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

CAH CLOSING REPRESENTATIONS

These representations 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.

- 1. HE did not respond to the specific concerns raised by the RHS.
- 2. The RHS says that there is no compelling case in the public interest justifying the CPO of these plots:
 - The DCO Scheme is not proportionate;
 - HE has ducked impacts on the RHS;
 - There is private harm that will lead to the economic devastation of the RHS Garden.
- 3. Wisley Lane Left out has not been addressed.
- 4. A green bridge was promised but not delivered.
- 5. The arrangements at Inset A (existing garden exit to be converted to Exit and Entrance) is a necessity to the RHS.
- 6. Loss of trees along the A3 and now the Overbridge area remain a concern.

7. The loss of trees may not be covered by Statutory compensation. There is an economic loss to be valued.

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

18 June 2020