

M25 Junction 10 / A3 Wisley Interchange Improvement project

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

Responses from ECRG

19.04.20

	Response from Elm Corner Residents Group
3.1.1	<p>As repeatedly stated to Highways England, 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 congestion, pollution and disturbance.</p> <p>Further, the overbridge will create noise, dust, vibration and light pollution for the hamlet of Elm Corner.</p> <p>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 Ockham Parish Council 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: ECRG 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 very directly affect every resident within Elm Corner with traffic delays, noise, dust, vibration and pollution. To inflict additional working hours beyond those originally proposed is completely unacceptable. Elm Corner 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 Elm Corner will be due to their proximity to the A3 and construction compound.</p>

	<p>Within REP5-031 section 4.3 SCC request that HE ‘consider the potential impact on local residents’ and as OPC have stated in REP6-018, they do not feel that HE are taking the impacts on the local community fully into account.</p>
3.4.1	<p>We have repeatedly stated our position regarding the impact of the proposed works on the natural environment within Elm Corner. 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. Within REP5-032 Natural England has consistently advised against the removal of the woodland ‘buffer’ in areas of the site alongside the M25 and A3. There is strong evidence that the retention of belts of mature trees provides an effective mechanism to disperse vehicle emissions away from sensitive habitats alongside busy roads. As stated previously, the achievement of favourable condition for this component part of Thames Basin Heaths SPA is dependent upon improvement of condition of the existing heathland resource, not expansion of heathland through large-scale felling of woodland. The ECRG need to be assured that the area of woodland between the A3 and Elm Corner is retained and that there is no large-scale felling of this buffer.</p> <p>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.</p>
3.5.1	<p>The ECRG were sent a design for the Wisley airfield construction compound on Tuesday 30th March with a deadline of 4 days for us to form a response. The ECRG have continually requested that the construction compound be sited at least a further 500 metres from the residents’ houses. This design does not take into account any of our requests and indeed now includes additional activities, materials processing, welding, toilet facilities and catering, when initially we were advised it would merely be used for topsoil storage. There has not been consultation but merely an updated plan sent to us. It appears that the materials processing activities have been moved to the Wisley airfield construction compound from the Nutberry Farm compound within the requested Change 9 to the DCO. The ECRG strongly object to Change 9 – there are no adjacent dwellings to the Nutberry Farm compound and the materials processing activities will generate large scale noise, dust, vibration and wind blown pollution to both the residents of Elm corner and the SSSI/SPA.</p> <p>We have repeatedly expressed both at REP5-058 and REP6-020 our concern about the scope of activities proposed at the construction compounds. These concerns have been repeated by OPC REP6-018. 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 Wisley airfield 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 Elm Corner. The</p>

	<p>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 Wisley airfield construction site. Undoubtedly, it seems unreasonable to inflict years of pollution and disruption within metres of Elm Corner without sharing 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 the concern expressed by OPC within REP6-018 and are disappointed that we have been unable to find Common Ground with HE on this matter despite our willingness to consult.</p> <p>We strongly disagree with HE that their assessment of the environmental effects of Change 9 would not present any material changes to the effects assessed in the ES. There can be no doubt that there will be material changes to the residents of Elm Corner from Change 9.</p>
3.8.5	<p>The ECRG wish to know how the final details of permanent fencing are to be approved and request to be included in consultation regarding design and extent of fencing on the south side of the A3 between the Ockham Park roundabout and J10. We also certainly need details of fencing to be installed on the road access from the Ockham Park roundabout to the Wisley overbridge and fencing on the bridge itself.</p>
3.13.6	<p>We refer to our submission REP6-020 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. We do not feel that using Change 8 to improve the visibility splays by tree cutting will be enough on its own to make this a safe junction.</p>
3.13.7	<p>If a 'left-out' junction from Wisley Lane is to be considered hypothetically then this scenario must also consider how the cost of the Wisley overbridge could be justified mainly as an entrance only to the RHS. Other hypothetical solutions could be found by reverting to some of the original possible plans in the Scheme Assessment Side Roads Addendum.</p>
3.15.5	<p>As we have stated throughout this process, ECRG request consultation on all matters relating to Elm Corner. 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. HE have confirmed this within REP6-013 and suggestions for the date of the first meeting have been made.</p>
3.15.7	<p>As mentioned at 3.5.1 of this submission, the details of the activities proposed for the Wisley airfield construction compound remain uncertain and we have examined REP4a-003 in some detail as stated above. The CEMP must 'avoid or minimise disruption to nearby receptors', the ECRG does not feel that this outcome is in place for it's residents.</p>