

M25 Junction 10 / A3 Wisley Interchange Improvement project

The Examining Authority's third written questions and requests for information (ExQ3) Deadline 7

Responses from Ockham Parish Council

17.04.20

	Response from Ockham Parish Council
	JW/HE has suggested to us that the Covid 19 pandemic may mean that Examination Period may be extended. Are you able to advise please?
3.1.1	<p>As mentioned within REP-016 and repeatedly stated to Highways England, Ockham Parish Council together with other parties such as RHS (RR-024) and Elm Corner Residents Group (RR-010) are convinced that the proposed road bridge to RHS Wisley is not the best access solution. The scheme as planned will direct an increased level of traffic through local villages using local roads which are not suitable for a greater level of vehicular use. For example, the level of traffic through the neighbouring parish of Ripley, for which we have seen no satisfactory statement of mitigation planning, is going to vastly increase pollution and disturbance.</p> <p>Further, the overbridge will create noise, dust, vibration and light pollution for the hamlet of Elm Corner and the wider community of Ockham, including Church End. The comments made within 2.13.35 by SCC within REP5-029 should also be seriously considered as they question the viability of the overbridge in relation to public transport. Stagecoach, the current bus operator of service 715 which is the sole bus facility provided within the parish of Ockham, have stated that they do not support a diversion of any journeys into RHS Wisley using the overbridge. HE have responded to this within document REP6-013 stating that the additional time added to bus journeys is counterbalanced by the benefits that the Scheme will deliver in terms of reduced journey times through M25J10/A3 interchange. The time savings stated by HE are supposition and do not diminish the significant environmental impact of private vehicles. A number of Interested Parties including the RHS, SCC, ECRG, Ripley Parish Council and OPC have continuously stated throughout the Examination that the proposed road bridge to RHS Wisley is not the best access solution.</p>
3.1.3	<p>Re: Change 4: Ockham Parish Council submitted a response to the targeted non statutory consultation 06.01.20 to 04.02.20 on 22.01.20 and we remain extremely concerned about the amendment to the Saturday construction working hours and request that these are not extended as proposed. These works are going to affect every resident within the parish of Ockham with traffic delays, noise, dust, vibration and pollution with arguably, very little benefit to local residents post construction. To inflict additional working hours beyond those originally proposed is completely unacceptable. All the hamlets that make up Ockham require peaceful enjoyment of their homes from Saturday lunchtime to Monday morning. The targeted non statutory consultation failed to mention that there will be some necessary overnight works (such as the taking down of the existing footbridge to RHS Wisley from Elm Lane) during the construction period which further illustrates the absolute necessity of the construction working hours being ceased weekly by lunchtime each Saturday. We also would request that there are no noisy works on Saturdays before 0900.</p>

	<p>We note that the extended hours have been incorporated into REP4a-003 under clause 5.3.1 where information about exceptional hours has been stated. These exceptions demonstrate how badly affected the community of Ockham will be by these works, particularly Elm Corner, who are located so close to the A3 and the proposed construction compound.</p> <p>Within REP5-031 section 4.3 SCC request that HE 'consider the potential impact on local residents' and as we have stated in REP6-018 we do not feel that HE are taking the impacts on the local community, particularly the hamlet of Elm Corner, fully into account.</p>
3.1.4	<p>As stated in our submission of 22.01.20 mentioned in 3.1.3 above, we are in support of the widening of Cockcrow Bridge and it being used as a green passageway for wildlife across the A3. This is in line with SWTs advice and recommendations and is also supported by SCC REP5-031</p>
3.2.2	<p>We stated our position re air quality in 3 of our responses to EXQ2. We note that HE has responded to this REP6-011 & REP6-013 and would value the Examiners analysis of HES statements.</p>
3.4.1	<p>Ockham Parish Council have repeatedly stated our position regarding the impact of the proposed works on the natural environment within Ockham. The significance of preserving areas of the natural environment cannot be underestimated and it should remain uppermost during this Examination that Guildford Borough Council, in whose district much of the proposed upgrade works will take place, have formally declared a National Climate Emergency.</p> <p>Within REP5-032 Natural England repeat their concern about the removal of the woodland 'buffer' 2.4.7.d and we repeat that we believe the proposal to severely thin the woodland adjacent to the A3 and around Boldermere, including the Scots pine is going to increase pollution. Crucially, it will also lead to a reduction in the air quality as Scots pine is one of very few species of tree that has the greatest ability to improve air quality - Dr Rossa Donovan MCIEEM CEcol, environmental scientist. In addition, as stated by Natural England the belts of mature trees provide 'an effective mechanism to disperse vehicle emissions away from sensitive habitats'.</p>
3.4.5	<p>As we have previously stated, OPC request that we are included as part of the Steering Group. HE have stated in REP6-13 that it would not be appropriate for ECRG to sit on this group but make no mention of OPC who as a statutory body request that we are included.</p>
3.5.1	<p>We have repeatedly expressed both at REP5-041 and REP6-018 our concern about the scope of activities proposed at the construction compounds. These concerns have been repeated by ECRG REP6-020. We have read REP4a-003 and draw no comfort from clause 1.3.6 which states that the full CEMP will not be available under the detailed design and construction plans have been finalised. As a result of this, we are not able to ascertain the full scope of the activities planned at the construction compounds. The ambiguity of the possible activity at the compounds, particularly the compound at FWA which is within metres of the hamlet of Elm Corner is of grave concern due to the impact of any activity which will be significant on residents.</p> <p>We draw no comfort from Table 3.3 which allows for liaison with 'the public' and we note Table 9.1 allows for sensitive areas which include areas within the parish of Ockham. The protection measures within 9.2.3 of REP4a-003 merely state that HE/BBA will carry out community liaison.</p> <p>We request again that we are given greater detail about the proposed activities at the construction sites, particularly the one at FWA. Undoubtedly, it seems unreasonable to inflict months of pollution and disruption within metres of a settlement without sharing</p>

	<p>full information about the scope of work and doing everything to attempt to mitigate the impacts.</p> <p>As previously stated, the fragile ecosystem of the SSSI and SPA which is located off Elm Lane will also be heavily impacted by the construction site and this additionally needs to be taken into account.</p> <p>We reiterate our concern expressed within REP6-018 and reiterate that OPC and ECRG, to our disappointment, have been unable to find Common Ground with HE on this matter despite our willingness to consult.</p>
3.6.1	<p>We have submitted information about the flooding on the A3 following Storms Ciara and Dennis in February 2020 REP5-041 and we were advised by Jonathan Wade of HE at a meeting with OPC on 10.03.20 that the design engineers are working with GBC regarding possible flooding at Boldermere. We await further information on this and note HES comments in REP6-013</p>
3.8.1	<p>As previously stated, we request the preservation of all trees and most importantly, the irreplaceable ancient woodland, within the parish of Ockham.</p>
3.8.4	<p>We support the view that the widened and green Cockcrow Bridge will be a positive asset to the scheme</p>
3.8.5	<p>As stated at 2.10.2 of EXQ2, acoustic fencing would provide residents of Ockham with some protection from A3/M25 road noise. We also refer you to our response at 3.4.1 within this submission.</p>
3.9.1	<p>Please see our response to 2.16.4 of EXQ2. We would like to see this longstanding matter resolved.</p>
3.13.1	<p>At the Ockham Parish Council meeting of 10.03.20, Jonathan Wade of HE advised that HE are carrying out their own traffic modelling rather than relying on other agencies. We did at that time request the details of this research and are still waiting.</p>
3.13.3	<p>It is likely that Old Lane, Ockham Lane and Ockham Road North together with Guilehill Lane will continue to be used after the proposed works are completed in order to avoid A3 congestion and longer journey times as a result of the overbridge to RHS Wisley. All roads within the parish of Ockham have limited capacity to carry increased volume of traffic trying to avoid A3 congestion issues/increased journey times. We note that SCC submitted REP5-30 which shows the collisions resulting in injury recorded by the police in Ripley and whilst there is no similar information for Ockham that we are aware of, the likely ongoing usage of the local roads is likely to carry similar consequences.</p>
3.13.6	<p>We refer to our submission REP6-018 and reiterate our concern about the safety aspect of the new Elm Lane/Old Lane junction. Within our submission, we made suggestions about achieving the best safe interchange and are keen to ensure that the detailed design allows for this. 2.13.30 REP5-029 submitted by SCC also suggests high friction surfacing as one measure to achieve this.</p>
3.15.5	<p>As we have stated throughout this process, Ockham Parish Council request consultation on all matters relating to the community of Ockham. We have communicated our concerns to Jonathan Wade of Highways England and a number of significant matters remain outstanding. We have recently requested that we are consulted as the detailed design develops and that we are given the opportunity for monthly planning meetings with BBA/HE REP6-018. HE have confirmed this within REP6-013 and suggestions for the date of the first meeting have been made.</p>
3.15.6	<p>Within the community of Ockham we reiterate GBCs concerns within REP5-038 regarding the environmental impacts of the scheme and concur with GBCs definition of 'commence'.</p>
3.15.7	<p>As mentioned at 3.5.1 of this submission, the details of the activities proposed for the construction compounds remains uncertain and we have examined REP4a-003 in some detail as stated above.</p>

