

**M25 JUNCTION 10/A3 WISLEY INTERCHANGE IMPROVEMENT SCHEME  
PROPOSED M25 JUNCTION 10/A3 WISLEY INTERCHANGE DEVELOPMENT  
CONSENT ORDER (“DCO”)**

**ROYAL HORTICULTURAL SOCIETY (“RHS”) – REGISTRATION NUMBER  
20022900**

---

**DEADLINE 11 SUBMISSIONS**

---

These comments are submitted on behalf of the RHS. Richard Max & Co LLP are the duly appointed solicitors to the RHS and are authorised to submit these comments and other documents on its behalf.

**OVERVIEW**

1. These comments address matters arising at Deadline 10 following the extension of the Examination by the ExA.
2. The RHS’s case is fully set out in the evidence it has already submitted to the Examination and is not undermined by any of the information submitted by the Applicant at Deadline 10.
3. Additional documentation comprises:
  - ***REP11-xxx – Response to REP10-004 (journey Times).***
  - ***REP11-xxx – Response to REP8-040 and REP10-003 (South Facing Slips).***
  - ***REP11-xxx – Table showing comparisons of REP10-032 with REP10-004.***
  - ***REP11-xxx - RHS Response to REP10-003.***
  - ***REP11-xxx - RHS Response to ExQ4.***
  - ***REP11-xxx – Appendix 1 – DMRB guidance LA115 (Habitat Regulations Assessment) dated January 2020 (referenced at 4.3.2).***
  - ***REP11-xxx – Appendix 2 – Table A – In combination Impacts - HE REP10-007 corrected by RHS (referenced at 4.3.3).***

- **REP11-xxx – Appendix 3 – AQC note (references at 4.3.3).**
- **REP11-xxx – Appendix 4 – Baker Consultants Ltd’s Figure 1 (referenced at 4.4.3, 4.4.5).**
- **REP11-xxx – Appendix 5 – Baker Consultants Ltd’s Figure 2 (referenced at 4.4.2, 4.4.3, 4.4.5).**
- **REP11-xxx – Appendix 6 – Baker Consultants Ltd’s Figure 3 (referenced at 4.4.3, 4.4.5).**
- **REP11-xxx – Appendix 7 – Baker Consultants Ltd’s Figure 4 (referenced at 4.4.3, 4.4.5).**
- **REP11-xxx – Appendix 8 – Baker Consultants Ltd’s Table 1 (referenced at 4.4.3, 4.4.5).**
- **REP11-xxx – Heritage Report of Chris Miele of Montagu Evans.**
- **REP11-xxx – CAH Opening Submissions.**
- **REP11-xxx – Plan M20022-A-003B.**
- **REP11-xxx – CAH Closing Submissions.**
- **REP11-xxx – Further report of Jeremy Barrell concerning trees.**

*Highways and traffic impacts*

4. The RHS response to REP8-040 and REP10-003 is attached at **REP11-xxx**.
5. The RHS response to REP10-004 is attached as **REP11-xxx**.

*Air quality and biodiversity*

6. The RHS response to REP10.003 is attached as **REP11-xxx**.
7. The ExA is asked to enquire whether NE has anything to add to its position as expressed to the ExA.

*Socio-economic impacts*

8. Such responses as the RHS wishes to make are contained in **REP11-xxx**.

*Heritage impacts (including direct financial Impact)*

9. The Report of Chris Miele of Montagu Evans is attached as **REP11-xxx**.
10. A copy has been sent to Historic England which has declined to meet the RHS to discuss the matters raised. The ExA is asked to enquire

whether Historic England has anything to add to its position as expressed to the ExA.

11. The RHS will submit a statement from its Director General commenting further on these matters at D12.

#### **ExQ4**

12. Attached as **REP11-xxx with Appendices 1 – 8** are the RHS responses to responses of HE and others to ExQ4.

#### **CPO and CAH**

13. Attached as **REP11-xxx** and **REP11-xxx** are the RHS opening and closing submissions to Session.
14. The plan referred to at the CAH is attached as **REP11-xxx**.

#### **LAND AND WORKS AGREEMENT (LWA) AND CONSTRUCTION IMPACTS**

15. Draft Heads of Terms are currently being discussed by HE and the RHS. It is hoped that completed Heads of Terms will be submitted at D12.
16. At present the RHS continues to reserve its position in respect of any Requirements dealing with construction related matters.

#### **DCO**

17. The RHS has requested that Requirement 18 concerning tree protection is amended [**REP10-034**].

#### **UNRESOLVED DESIGN ISSUES LEADING TO ROOT IMPACTS ON RHS REDWOOD TREES**

18. Attached as **REP11-xxx** is a further report from Jeremy Barrell.

19. HE has indicated to the RHS that it would undertake further detailed design work for the widening of the A3 and associated verge, drainage, lighting etc that would address the concerns of the RHS but this information has not yet been supplied.

20. The RHS continues to reserve its position in relation to these issues.

## **CONCLUSIONS**

21. In light of all the evidence submitted to date and the new material contained in these Deadline 10 submissions, the RHS reiterates its view that the ExA cannot recommend to the Secretary of State that the DCO Scheme is approved.

22. The RHS maintains its objections to the DCO Scheme and will make submissions at D12 and before 13<sup>th</sup> July

**Richard Max & Co LLP for and on behalf of the RHS**

**03 July 2020**