

M25 Junction 10 Project Team
National Infrastructure Planning
The Planning Inspectorate
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Ms Regena Coulthard



Dear Sirs,

Request for further information - Deadline 7, April 20, 2020

Generally commenting on 3.1.3 and 3.1.4, Changes 1, 2 and 6.

I have previously submitted a document with comments on the changes but it seems to not be listed on your website. Therefore I submit it again together with this one.

I would like to emphasise the points I have raised before in REP1-052 and REP6-026 and the above-mentioned submission:

I feel that not enough weight is placed on the need for mitigation, for the destruction that is caused to wildlife and the environment by the scheme. In my view there is a large discrepancy between the degree of mitigation offered and the actual damage caused.

It seems to me that every effort is made to keep the expenditure for mitigation to a minimum while large sums are being lavished on a scheme to make travel by car faster, more convenient and safer.

This is not only ethically and morally wrong, it is also short-sighted.

In spite of technological advances and modern conveniences, human beings are dependent on a healthy ecosystem in order to survive.

I believe that the 50m wide green bridge should be built as part of the mitigation for the scheme, and there should be green bridges over each branch of the junction. The agency should consider building green elements into all of the NMUs that will form part of the scheme.

I'm asking for more toad tunnels in Old Lane. In particular, no mitigation is being done for the new road Elm Lane, which cuts through pristine woodland, creating fragmentation and a new danger zone for protected and priority species such as Great Crested Newts and Common Toads.

The existing tunnel under the A3 will become defunct once the additional lanes have been built because its exit will be inside the lake. It is still not clear what will happen with this tunnel. To my knowledge it wasn't built as an amphibian underpass, nevertheless amphibians are able to use it. If the tunnel becomes unusable as a consequence of the new road layout, no mitigation has been proposed for the resulting additional habitat fragmentation.

During the Issue Specific Hearing 2 of 15 January 2020 I raised the point that not enough amphibian underpasses are included in the scheme. I understood that HE responded positively, i.e. that the amphibian underpasses were relatively minor alterations and that HE would be happy to

discuss this with SCC outside the perimeter of the DCO. SCC indicated that they were supportive of building the required number of amphibian underpasses.

But since then I have been told that HE don't intend to build any more than the two tunnels for Old Lane.

Elm Lane is of special concern. It is a fallacy to assume that the effect of a quiet road on the amphibian population is negligible. Please see my comments in REP6-026. I do not believe that it is lawful to build a new road through habitat of protected and priority species without implementing any mitigation.

I urge the planning authority to not allow this scheme to go ahead without the necessary and appropriate mitigation.

Commenting on 3.2.2

I recall from the Issue Specific Hearing 2 of 15 January 2020 that RHS had objections against the current Wisley bypass scheme based on journey lengths. Concerns were commercial (loss of customers) and environmental and climate impacts due to increased emissions. The RHS argued the case for additional slip roads at the Ochham interchange to be incorporated into the scheme.

I'm saddened and disappointed by the role played by the RHS, which I used to view as a conservation charity with the important mission to promote the public's interest in gardening and nature.

The initial preferred solution (WIS-01) allowed access to the gardens on the Wisley side. It would have taken some land from the gardens. It was rejected because of a large media campaign much along the lines of "who shouts the loudest, wins".

This scheme would have constituted the smallest land take, shortest journey times and hence, lowest emissions. It would have avoided the loss of habitat, habitat fragmentation and road kill zone created by the current scheme (WIS-11).

Considering that many of the dangerous delays are caused by visitors to Wisley gardens, and that much of the scheme is to improve access and accommodate the anticipated increase in visitor numbers, I find the unwillingness of the RHS to sacrifice any of their own land incomprehensible.

As if this wasn't enough, RHS are applying pressure to have more slip roads built, constituting more land take, some of it privately owned. Having witnessed the distress that is caused by compulsory acquisition orders I find the position taken by the RHS incredibly selfish and unworthy of an organisation of its standing.

I would urge the planning authority to reject the current proposal for the Wisley by-pass due to its high impact on environment, climate and wildlife, and to favour an option that allows access to the gardens on the Wisley side.

Thank you for your consideration.

Kind regards,

Regena Coulthard