

		Question	SCC response
1.	General		
3.1.2	Applicant and Surrey County Council (SCC)	<p>In your Statement of Common Ground (SoCG) [REP5-009] the Applicant refers to a schedule of works that are expected to become the responsibility of SCC in the future should the DCO be made. When is this schedule going to be provided to SCC? In addition, is SCC content with the two plans that the Applicant has provided and which are described in section 1.4.1 of [REP5-009]?</p>	<p>SCC are currently awaiting receipt from the Applicant of the schedule of works that are expected to become the responsibility of SCC in the future should the DCO be made. To assist the applicant SCC prepared and sent to the Applicant (on 14/02/20) a suggested draft table for use to determine the value of commuted sums to cover maintenance of additional items.</p> <p>This list was not exhaustive and needs to be added to as appropriate to clearly define the assets being considered but was provided to enable the Applicant to value the commuted sum payment. SCC were pleased to learn that the Applicant has been reviewing and assessing this table through its Commercial Team and SCC look forward to receiving confirmation of the assets that are expected to become the responsibility of SCC along with an appropriate commuted sum.</p> <p>As stated the Applicant has provided SCC with a set of plans showing maintenance routes for the Scheme. These drawings, show at a high level/small scale the access route lines to various assets.</p> <p>The Applicant has advised that they will provide a narrative and a full and detailed schedule of the works that are expected to become the responsibility of SCC in the future under the DCO to accompany these plans. This is welcome and currently awaited as the level of information SCC require within this narrative is the width of access that will be available for SCC's maintenance vehicles, including swept paths/turning areas, and that the Applicant will pass the title of land required for access to SCC. Clarity is needed on this point as it may affect the land acquisition designation.</p>

		<p>The Applicant states in REP2-014 for example that rather than title acquisition, land for maintenance access could be through temporary acquisition with permanent rights e.g. plot 9/13, (which is not in SCC ownership) for the maintenance of a proposed carrier drain adjacent to the A245 which the Applicant does not consider necessary to include that plot within the highway boundary and could be covered in a side agreement with SCC. SCC would therefore wish to see these plots set out/cross referenced in the schedule of assets SCC is being asked to maintain so it can be reassured sufficient access is being provided within SCC's control?</p> <p>Examples of the type of queries where SCC need further information to clarify how maintenance of assets to come to SCC will be possible include:</p> <ul style="list-style-type: none"> • No maintenance access is shown to the retaining wall on the north side of the A245 or the retaining wall on the south side of the A245. • Maintenance access to the Wisley Lane overbridge embankments and drainage ditch /drainage structures at the foot of the embankments • Maintenance access to the abutments and embankments of the realigned Wisley Lane bridge over Stratford Brook not shown including widths for maintenance vehicles and ensuring there is no conflict with maintenance access required by the Environment Agency to maintain Stratford Brook <p>This is not an exhaustive list. In summary, SCC believe that information is still to be provided by the Applicant to confirm that the DCO boundary has been defined to include all land necessary to construct, operate, maintain and manage the Scheme, including suitable provision for maintenance access. But note that the Applicant will be providing more information to reassure SCC in this respect.</p>
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3.1.3	All Interested Parties (IPs)	<p>With respect to the Applicant's Proposed Changes 2 to 6, the documentation for which was variously submitted at Deadlines 4 and 4a, which were accepted for Examination by the ExA on 27 February 2020 [PD-012], please provide any comments that you may have that specifically relate to Proposed Changes 2 to 6, which comprise the following:</p> <ul style="list-style-type: none"> • Change 2 - incorporation of two toad underpasses at Old Lane • Change 3 - removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions • Change 4 - amendments to Saturday construction working hours • Change 5 - diversion of a new gas main crossing of the M25 • Change 6 - amendments to the proposed speed limit at Elm Lane 	<p>A copy of SCC's consultation response to the proposed changes was copied to the Planning Inspectorate as REP5-031. SCC comments on Changes 2 to 6 are as follows:</p> <p>Change 2 - Incorporation of two toad underpasses at Old Lane and other mitigation measures</p> <p>2.1 As set out in SCC's Written Representation and the Deadline 3 submission (submission of oral statements at ISH2) - SCC welcomes the proposed revisions to the dDCO to include toad tunnels on Old Lane. Useful discussions have taken place on site with Surrey Amphibian and Reptile Group and Highways England. It has, however, been suggested that the proposed toad tunnel locations and fencing could be better located and that additional underpasses are required to be more effective. SCC would welcome confirmation from Highways England as to how the necessary provision can be best secured to the satisfaction of SCC and the Surrey Amphibian and Reptile Group.</p> <p>Change 3 - Removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions</p> <p>3.1 Following receipt of Highways England consultation letter and brochure on 6th January 2020 SCC noted that Page 10 of the brochure refers to further traffic modelling to predict traffic flows at this junction. SCC subsequently asked to be sent a copy of this traffic modelling information and a Road Safety Audit to cover the proposed changes. An "A245 Eastbound Design Changes Technical Note" was subsequently received on 10th January 2020 summarising the traffic modelling associated with this change. A Transport Assessment Addendum Report was submitted at Deadline 4 – see REP4-041. SCC has reviewed this</p>
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		<p>Transport Assessment Addendum Report and have commented below. At the time of writing, however, a Road Safety Audit (RSA) has not been received covering this proposed change.</p> <p>3.2 The RSA is required so that SCC can understand how Highways England have assessed the potential safety implications of this proposed change.. Consideration of this issue would provide reassurance that any issues arising have been considered and any required changes can be accommodated within the red line boundary.</p> <p>3.3 SCC now understand (from reading the dDCO amendments at Deadline 6) that the A245-A3 northbound on-slip jet/free flow lane has been deleted from the proposals. This jet/free flow lane had the benefit of ensuring London A3 bound traffic could join the A3 without delay and hence aim to reduce queuing back from the Painshill junction back towards the A245/Seven Hills junction. It is not clear as to why this jet lane has been omitted when a similar jet lane is proposed for the A3 northbound off slip to A245. SCC would like to understand how this is not detrimental in traffic terms to the A245.</p> <p>3.4 As regards the layout and traffic implications of the proposed change, and in addition to the point concerning the Road Safety Audit, SCC made a number of comments in response to the consultation in relation to the capacity and operation of the junction under this proposed revision to the dDCO. SCC have now received a reply from Highways England, but a number of concerns remain. These include:</p> <p>a) The TA Addendum Report (Rep4-041) contains only the summary model reports, and so there is little additional information to the summary received as part of the</p>
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		<p>consultation. Although the summary reports contained in the report suggest there is not a significant difference between the 'with' and 'without' free-flow slip, there are some differences. For example, Table 3.6. shows that in 2022 for the 07.00-08.00 hour, delays per vehicle increase for the junction as a whole from 1m36s/vehicle to 1m41s/vehicle. But if the increased delay is focussed on the A245 e/b, then it could be the delays to drivers using this approach will be more significant and queues will result. While the amended scheme does continue to provide an improvement over the Do-Minimum, SCC need to understand the effect of the amended scheme compared with the original proposal as the A245 is part of the Local Road network for which SCC is responsible.</p> <p>There are a number of aspects that change between the 'with' and 'without' free-flow slip option, ranging from land-take to traffic flow. It will be helpful to see a full assessment of the differences between the two options. As mentioned above, this is to allow SCC to understand the changes and to be able to explain the benefits and disbenefits of the two options to relevant parties, including both SCC and Elmbridge Borough Council Members.</p> <p>b) As noted in SCC's original response, SCC are keen to remove merges as they can lead to driver conflict. HE have confirmed that the nearside lane on the A245 e/b approach to the Seven Hills Road junction will be marked straight-ahead and left. SCC recommends that the nearside lane is marked as left-turn only. This would negate the need for both the short stretch of near-side lane on the downstream side of the junction and the subsequent merge. However, the capacity of the junction could be affected, and so this modification would need to be</p>
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		<p>assessed including the use of modelling. SCC are content for this particular element of work to be postponed until detailed design is underway, subject to HE confirming that this change can be implemented within the current red line boundary.</p> <p>3.4 The drawing contained in the brochure does not contain sufficient clarity to define the details at the A245/B265 junction clearly, specifically the A245 eastbound approach into the Seven Hills Road junction; from the drawing it appears as though the nearside lane is left & straight ahead. SCC would therefore like confirmation on both what the original (current) scheme shows and the layout proposed in the revision.</p> <p>3.5 SCC has concerns around the very short three lane section on the A245 eastbound on the downstream (east) side of the junction. As a rule, SCC are trying to remove these downstream merges as they can cause driver conflict. In addition, SCC would tend to have the merge on the offside so traffic in the right hand lane merges into the middle lane: we do not like it when nearside traffic merges with offside traffic as it can push vehicles further to the right and potentially into the on-coming stream (or in this case into the right hand lane). As such we would expect the merge as proposed would be acceptable.</p> <p>3.6 The main point, however, is that merges on the downstream side of the junction, unless somewhat distant from the junction and with a gradual merge (see next point below), can cause delay which impacts upon the flow through the junction. In such cases, appropriate underutilised green time in the relevant stage should have been incorporated in the LinSig model to reflect a reduced saturation flow due to issues on the downstream side affecting flow through the</p>
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		<p>junction. It is not possible for SCC to verify this without access to the traffic model. SCC's specific concern is that any reduction in capacity on the eastbound approach to this junction will have impacts on the congestion experienced by drivers travelling eastbound on the A245 from the Brooklands area.</p> <p>3.7 The length of taper on the downstream of the junction should be at least 100m from the downstream edge of the junction intervisibility zone as stated in DMRB CD 123 (August 2019). It is not possible for SCC to check this on the drawing provided in the brochure, but it appears as though the merge is considerably shorter than 100m.</p> <p>3.8 Table 1 of the A245 Eastbound Design Changes Technical Note indicates there will be some re-routing, although minimal and in turn, the LinSig results will also be affected by slightly reduced flows negotiating the junction. The technical note states on page 6 that the main increases in delay and journey time are for vehicles travelling eastbound on the A245 towards the Painshill junction, particularly those subsequently turning left onto the A3 northbound on-slip. It is difficult for SCC to understand what that impact is as only summary tables have been provided. SCC request further detail on:</p> <ul style="list-style-type: none"> • Changes to potential queuing on the A245 back from the Painshill junction • The change in journey time for the various movements on the A245 eastbound: e.g. left turn onto A3 northbound slip, straight ahead onto the junction circulatory carriageway and u-turners.
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		<p>3.9 In summary, the level of detail provided is insufficient for SCC to fully comment on the proposed revision. In addition to the modelling requests made above, SCC also require a copy of the RSA along with more detailed drawings in order to fully understand the lane details at the A245/B265 junction specifically.</p> <p>Change 4 - Amendments to Saturday construction working hours</p> <p>4.1 As set out in the latest SoCG REP5-009, SCC support the principle of reducing the overall time period for construction of the project.</p> <p>4.2 As set out in Joint Authorities Local Impact report, however, this is dependent upon Highways England's agreement that the M25 junction 10 Scheme should be subject to the South East Permit Scheme (SEPS). SEPS, in accordance with the Traffic Management Act 2004, provides for highway authorities to co-ordinate works affecting the highway, discharging the duty to maintain the highway network under the New Roads and Street Works Act 1991. Those wishing to undertake works affecting the highway are required to obtain a permit before carrying them out.</p> <p>4.3 SCC would ask that Highways England consider the potential impact on local residents and businesses and how this would be mitigated?</p> <p>Change 5 - Amendment to the speed limit at Elm Lane (and including Byway 525 – Byway Open to All Traffic). Stated as Change 6 in Highways England letter dated 4th November 2019 doc AS-023</p>
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			<p>5.1 As set out in para 7.8 of Joint Authorities Local Impact report SCC welcomes the proposed change to dDCO submitted on 4th November 2019 (Change 6 of AS-023) that amends the speed limit to 20mph on Elm Lane.</p> <p>5.2 SCC would welcome comments from Highways England as to how actual speeds along Elm Lane would meet the amended/posted speed limit to reduce the impact on amphibians crossing the new section of Elm Lane.</p> <p>Change 6 - Adjustments to the Order limits in the draft development consent order to accommodate the diversion of a gas main.</p> <p>This change will result in changes to the impacts on SCC's land holdings, including additional land to be used temporarily and rights to be acquired permanently. The County Council has no comment to make on this change, beyond the point that SCC would require suitable financial compensation for the impact upon SCC affected land.</p> <p>In respect of biodiversity impacts SCC recommend this additional work is covered by a method statement covering both working and reinstatement subject to the consent from Natural England</p>
3.1.4	All IPs	Included within the Applicant's request at Deadlines 4 and 4a to make Proposed Changes to the originally submitted application is Change 1 (extension of the proposed green element on Cockcrow Bridge). Proposed Change 1 to date has not been accepted for Examination by the ExA. There remains the potential for Change 1 to be accepted by the	<p>A copy of SCC's consultation response to the proposed changes was copied to the Planning Inspectorate as REP5-031. SCC's current comments on Change 1 Extension of the proposed green element on Cockcrow Bridge are as follows</p> <p>SCC supports the proposal to widen the green verge of the proposed Cockcrow Green Bridge from 10m to 25m as we consider that it is more likely to function as a green bridge, i.e. as a conduit for wildlife across the A3. This will in part help compensate for the fragmentation of habitats and isolation of</p>

		<p>ExA for Examination prior to the close of the Examination and accordingly the ExA considers it appropriate that all IPs be provided with the opportunity to comment on Proposed Change 1 if they wish on a without prejudice basis.</p>	<p>species that has occurred as a result of the construction of the M25 and the widening of the A3.</p> <p>SCC would wish to be involved in the detailed design, if this is approved through the Designated Funds process, and would wish to be satisfied that such a structure would not create highways risks e.g. the risk of surface materials being washed onto the highway below and provision of suitable high parapets/fencing to protect any species crossing the bridge and to reduce the impact from lighting and headlights below.</p> <p>Highways England has confirmed that it will accept responsibility for the future maintenance of the green verge in REP3-007 (see comment on para. 4.4.12 of the LIR on page 6). Highways England has included a clause within the side agreement to confirm that it will be responsible for the maintenance of the green verge and associated planting.</p> <p>SCC note from the accompanying drawing Amended Land Requirements – Proposed dDCO changes – Cockrow Overbridge Verge Widening (drg no HE551522-ATK-EAC-J10-DR-LM-000001 rev 3.0) that there are changes to the impacts on SCC's land holdings including additional permanent title acquisition. As such SCC would require suitable financial compensation for the acquisition of SCC affected land.</p> <p>SCC note that the widened approach ramps will slightly increase the risk of potential buried archaeology being encountered and would ask that this be covered by the written scheme for the investigation and mitigation of areas of archaeological interest</p> <p>SCC consider that would be helpful if a photomontage of the bridge could be produced for key viewpoints to understand how the green bridge would fit within the existing landscape.</p>
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			The Cockrow Bridge will impact on the Ockham Bites site (see SCC Local Impact Report para 8.3) which will require accommodation works that are shown outside of the dDCO Red Line Boundary. SCC is keen that a commitment from HE to appropriate accommodation works is secured during the DCO examination period.
8. Landscape and Visual Impact			
3.8. 4	GBC	With respect to the replacement Cockcrow bridge, paragraph 3.2.13 of the updated Report on Proposed Scheme Changes [REP4a-004] states that: " <i>The widened bridge would provide greater visual connectivity between the land on either side of the A3 and as such provide a positive contribution to the landscape character of the area.</i> " On the basis that this is yet to be accepted into the examination (having regard to Q3.1.4), do you concur with this analysis, and if not, why?	SCC agree in principle, the widened bridge would provide greater visual connectivity between the land on either side of the A3 and could provide a positive contribution to the landscape character of the area, subject to detailed design and landscaping.
9. Land use, recreation and non-motorised users			
3.9.1	SCC or the Applicant	Please provide a copy of a plan clearly showing the extent of the registered areas for Wisley Common and Ockham Common prior to the construction of the M25. It is only necessary for either SCC or the Applicant to submit the requested plan and the ExA would therefore ask you to agree amongst yourselves which organisation will be best placed to submit it and then	As the Commons Registration Authority, Surrey County Council is best placed to provide a plan showing the full extent of registered common land. At deadline 2 Surrey County Council submitted requested plans from the definitive map to the examination. Surrey County Council does have an earlier, first edition of the definitive map dating back to the late 1960s/early 1970s. It is thought that the first edition of the definitive maps pre-date the M25, however this can not be confirmed at this stage. It is likely that it will show some amendments to the extent of Common Land in the area in

		proceed on that basis.	question. However, under current Covid-19 restrictions SCC officers are working remotely and are unable to access the hard copy plans. The requested information will be submitted at the earliest opportunity.
3.9.2	SCC, EBC and GBC	Can you please advise on what input you have had in derivation of the 'target ratios' for the provision of replacement land in exchange for Special Category Land (SCL), ie Common Land and Open Space, namely: 2.5:1 for Common Land, 2:1 for Open Space and 1:1 for the permanent acquisition of rights over Common Land and Open Space, identified by the Applicant in [AS-005].	SCC has been involved with discussions with HE about RL ratios since early in the scheme. These started with target ratios and were amended when specific land parcels had been identified. HE has lead on putting forward the ratios which were then agreed by SCC
3.9.3	SCC, EBC and GBC	<p>With respect to the proposed provision of replacement land in exchange for SCL and the range of possible options outlined in Table 1 of the 'Note on Implications of Potential Reduction in Replacement Land' [REP5a-012], please:</p> <p>a) identify the three SCL options in Table 1 that you most and least favour, ranked in order of most/least preferred; and</p> <p>b) explain the reasons for those choices.</p>	<p>SCC most favours the options for possible reduction from most to least to least favourable ;</p> <p>5 -small woodland area not contiguous with SCL</p> <p>6- small woodland by M25 and limited connectivity</p> <p>7- very small area at extremity of site</p> <p>SCC least favours the options for possible reduction from most to least favourable</p> <p>3- largest area with good connectivity with SCL</p> <p>2- second largest area with good connectivity with SCL</p> <p>3- smaller wetter area of grassland, less attractive for public access and part may be used for Sanway FAS.</p>

	<p>Without prejudice to any representations you have made at earlier deadlines for this Examination concerning the provision of SCL replacement land, in answering this question each local authority is requested to disregard any 'in-principle' type objections they might have to a reduction in the target ratios stated by the Applicant in AS-005.</p> <p>Additionally, in answering this question each local authority is requested to take account of the following factors:</p> <ul style="list-style-type: none"> i. the underlying purposes for having the Common Land and Open Space; any user benefits and/or disbenefits in terms of the proximity of any replacement SCL to what would be the retained SCL; iii. the patterns of use for the existing SCL; and ii. the future patterns of use for the existing and new SCL. 	<p>The selection above reflects the usage and management of the existing areas together with SCC's assessment as to the relative values of different RL becoming part of the public open space.</p> <p>When SCC purchased the commons in 1968, there were two main blocks of common land and open space each side of the A3, These blocks were then further sub-divided when the M25 was constructed and formed two larger areas south west of the M25 and two smaller ones to the north east.</p> <p>When selecting RL, it is important that the common land is equally advantageous and that open space offers an attractive environment for air and exercise. The main recreational activities of horse riding and dog walking consist of users crossing the area on the way to somewhere else or as a destination in its own right where the most popular routes will be of a circular nature starting and finishing at a car park. RL is of greater benefit when it is of sufficient size to allow circular or part circular walks and when located next to existing routes. It is of less value when it is smaller in size and located at the extremities of the common. It is also more difficult to manage smaller, more remote areas which may be separated from larger areas, for example, by mowing and grazing. Although biodiversity is not the main consideration for selecting RL, it is one of the main reasons for visits to the area. The report 'Making Space for Nature' concluded that areas for wildlife needed to be bigger, better managed and joined up.</p> <p>It is recognised that potential RL is not spread equally and that there are few areas available of a suitable size to the south west of the M25.</p>
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13. Traffic, transport and road safety

3.13.2	Applicant and SCC	<p>While the ExA is aware that the Proposed Development does not and will not include south facing slips at the Ockham Park Junction, the ExA considers that in order for it to understand what the hypothetical effect the availability of south facing slips would have on the predicted distribution of traffic on the strategic and local road networks within the vicinity of Ripley, that the Applicant and/or SCC should extend the traffic modelling that has already been undertaken to date to include model runs that incorporate south facing slips at the Ockham Park junction.</p> <p>In this regard the ExA considers a collaborative approach is necessary and that it is for the Applicant and SCC to decide between themselves which organisation is best placed to undertake the modelling that the ExA is requiring to be undertaken. Should the Applicant and SCC be unable to agree which organisation should take the lead on which one undertakes this modelling then it will be for both the Applicant and SCC to undertake this modelling.</p>	<p>It has been agreed with HE that the Applicant will undertake the traffic modelling of south-facing slips at Ockham Park junction. SCC understand that full reporting of the results of this traffic modelling will be provided at Deadline 8, since there is insufficient time to complete the modelling and fully report on the results by Deadline 7. Nonetheless, the following initial conclusions have been made by HE from the spreadsheet modelling undertaken to date, the assumptions made and the currently available outputs have been set out as follows:</p> <ol style="list-style-type: none"> 1. All Wisley Lane traffic, including RHS traffic, to and from the A3 south would utilise the south-facing slips instead of routing through Ripley on the B2215. 2. All Wisley Airfield development generated traffic arriving from the A3 south in 2037 would utilise the south-facing off-slip (northbound) to access the proposed development via Ockham Park junction, rather than route through Ripley on the B2215. 3. All Wisley Airfield development generated traffic heading for the A3 south in 2037 would utilise the south-facing on-slip (southbound) via Ockham Park junction when leaving the development site, rather than use Old Lane as indicated by the 2037 DCO Scheme Do-something traffic modelling. 4. Traffic flows along the B2215 through Ripley with the DCO Scheme plus south-facing slips at Ockham Park junction would be effectively unchanged compared to the Do-minimum scenarios. 5. With the DCO Scheme plus south-facing slips there is a significant reduction in the forecast increase in traffic on Old Lane between the Wisley Airfield site access and the A3 as a result of the rerouting of Wisley Airfield generated traffic heading for the A3 southbound via Old Lane to instead utilising the south-facing on-slip (southbound) via Ockham Park junction.
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			<p>the new on-slip as other trips might still find the use of the Old Lane junction to access the s/b A3 more convenient depending upon their origin within the development. Consequently, it is the assumptions made driving the outputs rather than the modelling: the spreadsheet model is more a means of displaying these assumptions and the resulting change in flows rather than anything more complex. While SCC does not disagree with this approach and concurs it is an appropriate method given the time constraints, SCC considers that more clarity might be helpful to the ExA.</p> <p>As a simplified approach is being taken to the modelling of the Ockham slips, it is worth noting that should it be deemed useful to model the Ockham slips in conjunction with the additional Burnt Common slips additional assumptions would need to be made informed by some analysis of the existing models, and this would be more involved than the work conducted for the Ockham slips.</p> <p>SCC mention this as it may be helpful to the ExA in raising awareness (if not already known) that the north facing Burnt Common slip roads are now in the Road Investment Strategy 2 (RIS2) as a RIS3 Pipeline project for investigation in RIS2. SCC understand from the RIS2 document that if the study concludes they are feasible and deliverable, the slips could be implemented in the time period 2025 to 2030.</p> <p>SCC and GBC welcome the inclusion of the Burnt Common Slips in RIS2 as they form part of the Guildford Local Plan (Policy A42) and these slips, alongside traffic management measures on B2215, would help to mitigate the impact of Local Plan growth and strategic highway improvements on the village of Ripley.</p>
3.13.3	Applicant and SCC	Following on from question 3.13.2 the ExA requires that the Applicant	SCC accepts the validation of the model and agrees to the 2015 base traffic flows used by HE in the modelling work. SCC advises

	<p>and SCC work collaboratively to present at Deadline 7 for the base year of 2015 (or such other base year that the Applicant and SCC agree amongst themselves to be appropriate, having regard to the concern that SCC has about the 2015 base flows as recorded in paragraph 2.5.2 of REP5-009), and the years of 2022 and 2037 in respect of:</p> <ul style="list-style-type: none"> • the B2215 between the Ockham Park junction and its southern extremity; • Newark Lane; • Rose Lane; • Old Lane; • Ockham Lane; and • Ockham Road North <p>a. either a consolidated agreed set of predicted AM peak hour, interpeak and PM peak hour traffic flows; or</p> <p>b. if a consolidated set of predicted traffic flows are not agreed at this deadline, the presentation of the flows of</p>	<p>that it has not seen the recorded 2015 traffic flows and requests that these are made available by Highways England and put into the Examination Library for the record.</p> <p>SCC has concerns over the way that the traffic flows have been modelled and this has been reported in our representations and orally at the Hearings. However, considering the time that is now available and in order to assist the ExA to be able to report back to the Secretary of State, SCC accepts the 2022 and 2037 traffic flow data but only on the basis that a suitable mitigation scheme is secured for Ripley High Street.</p> <p>SCC's view remains that the predicted 2022 and 2037 traffic flows will cause a severe problem in Ripley. This will create severance in Ripley, impact severely on the local community and create severe delays at junctions as previously reported in SCC's submissions.</p> <p>With the data currently available SCC are not able to confirm whether the links are able to accommodate the predicted level of traffic flows. But SCC's position is that the links in Ripley are through a village setting with all accesses and other characteristics direct from the road. The level of traffic will cause issues for businesses and residents and will severely affect the quality of life and place that is currently Ripley.</p> <p>SCC's main concern is in the interpretation of the results and the junction capacity assessments that have been undertaken that HE contend shows key junctions working within capacity right through to 2037.</p>
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		<p>traffic that are and are not agreed, together with an explanation as to why the traffic flows cannot be agreed.</p> <p>In answering this question, the ExA recognises that any disagreement that there might be about the effects of any additional predicted flows of traffic on the operation of the local highway network within Ripley and its immediate environs may be subject to a range anywhere between minor to significant. However, the ExA considers it very important for it to be able to report in an informed way to the SoS about any traffic implications that the Proposed Development might have for the operation of the local highway network within and immediately around Ripley, explicit and concise explanations of what the reasons for any disagreements are must be provided. That is, does any disagreement concern:</p> <ul style="list-style-type: none"> a. the quality and representativeness of the input data 	
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		<p>that is being used, and if so why?</p> <ul style="list-style-type: none"> b. the choice of model that is being used, and if so why? c. the way the model is being run, and if so why? d. the interpretation of the results arising from the modelling, and if so why; or e. any combination of the above listed factors, and if so why? <p>The ExA wishes to stress that in replying to this question that simply stating that there is a disagreement about a matter or delaying giving an answer to this question to a later deadline, unless there is a very good explanation, will not be a satisfactory response.</p>	
3.13.4	Applicant and SCC	<p>Following on from the answer or answers to question 3.13.3, which should in effect set out your final positions with respect to the predicted traffic flow for: the B2215 between the Ockham Park junction and its southern</p>	<p>a) SCC considers that Ripley High Street will be unable to accommodate the predicted level of traffic flows in 2022 and 2037 and consider that mitigation is required to prevent the predicted level of increase from occurring and to protect the character and quality of life of residents and businesses in Ripley.</p>

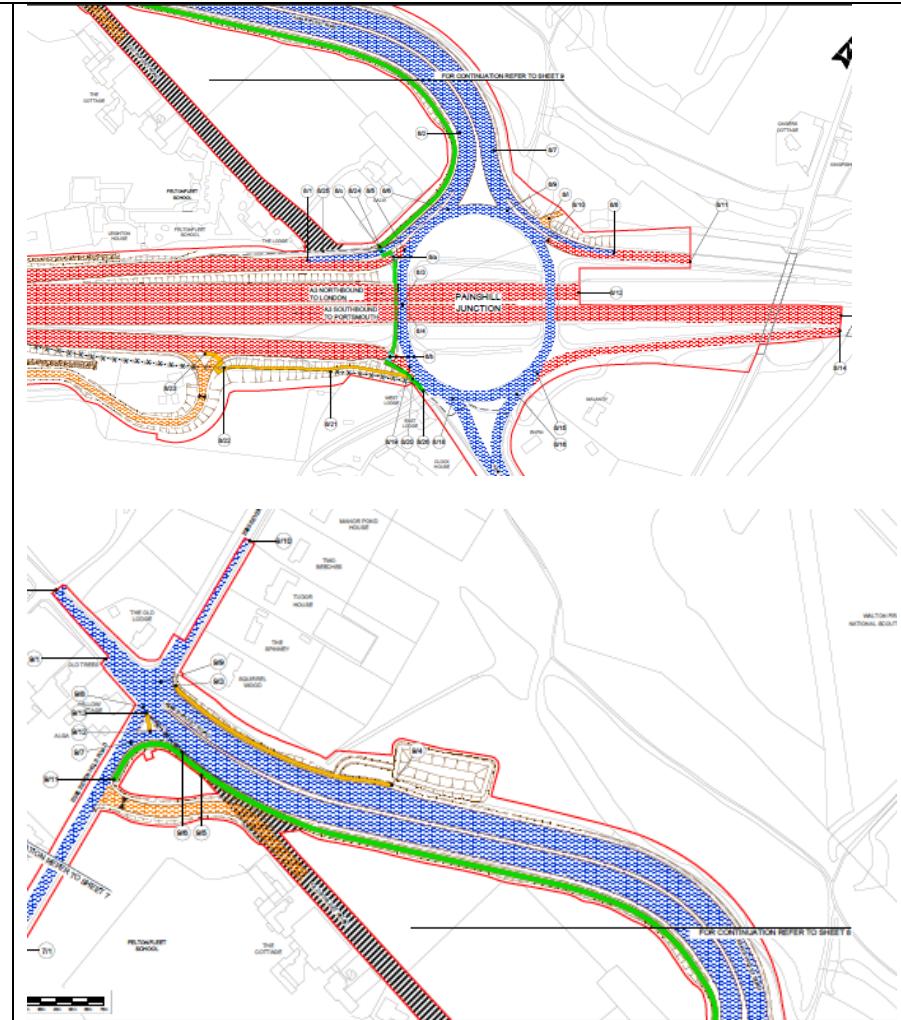
		<p>extremity; Newark Lane; Rose Lane; Old Lane; Ockham Lane; and Ockham Road North, please comment on:</p> <ul style="list-style-type: none"> a) the ability of the abovementioned roads to accommodate the traffic that would use those roads were the Proposed Development to receive consent and be implemented; and b) any need to mitigate the effects of any additional traffic using any of the abovementioned roads arising from the Proposed Development and the means for securing any necessary mitigation. 	<p>b) SCC considers that the ExA should impose upon the Applicant a requirement to construct a scheme to mitigate against the impacts of the additional traffic on B2215 Ripley High Street. This could be in the form of the measures set out in the Joint Council Local Impact Report submission REP2-047 paragraph 7.2.1.20 bullet point 3. The purpose of the scheme would be primarily to dissuade the RHS Wisley traffic from leaving the A3 to use the B2215 as the Applicant has modelled, and to ameliorate the place making issues this would create in Ripley if additional traffic uses B2215. The means of securing the necessary mitigation could be a requirement for the Applicant to enter into a S278 Agreement with Surrey County Council to mitigate against the anticipated increases in traffic flows from the Scheme. Any improvements should be in place before the Scheme is completed and the improvements would have to be approved by SCC through the S278 Agreement process.</p>
3.13.5	Applicant and SCC	<p>With respect to forward visibility at:</p> <ul style="list-style-type: none"> • the A3 northbound off slip to the A245 westbound, as shown on drawing XX-SK-CH-000037 Revision C01; • the new drainage pond access junction with the A245 eastbound , as shown on drawing 	<p>SCC's view is that ultimately the organisation who will be responsible for the road in the future, should be the organisation who should "sign off" the design of the road that they will be responsible for upon completion of the scheme. The A245 forms part of the Local Road Network.</p> <p>The applicants Streets, Rights of Way and Access Plans Regulation 5(2)(k) TR010030/APP/2.4 Sheet 8 and Sheet 9 of 31 show the New or improved highway - side roads in Blue "netted" shading – this being SCC's Local Road Network in this area</p>

XX-SK-CH-000039
Revision C01,

- A245 eastbound to the A3 northbound on-slip, as shown on drawing XX-SK-CH-000040 Revision C01, these drawings all within

[REP4- 006]:

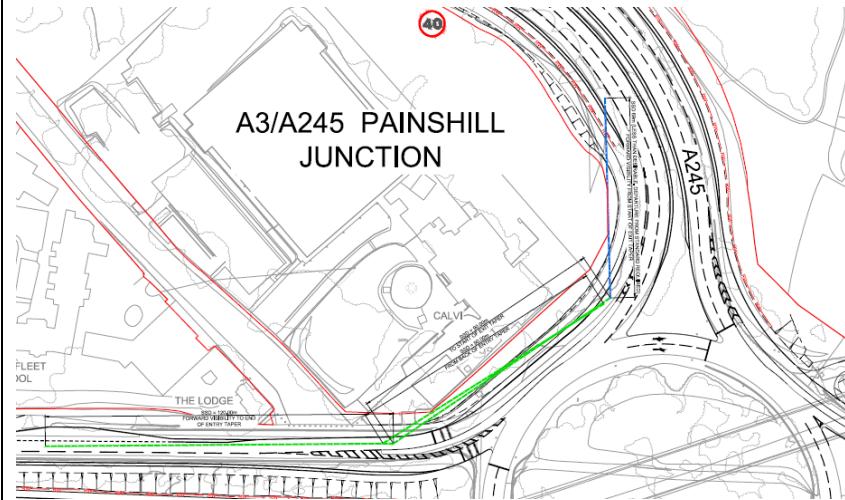
who is the relevant highway authority with responsibility for determining compliance with appropriate design standards, having regard to the owners and rights shown and declared on the Land Plans and within the BoR [REP5a-005], most particularly in respect of land plots 6/22, 8/31 and 8/36, which suggest that those junctions form or would form part of the strategic highway network rather than the local highway network?



So where the M25 junction 10 project will result in changes to roads that SCC is responsible for, it should be the scheme promotor/applicant (Highways England), as the designer of the scheme (under the Construction Design and Management

		<p>Regulations 2015) who should demonstrate to the satisfaction of the future road owner (SCC) as to whether our future road meets design standards and is safe or not, and if not what the mitigation might be. This will allow SCC to decide whether the design is acceptable or not.</p> <p>To date SCC have not seen the Road Safety Audit or achievable visibility splays/forward visibility in many locations and whether they meet design standards or require a departure and associated mitigation.</p> <p>If the land that affects the forward visibility becomes Highways England, or unless they have rights over it to enter it and undertake necessary maintenance, and together with the network itself, becomes part of the SRN, the responsibility lies with LHA (eg SCC) – which is something SCC would not want to take on, as it's not us who's creating the departures.</p> <p>If additional land is required to achieve forward visibility requirements for the local road network then SCC will require to have the title of the land to enter it and undertake necessary maintenance.</p> <p>If there is any vegetation within visibility splays that will require removal and hence ongoing maintenance that would in future fall to SCC then SCC will require the relevant commuted sum payments from the applicant to remove the additional financial burden on SCC.</p> <p><u>A3 northbound off slip to the A245 westbound, as shown on drawing XX-SK-CH-000037 Revision C01</u></p> <p>The visibility “lines” shown on drawing XX-SK-CH-000037 Revision C01 are singles lines and not a visibility envelope as</p>
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vehicles travel from A3 northbound off slip to the A245 and so SCC believe that to achieve the visibility splay shown will impact upon land outside of the highway boundary and mature trees in both highway ownership and possibly outside.

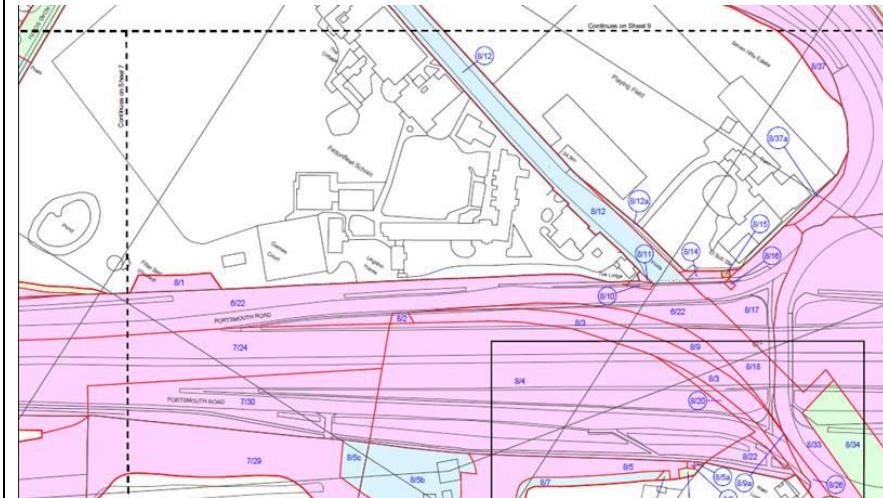


The applicant/Highways England are showing this area of land (plot 6/22 and other plots around the A3-A245 boundary) as title acquisition in this area and but is shown in the Book of Reference as Highways England already owning title.

The key issue at this location is that when considering the visibility envelope it would be the owner of the land required for the forward visibility for the two slips that's needed to be included within the DCO red line boundary but is not.

From consideration of the Book of Reference Plot 6/22 and other plots around the A3-A245 boundary e.g. plot 8/10, 8/11, 8/14, 8/16 are within Highways England ownership. But other plots are not e.g. 8/15 SE power networks, 8/37, 8/37a Feltonfleet school and there are plots outside of the red line boundary affected by the required visibility envelope that look to be outside of the highway

boundary e.g. owned by Felton Fleet school in the case of the off slip (westbound into A245).



New drainage pond access junction with the A245 eastbound , as shown on drawing XX-SK-CH-000039 Revision C01,

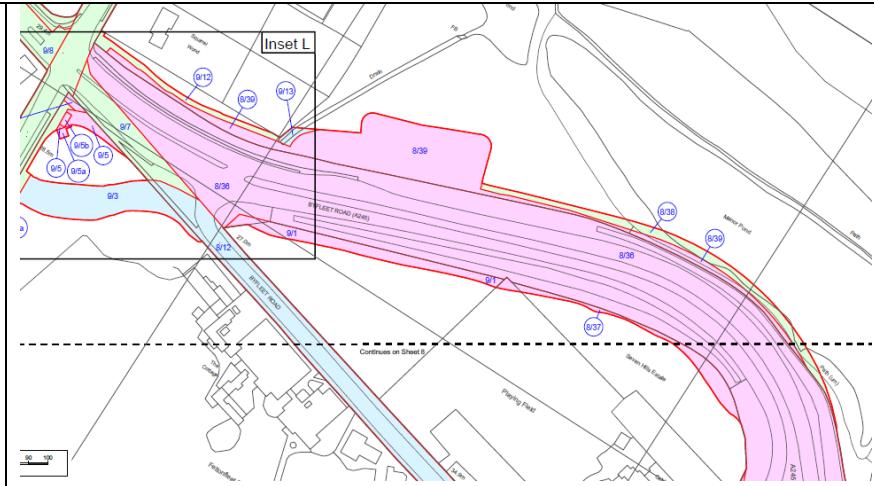
Considering the new drainage pond access junction with the A245 eastbound, the forward visibility as shown on drawing XX-SK-CH-000039 Revision C01 would appear to be acceptable and it is believed can all be contained within highway, given its location on the outside of the bend.

Visibility splays for vehicles exiting the junction should be shown however so that vehicles exiting the drainage pond access can see any queuing vehicles queuing back from the Painshill junction along the A245 and are not obscured by buses waiting at the bus stop. This may impact upon plot 8/39 which again is shown as title acquisition in this area and referring to the Book of Reference is

		<p>currently owned by Burhill Developments and so not currently under highway ownership. There may also appear to be an impact on plot 9/13 which is shown in the Book of Reference as owned by Felton Fleet school. SCC would ask for clarity from the Applicant regarding these areas.</p> <p>SCC requested the Road Safety Audit in this location and previously raised this with the applicant, (see SCC's response dated 7th May 2019 to Pre-Application Consultation – Additional Non-Statutory Targeted Consultation). The access is "square onto the A245 and so would require a vehicle to perhaps stop on the A245 to make the turn. SCC's response at that time was as follows:</p> <p>"SCC note that an access road to the pond is shown but would ask has this arrangement had a Road Safety Audit (RSA) and if so a copy of this RSA could be provided to SCC, with the relevant section of the RSA indicated, to show how vehicles can safely access this pond from the A245 to avoid such risks as rear shunts? Also is the access road to be gated and if so would the location of this gate allow safe access/egress and avoid such issues as fly tipping?"</p> <p>The applicant (Highways England) submitted a Road Safety Audit late on the 9th April 2020 (Document Ref: HE551522-ATK-GEN-XX-RP-CH-000009). This road safety audit only covers two issues (both related to the Pond access junction with A245, east of junction with Seven Hills Road). The two actions are:</p> <ol style="list-style-type: none"> 1. A formal access junction or vehicle crossover can and will be provided during detailed design stage. The addition of formal access junction or vehicle crossover will reduce the risks of conflicts and collisions – SCC accepts that addressing this in the detailed design is possible
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2. A turning facility can and will be provided during the detailed design stage. The provision of a turning facility within the pond area will eliminate the risks of collisions involving reversing vehicles - it is not clear to SCC whether this turning facility can be provided within the red line boundary and so SCC ask that this be clarified





A245 eastbound to the A3 northbound on-slip, as shown on drawing XX- SK-CH-000040 Revision C01

Considering the A245 eastbound to A3 northbound on-slip again the visibility “lines” shown on drawing XX-SK-CH-000040 Revision C01 are singles lines and not a visibility envelope as vehicles travel from A245 eastbound to the A3 northbound on slip to the A245 and so SCC’s view is that this visibility envelope should be plotted to demonstrate that the visibility requirements will not impact upon land outside of the highway boundary?.

This impacts on plot 8/31 which again is shown as title acquisition in this area but referring to the Book of Reference is within Highways England ownership. There may be issues and potentially with plots 8/38, 8/39 owned by Burhill Developments and so not in highway ownership and 8/32 is within Highways England ownership which may need clarification.

On a separate matter in this location SCC note in the work packages in the dDCO published at deadline 6 the Jet/Free flow

Lane from A245 east onto A3 North to London has been deleted but this was not clear from the previously submitted change consultation brochure. SCC's view is that this jet/free flow lane is required to ensure queues do not form on this section of the A245.



3.13.8	Applicant and RHS	<p>Having regard to the Applicant's response to ExA SWQ 2.13.9 [REP5-014]:</p> <ul style="list-style-type: none"> a) For the Applicant - what safety mitigation measures would the Applicant have sought? b) For RHS – had you been requested to provide mitigation, what measures might you have suggested? 	<p>SCC would like to inform the ExA that had the DCO Scheme with a realigned Wisley Lane been implemented prior to any planning application by RHS Wisley for the increase in visitor numbers permitted, then SCC would have objected to the increase due to the impacts of additional visitor numbers on the Local Road Network including Ripley.</p> <p>SCC would have sought a S106 planning obligation or a S278 Agreement to provide traffic management in Ripley High Street to mitigate the impact of the additional RHS Wisley traffic that would pass through Ripley High Street.</p> <p>SCC did not object to the actual planning application because the impacts were primarily on the strategic road network as traffic accessing RHS Wisley would have done so (in a non M25 Jtn 10 Scheme) from the A3/Wisley Lane junction that currently exists.</p>
15. Content of the draft Development Consent Order (dDCO)			
3.15.1 3	Applicant and LAs	Is a 5 year period in relation to replacement tree and shrub planting,	A 5 year replacement period is commonly used. However, less predictable weather with increased risk of drought and high

		that is referred to in R6(5), of sufficient length to ensure that all the proposed soft landscaping becomes properly established?	temperatures mean that failures are more likely and an increase to 10 years will ensure better landscape establishment.
16. Compulsory Acquisition (CA)			
3.16.1	All CA and/or TP objectors who had registered a request to be heard at the Compulsory Acquisition Hearing originally scheduled for 24 March 2020 (CAH1)	<p>Please provide in writing the oral case concerning the Applicant's CA and/or TP proposals that you intended to make at the postponed CAH1, in effect the written post hearing submissions that you would otherwise have submitted at Deadline 6. Should these written submissions exceed 1,500 then also provide a standalone written summary of the main submissions.</p> <p>In submitting your written versions of the oral case that you would have otherwise have made at CAH1, would you please ensure that as an Affected Person (AP) you identify each plot of land that you have an objection to the proposed CA and/or TP for. The identification of plots should be made by reference to the plot numbers given on the Land Plans [AS-002, as amended by any subsequent Land Plans submissions by the Applicant] and set out in the current version of the BoR [REP5a-005]. If your objection concerns multiple plots of land, but there are common themes spanning across</p>	<p>The scheme impacts a large number of County Council land parcels and consideration of the impacts on SCC land holdings is complex. Whilst the County Council does not dispute the extent of SCC land take required to deliver the scheme, subject of course to agreement of a suitable compensation package, there are a number of issues relating to categorisation within the land plans, categorisation and ongoing discussions around commuted sums and also reinstatement concerns. The Council is disappointed that land negotiation discussions have not progressed further at this point in the examination, as only 2 specific land acquisition meetings have been held to date. A further meeting was cancelled by HE due to illness, but correspondence in the interim has sought to clarify further aspects.</p> <p>The Council understands that at this time during COVID19 it has not been possible to hold the Compulsory Acquisition Hearings (CAH) although the CAH has been postponed and not cancelled. The Council has looked to set out some of its main concerns below by way of a summary but recognise that written responses from individual landowners as opposed to a CAH may introduce fragmentation to the process and issues in achieving a co-ordinated consistent approach to both its own and adjoining landowners' interests during a CAH.</p> <p>The Council is also aware that land plans/Book of Reference have been amended through the DCO examination process with both the changes applied for by the Applicant but also updated land plans/Book of Reference being submitted at deadlines within the examination process. This has made the review process challenging as there are complex land acquisition and land take</p>

		<p>the plots then it will be perfectly in order to identify any such groups of plots, by reference to the plot numbers shown on the Land Plans and used in the BoR and make common comments applicable to any such groupings.</p> <p>In the event that an AP's written submissions to be submitted in response to this question provides an answer to a question below which they are being requested to answer, then the ExA would prefer that the APs simply include a cross referring note explaining that the answer to any such question can be found in the response to question 3.16.1.</p>	<p>categories, permanent and temporary, rights in respect of this scheme. In summary therefore, the Council has set out a summary of its points below but would not want to fetter its position in regard to its position regarding the compulsory acquisition or categorisation of its land that may not be covered in the summary below.</p> <p>Issues have been summarised below and cover commuted sums, categorisation and compensation and the County Council would welcome the opportunity for matters to be considered in the round with other landowners' comments during some form of (virtual) CAH if required.</p> <p>1. Ockham Bites</p> <p>The entirety of the Ockham Bites car park is not within the DCO boundary, but the car park as a facility will be severely impacted by the scheme with a loss of approximately one third of capacity. The County Council consider that it is reasonable to expect that suitable accommodation works to remodel the car park to create replacement parking is secured through the agreement of a side agreement with HE during the course of the examination. The option proposed by HE is to address this issue through the compensation process. As this would be concluded following the examination, SCC is afforded no comfort that appropriate reinstatement will be achievable. There is likely to be a lengthy delay in settling compensation and in the meantime SCC will be left with management issues relating to the car park and café.</p> <p>As a temporary land take, SCC will have no legal right to advance compensation payment</p> <p>2. Permanent Rights for Access</p> <p>There are a number of land plots for which HE are retaining permanent rights over for access purposes and are therefore</p>
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		<p>linked to ongoing discussions around commuted sums. A conclusion has not yet been reached with HE on this broader matter. A key example for the County Council is the parallel Non Motorised User Route (NMU), which the Council has stated that it does not wish to adopt. Notwithstanding the Council's position on adoption, the Applicant has not offered a suitable commuted sum for future maintenance of this NMU route (which also has increased maintenance requirements as it would include separate surface type for the cycleway to the surface required for equestrians along the bridleway).</p> <p>3.Designation of land acquisition in relation to environmental mitigation and enhancement areas</p> <p>The Council also queries why environmental mitigation and enhancement areas (such as 25/1) are shown as land to be used temporarily and rights to be acquired permanently, rather than land to be used temporarily given that the maintenance and monitoring period is time limited?</p> <p>SCC understand that the maintenance period is too long for temporary possession and HE have stated that there will be no loss of advantage conveyed by those areas to the owner/the public when burdened by the permanent rights.</p> <p>Although it is stated that the permanent rights sought to be acquired in respect of the SPA enhancement areas would not be exercised beyond the agreed management period, how would this be secured if permanent rights are acquired by HE?</p> <p>4.Designation of land acquisition in relation to embankments</p> <p>Embankment areas relating to Cockrow Bridge and Wisley Lane overbridge such as plots, such as 5/1, 5/2, 13/1 are currently shown as land to be used temporarily. However SCC query whether HE need to acquire rights to land permanently. Some of</p>
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		<p>these embankments are significant engineered structures and SCC query whether HE will need access rights for maintenance</p> <p>5. Locations where the Council require title acquisition Comments have been made at question 3.1.2 about SCC requiring rights of access for maintenance purposes. There are similar issues in relation to maintaining visibility splays.</p> <p>6. Designation of land acquisition in relation to the Councils interests at Ockham Roundabout</p> <p>SCC queried why permanent acquisition is required for land plots on the Ockham roundabout such as 1/8 or 1/9. Highways England have clarified that title acquisition is proposed because Highways England is the reputed owner (in the case of Plot 1/9) or is one of the reputed owners (in the case of plot 1/8) and as explained in paragraph 4.8.5 of the Statement of Reasons, it is standard practice for Highways England include the land it already owns within the compulsory acquisition powers as a precautionary approach to ensure that no known or unknown third-party rights remain over the land which could potentially impede delivery of the Scheme. In the case of Plot 1/8, in which SCC has an interest in the highway surface of the roundabout, the intention is that SCC's interest will be excluded from any general vesting declaration which is executed in respect of this plot (or indeed in respect of any other such plots at the Ockham Park junction).</p> <p>SCC understand the logic behind the precautionary approach used here. It would appear that excluding SCC's interest in highway surface from any general vesting declaration leaves affected land subject to highway rights but SCC would have raised this at the Compulsory Acquisition Hearing for clarification.</p> <p>7. Wisley Lane diversion</p>
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3.16.3	Applicant and SCC	<p>With respect to plot 2/13 [Land Plan Sheet 2 of AS-002], has this plot of land been correctly categorised as being 'used temporarily', given that following the construction of the proposed Wisley Lane diversion this piece of land would become part of a newly created public highway and would thus be returned to SCC as a maintainable road; something that would be of an entirely different functional use compared to its current status as registered Common Land? If plot 2/13 has been mis-categorised then the Applicant should submit a revised version of Sheet 2 of the Land Plans and ensure that all other application documentation affected by that re-categorisation is revised and submitted in an amended form.</p>	<p>The dDCO contains the power to take temporary possession of land within the Order limits, including common land. HE wants to undertake works on common land and has applied to the Secretary of State for consent under s38 of the Commons Act 2006.</p> <p>It will be for the Secretary of State to raise any issues with the application for s.38 consent and make a decision on whether or not to grant permission to carry out works.</p> <p>Section 38 only gives consent for works on common land. The status of the land is not changed. Therefore it would still be handed back to SCC as common land with highway rights.</p> <p>Therefore it would appear that it has been correctly categorised.</p>
3.16.6	Applicant and SCC	<p>With respect to the status of the SCL subject to the exchange arising from the original construction of the M25 in and around Junction 10 and your answer to FWQ 1.16.16 [REP2-013 page 161], please explain the current ownership status of this</p>	<p>The historic land issue relates to around 20 different plots arising from the original M25 construction, many of which are unregistered. The Council's external solicitors have been undertaking thorough title investigations of these plots to establish the correct ownership. Once this is completed, vesting can be completed, correct titles registered and the Council's Commons Register altered if necessary, to reflect any common land changes. Until the title investigations are completed, the Council is</p>

		<p>land. With Compulsory Purchase powers having been exercised but which have not completed, is SCC still technically the landowner? If SCC is still technically the owner then should the land plans be amended to reflect that categorisation, ie be coloured as salmon pink and not mauve.</p>	<p>therefore unable to clarify which plots are currently in its ownership and therefore indicate the appropriate ownership categorisation and plan shading.</p>
3.16.8	Applicant and SCC	<p>With respect to the Park Barn Farm CA objections made in REP5a-013, if you have not made any comments at D6 with respect to REP-5a-013, then please do so, having particular regard to the submissions concerning:</p> <ul style="list-style-type: none"> a) the legitimacy of calculating the provision of SCL based on the ratio 'precedents' that were applied in the 1970s and 1980s in association with the construction of the M25 and the dualling of the A3; b) the effect of the M25's original construction on the integrity and functional quality of SCL within the area compared with the effect that the Proposed Development would have on the integrity and functional quality of the existing SCL; 	<p>The County Council is supportive of the comments that Highways England has made in REP6- 014, which deals with many of these points.</p>

		<p>c) the function and qualities of the existing SCL subject to the CA proposals and how the function and quality of the proposed replacement land at Park Barn Farm would compare with the existing SCL that would be replaced;</p> <p>d) whether the scale of the proposed at CA at Park Barn Farm has been influenced by the proposals to undertake biodiversity enhancements;</p> <p>e) whether the land at Park Barn Farm proposed for CA has been correctly characterised as being farm rather than land with a residential use and whether adequate weight has been attributed to the ways in which the land is currently being used; and</p> <p>f) whether the proposed scale of CA at Park Barn Farm would be no more than what would reasonably be</p>	
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		necessary to meet the requirements of the PA2008.	
3.16.9	Applicant and SCC	With respect to the SCL that it is proposed would be lost to the Proposed Development what proportion of that land can be characterised as performing a function that is central to its use for recreational purposes as opposed to any ancillary purpose associated with getting to or from the parts of the SCL that perform a central function?	All the areas of SCL required for the Proposed Development from parts of the larger blocks of SCL that exist in the four quadrants around M25 junction 10; none are principally providing an ancillary purpose associated with getting to or from the parts of the SCL. All areas of SCL have to have an edge; the fact that this edge is adjacent to part of the SRN does not mean that it does not perform a function that is central to its use for recreational purposes, irrespective of whether non-motorised access can be gained from the SRN or not.