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10<sup>th</sup> July 2020

Dear Examining Authority,

## Ref: Surrey Wildlife Trust's (SWT) Final Comments on the M25/A3 Highways England Proposals

If the present A3/M25 was being considered for construction today, we believe its location should not be considered due to the severance and fragmentation of protected habitats that it would create.

However, the roads do exist and the proposed scheme is designed to alleviate issues with that road network. Surrey Wildlife Trust's role in interacting with these proposals is detailed below.

## Surrey Wildlife Trust is committed to restoring nature across our county.

Surrey has one of the fastest-declining wildlife populations of any county in England. 2017's State of Surrey's Nature report showed that a third of our species are now either extinct or at risk of extinction. Roads, other developments and a lack of funding have created barriers between natural spaces and led to less and less room for wildlife. Nature reserves need to be connected by green corridors so wildlife populations can survive and thrive - we call this a 'Living Landscape'.

# **SWT Engagement with the DCO process**

We have engaged with the Applicant throughout this process to maximise the potential biodiversity gain and to enable nature to connect and flourish. By working closely with the project team and other regional and national specialists we have worked to consider biodiversity and the protected species that this site supports. Our role is simply to represent the remarkable species found here.

We have brought the proposal for the "green bridge" to the Applicant's attention and we have used our own resources and expertise to research this and the appropriate connections to the bridge. We have provided our experience of managing this reserve for nearly 20 years to inform the Applicant's ecological team. We have suggested proven and evidenced on site mechanisms to deliver a package to increase the SPA bird population. The proposals for mitigation and compensation works will go beyond what we have done in the past and we believe will take the site to another level in terms of its connectivity and wildlife interest.

A wide range of evidence has been put in front of the ExA. We hope that the long term monitoring data that SWT presented for Deadline 10 around the arrival and/or recovery of SPA species is

considered amongst the strongest evidence in front of you. This was collected, without an agenda, in line with the monitoring protocols that we and our partners use across the rest of the Thames Basin Heaths Special Protection Area. Please note the demonstrable success of removing conifer woodland from the site and the resultant increase in SPA bird population.

### The site management plan

We note the recent comments on the site's previous management plan. Our response to those is:

- 1. The management plan was written in 2009/10.
- 2. The tree felling and thinning works within that plan which the Baker analysis is based upon were carried out in the late 2000's and early 2010's. The works were planned to take part throughout the early part of the plan but were accelerated in consultation with the Forestry Commission. Both the thinning and felling works were completed then.
- 3. As such the works that have been designed as part of the DCO proposal are in addition to those previously delivered management plans works. i.e. Natural England, the Forestry Commission, Atkins, HE, RSPB and SWT met to discuss the future works and how they would go beyond the scope of the work already delivered in the management plan.
- 4. We will be producing a new management plan for the site that will deal with the areas outside the red line boundary (and associated mitigation and compensation areas). The works that are proposed by HE will be funded by them and we believe will deliver genuine improvements for the SPA species.

#### **Conclusion**

Surrey County Council as the landowner and Surrey Wildlife Trust as the site manager have reversed the fortunes of the protected heathland habitats on Wisley and Ockham over the last 20 years. SPA bird populations have significantly increased due to the management works undertaken. There are examples of these populations recovering across the county following works similar to those contained with the mitigation and compensation proposals. We are convinced that these works will increase the numbers further on site.

We look forward to seeing your recommendation to the Secretary of State.

Kind regards,



James Adler

Director of Biodiversity (Surrey Wildlife Trust)