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National Infrastructure Planning
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Ms Regena Coult



Dear Sirs,

M25 junction 10/A3 Wisley interchange improvement scheme Targeted non-statutory consultation -
Comments for Deadline of 4 February, 2020

I would like to participate in the consultation about the proposed changes to the improvement scheme.

Change 1

The 25m green bridge is extremely important. It will connect fragmented populations of adders and allow sand lizards to extend their habitat to Wisley Common, besides helping numerous other species of wildlife.

Adders are a highly endangered species. Part of their decline is due to the loss of genetic diversity. Connecting the two populations of Wisley Common and Chatley Heath should be a very positive step towards preventing further decline.

There should be 3 additional green bridges. The remaining arms of the A3 and M25 will have NMUs constructed over them. These could all be made into green bridges. It would reconnect the four quadrants of the SSSI.

Having read your answer to my previous representation I now have a better understanding of the technicalities and limitations of “mitigation” as used in the planning process.

However I would argue that the 25m green bridge and 3 additional three green bridges could all quite reasonably come out of the mitigation budget.

A huge sum of money is being spent on this improvement project. Essentially, this is money spent on destroying the environment. The cost of the green bridge(s) is insignificant in comparison.

I also believe that the extent of the destruction on the environment is highly underestimated. The construction phase alone is immensely damaging, besides the permanent losses and deaths created by the scheme. There are already reports of animals being killed before construction has even started. Consider the facebook post below (posted on the SARG group page, July3, 2019).



July 3, 2019

Found this female dead on a track on Wisley Common today, 39cm. Seems to have been squashed and quite possibly by one of the large vehicles working on the site as part of the M25 soil sampling.



Considering the overall destruction caused by the project I would say that creating the 4 green bridges could be regarded as appropriate mitigation to make up for the damage.

Please furthermore consider that this

entire project is about connectivity. Connectivity for humans, to make travel easier, faster and more convenient.

At the same time whilst creating the improved connectivity for human convenience, the desperately needed connectivity for wildlife, who depend on it to survive, is being denied due to legal technicalities.

Quoting from page 5 of the National Planning Policy Framework, paragraph 2c), emphasis mine:

“an environmental objective– to contribute to protecting and **enhancing** our natural, built and historic environment; including making effective use of land, helping to **improve** biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

The above directive clearly instructs that biodiversity not only needs to be preserved but enhanced. Therefore mitigation can, and should, do more than just compensate for any additional damage caused by the scheme.

Now would be the most economical way to build the green bridges as part of the overall development. It would be the most efficient use of taxpayers’ funds for mitigation.

Change 2

The incorporation of two toad underpasses at Old Lane and other mitigation measures is welcomed.

We would like to move the locations of the tunnels and add additional ones.

As discussed in the Special Issues Hearing Meeting of January 14 the applicant will allow the details of the exact locations to be finalised by Surrey Highways. This is much appreciated - many thanks.

For the record, I would like to present the case for

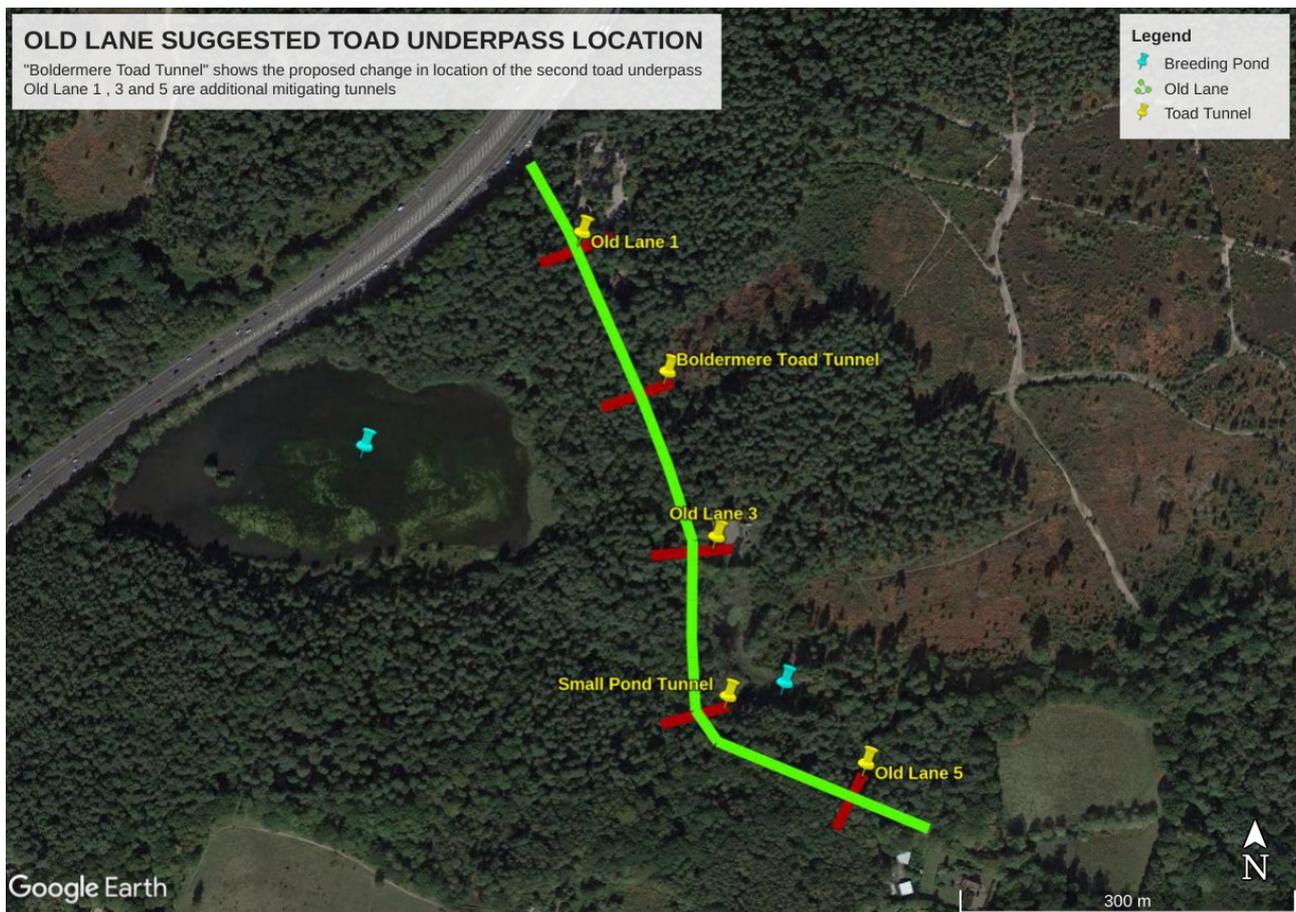
- a) moving the proposed toad tunnels in Old Lane and
- b) creating additional underpasses.

The tunnels as they are currently proposed do not cover the busiest part of the toad crossing. Some distance south of the Ockham Bites car park there is a natural dip in the landscape, and a large number of toads congregate there. One of the tunnels should be placed in that location.

As previously shown, the toads disperse from the two breeding ponds in all directions and return to them annually. Because Old Lane is framed by woodland, which is ideal toad habitat, they can be found all along this road. Therefore, deaths can occur anywhere. This is the reason for requesting 3 further tunnels. They will create additional safe places for amphibians and other small animals to cross. Two tunnels on their own are not sufficient to mitigate for the effect of traffic increase along all of Old Lane.

The markings on the Google Earth image below show the approximate proposed location of the tunnels in Old Lane. "Boldermere Toad Tunnel" and "Pond Tunnel" are the underpasses as proposed by the "Changes" Document, with the "Boldermere" tunnel moved to capture the higher density of toads at that location. Tunnels 1, 3 and 5 are further underpasses requested, which would help to mitigate against deaths along the length of Old Lane.

Great Crested Newts, an European Protected Species, have been found in the area during the surveys carried out by Atkins. These would also benefit from the additional tunnels.



Change 3

Although I have not previously registered an interest I would welcome this change as it reduces the land loss and the impact on Manor Pond.

Change 4

As Change 3 - not my main area of interest but I would recommend not to increase the hours. Workers, neighbours and drivers need a rest from the noise and works, as does the surrounding wildlife.

Change 5

A speed limit reduction to 20mph is welcomed. But this will have no effect on toad mortality. Speaking from experience, 20mph limits are rarely fully adhered to, especially if they are not enforced.

Even if it is adhered to, a 20mph limit will not mitigate for toad deaths. All it means is that the toads will be run over more slowly.

There is also a loss of habitat due to the new road, which has a detrimental effect and ought to be compensated for.

To justify the omission of mitigation a road crossing study is cited. This is a simple experiment lacking the depth of a full scientific study. A proper investigation would include patterns of toad behaviour and migration, traffic patterns and overall long-term effect of deaths on the population.

The simple experiment cited does not paint a true picture and it ought not to be used as a basis for deciding what mitigation measures should or shouldn't be taken.

I would like to make some points, based on my observations during my years of work as a toad warden:

- 1) toads are extremely slow-paced and take a very long time to cross a road
- 2) toads often don't travel in a straight line across a road, sometimes zig-zagging back and forth, thus spending even more time in the danger zone
- 3) toads use roads as a preferred system of travel
- 4) Elm Lane is just opposite the second breeding pond, thus forms the perfect highway for toads
- 5) toads often like to sit on roads on a mild wet night
- 6) toads emerge shortly after dusk; this coincides with rush hour during the most critical time of year, the spring migration
- 7) if conditions are perfect for toads there will be large numbers on the road at the same time
- 8) it can take just one car to wipe out a large number of the toads dispersed along a road simultaneously
- 9) 19 dwellings is a significant number; 20 to 40 vehicles returning home at rush hour; late night deliveries / shopping trips, visitors / parties all contribute to amphibian deaths

All in all the new road will have a significant negative impact on the toad population.

The existing dirt track is impassable to standard people carriers and it is therefore reasonable to assume that it does not currently cause any amphibian deaths.

Therefore in order to adequately mitigate for the new road it also should have zero amphibian deaths.

To achieve this it is proposed to make the road invisible to toads. This could be done by building toad underpasses at regular intervals in combination with one-way amphibian fencing on both sides. The proposed interval between underpasses is 50m.

The toad tunnels could be incorporated into speed bumps, enforcing the 20mph speed limit. This will also reduce road fatalities of deer, badgers and birds.

Great Crested Newts will also benefit if the underpasses are implemented.

With the toad underpasses being incorporated at the construction stage it is expected that these mitigation measures can be implemented at low extra effort and cost, thus yielding a very high return to investment ratio.

Change 6

As change 3, not my main area of interest. Just a comment that the gas main works should be done in a seasonally sensitive way such as to minimise disruption to wildlife.

Additional considerations not directly related to the changes consultation

I'm not sure when is the appropriate occasion to raise these issues, therefore I mention them here.

- 1) Please investigate the possibility of a toad tunnel under the A3. There is an existing tunnel under the A3, which might be used by toads at the present. Something will have to be done with this tunnel in any case, when the A3 is widened. Please investigate the possibility of a toad tunnel. It

may be possible to construct this as part of the overall works. This would be beneficial as it would reconnect the populations of Boldermere with those on Wisley Common.

2) Please reconsider the Wisley bypass scheme. I acknowledge the applicant's answer to my previous representation. The proposal of a culvert is welcomed. Nevertheless I believe it would be better not to have the road there at all, for the following reasons:

i) nobody seems to like this scheme actually - it is terrible for the environment and blighting to the neighbouring properties; having attended the Special Issues Hearing on January 14, I get the impression that not even RHS, for whose sake the scheme was chosen in the first place, are happy with it

ii) the ancient woodland is protected by the scheme, however, the important species rich edge habitat will be cut off by the new road

iii) although further away from Boldermere this road is in the amphibian catchment area and will have a detrimental effect

iv) as some others have suggested, could the central reservation be used somehow to avoid building this road and access to the gardens be created on the Wisley side?

Many thanks for considering my thoughts.

Yours faithfully,

Regena Coult