of construction plant and equipment; • site clearance; and • the temporary display of site notices or advertisements. <p>From the above list of activities, the RSPB would like to highlight its concerns regarding the erection of any temporary means of enclosure, receipt and erection of construction plant and equipment, and site clearance. For clarity, site clearance is defined within the dDCO [Revision 1], Schedule 1 under Other relevant works (m) as including fencing, vegetation removal, demolition of existing structures and the creation of alternative footpaths. The RSPB is however unsure of the extent of works that fall within the definition of 'temporary means of enclosure' and 'construction plant and equipment' as these are not defined in detail within the dDCO nor the Outline Construction Environmental Management Plan (CEMP). As the Examining Authority has stated in its question to the RSPB, these activities, if excluded from the definition of "commence", could take place outside the controls of the approved CEMP. The timing of works within the Scheme is not clear in relation to site clearance, erection of temporary means of enclosure, and receipt and erection of construction plant and equipment. These all have the potential to have impacts on breeding SPA birds if carried out at the wrong time of year or with inadequate working methods. Without clarity on timing and location of works for the above operations, the RSPB cannot be certain that these operations will not have significant impacts upon the SPA and therefore</p>	<p>Highways England response</p> <p>As noted in the preamble to these responses, Highways England has revised the drafting of "commence" so as to remove 'receipt and erection of construction plant and equipment' and 'site clearance'.</p> <p>Requirement 8(3) (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) provides an appropriate degree of control by preventing any works within the SPA from being carried out until work on the SPA compensation land has begun. Other existing legislative protections in respect of wild birds, such as those under Wildlife and Countryside Act 1981, will apply to any construction works forming part of the Scheme.</p>

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				<p>these operations should be included in the definition of 'commence' and be controlled under the approved CEMP and management plans required by the CEMP.</p> <p>Surrey Wildlife Trust</p> <p>It is for Natural England to assess this element.</p> <p>Environment Agency</p> <p>The only activities that could have raised concerns with us were for 'pre-construction ecological mitigation' and erections of 'enclosures' or 'plant and equipment', but only for areas in proximity to Stratford Brook on flood risk grounds, however we feel that these will be sufficiently controlled through our Protective Provisions.</p> <p>We shall leave detailed comments on activities at Boldermere to Surrey Wildlife Trust and Natural England (as appropriate), as we are primarily concerned about Water Framework Directive matters in connection with the lake, and these matters have been agreed.</p>	<p>Highways England response</p> <p>Highways England notes that Surrey Wildlife Trust has not proposed any amendments to the definition of "commence".</p> <p>Highways England response</p> <p>Highways England notes that the Environment Agency has not proposed any amendments to the definition of "commence".</p>
2.16.4	Applicant & SCC	SCC	<p>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>	<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>	<p>Highways England confirms that it provided the requested information to SCC on 16 March 2020.</p> <p>Highways England notes that SCC considers that the outstanding transfers will take a further 9-12 months to complete. Highways England has been engaged in discussions with SCC regarding the completion of the historic transfers for several years. Highways England disputes SCC's contention that the matter is particularly complicated and that one of the reasons for the ongoing delay is due to the amount of land in question. The transfers concern relatively modest sized plots of land and, given that the matter has been ongoing for several years already, there is no good reason for a further significant delay.</p> <p>In any event, and as explained in Highways England's responses to ExA questions 1.16.15 and 1.16.16 (REP2-013), the Secretary of State's decision as to whether or not to make the order authorising the construction of the Scheme does not depend upon the transfers being completed and the consequential updates to the commons register being made. This is because, firstly, Highways England has not sought powers of compulsory acquisition over land within the footprint of the M25 which, strictly, comprises registered common land. Furthermore, in relation to the "exchange land" to be provided pursuant to the 1979 and 1982 CPOs relating to the construction of the M25, Highways England has, as explained previously, regarded that land as special category land on the basis that (a) public access to the land is already available and so the land is therefore open space (and thus special category land) for the purposes of the</p>

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					<p>Planning Act 2008 (b) following completion of the transfers, the land will become registered common land and the commons register duly updated.</p>
2.16.5	RHS	RHS	<p>The ExA notes that the RHS objects to the compulsory acquisition of plots 11/2 and 2/27[REP1-038].</p> <p>a) Having regard to the condition for compulsory acquisition stated in Section 122(3) of the PA2008, namely '...that there is a compelling case in the public interest for the land to be acquired compulsorily' please explain why you consider that the compulsory acquisition sought by the Applicant with respect to plots 11/2 and 2/27 would or would not satisfy the previously mentioned condition in Section 122(3) of the PA2008.</p> <p>b) Additionally please confirm that the extent of your objection to the Compulsory Acquisition and/or</p>	<p>The RHS has decided to withdraw all its objections in relation to Plots to be compulsorily acquired (in the event that the DCO is confirmed) save in respect of Plots 2/27, 2/27(a) and 2/30 for the reasons explained below.</p> <p>a) The condition at Section 122(3) of the PA2008 is that there should be a compelling case in the public interest for the land to be acquired compulsorily. Government Guidance related to the compulsory acquisition of land under the PA2008 explains that for there to be a compelling case, the public benefits that will be derived from the compulsory acquisition must outweigh the private loss that would be suffered by those whose land is to be acquired (para 13). The resource implications of the proposed scheme are also something that should be taken into account.</p> <p>Plot 2/27 (which is to be acquired permanently), together with Plot 2/27a and 2/30 (which will be subject to temporary possession), lie at the main vehicular entrance to the RHS Gardens at Wisley from the A3. Plot 2/30 comprises part of Wisley Lane, the access road into, and out of, the Gardens. The purpose of acquiring Plot 2/27 is to construct the northern end of a bridge that will pass over the A3 and provide a new entrance to the Gardens. HE says that access to the Gardens from Wisley Lane will be maintained throughout the scheme works and during the 12-18 month construction period of the new bridge. However, it is unable to explain how this will be achieved given that the bridge will be built immediately adjacent to the existing entrance, with no apparent surrounding area for enabling works other than for Wisley Lane itself. HE has advised that the question of how the bridge will be constructed will be answered by its contractor, Balfour Beatty, but currently no solution has been made known to RHS.</p> <p>Should vehicular access from Wisley Lane be prevented during the scheme works, the Gardens would effectively have to close. This would have a significant and unacceptable financial impact at a time the Gardens would be seeking to realise the benefit of £65 million of current and ongoing investment. The loss that would be suffered would be at a level that undermines the compelling case for compulsory acquisition.</p> <p>For these reasons RHS maintains its objection to the compulsory acquisition of plot 2/27, until such time that HE enters into a Land and Works Agreement that provides a solution to the maintenance of uninterrupted access to the Gardens from Wisley Lane during the Scheme works.</p> <p>b) The RHS objects to the compulsory acquisition of Plot 2/27 and also, for the same reasons, the temporary possession of plots 2/27a and 2/30.</p> <p>It no longer objects to the compulsory acquisition of Plot 11/2, (save as to access over RHS Land) on the basis that it will not be permanently acquired and will be returned to RHS following the undertaking of works by HE. RHS also does not oppose the compulsory acquisition of any of its other land (or rights over land) included in the draft Order, nor does it object to the temporary possession of land, other than for plots 2/27a and 2/30.</p>	<p>Highways England welcomes the withdrawal of RHS' objections to the compulsory purchase of its land which is affected by the Scheme, other than in relation to plots 2/27, 2/27a and 2/30, which comprise land needed for the construction of the Wisley Lane diversion.</p> <p>As to those plots, Highways England recognises the importance to RHS of continued access to RHS Garden Wisley during construction of the Scheme, particularly in the light of RHS' own development proposals.</p> <p>The construction of the Wisley Lane overbridge to carry the Wisley Lane diversion is planned to commence in spring 2021 and is planned to be "open for traffic" by November 2021.</p> <p>Highways England together with the Scheme contractor have recently held discussions with representatives of RHS to understand the RHS' concerns in greater detail and to explain how the contractor will construct the Wisley Lane diversion in order to minimise disruption to RHS.</p> <p>As the Scheme has not yet been designed in detail, it is not possible at this stage to provide RHS with specific proposals or detailed method statements to explain precisely how the works will be carried out. RHS has indicated to Highways England that it would be willing to offer Highways England the use of small quantities of land within its ownership if doing so would provide the Scheme contractor with greater flexibility in undertaking construction works in order to facilitate uninterrupted access by visitors to RHS Garden Wisley. Highways England welcomes RHS' co-operation in this regard.</p> <p>In anticipation of the Scheme proceeding, Highways England and RHS have agreed to set up a working group which will meet regularly to discuss the interaction between Highways England's Scheme and RHS' own development proposals, to ensure that any disruption to RHS Garden Wisley is minimised.</p>

Question Number	Question to:	Interested Party Responding	Question	IP Response	Highways England Response
			Temporary Possession powers sought by the Applicant, insofar as they relate to the land owned by it, are limited to plots 11/2 and 2/27, given the previous reference in your relevant representation [RR-024] to in effect an objection in principle to compulsory acquisition of any RHS land.	RHS also does not oppose the compulsory acquisition of any of its other land (or rights over land) included in the draft Order, nor does it object to the temporary possession of land, other than for plots 2/27a and 2/30.	

Appendix A. Agreed minutes from the meeting on 23 January 2020 with Painshill Park Trust and Surrey Fire and Rescue

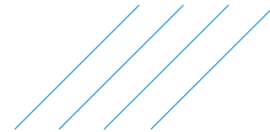


Meeting Notes

Project: M25 Junction 10/A3 Wisley Interchange Scheme	
Subject: Surrey Fire and Rescue Service – Emergency Access to the Gothic Tower	
Meeting place: Painshill Park	Meeting no: 4
Date and time: 23.01.2020: 10am-11am	Minutes by: [REDACTED]
Present: [REDACTED] (JW) [REDACTED] (LR) [REDACTED] (RRS) [REDACTED] (PG) [REDACTED] (PK) [REDACTED] (MS) [REDACTED] (RB) [REDACTED] (DO) [REDACTED] (CD)	Representing: Highways England Painshill Park Trust Painshill Park Trust Painshill Park Trust SFRS SFRS Atkins Atkins CJ Associates/Atkins

ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
1.	<p><u>Introductions</u></p> <p>1.1 Introductions were made as follows:</p> <ul style="list-style-type: none"> - R [REDACTED] B [REDACTED], Assistant Project Manager from Atkins - L [REDACTED] R [REDACTED], Trustee of Painshill Park - R [REDACTED] R [REDACTED]-S [REDACTED], Chairman of the Trustees - D [REDACTED] O [REDACTED], Operational Safety Manager from Atkins - J [REDACTED] W [REDACTED], Highways England Project Manager - P [REDACTED] K [REDACTED], SFRS Central Command - M [REDACTED] S [REDACTED], SFRS Elmbridge Borough Commander - P [REDACTED] G [REDACTED], Director of Painshill Park - C [REDACTED] D [REDACTED], Stakeholder Engagement team from Atkins 	
2.	<p><u>Health and Safety Moment</u></p> <p>2.1 RRS noted the meeting was about safety at Painshill Park (PP).</p>	
3.	<p><u>Purpose of the Meeting</u></p> <p>3.1 JW explained the meeting was being held to discuss fire access arrangements at PP.</p>	

Next meeting:	N/A
Distribution:	Those present, [REDACTED]
Date issued:	05.03.20
File Ref:	



ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
	<p>3.2 RRS added the meeting would also provide an opportunity to review the email from PK to [REDACTED] and [REDACTED] at Surrey County Council (SCC) dated 22 January 2020 (attached to minutes).</p> <p>3.3 JW provided a brief overview of the scheme noting that it involves the closure of 13 accesses with the aim of reducing accidents and improving reliability of the network.</p> <p>3.4 JW advised the works are due to commence in March 2021. The imminent appointment of Balfour Beatty Atkins (BBA) to the role of works contractor was mentioned and that BBA would be establishing relationships with the emergency services.</p>	
4.	<p><u>Review of Existing Emergency Access Arrangements</u></p> <p>4.1 JW commented that the existing access from the A3 can be used by SFRS and PP. Highways England cannot see an alternative route at this time.</p> <p>4.2 PK explained the fire safety team had need to make a site visit and with reference to his email provided the context to SFRS's position.</p> <p>4.3 With reference to statute and what can be required under law PK advised the following fire safety legislation for the protection of buildings needs to be taken into account:</p> <ul style="list-style-type: none"> - The Regulatory Reform (Fire Safety) Order 2005 - Approved Document B - The Surrey Act 1985 <p>4.4 PK explained that the Gothic Tower, currently being used as a café comes under the Fire Safety Order and a risk assessment, method of escape and fire alarm system can be required.</p> <p>4.5 PK referred to the potential to convert the Gothic Tower (GT) to residential property and explained SFRS has no authority over an existing single occupancy residential building. Certain means of access can be required for new builds such as the provision of a turning circle.</p> <p>4.6 In summary legislation does not provide guidance on what is required if the A3 access is lost.</p> <p>4.7 PK then turned to the operational considerations for SFRS in respect of attendance times, resources and water supplies.</p> <p>4.8 PK stated that A3 secondary access is not ideal but if necessary, the police can be asked to close the A3.</p> <p>4.9 PK explained that if a fire occurs at the GT a quick response time is required. There may be variations in response time due to traffic or conditions in the Park.</p> <p>4.10 PK advised that in the recent test situation using the "tradesman's entrance"/road in the Park was not found to be ideal. The time taken from the Fire Station to suitable distance from the GT was 15 minutes. Trees were found to be growing in the way of the appliance. It was stated that the route needs to be 3.7 metres wide. Currently appliances would need to park behind each other. These factors delay response time.</p>	

Contains sensitive information

M25 J10 Meeting at Painshill Park 23.01.20 with Surrey Fire and Rescue Service – Minutes – Final with SFRS amendments incorporated

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ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
4.11	Reliance on a water supply from the lake would also add to response time. Water from the lake could be used to prevent a fire spreading.	
4.12	Although each appliance carries 2000 litres of water this is quickly used up and mobile water carriers cannot be taken up through the Park. Currently the access from the A3 can be used to provide an additional supply of water to fight a fire at the GT because there is vehicular access to it. If Highways England's scheme is implemented the A3 would need to be closed to allow water carriers to be parked on the carriageway adjacent to the current access and a hose run over the bank and up to the GT.	
4.13	PK noted that a sprinkler system in the Gothic Tower would help suppress a fire.	
4.14	RRS stated that PPT wished to understand its responsibilities and get as much information as possible from the meeting. RRS asked what improvements are required to the route through the Park to the GT. PK responded that SFRS could advise on suggested improvements. A turning circle at the GT with several passing points along the route were recommended although SFRS cannot require PPT to make the suggested changes to the access. RRS remarked that it is for this reason PPT believes the A3 access is so important. RRS observed that improvements to the access will impact on the historic landscape.	
4.15	PK also mentioned the importance of PPT staffing the entrance to the Park when SFRS is called and the maintenance of trees so that the route is not obstructed.	
4.16	MS raised further points in relation to risk assessment, raising the alarm, substances and fire loadings. MS stated that in the event of a fire a Land Rover 4x4 would be called to dampen vegetation but pointed out that it is the responsibility of the landowner to keep foliage area clear. The risk of the GT collapsing was highlighted by MS while PK added that SFRS does not want to have to drive past a fire to turn a vehicle around.	
4.17	JW asked about the condition of the existing road surface and PK confirmed it is suitable for a fire appliance.	
4.18	PPT's growing events programme was discussed with PK advising each event is considered on its merits by the Safety Advisory Group (SAG). SCC is the emergency planning lead and SFRS attends meetings. The threshold for an event needing to be considered by SAG is 5000 people (this is an approximate number and may vary).	
4.19	PG outlined a scenario where the trade gate is out of action and the problem this would cause for emergency vehicles gaining access. Hence the need to have the A3 entrance as a fallback. Parking in the meadow for cinema and weddings was mentioned with weddings causing traffic to queue for up to 30 minutes.	
4.20	MS commented that dispersal of traffic needs to be taken into account in planning the event. PK added that staff need significant training to manage traffic in these circumstances. PK remarked that ideally events would have another access into the car park as	

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ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
	<p>the secondary access onto the A3 does not overcome the problems which have been highlighted.</p> <p>4.21 RRS responded that the river presents a problem in creating another exit through the car park. In PK's view this is a problem for the Park to deal with in the planning of events</p> <p>4.22 DO asked whether SFRS has existing contingency plans for the Park. In response PK stated that all incidents are different. SFRS has general policies and procedures. There are pre-determined attendance plans for specific risks</p> <p>4.23 PK explained that in the event of an incident the emergency services are mobilised. An all Services tactical co-ordination group is formed and a plan developed for the situation at a specific location. MS added that although contingency plans may be drawn up for an event SFRS reacts spontaneously as the situation unfolds. A mobile data terminal is fitted to fire appliances which provides information on access to buildings.</p> <p>4.24 LR expressed concern about the loss of the A3 access as it cannot be replaced once it has been closed off and asked whether Highways England's reluctance to pursue provision of an alternative through Court Close Farm was for financial reasons.</p> <p>4.25 DO asked what impact the loss of the second access would have on SFRS. MS responded that the second access provides the opportunity for other fire appliances to attend a fire and for water to be supplied to fight the fire.</p> <p>4.26 LR raised the issue of response times for SFRS noting it had taken 15 minutes to reach the GT when visited recently whereas the standard for Surrey is 10 minutes for the first appliance. PK accepted that a 10 minute response time is SCC's standard but stated sometimes this response time are not met. The second access allows SFRS to meet the Surrey standard.</p> <p>Post meeting note: SFRS clarified that the second access assists it in meeting the Surrey standard.</p> <p>4.27 RRS summarised PPT's current use of the A3 access as for:</p> <ul style="list-style-type: none"> - Emergencies - Occasional heavy service vehicles (removal of timber/reconstruction) - Emergency exit for events when large numbers of people are in the Park (e.g. Elmbridge Food Festival/Charity Fun Runs) 	
5.	<p>Future Development Plans</p> <p>5.1 JW asked whether PPT was able to share its development plans. PG tabled a spreadsheet projecting visitor numbers and events to 2022 and explanatory paper. PG explained this information was a work in progress and not yet ready to present to the Examining Authority (ExA).</p> <p>5.2 RRS explained the importance of events in the generation of resources as PPT can no longer rely on a donor who has supported the Park in the past.</p>	

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M25 J10 Meeting at Painshill Park 23.01.20 with Surrey Fire and Rescue Service – Minutes – Final with SFRS amendments incorporated

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ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
6.	<p><u>Girlguiding GLW alternative route</u></p> <p>6.1 The alternative access route proposed by the Guides was discussed.</p> <p>6.2 MS commented that SFRS would expect a new road to be relatively straight. RB advised that the Girlguiding GLW alternative route would not be the required 3.7m width after the entrance to Heyswood Campsite.</p> <p>6.3 PG noted that a track parallel to the A3 would remove some of the Guides' safeguarding issues and the three gate issue in relation to the use of the route for emergencies in the Park would be resolved.</p> <p>6.4 JW tabled the slides originally used in a presentation to the Guides to explain the constraints along the A3 including ancient woodland which presents a barrier to adopting the proposal on a par with interfering with the built heritage. Referring to National Policy, JW stated that there would be a need to provide a "wholly exceptional reason" to take ancient woodland to create the alternative access proposed by the Guides.</p> <p>6.5 LR asked who would make the decision to which JW responded it would be the ExA and the Secretary of State. The ExA has so far not pressed Highways England to adopt the alternative route.</p> <p>6.6 MS asked for clarification on the Guides' safeguarding issues. The fencing of both sides of the route, separation of the custodian cottage and occupiers of Court Close Farm were identified by RB and PG as cause for concern to the Guides.</p> <p>6.7 JW concluded that there are challenges to the alternative route proposed by the Guides.</p>	
7.	<p><u>Conclusions</u></p> <p>7.1 JW concluded that stock needs to be taken of the information tabled at the meeting and raised at the hearings.</p> <p>7.2 RRS referred to the opposition to the acquisition of PPT land in the absence of a secondary access being provided. PPT will raise this issue at the compulsory purchase hearings in March.</p> <p>7.3 JW responded that currently a decisive answer cannot be given on a secondary access.</p> <p>7.4 DO asked whether PPT would be satisfied if an access was retained for emergency service use only, as using this access for logging vehicle and other maintenance would not be permitted on safety grounds. RRS confirmed access for maintenance vehicles remains very important to future land management and restoration of the historic landscape while access for the emergency services and visitor exit is vital for visitor safety and proposed increase in visitor numbers.</p> <p>7.5 PK commented that the A3 exit is unsuitable for visitors and that SFRS treat the A3 as a motorway.</p> <p>7.6 LR asked about contact with the ambulance service. DO advised he had been in touch with the ambulance service so PPT should hear from them shortly.</p>	

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ITEM	DESCRIPTION AND ACTION	RESPONSIBLE
8.	<u>AOB</u> None.	
9.	<u>Next Steps</u> Not discussed.	

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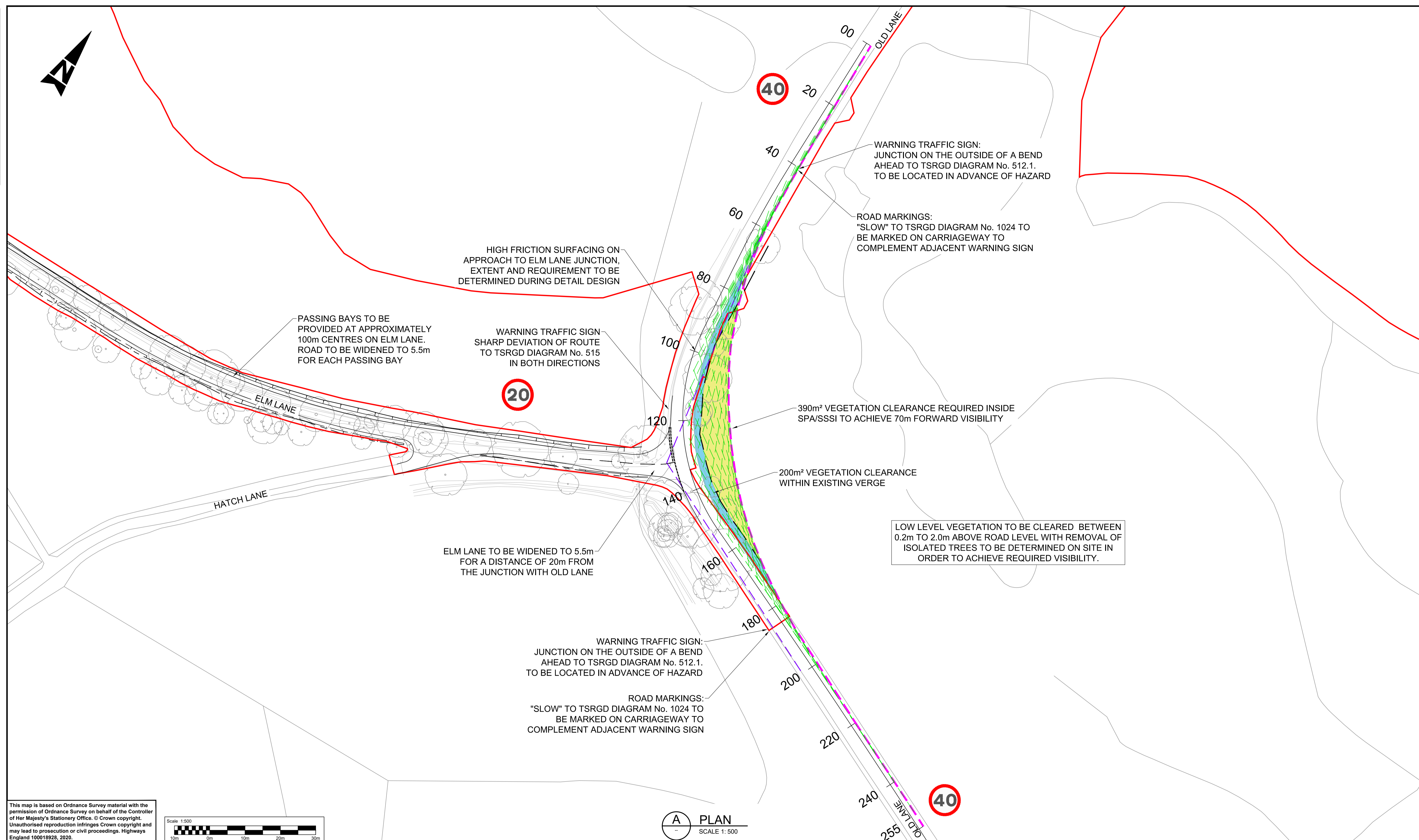
M25 J10 Meeting at Painshill Park 23.01.20 with Surrey Fire and Rescue Service – Minutes – Final with SFRS amendments incorporated

6

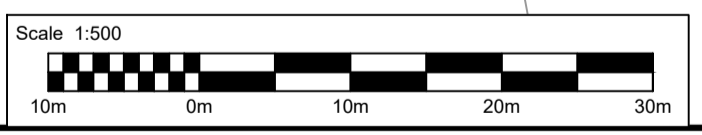
Appendix B. Visibility Splay Drawings (reference to ExQ2.13.30)

DO NOT SCALE

Millimetres
0 10 100



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A PLAN
SCALE 1: 500

- NOTES:**
- ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
 - ALL VISIBILITY SPLAYS ARE SHOWN IN ACCORDANCE WITH THE DESIGN MANUAL FOR ROADS AND BRIDGES (DMRB) CD 109.
 - ALL VISIBILITY SPLAYS HAVE BEEN CHECKED USING TOPOGRAPHICAL SURVEY AND PRELIMINARY DESIGN INFORMATION.
- LEGEND:**
- FORWARD VISIBILITY SHOWING 70m SSD IN ACCORDANCE WITH DMRB CD 109 FOR A DESIGN SPEED OF 60kph (ONE STEP BELOW).
 - ELM LANE JUNCTION VISIBILITY LOOKING LEFT AND RIGHT = 70m SSD.
 - LIMITATION OF FORWARD VISIBILITY BASED ON 70m STOPPING SIGHT DISTANCE (SSD).
 - 390m² VEGETATION TO BE CLEARED WITHIN SPA.
 - 200m² LOW LEVEL VEGETATION TO BE CLEARED WITHIN VERGE.
 - APPROXIMATE CENTERLINE ALIGNMENT.
 - DCO BOUNDARY BASED ON ORDNANCE SURVEY.
 - ASSUMED HIGHWAY BOUNDARY BASED ON TOPOGRAPHICAL SURVEY.

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION						
In addition to the hazards/risks normally associated with the types of work detailed on this drawing, note the following significant residual risks (Reference shall also be made to the design hazard log).						
Construction						
NONE						
Maintenance / Cleaning						
NONE						
Use						
NONE						
Decommissioning / Demolition						
NONE						

Description	Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
ISSUED TO SCC	A1	C01	SB	LH	PJH	GB	27/03/20

Drawing Suitability: **APPROVED - PUBLISHED** Status: **A1**

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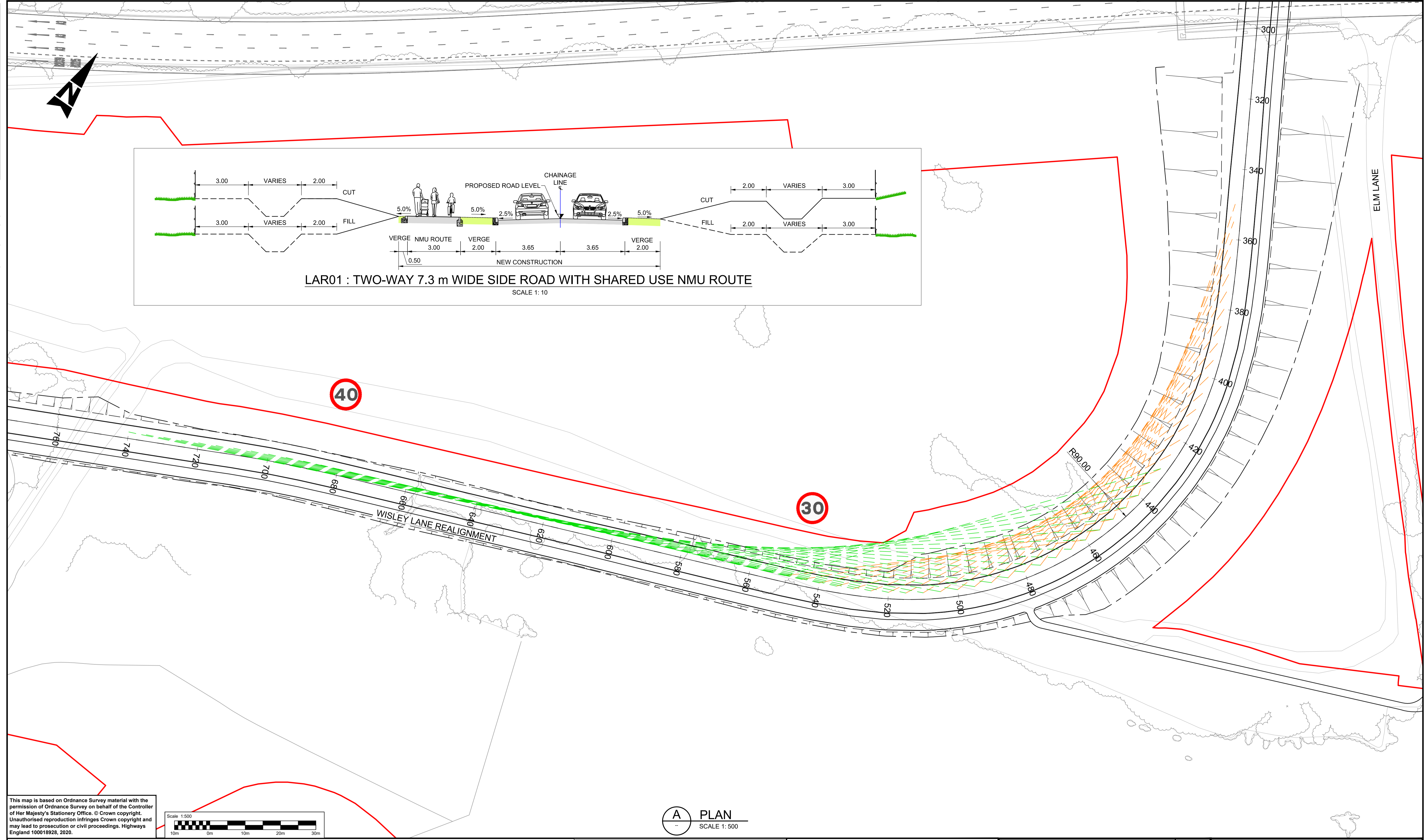
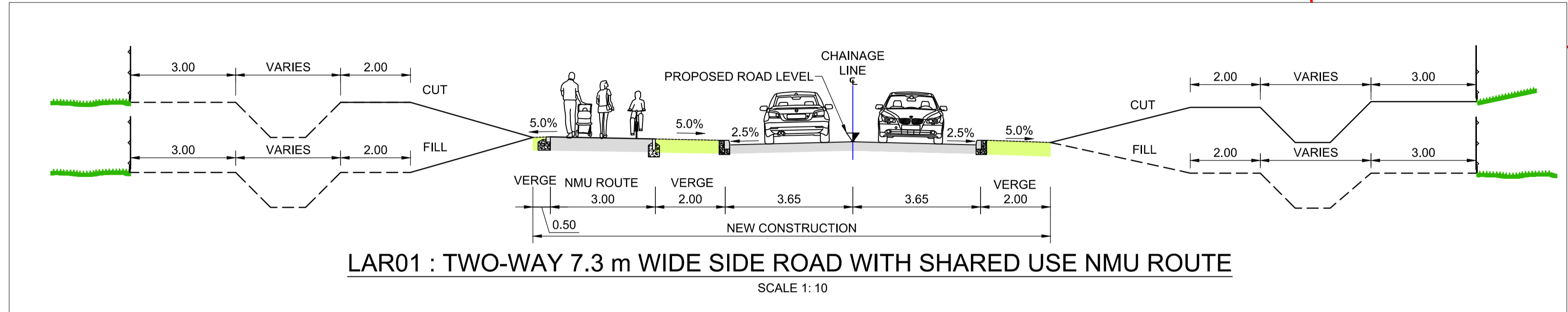
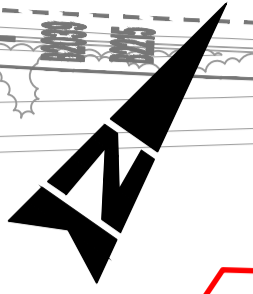
Client: **Working on behalf of highways england**

Project Title: M25 junction 10/A3 Wisley interchange	
Drawing Title: ELM LANE JUNCTION WITH OLD LANE FORWARD VISIBILITY SHOWING 70m STOPPING SIGHT DISTANCE (SSD)	
Drawing Number: HE551522	Originator: ATK
Project: XX	Volume: HGN
Location:	Type: - SK - CH - 000093
Original Size: A1	Scale: 1:500
Project Ref. No.: 5158141	Sheet: 1 of 1
Issue Date:	Rev: C01

DO NOT SCALE

Millimetres

0 10 100



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LEGEND:

- DESIRABLE FORWARD VISIBILITY SHOWING 120m SSD IN ACCORDANCE WITH DMRB CD 109 FOR A DESIGN SPEED OF 70kph.
- DESIRABLE FORWARD VISIBILITY SHOWING 90m SSD IN ACCORDANCE WITH DMRB CD 109 FOR A DESIGN SPEED OF 60kph.
- DCO BOUNDARY.

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION						
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Construction NONE						
Maintenance / Cleaning NONE						
Use NONE						
Decommissioning / Demolition NONE						

Description						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
SUBMITTED FOR DEADLINE 4						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
A1	CO1	SB	LH	RM	GB	11/02/20
SUBMITTED FOR DEADLINE 6						
Status	Revision	Drawn	Checked	Reviewed	Authorised	Issue Date
A1	CO2	SB	LH	RM	GB	17/03/20

Drawing Suitability: **APPROVED - PUBLISHED** Status: **A1**

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Project Title: M25 junction 10/A3 Wisley interchange	
Drawing Title: WISLEY LANE FORWARD VISIBILITY AND CROSS SECTION	
Drawing Number: HE551522	Originator: ATK
Project: XX	Volume: HGN
Type: - SK - CH - 000034	
Location: A1	Scale: 1:500
Project Ref. No.: 5158141	Sheet: 1 of 1
Issue Date: 17/03/20	Rev: C02

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