

**M25 junction 10/A3 Wisley interchange  
TR010030**

**9.102 Applicant's Response to  
Interested Parties Comments on the  
ExA's Third Written Questions**

Rule 8(1)(b)(i)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

May 2020

# Infrastructure Planning

## Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010

## M25 junction 10/A3 Wisley interchange Development Consent Order 202[x ]

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### 9.102 Applicant's Response to Interested Parties Comments on the ExA's Third Written Questions

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<b>Rule Number:</b>	Rule 8(1)(b)(i)
<b>Planning Inspectorate Scheme Reference</b>	TR010030
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<b>Author:</b>	M25 junction 10/A3 Wisley interchange project team, Highways England and Atkins

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# 1. Introduction

This document sets out Highways England's responses to comments made by Interested Parties on the Examining Authority's third round of Written Questions (ExAQ3), submitted at Deadline 7.

Within the table in this document, Highways England provide responses to:

- Surrey County Council (REP7-025);
- Guildford Borough Council (REP7-022);
- Elmbridge Borough Council (REP7-020);
- Royal Horticultural Society (REP-039);
- Ockham Parish Council (REP7-023);
- Elm Corner Residents (REP7-031); And
- Mr and Mrs Young, Ms Barkham and Ms Kendrick (REP7-037);

Where issues raised within the submission have been dealt with previously by Highways England, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.

In order to assist the Examining Authority, Highways England has not provided comments on every point made by Interested Parties, including for example statements which are matters of fact and those which it is unnecessary for Highways England to respond to. In the Interested Parties Response column of the table below, Highways England has only provided the relevant part of the comment that it is responding to. However, and for the avoidance of doubt, where Highways England has chosen not to comment on matters contained in the response, this should not be taken to be an indication that Highways England agrees with the point or comment raised or opinion expressed.

## 2. Applicant's comments on Interested Parties responses to the Examining Authority's (ExA's) Third Written Questions (ExAQ3)

Question No	Question to:	Question:	Interested Party's Response	Highways England
<b>Surrey County Council</b>				
<b>1</b>	<b>General</b>			
3.1.2	Applicant and Surrey County Council (SCC)	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><i>"SCC are currently awaiting receipt from the Applicant of the schedule of works that are expected to become the responsibility if 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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</i></p>	<p>In REP2-014 (commenting on REP1-020-60 on page 43) Highways England explained why it does not consider it appropriate for the DCO to make provision for the payment of commuted sums for the maintenance of local highway works or for new public rights of way as other mechanisms exist for SCC to secure funds for this purpose from central Government.</p> <p>This remains Highways England's position as a matter of general approach but discussions with SCC have developed and a compromise position is being discussed for this scheme where Highways England will pay commuted sums to SCC for the maintenance of certain parts of the local highway network affected by the scheme.</p> <p>The compromise position is based upon the provisions in Part 4 of Schedule 8 of the draft DCO for the A303 Sparkford to Ilchester Dualling Scheme as at June 2019. This contains a process whereby Highways England is required to pay commuted sums to the local highway authority for the future maintenance so called "Non-standard Highway Assets" not previously forming part of the local highway network. The provisions do not contain a precise amount payable but a mechanism under which the assets to which the commuted sum payment is to relate is to be set out in a schedule to be agreed whereupon the commuted sum itself is calculated. In case of disagreement as to the schedule or the sum, the matter can be resolved by arbitration.</p> <p>Highways England is preparing a schedule of works to become the responsibility of the local highway authority and it will identify those items that Highways England regards as non-standard highway assets. It will be made available to SCC as soon as possible.</p> <p>As regards maintenance access, this information is also being prepared. The dDCO [REP6-003] provides for appropriate access and</p>

Question No	Question to:	Question:	Interested Party's Response	Highways England
			<p><i>is being asked to maintain so it can be reassured sufficient access is being provided within SCC's control? 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:</i></p> <ul style="list-style-type: none"> <li>- <i>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.</i></li> <li>- <i>Maintenance access to the Wisley Lane overbridge embankments and drainage ditch /drainage structures at the foot of the embankments</i></li> <li>- <i>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.</i></li> </ul> <p><i>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".</i></p>	<p>access rights in favour of SCC, but this does not necessarily involve the transfer of title to SCC, as that may not be appropriate.</p> <p>As regards maintenance access to SCC assets, the DCO drawings do not show the maintenance access arrangements for all of SCC assets/future assets. However draft maintenance access plans have been issued and discussed with SCC and the access arrangements will be finalised during the detailed design. The maintenance access to the A245 retaining wall, Wisley Lane overbridge embankments and Stratford Brook bridge /embankments can be provided within the DCO boundary and will be added to the maintenance drawings and discussed and agreed with SCC in due course.</p>
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"> <li>- Change 2 - incorporation of two toad underpasses at Old Lane</li> <li>- Change 3 - removal of part of the proposed improvements to the A245</li> </ul>	<p><i>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:</i></p> <p><b><i>Change 2 - Incorporation of two toad underpasses at Old Lane and other mitigation measures</i></b></p> <p><i>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.</i></p>	<p>Change 2</p> <p>2.1 - Highways England considers that the toad underpasses provided for in this change will be perfectly adequate to serve their function but recognises the possibility of better locations being found for them. Highways England is discussing arrangements with SCC where the two toad underpasses could be relocated and/or a third one added by agreement with SCC as the landowner and local highway authority. No doubt SCC will consult the Surrey Amphibian and Reptile Group in order to locate the toad underpasses to best advantage.</p>



Question No	Question to:	Question:	Interested Party's Response	Highways England
		<p>eastbound between the Seven Hills Road and Painshill junctions</p> <ul style="list-style-type: none"> <li>- Change 4 - amendments to Saturday construction working hours</li> <li>- Change 5 - diversion of a new gas main crossing of the M25</li> <li>- Change 6 - amendments to the proposed speed limit at Elm Lane</li> </ul>	<p><b>Change 3 - Removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions</b></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 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:  a) The TA Addendum Report (Rep4-041) contains only the summary model reports, and so there is little additional</p>	<p>Change 3</p> <p>3.1 – The RSA is being prepared and will be provided to SCC when available.</p> <p>3.2 Although Highways England will be providing the RSA when available, Highways England has no reason to believe that any design changes would be needed involving land outside of the red line boundary.</p> <p>3.3 – A detailed evaluation of the free-flow left turn lane from the A245 eastbound to the A3 northbound on-slip at the Painshill junction indicated that it would deliver insufficient benefits, in terms of journey time savings and operational performance of the junction. This is evidenced by the traffic modelling results presented in the TA Addendum [REP4-041] that confirms that removing the free-flowing (jet) lane will have a minimal impact on journey times and the operational performance of the road network compared to the DCO Scheme as originally applied for. It is on this basis that the amendment to the DCO Scheme has been made to remove it, along with reducing the number of eastbound lanes on the A245 between Seven Hills and Painshill junctions from three lanes to two.</p> <p>3.4 a) – Changes in traffic flows and journey times for the DCO Scheme as changed are presented in the TA Addendum Report [REP4-041]. Additional local junction traffic modelling results for the Seven Hills and Painshill junctions for the DCO Scheme as changed are presented in Appendix A and can be compared with the same</p>

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			<p><i>information to the summary received as part of the 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. 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.</i></p> <p><i>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 near side 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 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.</i></p> <p><i>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 &amp; straight ahead. SCC would therefore like confirmation on both what the original (current) scheme shows and the layout proposed in the revision.</i></p> <p><i>3.5 SCC has concerns around the very short three lane section on the A245 eastbound on the downstream (east) side</i></p>	<p>information for the submit Scheme in Appendix F of the Transport Assessment Report [REP-136].</p> <p>The mean maximum queue lengths on the A245 eastbound approach to the Painshill junction for the unchanged DCO Scheme are forecast to be &lt;1 vehicle for the free-flow left turn lane, up to 7 vehicles in the middle straight-ahead lane and up to 19 vehicles in the offside lane. For the DCO Scheme as changed these figures become to up to 5 vehicles for the two nearside straight-ahead and left lanes and up to 19 vehicles in the offside lane. Therefore, the queue lengths do not significantly differ with the change and can be comfortably accommodated within the storage capacity of the approach flare to the Painshill junction.</p> <p>Details of changes to traffic flow, queues and delays are shown below. The change reduces land take by approximately 3100m<sup>2</sup>.</p> <table border="1" data-bbox="1872 825 2813 1291"> <thead> <tr> <th colspan="2">Forecast Year</th> <th colspan="3">2022</th> <th colspan="3">2037</th> </tr> <tr> <th>Item</th> <th>Period</th> <th>Application scheme</th> <th>Changed scheme</th> <th>Impact</th> <th>Application scheme</th> <th>Changed scheme</th> <th>Impact</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Traffic flow A245 EB at Painshill Interchange (pcus)</td> <td>AM</td> <td>1,153</td> <td>1,153</td> <td>0</td> <td>1,150</td> <td>1,148</td> <td>-2</td> </tr> <tr> <td>IP</td> <td>1,131</td> <td>1,130</td> <td>-1</td> <td>1,115</td> <td>1,114</td> <td>-1</td> </tr> <tr> <td>PM</td> <td>1,200</td> <td>1,200</td> <td>0</td> <td>1,177</td> <td>1,178</td> <td>1</td> </tr> <tr> <td rowspan="2">Mean max queue A245 EB at Painshill Interchange (pcus)</td> <td>AM</td> <td>16</td> <td>19</td> <td>3</td> <td>18</td> <td>20</td> <td>2</td> </tr> <tr> <td>PM</td> <td>17</td> <td>19</td> <td>2</td> <td>26</td> <td>29</td> <td>3</td> </tr> <tr> <td rowspan="2">Traffic delay at Painshill interchange A245 EB (Total pcu hours)</td> <td>AM</td> <td>5.0</td> <td>7.2</td> <td>2.2</td> <td>6.0</td> <td>7.9</td> <td>1.9</td> </tr> <tr> <td>PM</td> <td>5.2</td> <td>7.0</td> <td>1.8</td> <td>10.1</td> <td>12.9</td> <td>2.8</td> </tr> </tbody> </table> <p>3.4 b) – Traffic modelling with the A245 eastbound nearside approach lane to the Seven Hills junction being a left turn only lane has indicated that the junction is forecast to exceed capacity hence it is a shared left turn and straight-ahead lane; albeit relatively little traffic goes straight-ahead from this nearside lane. Nonetheless, Highways England is content for the modification to the Seven Hills junction proposed by SCC to be considered when the detailed design is underway and can confirm that it could be implemented within the current DCO boundary should SCC be prepared to accept the resulting reduction in operational performance of the junction (which is on the local highway network).</p> <p>3.4 – Highways England can confirm that the A245 nearside eastbound approach lane at the Seven Hills junction would be marked as straight ahead and left in both the DCO Scheme and the Scheme</p>	Forecast Year		2022			2037			Item	Period	Application scheme	Changed scheme	Impact	Application scheme	Changed scheme	Impact	Traffic flow A245 EB at Painshill Interchange (pcus)	AM	1,153	1,153	0	1,150	1,148	-2	IP	1,131	1,130	-1	1,115	1,114	-1	PM	1,200	1,200	0	1,177	1,178	1	Mean max queue A245 EB at Painshill Interchange (pcus)	AM	16	19	3	18	20	2	PM	17	19	2	26	29	3	Traffic delay at Painshill interchange A245 EB (Total pcu hours)	AM	5.0	7.2	2.2	6.0	7.9	1.9	PM	5.2	7.0	1.8	10.1	12.9	2.8
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			<p><i>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.</i></p> <p><i>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 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.</i></p> <p><i>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.</i></p> <p><i>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:</i></p> <p><i>- Changes to potential queuing on the A245 back from the Painshill junction;</i></p>	<p>as changed. See plans Sheet 9 [APP-012] and Sheet 9 in Appendix H [REP4a-005].</p> <p>3.5 – The nearside flaring of the A245 eastbound approach to the Seven Hills junction in combination with it being a shared straight ahead and left lane makes a nearside merge downstream of the junction more appropriate in this instance than an off-side merge. This is because less traffic will need to merge than if there was an offside merge, because some of the traffic in the nearside lane is turning left rather than going straight ahead. Traffic will not be pushed into oncoming traffic on the A245 westbound carriageway due to the merge as the Scheme includes a central reserve separating the east and westbound carriageways.</p> <p>3.6 – The strategic, operational and local junction traffic modelling for the Scheme as changed has been undertaken accounting for the relatively short A245 eastbound merge downstream of the Seven Hills junction. The exit merge on the A245 eastbound has been modelled within LinSig using the application of the funnel modelling methodology described in the Transport Research Laboratory (TRL) knowledgebase to reflect issues on the downstream side affecting flow through the junction. Using this methodology results in approximately 12% of the A245 eastbound straight-ahead traffic using the nearside lane and merging downstream of the junction. Details of the local junction modelling are provided in Appendix A of this document.</p> <p>3.7 – The length of the taper downstream of the junction is 100m in accordance with CD123 paragraph 7.10.1.</p> <p>3.8 – See response to 3.4 a) above.</p>

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			<p>- 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.</p> <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><b>Change 4 - Amendments to Saturday construction working hours</b></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><b>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 4<sup>th</sup> November 2019 doc AS-023.</b></p> <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 4<sup>th</sup> November 2019 (Change 6 of AS-023) that amends the speed limit to 20mph on Elm Lane.</p>	<p>3.9 – Highways England has responded with more detail above to the modelling requests, the RSA will be shared when available and drawings were included with the change application.</p> <p>4.1 SCC's support is noted and welcomed.</p> <p>4.2 Following discussions between SCC and Highways England, Highways England has decided that it will adhere to the South East Permit Scheme not least to assist SCC in the efficient allocation of road space for works. Due provision is made in the dDCO submitted at deadline 8 {REF}</p> <p>4.3 – The working hours change will not cause any different significant environmental effects to those described in the environmental statement for the scheme. This is explained in section 5 of the Report on Proposed Scheme Changes 7-9 [REP7-016]. Paragraph 5.5.1 of that report explains that the placing of topsoil within the worksite will mitigate any additional noise and /or visual effects. No specific mitigation for local residents and businesses is necessary beyond that already provided for, not least in the proposed requirement (requirement 3 in Schedule 2 of the dDCO) for a construction environmental management plan (CEMP) to be approved by the Secretary of State in respect of the construction works. A revised version of the outline CEMP (to form the basis of the operative, approved version) was submitted at deadline 7 [REP7-014]</p> <p>5.1 Highways England acknowledge SCC's support for this change as suggested by SCC.</p>

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			<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><b>Change 6 - Adjustments to the Order limits in the draft development consent order to accommodate the diversion of a gas main.</b></p> <p><i>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. 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.</i></p>	<p>5.2 – The new section of Elm Lane between Elm Corner and Old Lane will be a single-track road, 3m wide, with passing places, as a result the traffic speed is not anticipated to exceed the posted speed limit of 20mph.</p> <p>The speed restriction on Elm Lane is in addition to the provision of toad underpasses along Old Lane.</p> <p>Highways England acknowledges that SCC is entitled to compensation for land taken or used for the purposes of the Scheme according to the terms of the DCO.</p> <p>This additional work will become part of the wider DCO scheme and will therefore be covered under the wider Precautionary Methods of Working that will be implemented during construction, and the habitat reinstatement will be covered under requirement 17 of the draft DCO.</p>
13	<b>Traffic, Transport and Road Safety</b>			
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</p>	<p>It has been agreed with HE that the Applicant will undertake the traffic modelling of south-facing slips at Ockham Park junction.</p> <p>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"> <li>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.</li> <li>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.</li> <li>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.</li> <li>4. Traffic flows along the B2215 through Ripley with the DCO Scheme plus south-facing slips at Ockham Park junction</li> </ol>	See response adjacent to the points being raised below



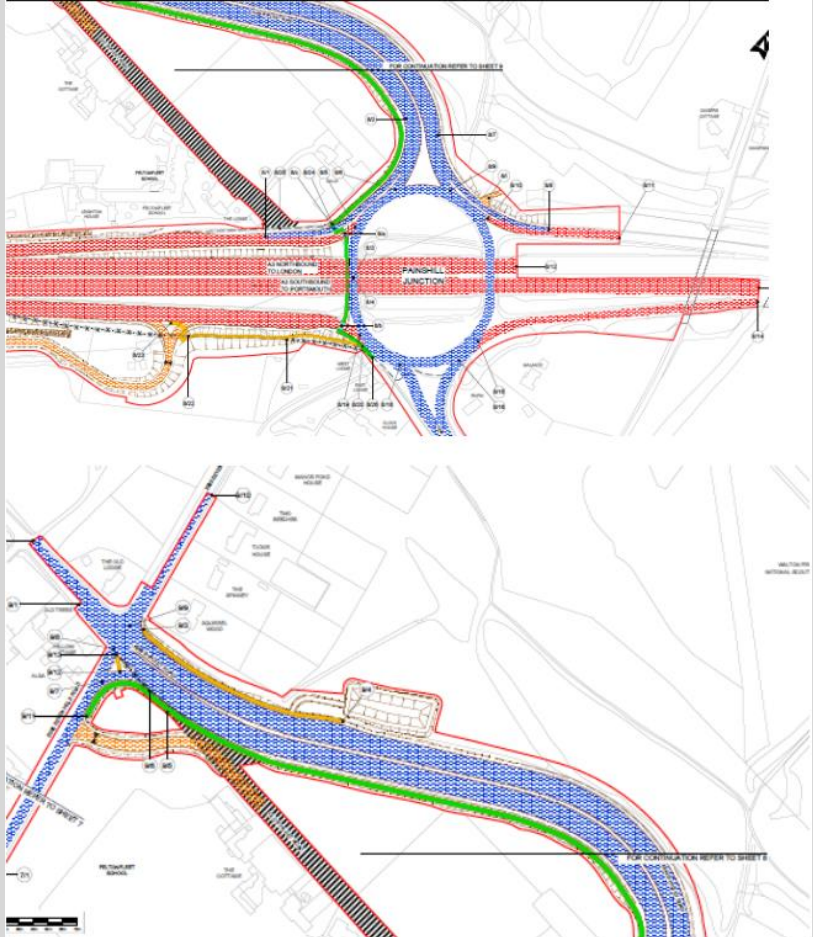
Question No	Question to:	Question:	Interested Party's Response	Highways England
		<p>Applicant and SCC to decide between themselves which organisation is best placed to undertake the modelling that the ExA is requiring to be undertaken. Should the Applicant and SCC be unable to agree which organisation 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>would be effectively unchanged compared to the Do minimum scenarios.</p> <p>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.</p> <p>6. It is not known what the impact of the slips might be on other movements that presently or in the future would travel through villages such as Ockham, Effingham, East and West Horsley and Pyrford.</p> <p>7. With the DCO scheme and south facing slips at Ockham Park interchange it is forecast that in 2022 up to approximately 900 vehicles per day would use the off-slip and 700 vehicles per day would use the on-slip road , with less than 85 vehicles per hour using each slip road in any peak hour.</p> <p>8. With the DCO scheme and south facing slips at Ockham Park interchange it is forecast that in 2037 this increases to approximately 2,750 vehicles per day utilising both the off and on slip roads, mostly due to traffic generated by the Wisley Airfield development, with between 150 and 350 vehicles per hour using each slip road in any peak hour.</p> <p>However, SCC do have some further questions and comments on the above, as follows:</p> <p>1. It is unclear what modelling HE are referring to when they state that 'Final reporting of the results of this traffic modelling will be provided at Deadline 8': is it the spreadsheet model or modelling using HE's strategic model? SCC assume the outputs available are based on the former, but it is suggested this is clarified. However, if the full reporting is to be based on other modelling then this should be explained as the outputs will change.</p> <p>2. The outputs are reported are very much based on the assumptions made. For example, output (3) states that all Wisley Airfield traffic heading for the A3 south would utilise the A3 s/b on-slip as opposed to using Old Lane. However, in reality, it is likely to be only a proportion of these trips, albeit potentially the majority that would utilise 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</p>	<p>1) As stated by SCC, their responses refer to a spreadsheet model developed by Highways England and shared with SCC to enable this answer to be drafted in time. In the event, answers were available from the strategic traffic model and these were presented as Highways England's response to this question.</p> <p>2) See point 1 above. The comments made by SCC here refer to the spreadsheet model and not outputs from the strategic highway model.</p>

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			<p>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. 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. 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>	<p>Highways England will not be modelling Burnt Common slips. The slips are not required as a part of the Scheme and the slips at Burnt Common are only applicable to mitigate development in accordance with Policy A35 of the Guildford Borough Local Plan at the former Wisley Airfield site. Accordingly, this is a matter for the developer of that scheme.</p>
3.13.3	Applicant and SCC	<p>Following on from question 3.13.2 the ExA requires that the Applicant 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"> <li>- the B2215 between the Ockham Park junction and its southern extremity;</li> <li>- Newark Lane;</li> <li>- Rose Lane;</li> <li>- Old Lane;</li> <li>- Ockham Lane; and</li> </ul>	<p><i>SCC accepts the validation of the model and agrees to the 2015 base traffic flows used by HE in the modelling work. SCC advises 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>With the data currently available SCC are not able to confirm whether the links are able to accommodate the predicted level</i></p>	<p>The 2015 observed traffic flows used by Highways England in the modelling work are contained in Appendix B of this document.</p> <p>In the light of further discussions between Highways England and SCC it is now agreed that the modelling carried out by Highways England is sufficient and this is recorded in the latest version of the statement of common ground at deadline 8. It is not reasonable for SCC only to accept the adequacy of Highways England's modelling if a suitable mitigation scheme is secured for Ripley. Plainly, one does not follow from the other. However, Highways England acknowledges that there is a difference of opinion between SCC and Highways England about the effects of the forecast increase of traffic in Ripley on account of the Scheme and whether mitigation is needed or not.</p> <p>In view of this difference, as explained in responding to the ExA's written question 3.13.4 at deadline 7 [REP7-004], Highways England has put forward wording for a requirement under which mitigation would be required in Ripley, if the Secretary of State considers such an approach to be appropriate.</p>



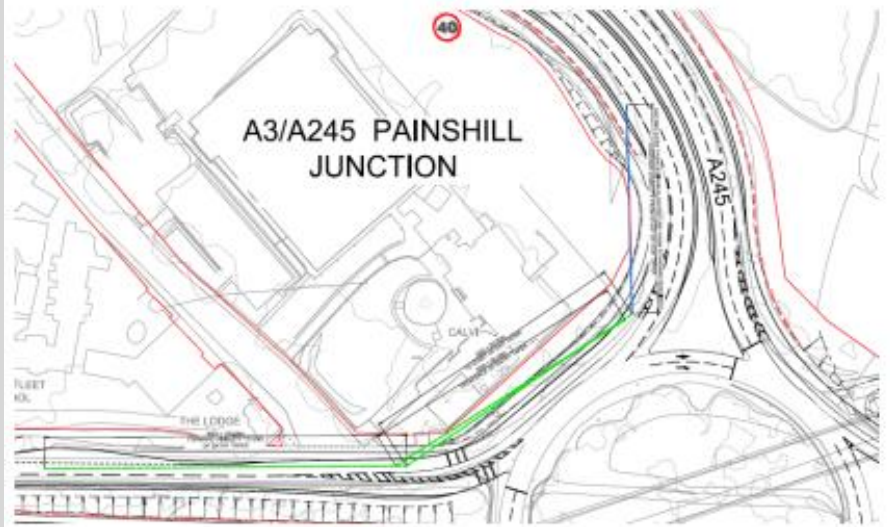
Question No	Question to:	Question:	Interested Party's Response	Highways England
		<p>- Ockham Road North</p> <p>a. either a consolidated agreed set of predicted AM peak hour, interpeak and PM peak hour traffic flows; or</p> <p>b. if a consolidated set of predicted traffic flows are not agreed at this deadline, the presentation of the flows of 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> <p>a. the quality and representativeness of the input data that is being used, and if so why?</p> <p>b. the choice of model that</p>	<p><i>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.</i></p> <p><i>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.</i></p>	<p>The wording of this potential requirement has been adjusted by Highways England in the light of discussion about it with SCC. The revised wording has been agreed with SCC as set out in the statement of common ground.</p> <p>Regarding junction capacity, Highways England has carried out the relevant modelling and junction capacity assessments and provided the results during discussions with SCC; including undertaking Level of Service assessments at SCC's request. These results show little change between the do-minimum scenario and the do-something (i.e. the Scheme) scenario is because of both the high levels of background growth assumed to occur locally and the relatively limited impact that the Scheme will have.</p>

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		<p>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?  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 extremity; Newark Lane; Rose Lane; Old Lane; Ockham Lane; and Ockham Road North, please comment on:</p> <p>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</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>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>	<p>b) There is disagreement between SCC and Highways England regarding this matter but as explained above Highways England has suggested wording for a requirement in respect of it.</p> <p>The potential requirement would require Highways England to submit a scheme to the Secretary of State for his approval. The scheme would need to comprise certain elements as specified in the requirement (subject to contrary agreement between Highways England and SCC) including a cost estimate and arrangements for the delivery of the scheme either by Highways England or by SCC. Both SCC and the local planning authority would have to be consulted about the proposed scheme and in order to secure its delivery, the Wisley Lane diversion would not be allowed to be open for traffic until it has been approved.</p>

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		<p>arising from the Proposed Development and the means for securing any necessary mitigation.</p>		<p>Much of the detail of the scheme, including a delivery programme and other detailed arrangements, are by this means left for determination at a later stage whilst the principle of mitigation in Ripley is secured at this stage.</p>
<p>3.13.5</p>	<p>Applicant and SCC</p>	<p>With respect to forward visibility at:          - 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 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?</p>	<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>  <p>So where the M25 junction 10 project will result in changes to roads that SCC is responsible for, it should be the scheme</p>	<p>Whether or not these design features are within the strategic road network or local highway network they will form elements of the authorised works pursuant to the DCO. Therefore, it is for the Secretary of State to approve them as a matter of preliminary design at this stage and in due course to approve the detailed design under the relevant DCO requirement.</p> <p>Insofar as any necessary rights over land are required to construct and or maintain these elements in circumstances where those rights cannot be obtained there are other means by which mitigation can be achieved, such as traffic signal control as an alternative to a visibility splay.</p> <p>Discussions about the detail of these matters continue with SCC as referred to in section 2.4.1 of the Statement of Common Ground.</p>


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			<p>promotor/applicant (Highways England), as the designer of the scheme (under the Construction Design and Management 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>A3 northbound off slip to the A245 westbound, as shown on drawing XX-SK-CH-000037 Revision C01</p> <p>The visibility "lines" shown on drawing XX-SK-CH-000037 Revision C01 are singles lines and not a visibility envelope as 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.</p>	




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			 <p>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.</p> <p>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.</p> <p>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)</p> <p>New drainage pond access junction with the A245 eastbound , as shown on drawing XX-SK-CH-000039 Revision C01,</p> <p>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.</p> <p>Visibility splays for vehicles existing the junction should be shown however so that vehicles exiting the drainage pond access can see any queuing vehicles queuing back form 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 currently owned by Burhill Developments and so not currently under highway ownership. There may also appear to be an impact on plot</p>	



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			<p>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> <ul style="list-style-type: none"> <li>- 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</li> <li>- 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</li> </ul>	

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			 <p>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.</p>	

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			<p>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.</p> 	
15	<b>Content of the draft Development Consent Order (dDCO)</b>			
3.15.1 3	Applicant and LAs	Is a 5 year period in relation to replacement tree and shrub planting, that is referred to in R6(5), of sufficient length to ensure that all the proposed soft landscaping becomes properly established?	A 5 year replacement period is commonly used. However, less predictable weather with increased risk of drought and high temperatures mean that failures are more likely and an increase to 10 years will ensure better landscape establishment.	The applicant maintains that a 5 year period is sufficient for planting to become established. Please refer to Highways England's response to 3.15.13 at Deadline 7 [REP7-004]. It should be noted that the scheme for which consent is sought includes plans which set out up to 20 further years of management of soft landscaping to ensure continued development of the proposals. Refer to APP-105 and APP-106.
16	<b>Compulsory Acquisition</b>			
3.16.1	All CA and/or TP objectors who had registered a request to be heard at the Compulsory Acquisition Hearing originally scheduled	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	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	<p>Highways England remains willing to discuss arrangements for the acquisition and use of land owned by SCC for the purposes of the Scheme and will continue to liaise with SCC in this regard. Highways England acknowledges that SCC will be entitled to compensation in respect of land taken or used pursuant to the DCO as provided for in the DCO.</p> <p>Highways England has commented in turn in relation to the numbered points raised by SCC in response to this question.</p>



Question No	Question to:	Question:	Interested Party's Response	Highways England
	for 24 March 2020 (CAH1)	<p>standalone written summary of the main submissions.</p> <p>In submitting your written versions of the oral case that you would 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>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.</p> <p>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 coordinated 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 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.</p> <p>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</p>	<p>1. Highways England is willing to discuss a separate agreement with SCC in relation to this issue. As SCC rightly acknowledge the area concerned is outside the scope of the DCO and so Highways England will have no powers to undertake the accommodation works sought. Accordingly, a compensation payment for land taken or for the injurious affection of land not taken represents the appropriate fall-back position should it not be possible to reach agreement with SCC. There is now limited time available before the examination is due to end to conclude what could be a complex agreement hence Highways England's willingness to discuss the detail of such an agreement when it has time available to do so.</p>

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			<p>the car park and café. 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 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 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 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 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</p> <p>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>2. As explained above Highways England is discussing with SCC the payment of commuted sums, as regards this particular scheme, for some elements of the local highway network affected by it. However, the general position remains that it is for SCC to maintain its local highway network, not Highways England, and SCC obtains central Government funding in order to do so. The fact that Highways England is (at its expense) making substantial improvements to NMU routes in the vicinity of the junction does not alter this general arrangement.</p> <p>3. Plot 25/1 is subject to works relating to the Ockham Common/Old Land SPA enhancement area (work no.58(h) in the dDCO [REP6-003]). The Special Protection Area ("SPA") works in this and other SPA enhancement areas will be regulated by a SPA management plan to be approved under requirement 8 of the dDCO . It is anticipated the maintenance and monitoring period for the SPA works in the approved scheme will be up to 20 years consistent with the SPA Management and Monitoring Plan [REP4-031]. The dDCO contains temporary possession powers in article 33 that may be exercised within the 5 year maintenance period (article 33(11)). Given the long time periods involved Highways England is seeking land rights over land in the dDCO as regards SPA land rather than temporary powers. The rights are in effect limited in time since the right itself is only for the purpose specified in the dDCO Schedule 5 and so of no use to Highways England (and in effect defunct) once that purpose has been served. In the case of Plot 25/1 (for example), the purpose is "To undertake, retain, inspect, access, maintain, monitor and renew environmental compensation works"</p> <p>4. Highways England has made provision in the dDCO for maintenance access as it considers necessary. Where permanent rights are required, such as access rights, these are provided for and listed and schedule 5 of the dDCO. The reference to the three plots mentioned by SCC is not fully understood but Highways England is satisfied with their current designation and so sees no need to make an adjustment.</p> <p>5. Please refer to Highways England's answer to point 3.1.2 in this document above.</p>



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			<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). 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> <p>In addition, the Council will seek a market value for land taken or for which permanent rights are granted, where the land taken or rights granted release a value to adjoining land, where in a no scheme world the value released would be reflected in commercial negotiation.</p>	<p>6. Under Article 12(2) of the dDCO [REP6-003] where a highway is altered under the dDCO, it is to be maintained by the local highway authority from its completion. There is no question that any land acquisition pursuant to the dDCO in relation to the Ockham Park roundabout will affect the status of the highway or whether it falls within the strategic road network or local road network. In the case of plots 1/8 and 1/9 these are associated with the A3, hence Highways England's interest in them and the use of compulsory purchase powers to clear away any third party rights inconsistent with their highway function.</p> <p>7. This goes to the general entitlement to compensation referred to above.</p>
3.16.3	<b>Applicant and SCC</b>	<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</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. Therefore it would appear that it has been correctly categorised</p>	<p>The plot of land has been correctly categorised as land to be used temporarily. The land is owned by SCC and is required for the construction of the Wisley Lane diversion. The Wisley Lane diversion will form part of the local highway network and so for SCC to maintain. Accordingly, there is no need for Highways England to acquire the freehold in the land or to take to permanent rights over the land. The land is common land at the moment but in view of the fact that it will be used for a new road under the Scheme, replacement land is being provided for it.</p> <p>Consent under section 38 of the Commons Act 2006 to authorise works on common land would only be necessary whilst the land still has common land status. As explained in Highways England's response to this question in due course, by virtue of article 38(4) of the dDCO its common land status would be lost.</p>

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		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 recategorisation is revised and submitted in an amended form.		
<b>Guildford Borough Council</b>				
<b>2.</b>	<b>Principal and nature of the development, including need and alternatives</b>			
3.2.2	Applicant, Guildford Borough Council (GBC), Elmbridge Borough Council (EBC), Royal Horticultural Society (RHS) and any other Interested Parties (IPs)	For the purposes of the determination of the submitted application for the Proposed Development does the amended duty under The Climate Change Act 2008, namely achieving net zero greenhouse gas emissions by 2050 pursuant to The Climate Change Act 2008 (2050 Target Amendment) Order 2019, which took effect on 27 June 2019, have any implications for the assessment of the effect on climate change that has been undertaken (ie the conclusions contained within chapter 15 of the ES [APP-060]), particularly with regard to: the provisions of the National Policy Statement for National Networks (NPSNN); any other national policy relating to climate change (including any commitments as part of the Paris Climate Agreement of December	<i>"The Council considers that the 2050 Target Amendment Order is relevant to the assessment of this proposal. The applicant should review the conclusions of Chapter 15 of the ES."</i>	<p>The assessment of the Scheme has been undertaken in accordance with Government policy and guidance at the time of writing, including the DMRB and NN NPS.</p> <p>The Climate Change Act 2008, which was amended in 2019 following the Paris Agreement (ratified in 2016), requires 'the Secretary of State to ensure that the net UK carbon account for the year 2050 is 100% lower than the 1990 baseline'. To meet this target, the Secretary of State sets carbon budgets for five-year periods. These reduce gradually to act as stepping-stones to the overall reduction. The DMRB and NN NPS require assessment of the Scheme against these budgets, to assess whether the Scheme is likely to have a material impact on the Government meeting these. Carbon budgets are currently set up to 2032, with the remaining budgets beyond this yet to be agreed.</p> <p>The assessment contained in Chapter 15 of the ES [APP-060] found that during construction, and operation in the Opening Year and Design Year, the contribution of the Scheme is minimal (&lt;0.004% of the 3rd carbon budget), and the Scheme is unlikely to have a material impact on the Government meeting its budgets. The change to the Climate Change Act would not alter the findings of the assessment, as it did not alter the existing carbon budgets against which the Scheme has been assessed, in line with the DMRB and NN NPS.</p> <p>The NN NPS was written in 2014 prior to the Paris Agreement, unlike the Airports NPS, which was published afterwards in 2018. The judgement in the recent Court of Appeal is therefore unlikely to extend to the NN NPS. Paragraph 5.16 of the NN NPS notes the requirement to reduce greenhouse emissions by 2050, and that the means for delivering emissions reductions will be through the carbon budgets.</p>

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		2015; and any in principle type considerations raised in the recent Court of Appeal judgement concerning the Airports NPS?		<p>Paragraph 5.17 notes that applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets. It is considered unlikely that the Paris Agreement would require any revision of these points, as the carbon budgets are the key mechanism for reducing greenhouse gas emissions.</p> <p>The NNNPS at paragraph 5.17 states "it is very unlikely that the impact of a road project will, in isolation, affect the ability of the Government to meet its carbon reduction plan targets." While paragraph 5.18 states "any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would have a material impact on the ability of Government to meet its carbon reduction targets."</p>
<b>15.</b>	<b>Contents of the draft Development Consent Order</b>			
3.15.13	Applicant and LA	Is a 5 year period in relation to replacement tree and shrub planting, that is referred to in R6(5), of sufficient length to ensure that all the proposed soft landscaping becomes properly established?	<i>"No. GBC does not consider 5 years to be appropriate, a period of at least 10 years should be required"</i>	The applicant maintains that a 5 year period is sufficient for planting to become established. Please refer to Highways England's response to 3.15.13 at Deadline 7 [REP7-004]. It should be noted that the scheme for which consent is sought includes plans which set out up to 20 further years of management of soft landscaping to ensure continued development of the proposals. Refer to APP-105 and APP-106.
3.15.17	GBC and RHS	Please set out any concerns or comment you may have on the new Requirement 18 (Protection of certain tree roots at RHS Garden Wisley) in the dDCO [REP5- 002].	<i>"The RHS Tree Protection Plan shows the red hatched areas to be an area where "no plant, materials or vehicles" will be used or stored. If this is the objective of the Requirement then this should be secured by the requirement. GBC is not convinced that "except with the consent of the owner" is appropriate and would result in an agreement process that was divorced from other agreement which is generally by the SoS, in consultation with LPAs and/or IPs. GBC would suggest that the requirement should be amended, to be more precise and enforceable. It should either preclude works in these areas or should require the submission of a method statement for any works in these areas for the approval of the approval of the SoS following consultation with LPAs and IPs"</i>	<p>The intention in Requirement 18 is to prevent any intrusive works in the areas shown on the Tree Protection Plan. This includes no plant, materials or vehicles being used or stored in this area, as stated on the plan. For clarity, Highways England will amend Requirement 18 to state:</p> <p>"No intrusive works in connection with the authorised development may be carried out <u>and no plant, materials or vehicles will be used or stored</u> in the areas shown cross-hatched red on the RHS Tree Protection Plan, except with the consent of the owner of RHS Garden Wisley, such consent not to be unreasonably withheld or delayed."</p> <p>Obtaining consent from RHS rather than the Secretary of State following consultation with LPAs and IPs is appropriate as this Requirement concerns a particular landowner and the Secretary of State can be reassured that the requirement adequately protects the interest of the RHS.</p>
<b>Elmbridge Borough Council</b>				
<b>15.</b>	<b>Content of the draft Development Consent Order (dDCO)</b>			

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3.15.13	Applicant and LAs	Is a 5 year period in relation to replacement tree and shrub planting, that is referred to in R6(5), of sufficient length to ensure that all the proposed soft landscaping becomes properly established?	<i>"EBC's standard replacement planting condition requires that if any newly planted tree or shrub dies or is removed within 5 years from the completion of the project it must be replaced. The examiners have queried whether this time period is sufficiently long enough and have suggested this be extended to a 10 year period. Considering the size of the project, EBC are in support of the extended time period and if any newly planted tree or shrub dies or is removed within 10 years from the completion of the project it must be replaced."</i>	The applicant maintains that a 5 year period is sufficient for planting to become established. Please refer to Highways England's response to 3.15.13 at Deadline 7 [REP7-004]). It should be noted that the scheme for which consent is sought includes plans which set out up to 20 further years of management of soft landscaping to ensure continued development of the proposals. Refer to APP-105 and APP-106.
<b>16.</b>	<b>Compulsory Acquisition (CA)</b>			
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)	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. 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	<i>"EBC had not registered a request to attend or be heard at the CA but supplied the following comments to the ExA: Elmbridge Borough Council owns land which is subject to Compulsory Acquisition. Some of this land is held under lease. Whilst we are not objectionable to this acquisition, we would seek that our rights and obligations as public body, landowner and landlord are protected. We will therefore be relying on the statutory process regarding compulsory acquisition to be adhered to. Furthermore, we expect the representatives of the acquiring authority to engage in reasonable conversations with ourselves and our tenants."</i>	Highways England has and continues to engage with Elmbridge Borough Council and its tenants in respect of land that is subject to compulsory acquisition.



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		<p>objection concerns multiple plots of land, but there are common themes spanning across 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>		
<b>Royal Horticultural Society</b>				
<b>4</b>	<b>Biodiversity and Habitats Regulations Assessment</b>			
3.4.1	RHS	In regard to any potential effects on the Thames Basin Heaths SPA (TBH SPA) due to air quality considerations, please comment on the response made by Natural England at Deadline 5 [REP5-032] in regard to the ExA's Second Written Questions.	<i>"The RHS responses to Natural England's responses in REP5-032 are set out in the Appendix to this Document".</i>	Please refer to Appendix C below.
3.4.2	RHS	Given the results presented in Figures 1, 2 and 3 of [REP5-049] what implications in regard to	<i>"The RHS deals with this issue in REP-6-024, see pdf pages 23-23 and pdf page 95 in RHS response to issue NA1 in the draft SoCG with Highways England. This material makes clear that ammonia concentrations, like NOx concentrations, are not at</i>	Highways England has already responded to comments on ammonia at REP7-008 paragraphs 2.2.43 to 2.2.48.



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		<p>ammonia concentrations do you consider there would be as a result of the Proposed Development for the TBH SPA, taking into account the specific characteristics of this part of the SPA, its spatial relationship with the strategic road network, and the nature of the qualifying species of the TBH SPA.</p>	<p><i>background at 30 metres from the road, but need to be considered at least out to 200 m from the road. Furthermore, REP5-049 at 4.23 references an emissions factor tool for ammonia from road traffic (available freely for all to use) that would allow a detailed consideration of ammonia emissions. Prior to this, HE had proposed using a doubling of nitrogen deposition rates due to NOx to equate to the additional contribution from ammonia. RHS accepts this approximation, although it is likely to be an underestimate. Increased ammonia will increase the nitrogen deposition. However, HE has not presented the results with nitrogen deposition for all receptors. As RHS has made clear it is important to consider the effect of the DCO Scheme at all locations across the SPA, and not just for locations beyond 150m (see REP6-024 and response to Question 3.4.1 above).</i></p> <p><i>The 150m buffer area supports a mix of woodland types (both mixed woodland and conifer plantation which as both NE and HE have acknowledged is supporting habitat for the qualifying species of the SPA by virtue of the invertebrates it supports (upon which the SPA birds may feed). It is therefore a legal requirement to assess the impacts of elevated nitrogen deposition (including ammonia) from the DCO Scheme and in combination with other plans and projects on this area. As detailed above HE has not done this analysis, indeed HE had not even calculated the levels of ammonia that will be generated within the 150m of the roads. RHS has already presented a critique of the potential effects of increased nitrogen deposition upon invertebrate populations (REP6-024).</i></p> <p><i>As well as the current specific characteristics of this part of the SPA it is also necessary to consider the future character of the site. As detailed above, part of HEs compensation measures including the restoration of woodland within 150m of the road network back to heathland. Once restored these habitats are likely to become breeding habitat for woodlark and nightjar”.</i></p>	<p>As per their Deadline 6 submission [REP6-024], RHS have again challenged the SiAA's consideration of the woodland as a buffer, its contribution to an invertebrate resource for the SPA qualifying species and the absence of any adverse effects on the SPA resulting from changes in nitrogen deposition within the woodland buffer as a result of the Scheme. These points are already discussed in detail in paragraphs 2.2.4 to 2.2.29 of Highways England's comments on RHS's Deadline 6 submission [REP7-008], which demonstrates why this challenge is incorrect.</p> <p>RHS also note that some of the woodland buffer will be cleared and restored to heathland as part of the suite of compensatory measures, and that these areas may attract future breeding SPA qualifying species. As explained in 3.8.2 of Highways England's response to ExQ3 [REP7-004], the management of the Ockham and Wisley Commons SSSI component of the Thames Basin Heaths SPA does not require the removal of the woodland buffer in order to achieve favourable condition for the site. The clearance of some areas of woodland within SPA enhancement areas is part of the suite of compensatory measures, which (as explained in 3.8.2 of Highways England's response to ExQ3 [REP7-004]), fall outside 'normal practice' and would not have occurred as part of the existing management of the SPA.</p> <p>The suite of compensatory measures were designed under consultation with Natural England, Forestry Commission, RSPB, Surrey Wildlife Trust and Surrey County Council at Stage 5 of the HRA [REP4-014], after an adverse effect was identified during the SiAA.</p> <p>The proposed woodland clearance as part of the suite of compensatory measures is therefore, by definition, not part of the current future proposals for the SPA, and it would be wholly inappropriate to include this within the SiAA.</p> <p>As explained in 3.8.2 of Highways England's response to ExQ3 [REP7-004], it is acknowledged that the areas of heathland restoration closer to the A3 as part of the suite of compensatory measures would be exposed to higher levels of nitrogen deposition than the existing areas of heathland and therefore may require a greater level of management. However, the SPA management and monitoring plan [AS-014] allows for adaptive management where required, through the long-term provision of works and monitoring targets and under discussion with the steering group.</p>
<b>13</b>	<b>Traffic, Transport and Road Safety</b>			
3.13.7	Applicant and RHS	In response to the ExA's SWQ 2.13.14 you have	"For the purposes of responding to ExQ3 at Deadline 7:	a) As Wisley Lane and the A3 are at the same level in this location, any junction would be an at-grade junction.

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		<p>provided conflicting answers as to whether the 'RHS Alternative' access arrangement would include an at grade or grade separated junction between Wisley Lane and the A3. It appears to the ExA that unless fundamentally different design assumptions are being made about what form a 'left out' junction from Wisley Lane might take that such a junction could only be either at grade or grade separated.</p> <p>The Applicant and the RHS are therefore requested to:</p> <p>a) agree between one another hypothetically what form of junction or junctions could physically be accommodated; and</p> <p>b) then advise the ExA which of DMRB CD122 or CD123 would any such junction design or designs need to be assessed against. Should any junction design or designs require a relaxation from the relevant design standards to be applied, the Applicant and the RHS are requested to explain the nature of any relaxation that would be required.</p> <p>The response to this question is one which the ExA expects the Applicant and the RHS should include in their SoCG, with clear explanations for matters that are or are not agreed.</p>	<p>a) <i>Please see the attached plan ("ExQ3.13.7 – Plan") which has been shared with HE along with the following explanation (a response is awaited).</i></p> <p>b) <i>CD122 provides the following definition of a grade separated junction: "A grade separated junction has at least two carriageway links at different levels, and usually involves the provision of a structure to accommodate carriageways crossing. "The RHS Alternative Scheme satisfies this definition.</i></p> <p><i>The RHS invited HE to agree this information but it was not able to do so by Deadline 7 so this is the RHS answer to the question – not an agreed or disagreed position with HE. A response to this question will be included in the SoCG on the basis required by the ExA".</i></p>	<p>DMRB CD123 provides requirements and advice on the geometrical design for at-grade priority junctions. The standard does not permit at grade junctions on Dual 3 lane all-purpose (D3AP) carriageways (and by implication Dual 4 lane all-purpose carriageways (D4AP)).</p> <p>The RHS alternative design provided in REP7-039 is an at grade junction that appears to be based on design parameters in CD122 and CD123. CD122 is the relevant standard for grade separated junctions.</p> <p>In reference to a hypothetical junction, if CD122 were to be applied at this location the following elements could not be accommodated without substantial departures from standards: This is explained below.</p> <p>b) The following text concerns the application of CD122 and why its requirements could not be met. It also demonstrates how the RHS alternative design fails to meet its requirements.</p> <p><i>Design Speed.</i></p> <p>DMRB CD 122; paragraph 5.4 and Table 5.4 Connector road design speed, requires a slip road to have a minimum design speed of 70kph when the mainline design speed is 120kph, as is the case for northbound A3.</p> <p><i>Horizontal curvature.</i></p> <p>DMRB CD 122 Table 5.4 gives the minimum design speeds for connector roads and refers to DMRB CD109 Table 2.10, reproduced below, which provides the base geometric parameters for these design speeds.</p> <p>Hence the following apply:</p> <ul style="list-style-type: none"> <li>• Desirable minimum Radius to DMRB CD109 Para 2.9 = 360m (design speed = 70kph)</li> <li>• Absolute minimum Radius. Departure from Standard to DMRB CD109 Para 2.11 Radius of 90m (design speed = 50kph)</li> </ul> <p>DMRB CD109 para 2.11 states "Horizontal curvature shall not be less than those given in Table 2.10 for 50kph design speed regardless of permitted relaxations" Hence, any radius less than 90m with a design speed less than 50kph is not permitted under DMRB CD109. Furthermore, DMRB CD122 para 1.3 states "The relaxation prescribed by CD109 [Ref 3.N] shall not be applied to this document" and any radius below 360m would be departure.</p> <p>The RHS alternative design assumes a radius of 58m which would result in a design speed less than 50kph. This is not permitted under DMRB CD109.</p>

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				<p><i>Near Straight.</i></p> <p>DMRB CD 122 paragraph 5.8 requires a near straight at least equal in length to the nose [85m] to be provided at the back of the nose.</p> <p>The RHS alternative design does not include a 'near straight' as required under DMRB CD 109. This is a departure from standard.</p> <p><i>Merge Type.</i></p> <p>DMRB CD122; Figure 3.12a All-purpose road merging diagram, the merge type is determined by the number of Vehicles Per Hour of the Merging Traffic and the number of Vehicle Per Hour on the mainline. Any merge type that is above or below that required would be a departure from standard. Although traffic modelling has not been carried out for a Wisley Lane merge, a merge layout for a single lane with less than approximately 1000 vehicles per hour would be a CD122 Layout A option 1 – taper merge in accordance with CD122 Figure 3.14a.</p> <p>The RHS alternative design appears to include a CD122 Layout B – parallel merge, which presumably is included to improve the weaving length from the slip road in to the mainline.</p> <p><i>Weaving Length.</i></p> <p>DMRB CD122; paragraph 4.5 requires a weaving length of 1km. Applying the minimum design standards as described above for the grade separated junction with a horizontal curvature of 90m radius (for a design speed is 50kph), a near straight of 85m and a merge type Layout A at this location results in a weaving length of 746m. This would not comply with the standards and a departure from standard would be required as relaxations for weaving length are not permitted.</p> <p>Note: If designed to standards, the minimum horizontal curvature [360m radius] permitted for a design speed of 60kph would further reduce the weaving length to 476m and this element would therefore require a departure from standard.</p> <p>The RHS alternative design only achieves approximately 1km weaving necessary by including a substandard design speed and horizontal radius and no near straight.</p>
15	<b>Contents of the draft Development Consent Order</b>			
3.15.17	GBC & RHS	Please set out any concerns or comment you may have on the new Requirement 18 (Protection of certain tree roots at RHS Garden Wisley) in the dDCO [REP5-002].	<p><i>"Requirement 18 does not offer the protection needed so as to ensure that the Redwood Trees in question will not be harmed.</i></p> <p><i>Please refer to the Barrell Tree Consultancy letter dated 17 April 2020 forming Appendix 3 to the Overview submitted by the RHS at Deadline 7 [REP7-042]"</i>.</p>	Refer to Highways England's response in document reference TR010030/APP/9.100 submitted at Deadline 8.



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<b>16</b>	<b>Compulsory Acquisition</b>			
3.16.1	All CA/and or TP objectors we had registered to be heard at a CAH scheduled for 24 March 2020 (CAH 1)	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. In submitting your written versions of the oral case that you would 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 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	<p><i>"The RHS maintains its objections in relation to Plots 2/27, 2/27(a) and 2/30 for the reasons explained below. Plot 2/27 (which is to be acquired permanently), together with Plot 2/27a and 2/30 (which will be subject to temporary possession), lie at the main vehicular entrance to the RHS Gardens at Wisley from the A3. Plot 2/30 comprises part of Wisley Lane, the access road into, and out of, the Gardens.</i></p> <p><i>The purpose of acquiring Plot 2/27 is to construct the northern end of a bridge that will pass over the A3 and provide a new entrance to the Gardens. HE says that access to the Gardens from Wisley Lane will be maintained throughout the scheme works and during the 12- 18 month construction period of the new bridge.</i></p> <p><i>However, HE has not explained how this will be achieved given that the bridge will be built immediately adjacent to the existing entrance, with no apparent surrounding area for enabling works other than for Wisley Lane itself. HE has advised that the question of how the bridge will be constructed will be answered by its contractor, Balfour Beatty, but currently no solution has been made known to RHS. On the information currently available there is a significant risk that the Gardens would have to close during the construction works.</i></p> <p><i>This would have a significant and unacceptable financial impact at a time the Gardens would be seeking to realise the benefit of £65 million of current and ongoing investment. The loss that would be suffered would be at a level that undermines the compelling case for compulsory acquisition.</i></p> <p><i>For these reasons RHS maintains its objection to the compulsory acquisition of plot 2/27, until such time that HE enters into a Land and Works Agreement that provides a solution to the maintenance of uninterrupted access to the Gardens from Wisley Lane during the Scheme works.</i></p> <p><i>The RHS objects to the compulsory acquisition of Plot 2/27 and also, for the same reasons, the temporary possession of plots 2/27a and 2/30".</i></p>	Highways England and its contractor are in detailed discussions with RHS regarding these construction issues with a view to minimising any disruption so far as is practicable.



Question No	Question to:	Question:	Interested Party's Response	Highways England
		<p>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</p>		
<b>Ockham Parish Council</b>				
<b>1</b>	<b>General</b>			
3.1.3	All Parties	<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"> <li>- Change 2 - incorporation of two toad underpasses at Old Lane;</li> <li>- Change 3 - removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions;</li> <li>- Change 4 - amendments to</li> </ul>	<p><i>"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..."</i></p>	<p>Night time working requirements were set out in the originally submitted draft Development Consent Order (dDCO) [APP-018] and the Outline Construction Environmental Management Plan (OCEMP) [APP-134] which both included a reference to "night-time closures for bridge demolition and installation or other works requiring the full or partial closure of, or otherwise adversely affecting the operation of the M25 and A3 carriageways" (dDCO Requirement 3(2)(b)(i) and OCEMP paragraph 5.3.1, first bullet). This text has not changed during subsequent iterations of the dDCO or OCEMP and remains extant.</p>

Question No	Question to:	Question:	Interested Party's Response	Highways England
		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;		
<b>4.</b>	<b>Biodiversity and Habitats Regulations Assessment</b>			
3.4.1	RHS	In regard to any potential effects on the Thames Basin Heaths SPA (TBH SPA) due to air quality considerations, please comment on the response made by Natural England at Deadline 5 [REP5-032] in regard to the ExA's Second Written Questions.	<i>"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'"</i>	<p>Natural England have agreed with the suite of compensatory and enhancement measures which form part of the Scheme, the provision of which will not contradict Natural England's view that 'Natural England has consistently advised against the removal of the woodland 'buffer' in areas of the site alongside the A3 and M25', as stated in response 2.4.7d within Natural England's response to the ExA's second written questions [REP5-032]. As recorded in 3.2.16 of the Statement of Common Ground (SoCG) between Highways England and Natural England [REP5-003], Natural England were consulted on and agreed with the suite of compensatory measures as contained in the HRA Stages 3-5 [REP4-014]. This included the agreement on the SPA compensation land parcels and SPA enhancement areas, and their proposed management.</p> <p>As explained in 2.4.4 of Highways England's comments on Interested Parties' responses to ExQ2 [REP6-013], the intention of the woodland enhancement works proposed for the woodland area between the Elm Corner residents and the A3 will be to improve woodland structure and diversity. A monitoring target identified for this area, as stated in Table 7.5.4 of the SPA Management and Monitoring Plan [REP4-031], 'E4 Objective 3', is to ensure that the new planting (which is proposed for this area) provides sufficient screening between the existing Elm Corner properties and the A3.</p> <p>The details of this planting will be refined during the detailed design process, and the SPA Management and Monitoring Plan [REP4-031] will be updated with these details and submitted to the Secretary of State for approval under Requirement 8 of the draft DCO [REP6-003].</p> <p>Highways England will engage with the Elm Corner residents and Ockham Parish Council as part of this detailed design process.</p> <p>As explained in paragraph 7.5.1.1 of the SPA management and monitoring plan [APP-105], for the remainder of SPA enhancement areas where woodland thinning is proposed, the thinning of woodland will focus on increasing diversity within the retained woodland, by creating wide glades, open areas and wavy woodland edges. The</p>

Question No	Question to:	Question:	Interested Party's Response	Highways England
				<p>woodland itself will be retained in the woodland thinning enhancement areas; it will just be of a more diverse structure. As recorded in 3.2.16 of the SOCG between Highways England and Natural England [REP5-003], Natural England were consulted on and agreed with the SPA enhancement area proposals.</p> <p>There is not expected to be any increase in air pollution as a result of the thinning of the woodland. Trees are able to capture particulate matter concentrations, but this is only in the order of a few percent (Air Quality Expert Group, Impacts of Vegetation on Urban Air Pollution, Defra, 2018, section 2, first paragraph1)</p> <p>In terms of the work by Rossa Donovan quoted by Ockham Parish Council, it is believed that this references a study in the West Midlands to identify which trees should be planted in urban areas to help improve air quality. The study focused on the contribution of tree species to the formation of ozone through the release of biogenic volatile organic compounds (see findings of the study<sup>2</sup> at link below)). Ozone is a regional pollutant that can be both harmful to human health and vegetation, but is not included in air quality assessments, which focus on air quality at the local level. The study is therefore of little relevance to the Thames Basin Heaths SPA which is not in an urban area.</p>
3.4.5	Applicant	When will the terms of reference for the proposed Steering Group be made available, and how will these be consulted upon?	<p><i>“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”.</i></p>	<p>As set out in Highways England’s response to Ockham Parish Council comments on Written Question 2.4.4 contained in Comments on Interested Party Responses to ExQ2 [REP6-013], Highways England will engage with Ockham Parish Council as part of the detailed design process.</p> <p>The steering group that is referred to in 7.2.1.11 of the SPA Management and Monitoring Plan [REP4-031] will consist of experts from nature conservation agencies and their remit will be to determine if the proposed management and monitoring measures are being carried out appropriately and are achieving the measures of success/objectives set out in the management plans.</p> <p>Given the technical composition of the steering group, it would not be appropriate for a member of Ockham Parish Council to participate in this group as a member. However, the Parish Council’s views and opinions will be welcomed and Highways England will continue to undertake regular engagement with Ockham Parish Council throughout the detailed design and construction of the Scheme.</p>

<sup>1</sup> available at [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807251306\\_180509\\_Effects\\_of\\_vegetation\\_on\\_urban\\_air\\_pollution\\_v12\\_final.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807251306_180509_Effects_of_vegetation_on_urban_air_pollution_v12_final.pdf)  
<sup>2</sup> <http://www.es.lancs.ac.uk/people/cnh/UrbanTreesBrochure.pdf>

Question No	Question to:	Question:	Interested Party's Response	Highways England
<b>5.</b>	<b>Construction</b>			
3.5.1	Applicant	In response to the ExA's second written question 2.5.2 you state in [REP5-014] that details of how the construction compounds will be used is a matter for detailed design. Please set out how the approval process for the detailed design of the construction compounds would proceed, and how local residents, such as those at Elm Corner, would be involved in consultations regarding the detailed design process.	<i>"We request again that we are given greater detail about the proposed activities at the construction sites, particularly the one at FWA [Former Wisley Airfield]"</i> .	<p>Highways England can confirm that a plan showing more detail of the proposed layout of the construction site at the Former Wisley Airfield was included in the Report on Proposed Scheme Changes 7 to 9 [REP7-016] accompanying the request for additional changes submitted to the Examining Authority on 9 April 2020. Additionally, in advance of that submission Highways England also informed the residents of Elm Corner of the proposed change, via a letter dated 30 March 2020, which included the same plan included subsequently in the report, and invited residents' comments. and the proposed change was also discussed with the residents via a conference call on 2 April 2020.</p> <p>A subsequent written response was received by Highways England on 1 April 2020 from Ockham Parish Council with regard to proposed Changes 8 and 9 which formed the substantive part of deadline 6 submission where the Parish Council indicated it has seen the relevant plan which is a higher resolution version of the plan in REP7-016.</p>
<b>8.</b>	<b>Landscape and Visual Impact</b>			
3.8.1	Applicant	In relation to the visual impact of the Proposed Development, what allowance has been made for the extent of tree removal that would be associated with the Proposed Development?	<i>"As previously stated, we request the preservation of all trees and most importantly, the irreplaceable ancient woodland, within the parish of Ockham"</i> .	<p>As set out in Environmental Statement Chapter 7 - Biodiversity Rev 1 - changes to application [REP4-023], paragraphs 7.11.36 to 7.11.38, due to the irreplaceable nature of ancient woodland habitat, all habitat loss within the permanent and temporary land take areas within ancient woodland is considered as permanent loss of ancient woodland.</p> <p>The area of ancient woodland at Elm Corner Wood which will be permanently lost as a result of the construction of the highways proposals is small and from the outer edge of the ancient woodland where it meets the A3 and therefore will not result in fragmentation.</p> <p>The Scheme will result in the planting of 27.4 ha of woodland and 10.4 ha of wood pasture, including woodland creation at Park Barn Farm that will provide linkages between the ancient woods at Queen Anne's Hills and Buxton Woods. In addition, soils from the ancient woodlands will be translocated and used for woodland creation within the Park Barn Farm replacement area, thus providing suitable soils and a seed bank for ancient woodland ground flora to establish within the newly planted woodland areas. In addition, 4.2 ha of ancient woodland habitat at the former Chatley Farm replacement land will be enhanced by the removal of rhododendron, enabling a more diverse woodland to establish in the long term, and 8.5 ha of Elm Corner SNCI (including the retained area of ancient woodland) will be managed to improve habitat quality and species and structural diversity.</p>



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<b>13.</b>	<b>Traffic, Transport and Road Safety</b>			
3.13.1	Applicant	Please explain who is responsible for calibrating, running and validating the models that you have run to generate the various traffic predictions for 2022 and 2037 set out in all of your application documentation submitted to date. That is, does the Applicant take responsibility for calibrating, running and validating some or all of the models and then you provide your consultants with the results of the model runs for interpretation or do your consultants run the models and you then take on the role of auditing the output for the model runs to check the reliability of the output of the various models?	<i>"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".</i>	Highways England has provided links to documents to Ockham Parish Council for their review. These demonstrate the methodology which was used to undertake the traffic modelling and contain traffic modelling information that has been submitted into the Examination previously. The information on traffic modelling has been sent directly to Ockham Parish Council, along with other information requested at the parish council meeting.
3.13.6	Applicant	Should they be required, how would any potential detailed design modifications, as referred to in section 2.4.1 of the updated SoCG [REP5-009], be incorporated into the Examination process, having regard to the time remaining?	<i>"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".</i>	As set out in Applicant's Comments on Ockham Parish Council's Deadline 6 submission [REP7-007] the proposed visibility splay and traffic management arrangements have been discussed with Surrey County Council as highway authority for this road and agreed as being appropriate for the road type and the levels of traffic predicted in the modelling. Highways England will continue discussions with Surrey County Council on traffic management for detailed design.
<b>15.</b>	<b>Contents of the draft Development Consent Order</b>			
3.15.5	Applicant	With respect to the process of obtaining approvals for details pursuant to Requirements, please explain what is involved in that process, ie how the Secretary of State goes about seeking the views of	<i>"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</i>	Highways England has held regular meetings with Ockham Parish Council over the duration of the project. As set out in the response related to ExAWQ 3.4.5 above, Highways England will undertake regular engagement with Ockham Parish Council throughout the construction period, in accordance with the community relations strategy that will form part of the final CEMP to be approved by the Secretary of State as provided for in Requirement 3(2)(e) of the draft DCO [REP6-003].

Question No	Question to:	Question:	Interested Party's Response	Highways England
		the named consultees (local authorities and statutory bodies) in terms of timescales and addressing any disagreements. How are any disagreements to be addressed and/or resolved?	<i>within REP6-013 and suggestions for the date of the first meeting have been made".</i>	
<b>Elm Corner Residents</b>				
<b>1.</b>	<b>General</b>			
3.1.3	All Interested Parties	<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"> <li>- Change 2 - incorporation of two toad underpasses at Old Lane;</li> <li>- Change 3 - removal of part of the proposed improvements to the A245 eastbound between the Seven Hills Road and Painshill junctions;</li> <li>- Change 4 - amendments to Saturday construction working hours;</li> </ul>	<i>"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..."</i>	Night time working requirements were set out in the originally submitted draft Development Consent Order (dDCO) [APP-018] and the Outline Construction Environmental Management Plan (OCEMP) [APP-134] which both included a reference to " <i>night-time closures for bridge demolition and installation or other works requiring the full or partial closure of, or otherwise adversely affecting the operation of the M25 and A3 carriageways</i> " (dDCO Requirement 3(2)(b)(i) and OCEMP paragraph 5.3.1, first bullet). This text has not changed during subsequent iterations of the dDCO or OCEMP and remains extant.

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		- Change 5 - diversion of a new gas main crossing of the M25;  Change 6 - amendments to the proposed speed limit at Elm Lane;		
<b>4.</b>	<b>Biodiversity and Habitats Regulations Assessment</b>			
3.4.1	RHS	In regard to any potential effects on the Thames Basin Heaths SPA (TBH SPA) due to air quality considerations, please comment on the response made by Natural England at Deadline 5 [REP5-032] in regard to the ExA's Second Written Questions.	<p><i>“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”.</i></p>	<p>Natural England have agreed with the suite of compensatory measures, and they do not contradict Natural England's view that 'Natural England has consistently advised against the removal of the woodland 'buffer' in areas of the site alongside the A3 and M25', as stated in response 2.4.7d within Natural England's response to the ExA's second written questions [REP5-032]. As recorded in 3.2.16 of the SOCG between Highways England and Natural England [REP5-003], Natural England were consulted on and agreed with the suite of compensatory measures as contained in the HRA Stages 3-5 [REP4-014]. This included the agreement on the SPA compensation land parcels and SPA enhancement areas, and their proposed management.</p> <p>As explained in 2.4.4 of Highways England's comments on IP responses to ExQ2 [REP6-013], the intention of the woodland enhancement works proposed for the woodland area between the Elm Corner residents and the A3 will be to improve woodland structure and diversity. A monitoring target identified for this area, as stated in Table 7.5.4 of the SPA Management and Monitoring Plan [REP4-031], 'E4 Objective 3', is to ensure that the new planting (which is proposed for this area) provides sufficient screening between the existing Elm Corner properties and the A3.</p> <p>The details of this planting will be refined during the detailed design process, and the SPA Management and Monitoring Plan [REP4-031] will be updated with these details and submitted to the Secretary of State for approval under Requirement 8 of the draft DCO [REP5-002].</p> <p>Highways England will engage with the Elm Corner residents and Ockham Parish Council as part of this detailed design process.</p> <p>As explained in paragraph 7.5.1.1 of the SPA management and monitoring plan [APP-105], for the remainder of SPA enhancement areas where woodland thinning is proposed, the thinning of woodland will focus on increasing diversity within the retained woodland, by creating wide glades, open areas and wavy woodland edges. The woodland itself will be retained in the woodland thinning enhancement areas; it will just be of a more diverse structure. As recorded in 3.2.16 of the SOCG between Highways England and Natural England [REP5-003], Natural England were consulted on and agreed with the SPA enhancement area proposals.</p>

Question No	Question to:	Question:	Interested Party's Response	Highways England
				<p>There is not expected to be any increase in air pollution as a result of the thinning of the woodland. Trees are able to capture particulate matter concentrations, but this is only in the order of a few percent (Air Quality Expert Group, Impacts of Vegetation on Urban Air Pollution, Defra, 2018, section 2, first paragraph<sup>3</sup>)</p> <p>In terms of the work by Rossa Donovan quoted by Ockham Parish Council, it is believed that this references a study in the West Midlands to identify which trees should be planted in urban areas to help improve air quality. The study focused on the contribution of tree species to the formation of ozone through the release of biogenic volatile organic compounds (see findings of the study<sup>4</sup> at link below). Ozone is a regional pollutant that can be both harmful to human health and vegetation, but is not included in air quality assessments, which focus on air quality at the local level. The study is therefore of little relevance to the Thames Basin Heaths SPA which is not in an urban area.</p>
<b>5.</b>	<b>Construction</b>			
3.5.1	Applicant	<p>In response to the ExA's second written question 2.5.2 you state in [REP5-014] that details of how the construction compounds will be used is a matter for detailed design. Please set out how the approval process for the detailed design of the construction compounds would proceed, and how local residents, such as those at Elm Corner, would be involved in consultations regarding the detailed design process.</p>	<p><i>"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... There has not been consultation but merely an updated plan sent to us"</i></p>	<p>The ECRG were sent a plan showing the proposed layout (HE551522-ATK-LDC-A3_L1-DR-ZL-096502-Rev 0.pdf) of the Former Wisley Airfield construction site setting out the full scope of activities proposed for the site, along with an offer of a meeting, which, given current circumstances would need to be remote. This meeting with members of ECRG was held on 2 April 2020. A written response from ECRG was received by Highways England on 1 April 2020 with regard to proposed Changes 8 and 9 which formed the substantive part of ECRG's deadline 6 submission [REP6-020].</p> <p>Highways England has responded to these comments both in the Report on Proposed Scheme Changes 7-9 [REP-7-016] and in the Applicants Comments on Elm Corner Residents Group Deadline 6 submission [REP7-010].</p> <p>With regards to continuing engagement with Elm Corner residents Highways England draws the attention of the Examining Authority to section 3.15.5 of ECRG's response. ECRG note in 3.15.5 that Highways England has confirmed in its Comments on Interested Party Responses to ExQ2 [REP6-013], section 2.4.4, that Highways England will engage with ECRG.</p> <p><i>"The ECRG have continually requested that the construction compound be sited at least a further 500 metres from the residents' houses"</i></p> <p>As set out in section 5.2.2 of the Report on Proposed Scheme Changes 7-9 [REP7-016] the area of the Wisley Airfield site which has been identified for the worksite is existing concrete hardstanding, thus negating the need for further earthworks to accommodate the materials</p>

<sup>3</sup> available at [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807251306\\_180509\\_Effects\\_of\\_vegetation\\_on\\_urban\\_air\\_pollution\\_v12\\_final.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/1807251306_180509_Effects_of_vegetation_on_urban_air_pollution_v12_final.pdf).

<sup>4</sup> <http://www.es.lancs.ac.uk/people/cnh/UrbanTreesBrochure.pdf>.



Question No	Question to:	Question:	Interested Party's Response	Highways England
				<p>processing. This location therefore provides a suitable site which avoids additional land take from the environmental designations. As set out in Applicant's Response to Examining Authority's Second Written Questions [REP05-014], question 2.5.2, to locate the construction compound elsewhere on the Wisley Airfield would require vehicles to travel further to reach it, necessitating additional vehicle miles for construction vehicles.</p> <p>With regards to the assessment of effects and mitigation of identified effects, the Report on Proposed Scheme Changes 7-9 [REP7-016], section 5.4 includes an assessment of environmental effects associated with proposed Scheme change 9. That report concludes in section 9.1.3 that any noise or landscape impacts would be suitably mitigated as to not result in any alterations to the conclusions of the Environmental Statement based on the submitted scheme.</p> <p>Requirement 3 of the dDCO [REP6-003], provides that the Construction Environmental Management Plan (CEMP) will include a number of management plans and method statements covering specific environmental aspects. These management plans and method statements, as part of the CEMP, will contain best practice mitigation, supplemented where appropriate with specific mitigation, and will be subject to consultation with Guildford Borough Council (as the local planning authority) and approval by the Secretary of State.</p>
<b>8.</b>	<b>Landscape and Visual Impact</b>			
3.8.5	Applicant	Please confirm how final details of all permanent fencing are to be approved and what consultation process with relevant stakeholders, such as the Local Authorities and adjacent landowners, will take place. How will any consultation responses received feed into the final choice and design of fencing to be installed?	<i>"The ECRG wish to know how the final details of permanent fencing are to be approved".</i>	The Applicants Response to Examining Authority Third Written Questions [REP7-004] provides a response to question 3.8.5 on page 28.
<b>13.</b>	<b>Traffic, Transport and Road Safety</b>			
3.13.6	Applicant	Should they be required, how would any potential detailed design modifications, as referred to in section 2.4.1 of the updated SoCG [REP5-009], be incorporated into the Examination process, having regard to the time remaining?	<i>"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".</i>	As set out in Applicant's Comments on Elm Corner Residents Group's Deadline 6 submission [REP7-007] the proposed visibility splay and traffic management arrangements have been discussed with Surrey County Council as highway authority for this road and agreed as being appropriate for the road type and the levels of traffic predicted in the modelling. Highways England will continue discussions with Surrey

Question No	Question to:	Question:	Interested Party's Response	Highways England
				County Council on traffic management matters as part of the detailed design of the Scheme.
<b>Mr and Mrs P Young, Mrs A Barkham and Ms B Kendrick</b>				
<b>5. Construction</b>				
3.5.1	Applicant	<p>In response to the ExA's second written question 2.5.2 you state in [REP5-014] that details of how the construction compounds will be used is a matter for detailed design. Please set out how the approval process for the detailed design of the construction compounds would proceed, and how local residents, such as those at Elm Corner, would be involved in consultations regarding the detailed design process.</p>	<p><i>"My Clients are extremely concerned about how the use of the proposed construction compounds on the adjoining Wisley airfield will impact upon them. We understand from the Project Manager that it is proposed to set up a working group which the residents of Elm Lane and their representatives would be invited to join so that the impact of the use of the compounds can be monitored. Whilst this is a welcome suggestion and my clients would be very keen to participate in such a group, nonetheless the concern remains that this may give them little practical influence when the physical impact of the works is at its greatest.</i></p> <p><i>In particular, our clients are concerned about the following matters:</i></p> <p><i>a) The hours of operation and the use of floodlighting.</i></p> <p><i>b) The proposed height of the bund is 3m. It is recognised that this will provide a useful barrier, it could potentially be higher and /or topped with an acoustic fence.</i></p> <p><i>c) It will be necessary to consider weed control on this earth bund as the prevailing wind will blow weed seeds into gardens of all of the residents' properties.</i></p> <p><i>d) There is a general concern about the location of the compound as had it been located further to the west, the impact of the residents would have been significantly reduced."</i></p>	<p>a) Requirement 3 of the dDCO [REP6-003], provides that the Construction Environmental Management Plan (CEMP) to be approved by the Secretary of State under that requirement ,must include a number of management plans and method statements covering specific environmental aspects. These are listed at requirement 3(2)(c). These management plans and method statements, as part of the CEMP, will contain best practice mitigation, supplemented where appropriate with specific mitigation, and will be subject to consultation with Guildford Borough Council (as the local planning authority for the area) and approval by the Secretary of State. These management plans will cover issues including the control of noise and vibration (Requirement 3(2)(c)(ii)) and construction site artificial lighting (Requirement 3(2)(c)(iv)).</p> <p>b) Highways England welcomes the recognition that the 3m bund will provide a useful barrier. Unfortunately, it is not technically feasible to erect an acoustic fence on top of the bund as it would be subject to substantial wind loading which would require the fence to have substantial footings and these would have to be removed and re-erected every time there was a need to add or remove topsoil. Additionally, 3m in height is best practice as higher bunds can negatively affect the quality of top soil at the bottom.</p> <p>c) Further to the response to a) above, Requirement 3 requires Highways England to put in place various management plans covering issues including the control of dust, odour and smoke (Requirement 3(2)(c)(iii)) and the management and storage of topsoil (Requirement 3(2)(c)(vi)).</p> <p>d) As set out in section 5.2.2 of the Report on Proposed Scheme Changes 7-9 [REP7-016] the area of the Wisley Airfield site which has been identified for the worksite is existing concrete hardstanding, thus negating the need for further earthworks to accommodate the materials processing. This location therefore provides a suitable site which avoids additional land take from the environmental designations. As set out in Applicant's Response to Examining Authority's Second Written Questions [REP05-014], question 2.5.2, to locate the construction compound elsewhere on the Wisley Airfield would require vehicles to travel further to reach it, necessitating additional vehicle miles for construction vehicles.</p>



# Appendices



# Appendix A. Painshill / Seven Hills junction modelling results

## Operational Performance

**Table A1.1 Operational Performance: Painshill/Seven Hills - 2022 Do Something AM Peak**

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
J1: Painshill				
1/1	A3 (s) Off-slip Left	68.7%	10.8	2.7
1/2	A3 (s) Off-slip Ahead	68.1%	7.5	3.3
2/2+2/1	Byfleet Road EB Left Ahead	70.0 : 70.0%	8.1	3.6
2/3	Byfleet Road EB Ahead	73.5%	11.0	3.6
3/1	A3 (n) Off-slip Left Ahead	72.1%	7.7	3.6
3/2	A3 (n) Off-slip Ahead	74.3%	7.8	3.7
4/1	Cobham Bridge Left Ahead	80.1%	10.6	4.7
4/2	Cobham Bridge Ahead	79.3%	11.1	4.7
5/1	A3 (s) On-slip Ahead	48.2%	7.0	1.3
5/2	A3 (s) On-slip Ahead	48.5%	7.3	1.3
8/1	Circ @ A3 (s) off Ahead	70.4%	6.9	1.1
8/2	Circ @ A3 (s) off Right Ahead	69.0%	8.4	1.3
9/1	Circ @ Byfleet Road Ahead Right	88.3%	7.6	0.7
10/1	Circ @ A3 (n) off Ahead	92.4%	15.0	3.0
10/2	Circ @ A3 (n) off Right	71.5%	2.0	0.8
11/1	Circ @ Cobham Bridge Ahead Right	85.2%	7.0	1.7
11/2	Circ @ Cobham Bridge Ahead Right	90.1%	7.5	1.9
J2: B365 / A245				
1/1	Seven Hills Road (n) Left	77.2%	21.8	6.7
3/2+3/1	Byfleet Road (East - Westbound) Left Ahead	93.2 : 93.2%	39.2	7.8
3/3	Byfleet Road (East - Westbound) Right	48.5%	8.7	2.5
3/4	Byfleet Road (East - Westbound) Right	51.8%	9.6	2.8
5/1+5/2	Seven Hills Road (s) Right Left Ahead	53.5 : 53.5%	2.4	2.0
7/1	Byfleet Road (West - Eastbound) Ahead Left	62.3%	10.6	4.1
7/2+7/3	Byfleet Road (West - Eastbound) Ahead	78.7 : 78.7%	14.2	9.1
8/1	Seven Hills Road (n)	28.8%	0.2	0.2
12/1	Seven Hills Road (s) Ahead Right	1.8%	0.0	0.0

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
13/1	Feltonfleet School Right Left	9.8%	0.1	0.1
PRC (%)	-3.5%			
Total Delay	78.14			

**Table A1.2 Operational Performance: Painshill/Seven Hills - 2022 Do Something PM Peak**

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
J1: Painshill				
1/1	A3 (s) Off-slip Left	70.3%	11.4	2.9
1/2	A3 (s) Off-slip Ahead	64.6%	6.3	2.9
2/2+2/1	Byfleet Road EB Left Ahead	70.5 : 70.5%	8.1	3.6
2/3	Byfleet Road EB Ahead	72.5%	10.9	3.4
3/1	A3 (n) Off-slip Left Ahead	76.4%	6.0	3.4
3/2	A3 (n) Off-slip Ahead	80.0%	6.4	3.7
4/1	Cobham Bridge Left Ahead	88.0%	14.4	6.6
4/2	Cobham Bridge Ahead	58.6%	7.2	2.6
5/1	A3 (s) On-slip Ahead	56.5%	5.7	1.1
5/2	A3 (s) On-slip Ahead	54.9%	6.4	1.0
8/1	Circ @ A3 (s) off Ahead	41.8%	5.1	0.9
8/2	Circ @ A3 (s) off Right Ahead	54.7%	5.9	1.2
9/1	Circ @ Byfleet Road Ahead Right	84.1%	7.1	2.1
10/1	Circ @ A3 (n) off Ahead	77.0%	10.2	2.1
10/2	Circ @ A3 (n) off Right	59.7%	13.0	2.2
11/1	Circ @ Cobham Bridge Ahead Right	83.8%	8.4	1.7
11/2	Circ @ Cobham Bridge Ahead Right	85.5%	9.2	1.9
J2: B365 / A245				
1/1	Seven Hills Road (n) Left	74.8%	20.5	6.3
3/2+3/1	Byfleet Road (East - Westbound) Left Ahead	70.6 : 70.6%	13.0	1.8
3/3	Byfleet Road (East - Westbound) Right	50.1%	9.1	2.6
3/4	Byfleet Road (East - Westbound) Right	52.3%	9.7	2.8
5/1+5/2	Seven Hills Road (s) Right Left Ahead	73.8 : 73.8%	4.2	3.3

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
7/1	Byfleet Road (West - Eastbound) Ahead Left	61.6%	10.8	4.2
7/2+7/3	Byfleet Road (West - Eastbound) Ahead	78.9 : 78.9%	14.2	9.1
8/1	Seven Hills Road (n)	25.5%	0.2	0.2
12/1	Seven Hills Road (s) Ahead Right	2.5%	0.0	0.0
13/1	Feltonfleet School Right Left	13.1%	0.1	0.1
PRC (%)	2.3%			
Total Delay	73.57			

**Table A1.3 Operational Performance: Painshill/Seven Hills - 2037 Do Something AM Peak**

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
J1: Painshill				
1/1	A3 (s) Off-slip Left	80.4%	15.6	4.3
1/2	A3 (s) Off-slip Ahead	73.8%	8.4	3.8
2/2+2/1	Byfleet Road EB Left Ahead	75.9 : 75.9%	9.2	4.4
2/3	Byfleet Road EB Ahead	73.1%	11.0	3.5
3/1	A3 (n) Off-slip Left Ahead	69.2%	6.0	3.0
3/2	A3 (n) Off-slip Ahead	71.2%	6.1	3.1
4/1	Cobham Bridge Left Ahead	77.0%	10.2	4.2
4/2	Cobham Bridge Ahead	77.7%	10.9	4.5
5/1	A3 (s) On-slip Ahead	47.9%	7.5	1.3
5/2	A3 (s) On-slip Ahead	45.2%	6.9	1.2
8/1	Circ @ A3 (s) off Ahead	62.7%	6.2	0.9
8/2	Circ @ A3 (s) off Right Ahead	65.5%	7.3	1.1
9/1	Circ @ Byfleet Road Ahead Right	93.9%	8.1	0.6
10/1	Circ @ A3 (n) off Ahead	94.3%	17.1	2.3
10/2	Circ @ A3 (n) off Right	63.2%	2.7	0.9
11/1	Circ @ Cobham Bridge Ahead Right	82.2%	7.0	1.5
11/2	Circ @ Cobham Bridge Ahead Right	78.6%	6.4	1.4
J2: B365 / A245				
1/1	Seven Hills Road (n) Left	83.7%	25.1	8.3



Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
3/2+3/1	Byfleet Road (East - Westbound) Left Ahead	95.5 : 95.5%	48.1	10.6
3/3	Byfleet Road (East - Westbound) Right	50.9%	9.2	2.7
3/4	Byfleet Road (East - Westbound) Right	54.5%	10.1	3.0
5/1+5/2	Seven Hills Road (s) Right Left Ahead	52.5 : 52.5%	2.3	2.0
7/1	Byfleet Road (West - Eastbound) Ahead Left	65.9%	11.8	4.5
7/2+7/3	Byfleet Road (West - Eastbound) Ahead	85.5 : 85.5%	19.2	10.8
8/1	Seven Hills Road (n)	30.5%	0.2	0.2
12/1	Seven Hills Road (s) Ahead Right	1.8%	0.0	0.0
13/1	Feltonfleet School Right Left	9.8%	0.1	0.1
PRC (%)	-6.1%			
Total Delay	84.47			

**Table A1.4 Operational Performance: Painshill/Seven Hills - 2037 Do Something PM Peak**

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
J1: Painshill				
1/1	A3 (s) Off-slip Left	76.7%	13.7	3.7
1/2	A3 (s) Off-slip Ahead	62.6%	7.0	2.9
2/2+2/1	Byfleet Road EB Left Ahead	79.9 : 79.9%	10.2	5.0
2/3	Byfleet Road EB Ahead	91.1%	19.1	7.9
3/1	A3 (n) Off-slip Left Ahead	61.0%	4.5	2.3
3/2	A3 (n) Off-slip Ahead	62.1%	4.4	2.3
4/1	Cobham Bridge Left Ahead	88.6%	13.2	6.6
4/2	Cobham Bridge Ahead	80.4%	10.9	4.9
5/1	A3 (s) On-slip Ahead	57.7%	8.8	2.1
5/2	A3 (s) On-slip Ahead	58.6%	8.8	2.1
8/1	Circ @ A3 (s) off Ahead	60.6%	4.1	1.5
8/2	Circ @ A3 (s) off Right Ahead	50.5%	4.4	1.6
9/1	Circ @ Byfleet Road Ahead Right	90.9%	7.7	0.9
10/1	Circ @ A3 (n) off Ahead	90.5%	12.9	3.3

Lane No.	Lane Name	DoS (%)	MMQ (PCU)	Total Delay (PCUhr)
10/2	Circ @ A3 (n) off Right	74.7%	16.0	2.9
11/1	Circ @ Cobham Bridge Ahead Right	78.1%	8.0	1.6
11/2	Circ @ Cobham Bridge Ahead Right	77.4%	8.1	1.6
J2: B365 / A245				
1/1	Seven Hills Road (n) Left	92.4%	25.7	11.0
3/2+3/1	Byfleet Road (East - Westbound) Left Ahead	77.2 : 77.2%	15.3	2.5
3/3	Byfleet Road (East - Westbound) Right	55.8%	8.5	2.8
3/4	Byfleet Road (East - Westbound) Right	60.8%	9.6	3.2
5/1+5/2	Seven Hills Road (s) Right Left Ahead	69.2 : 69.2%	3.4	2.7
7/1	Byfleet Road (West - Eastbound) Ahead Left	61.7%	9.7	3.6
7/2+7/3	Byfleet Road (West - Eastbound) Ahead	91.1 : 91.1%	20.9	12.5
8/1	Seven Hills Road (n)	26.6%	0.2	0.2
12/1	Seven Hills Road (s) Ahead Right	2.5%	0.0	0.0
13/1	Feltonfleet School Right Left	13.1%	0.1	0.1
PRC (%)	-2.6%			
Total Delay	91.84			

## Average Journey Time Comparison

**Table A2.1 Average Journey Time Comparison Painshill/Seven Hills - 0700-0800 (s)**

From	To	2022		2037	
		DM	DS	DM	DS
A3 (north)	Cobham Bridge	139	110	105	114
	Seven Hills Road S	319	197	269	192
	Byfleet Road (west)	373	269	322	265
	Seven Hills Road N	332	262	281	265
	Feltonfleet School	353	222	256	230
Cobham Bridge	A3 (south)	112	117	110	115
	Seven Hills Road S	234	139	233	137
	Byfleet Road (west)	284	216	285	213
	Seven Hills Road N	248	206	243	208
	A3 (north)	166	143	151	140
	Feltonfleet School	198	155	198	153
A3 (south)	Seven Hills Road S	309	108	501	105
	Byfleet Road (west)	362	185	530	183
	Seven Hills Road N	317	180	499	188
	Cobham Bridge	186	134	271	135
	Feltonfleet School	360	126	568	131
Seven Hills Road S	Byfleet Road (west)	132	139	134	137
	Seven Hills Road N	120	128	124	129
	A3 (north)	160	159	161	148
	Cobham Bridge	167	167	169	157
	A3 (south)	203	254	213	184
	Feltonfleet School	0	0	0	0
Byfleet Road (west)	Seven Hills Road N	352	139	446	142
	A3 (north)	402	186	490	190
	Cobham Bridge	399	187	491	178
	A3 (south)	431	265	530	210
	Seven Hills Road S	568	299	685	257
	Feltonfleet School	425	334	527	274
Seven Hills Road N	A3 (north)	170	179	163	182
	Cobham Bridge	169	187	166	181
	A3 (south)	205	269	210	217

From	To	2022		2037	
		DM	DS	DM	DS
	Seven Hills Road S	120	307	120	266
	Byfleet Road (west)	166	340	161	348
	Feltonfleet School	160	352	167	291
Feltonfleet School	A3 (north)	169	171	181	167
	Cobham Bridge	172	191	182	175
	A3 (south)	210	306	228	206
	Seven Hills Road S	0	0	0	0
	Byfleet Road (west)	261	156	264	158
	Seven Hills Road N	272	146	293	139

**Table A2.2 Average Journey Time Comparison Painshill/Seven Hills - 0800-0900 (s)**

From	To	2022		2037	
		DM	DS	DM	DS
A3 (north)	Cobham Bridge	136	110	102	109
	Seven Hills Road S	322	176	279	203
	Byfleet Road (west)	371	249	334	277
	Seven Hills Road N	316	245	282	260
	Feltonfleet School	326	204	254	230
Cobham Bridge	A3 (south)	122	137	105	109
	Seven Hills Road S	253	133	247	157
	Byfleet Road (west)	305	207	295	226
	Seven Hills Road N	251	196	242	207
	A3 (north)	158	147	141	138
	Feltonfleet School	224	150	213	161
A3 (south)	Seven Hills Road S	631	86	728	132
	Byfleet Road (west)	677	161	772	204
	Seven Hills Road N	624	158	716	190
	Cobham Bridge	402	126	438	129
	Feltonfleet School	608	104	693	142
Seven Hills Road S	Byfleet Road (west)	130	147	137	162
	Seven Hills Road N	124	134	127	147
	A3 (north)	150	173	157	171
	Cobham Bridge	159	189	161	178



From	To	2022		2037	
		DM	DS	DM	DS
	A3 (south)	203	286	209	209
	Feltonfleet School	0	0	0	0
Byfleet Road (west)	Seven Hills Road N	435	142	486	139
	A3 (north)	479	195	527	187
	Cobham Bridge	474	197	528	175
	A3 (south)	504	294	561	206
	Seven Hills Road S	656	315	707	249
	Feltonfleet School	482	346	534	277
Seven Hills Road N	A3 (north)	164	186	157	181
	Cobham Bridge	163	190	161	176
	A3 (south)	197	294	204	211
	Seven Hills Road S	123	326	119	267
	Byfleet Road (west)	167	354	161	368
	Feltonfleet School	144	375	158	293
Feltonfleet School	A3 (north)	1177	198	1169	192
	Cobham Bridge	1186	210	1143	200
	A3 (south)	1155	330	1245	231
	Seven Hills Road S	0	0	0	0
	Byfleet Road (west)	1433	166	1405	182
	Seven Hills Road N	1465	156	1447	170

**Table A2.3 Average Journey Time Comparison Painshill/Seven Hills - 1600-1700 (s)**

From	To	2022		2037	
		DM	DS	DM	DS
A3 (north)	Cobham Bridge	91	119	90	144
	Seven Hills Road S	189	204	175	186
	Byfleet Road (west)	245	261	231	278
	Seven Hills Road N	251	272	227	290
	Feltonfleet School	169	218	157	244
Cobham Bridge	A3 (south)	130	117	189	139
	Seven Hills Road S	138	110	134	145
	Byfleet Road (west)	198	189	193	217
	Seven Hills Road N	205	196	192	233

From	To	2022		2037	
		DM	DS	DM	DS
	A3 (north)	157	143	163	152
	Feltonfleet School	123	127	123	165
A3 (south)	Seven Hills Road S	121	80	118	83
	Byfleet Road (west)	177	153	172	161
	Seven Hills Road N	187	172	180	176
	Cobham Bridge	127	133	159	124
	Feltonfleet School	96	96	94	99
Seven Hills Road S	Byfleet Road (west)	141	143	144	141
	Seven Hills Road N	141	125	126	129
	A3 (north)	170	144	166	154
	Cobham Bridge	185	152	170	151
	A3 (south)	204	171	194	192
	Feltonfleet School	0	0	0	0
Byfleet Road (west)	Seven Hills Road N	310	135	416	139
	A3 (north)	360	168	471	181
	Cobham Bridge	357	166	469	175
	A3 (south)	369	187	474	208
	Seven Hills Road S	0	0	0	0
	Feltonfleet School	433	239	461	256
Seven Hills Road N	A3 (north)	218	162	231	177
	Cobham Bridge	213	166	231	174
	A3 (south)	230	193	237	214
	Seven Hills Road S	161	227	180	243
	Byfleet Road (west)	226	270	227	300
	Feltonfleet School	434	247	344	267
Feltonfleet School	A3 (north)	617	175	332	184
	Cobham Bridge	619	177	338	187
	A3 (south)	630	214	334	226
	Seven Hills Road S	0	0	0	0
	Byfleet Road (west)	660	169	315	172
	Seven Hills Road N	712	152	338	157

**Table A2.4 Average Journey Time Comparison Painshill/Seven Hills - 1700-1800 (s)**

From	To	2022		2037	
		DM	DS	DM	DS
A3 (north)	Cobham Bridge	89	101	89	108
	Seven Hills Road S	179	180	180	182
	Byfleet Road (west)	240	250	238	265
	Seven Hills Road N	246	264	221	285
	Feltonfleet School	162	195	161	203
Cobham Bridge	A3 (south)	123	126	200	151
	Seven Hills Road S	134	111	141	154
	Byfleet Road (west)	194	189	198	228
	Seven Hills Road N	202	199	186	252
	A3 (north)	150	141	157	151
	Feltonfleet School	117	129	121	167
A3 (south)	Seven Hills Road S	132	79	124	90
	Byfleet Road (west)	188	152	180	171
	Seven Hills Road N	201	175	181	194
	Cobham Bridge	116	128	140	123
	Feltonfleet School	110	97	103	101
Seven Hills Road S	Byfleet Road (west)	146	133	140	133
	Seven Hills Road N	117	117	119	125
	A3 (north)	145	139	155	142
	Cobham Bridge	162	144	156	139
	A3 (south)	188	160	185	194
	Feltonfleet School	0	0	0	0
Byfleet Road (west)	Seven Hills Road N	375	135	479	139
	A3 (north)	417	167	521	179
	Cobham Bridge	414	166	520	174
	A3 (south)	424	186	527	208
	Seven Hills Road S	0	0	0	0
	Feltonfleet School	458	235	523	279
Seven Hills Road N	A3 (north)	160	167	168	180
	Cobham Bridge	157	168	166	181
	A3 (south)	175	195	175	221
	Seven Hills Road S	128	228	122	256
	Byfleet Road (west)	167	0	164	378

From	To	2022		2037	
		DM	DS	DM	DS
	Feltonfleet School	170	245	146	268
Feltonfleet School	A3 (north)	554	158	258	168
	Cobham Bridge	562	165	254	169
	A3 (south)	558	190	277	211
	Seven Hills Road S	0	0	0	0
	Byfleet Road (west)	596	151	281	157
	Seven Hills Road N	660	135	296	139



## Levels of Service Comparison

**Table A3.1 Level of Service Comparison Painshill - 0700-0800 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
A3 Southbound off-slip	E	D	C	D
Cobham Bridge Westbound Approach	C	C	C	C
A3 Northbound off-slip	F	C	F	C
Byfleet Road Eastbound Approach	C	D	C	C
Northern Circulatory	B	B	B	A
Eastern Circulatory	B	B	A	A
Southern Circulatory	C	B	B	B
Western Circulatory	A	B	A	B

**Table A3.2 Level of Service Comparison Painshill - 0800-0900 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
A3 Southbound off-slip	F	D	C	D
Cobham Bridge Westbound Approach	D	D	C	C
A3 Northbound off-slip	F	B	F	C
Byfleet Road Eastbound Approach	C	E	C	C
Northern Circulatory	B	A	B	A
Eastern Circulatory	A	B	A	A
Southern Circulatory	C	B	B	B
Western Circulatory	A	B	A	B

**Table A3.3 Level of Service Comparison Painshill - 1600-1700 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
A3 Southbound off-slip	C	D	B	E
Cobham Bridge Westbound Approach	D	C	E	D
A3 Northbound off-slip	C	C	C	B
Byfleet Road Eastbound Approach	C	B	C	C
Northern Circulatory	B	A	B	A
Eastern Circulatory	A	A	A	A

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Southern Circulatory	B	B	B	C
Western Circulatory	B	A	C	B

**Table A3.4 Level of Service Comparison Painshill - 1700-1800 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
A3 Southbound off-slip	B	C	B	C
Cobham Bridge Westbound Approach	D	D	E	D
A3 Northbound off-slip	C	C	C	B
Byfleet Road Eastbound Approach	B	B	B	C
Northern Circulatory	A	A	A	A
Eastern Circulatory	A	A	A	A
Southern Circulatory	A	B	A	C
Western Circulatory	B	A	B	B

**Table A3.5 Level of Service Comparison Seven Hills - 0700-0800 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Seven Hills North	B	C	B	D
Byfleet Road (east- ahead)	E	D	F	D
Byfleet Road (east-right turn)	D	D	D	E
Seven Hills Road South	D	D	D	D
Byfleet Road (west)	F	C	F	D
Feltonfleet Access	F	A	F	A

**Table A3.6 Level of Service Comparison Seven Hills - 0800-0900 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Seven Hills North	C	C	B	C
Byfleet Road (east- ahead)	F	C	F	E
Byfleet Road (east-right turn)	E	D	E	E
Seven Hills Road South	D	E	D	E

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Byfleet Road (west)	F	C	F	C
Feltonfleet Access	F	A	F	A

**Table A3.7 Level of Service Comparison Seven Hills - 1600-1700 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Seven Hills North	F	C	F	D
Byfleet Road (east- ahead)	C	C	C	C
Byfleet Road (east-right turn)	D	D	D	D
Seven Hills Road South	E	E	D	E
Byfleet Road (west)	F	C	F	C
Feltonfleet Access	F	A	F	A

**Table A3.8 Level of Service Comparison Seven Hills - 1700-1800 (s)**

Arm/Movement	2022		2037	
	DM	DS	DM	DS
Seven Hills North	C	C	C	D
Byfleet Road (east- ahead)	C	C	C	D
Byfleet Road (east-right turn)	E	D	D	E
Seven Hills Road South	D	D	D	D
Byfleet Road (west)	F	C	F	C
Feltonfleet Access	F	A	F	A

# Appendix B. Base year observed count data



Screenline		2015 Observed Hour Counts							
Route	Description	Dir	AM	IP	PM	Dir	AM	IP	PM
1.1	Seven Hills Road NB	Northbound	808	683	802	Southbound	780	731	747
1.2	A307 Portsmouth Road NB		726	530	643		591	541	601
1.3	A3NB b/w Painshill and Copsem		3028	2249	3301		3405	2557	3253
1.4	A3RB to Warren Lane		1022	902	926		810	839	995
2.1	A3 to A245 Cobham Bridge	Eastbound	930	1119	1106	Westbound	1086	1084	1060
2.2	Ockham Lane		244	236	315		379	267	237
2.3	A3 To A247 Clandon Road		64	51	79		81	49	51
2.4	New Inn Ln s/o A3100		416	377	587		602	368	401
2.5	Ripley Ln s/o Guileshill Ln		499	452	499		448	427	417
3.1	A246 (Epsom Rd) / The Street to Ockham	Southbound	722	460	523	Northbound	502	454	622
3.2	Guileshill Ln b/w Ripley		57	44	64		88	46	51
3.3	A3SB s/o Ockham Roundabout		3579	3659	4348		3690	2953	3639
3.4	Ripley RB to B2215		526	483	690		705	495	548
3.5	A245/Parvis Rd e/o Pyrford		1024	903	714		861	875	1024
3.6	B385/Wood ham Ln just e/o		463	460	511		479	432	425
4.1	Byfleet	Westbound	1437	1069	1089	Eastbound	987	1016	1033
4.2	A3 to Wisley Lane		168	205	131		145	205	205
4.3	Ripley to Guleshill		323	169	295		263	183	277
4.4	Send Rd s/o B382/High street		578	456	480		665	515	743

## Appendix C: Highways England’s response to RHS’s Appendix 1 Detailed RHS response to Q3.4.1

Question No	Question	NE response	RHS Response	Highways England
2.3.2	Royal Horticultural Society (RHS) and Natural England (NE)			
	<p>Please provide the relevant guidance or scientific rationale for the need to include, or not include, an assessment of Ammonia concentrations in the assessment of air quality effects on the SPA.</p>	<p>Natural England does not have specific guidance or rationale regarding the assessment of Ammonia for effects from motor vehicles. What we do have is a guidance note outlining to competent authorities how to assess the effects of motor vehicle emissions as a whole. Which helps to determine whether a plan or project is likely to have significant effect upon the integrity of a designated European Site.</p> <p>Our guidance can be found at <a href="http://publications.naturalengland.org.uk/publication/4720542048845824">http://publications.naturalengland.org.uk/publication/4720542048845824</a>            We suggest that this is read in conjunction with the applicant’s air pollution documentation. Natural England is of the opinion that the applicant has followed this guidance when assessing the proposal. The guidance says, “Air pollution that typically affects habitat will include dust and particulate matter (PM), nitrogen oxides (NOx), ammonia (NH3) and sulphur dioxide (SO2). Each proposal type will have emissions typically associated with its specific activity. For example, ammonia is typically associated with farming or waste management. Combustion sources such as industry or traffic are more likely to be associated with nitrogen oxides and particulate matter.”</p> <p>“When considering the potential for in-combination effects, a competent authority should also recognise that different proposal types (‘sectors’) and different pollutants (e.g. ammonia (NH3), nitrogen oxides (NOx and NO2)) can combine together to have the same or similar effect on a given area of habitat. By way of example, nitrogen deposition on a site can result from both the emissions of ammonia from a farm source and also from emissions of nitrogen oxides from a traffic source, with both having an eutrophication effect.”</p>	<p>Natural England (NE) considers that its guidance has been followed, however, as NE has accepted its guidance did not cover the issue of ammonia emission from traffic. The guidance referred to dates from 2018; since that time it has become clear that ammonia emissions from diesel vehicles have increased significantly, as more of the diesel fleet is equipped with selective catalytic reduction (SCR) converters that use urea (adblue) to remove the NOx.</p> <p>While the SCR converters are designed to reduced NOx they produce more ammonia. In addition, the national fleet is moving away from diesel toward petrol vehicles which produce more ammonia. The increase in ammonia emissions from traffic has only become apparent in recent times. Air Quality Consultants Ltd published research on this issue in February 2020 (<a href="https://www.aqconsultants.co.uk/resources/ammonia-emissions-from-roads-for-assessing-impacts">https://www.aqconsultants.co.uk/resources/ammonia-emissions-from-roads-for-assessing-impacts</a>) which reported that ammonia now contributes between 50-70% of Nitrogen deposition from road traffic (see REP5-049). The increasing awareness of ammonia from traffic emission is also reflected in the peer review literature, e.g. Fenn et al 2018 On-road emissions of ammonia: An underappreciated source of atmospheric nitrogen deposition (Science Of The Total Environment Vol 625 p909-910, and Elser et al 2018), High contributions of vehicular emissions to ammonia in three European cities derived from mobile measurements (Atmospheric Environment 2018 p210-220). This works post-dates NE’s Guidance. The scientific rational for including ammonia in the N dep calculations is clear; as Air Quality Consultants Ltd’s research shows, ammonia is a significant proportion (c. 50-70%) of N dep generated from traffic. RHS has already explained, by reference to Habitat Regulations Assessment (HRA) caselaw from the Court of Justice of the European Union, that it is a legal requirement for ammonia to be included in the N dep calculations, see paragraphs 11, 12.4 and 51 of Freeths LLP’s Annex in RHS’s REP6-024. Consideration of ammonia emissions from traffic is now commonplace in HRAs, see paragraph 52 of Freeths LLP’s Annex in RHS’s REP6-024.</p>	<p>Highways England has already responded to comments on ammonia at REP7-008 paragraphs 2.2.43 to 2.2.48.</p>

Question No	Question	NE response	RHS Response	Highways England
2.4.7	<p>NE and Surrey County Council (SCC)/Surrey Wildlife Trust (SWT)</p> <p>Please comment on the matters raised by the RHS in its and the Baker Consultants submissions [REP1-043 and REP3-044] in regard to the potential air quality impacts of the Proposed Development on the Thames Basin Heaths SPA. In particular, please comment on whether in your view:</p> <p>1. a) the consideration of alternatives has been fully and properly addressed by the Applicant as required by the Habitats Regulations;</p> <p>2. b) the Applicant has adequately modelled the nitrogen deposition levels for both the scheme alone and in-combination with other plans and</p>	<p>As stated previously Natural England is satisfied that consideration of alternative options and means of avoiding or minimising impacts on Thames Basin Heaths SPA was properly considered by the applicant. Natural England was consulted over option choices from the early stage of scheme design and was able to advise over the relative merits of scheme design options in relation to potential impacts on the SPA.</p> <p>Natural England is satisfied that the applicant has adopted a precautionary approach to this aspect and has followed appropriate guidance.</p>	<p>There are two fundamental problems which undermine the validity of NE's conclusion that alternative options have been properly considered by HE. These are fully explained in Freeths LLP's Annex at RHS'S REP6-024 but in essence: NE has erred in advising HE that, notwithstanding HE- and NE-acknowledged "significant" increases in N deposition rates within the "woodland buffer" aligning the M3 and M25 (&lt;150m from the roads), it can be concluded that there is no reasonable scientific doubt as to the absence of adverse effects to the integrity of the SPA from changes in air quality from the DCO Scheme alone or in combination with other plans or projects. This approach is directly contradicted by HE and NE's own acknowledgement of the adverse effect on SPA integrity of the DCO Scheme arising from invertebrate reductions due to removal of woodland &lt;150m from the roads. Such invertebrate reductions could also arise from the acknowledged significant air quality changes in the woodland and thereby adversely affect SPA integrity.</p> <p>NE has also not been provided by HE with full or robust air quality information such that the significant increases in N deposition from the DCO Scheme in the SPA "woodland buffer" 0-150m from the roads already acknowledged by NE and HE are a gross underestimate of the real increase in levels.</p> <p>The correct conclusion is therefore that it cannot be concluded that there will be no adverse effect from the DCO Scheme alone or in combination on the SPA through air quality impacts. As a matter of law, therefore (see paragraph 10 of Freeths LLP's Annex at REP6-024), less damaging alternative solutions by reference to the air quality impact pathway must be considered and fully assessed.</p> <p>RHS has made clear that the in-combination calculations have not been carried out correctly. In response, HE has now presented in-combination impact calculations correctly in REP5-003, pages 162-164, NE made its comments above before seeing the new data, so it was wrong to say that it was satisfied with what HE had presented.</p> <p>However, in any event (i) the calculations presented only apply to the parts of the SPA 150m or more from the roads; values for the woodland areas &lt;150m from the road are missing; and (ii) the calculations presented do not include the ammonia contribution.</p>	<p>The RHS response refers back to the Freeths Annex in the RHS's comments on any further information requested by the ExA received by D5 and D5a [REP6-024]. This has already been fully responded to in Section 2.2 and Appendix A of Highways England's comments on RHS's Deadline 6 submission [REP7-008].</p> <p>Highways England has responded to comments on the in combination assessment at REP2-022 2.9.1, in REP4-005 2.9 and in REP6-010 3.1.5 to 3.1.7.</p> <p>The in combination assessment was undertaken correctly and in accordance with advice from Natural England. The calculations in REP5-003 simply refer to a sensitivity test which does not have any bearing on the findings of the SiAA</p>

Question No	Question	NE response	RHS Response	Highways England
	projects (having regard to the Applicant's comments on responses to the ExA's FWQ 1.4.3 in [REP3-008]);			and was not undertaken to correct any error.
	3. c) ammonia should be included in the assessment of nitrogen deposition;	Natural England is satisfied that this aspect has been addressed by the applicant and has demonstrated adequately that even with the inclusion of predicted ammonia deposition there is no likely significant effect on the habitat features supporting the special interest features of the SPA.	NE's assessment is clearly incorrect. It pre-supposes that all SPA land within 0-150m of the roads is merely "buffer land" with no relevance to the integrity of the SPA. This is clearly incorrect and is directly contradicted by NE and HE's own approach to the assessment of impact on SPA integrity from land take within this same woodland area. Freeths LLP's Annex in REP6-024 explains why that habitat within 150m of the road must be included within the assessment and impacts in that area must be assessed with the benefit of robust air quality data which accurately predicts in that area of the SPA increases in levels of air pollutants from the DCO Scheme, alone or in combination with other plans or projects.	Highways England has commented on the contribution of ammonia to nitrogen deposition at REP7-004, 3.4.3 and REP7-008, 2.2.48.
	4. d) In contending that the nitrogen deposition would only affect the woodland buffer element of the SPA and not areas of heathland the Applicant has correctly applied the tests required in the Habitats Regulations and Birds Directive. Is restoring the woodland buffer to heathland necessary to achieve or maintain the SPA in	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.	Natural England's response to this issue is contradictory and illogical.  First NE has only answered the second question posed as to whether restoring the woodland buffer to heathland is necessary to achieve or maintain the SPA in favourable conservation status. NE has however confirmed its full agreement with HE's proposed suite of compensatory habitat measures (see paragraph 3.2.16 of NE and HE's Statement of Common Ground dated 3 March 2020 (REP5-003)) which directly contradict NE's approach that the woodland buffer <150m from the roads must be retained. This is because the suite of compensatory measures presented by HE, and supported by NE, include clear felling of woodland within the SPA <150m from the roads "in order to allow heathland restoration" (paragraph 4.2.1 of REP4-017). This demonstrates that NE regards clear felling of this woodland <150m from the roads within the SPA as advantageous to the SPA. NE cannot at the same time logically sustain its view that restoration to heathland of the woodland <150m from the roads is not desirable for the SPA.  Secondly, NE has simply failed to answer the first question posed, i.e. whether HE has correctly applied the tests required in the Habitats Regulations and Birds Directive by contending the nitrogen deposition would only affect the woodland buffer element of the SPA and not areas of heathland. Nevertheless, it is clear from the NE / HE Statement of Common Ground (REP5-003) that NE believes that HE has correctly applied the HRA tests in adopting this approach.	The RHS response makes two assertions:  1. That the suite of compensatory measures contradicts Natural England's consistent advice against the removal of a woodland buffer alongside the A3 and M25;  2. That Natural England have not answered part of the question and that as set out in the Freeths Annex in the RHS's comments on any further information requested by the ExA received by D5 and D5a [REP6-024], Highways England has not correctly applied the HRA tests.  Both of these points are incorrect and have already been answered by Highways England.  <b>1. That the suite of compensatory measures directly contradicts Natural England's consistent advice against the removal of a woodland buffer alongside the A3 and M25</b>  RHS's Deadline 6 submission [REP6-024] has been responded to by Highways England [REP7-008].



Question No	Question	NE response	RHS Response	Highways England
	<p>favourable conservation status? If so, how have you accounted for the future impacts of nitrogen deposition on areas within the SPA that would become heathland rather than woodland, or would become any other habitat that would be of importance for any of the bird species for which the SPA has been designated?</p>		<p>This however is clearly wrong and RHS's REP6-024 (see Freeths LLP's Annex) explains in detail the reasons why.</p>	<p>As Natural England has explained in response 2.4.7d within Natural England's response to the ExA's second written questions [REP5-032], the achievement of favourable condition for the Ockham and Wisley Commons SSSI component part of Thames Basin Heaths SPA is dependent upon improvement of the condition of the existing heathland resource, not expansion of heathland through large-scale felling of woodland.</p> <p>As explained in 3.8.2 of Highways England's response to ExQ3 [REP7-004], this is not to say that the clearance of some areas of this woodland would conflict with the conservation objectives of the SPA, but rather, that the management of the Ockham and Wisley Commons SSSI component of the Thames Basin Heaths SPA does not require the removal of the woodland buffer in order to achieve favourable condition for the site.</p> <p>The clearance of some areas of woodland within SPA enhancement areas is part of the suite of compensatory measures, which (as explained in 3.8.2 of Highways England's response to ExQ3 [REP7-004]), fall outside 'normal practice' and would not have occurred as part of the existing management of the SPA.</p> <p>The suite of compensatory measures do not contradict Natural England's view as stated in response 2.4.7d within Natural England's response to the ExA's second written questions [REP5-032], that 'Natural England has consistently advised against the removal of the woodland 'buffer' in areas of the site alongside the A3 and M25'. As explained in response to question 3.8.2 in Highways England's response to ExQ3 [REP7-004], the only location where woodland is cleared alongside the A3 or M25 as part of the suite of compensatory measures is at the replacement Cockcrow bridge (areas E1 and E2 as shown in Figure 13 of the HRA figures [AS-006]). This was a well-</p>

Question No	Question	NE response	RHS Response	Highways England
				<p>considered decision in order to maximise the effectiveness of the proposed green bridge by providing a continuous heathland link either side of the green bridge, and was agreed with Natural England, Forestry Commission, RSPB, Surrey Wildlife Trust and Surrey County Council. This is an exceptional and unique opportunity, and to claim that it contradicts Natural England's consistent approach is unfounded.</p> <p>In all other locations, a woodland buffer along the edge of the A3 and M25 is being retained.</p> <p><b>2. As set out in the Freeths Annex in the RHS's comments on any further information requested by the ExA received by D5 and D5a [REP6-024], Highways England has not correctly applied the HRA tests</b></p> <p>The RHS response refers back to the Freeths Annex in the RHS's comments on any further information requested by the ExA received by D5 and D5a [REP6-024]. This has already been fully responded to in Section 2.2 and Appendix A of Highways England's comments on RHS's Deadline 6 submission [REP7-008], and confirms that Highways England have indeed carried out the SiAA correctly and correctly applied the HRA tests.</p>

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