

**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 12 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 11 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 11.
3. Additional documentation comprises:
 - ***REP12-xxx – RHS responses to REP11-007.***
 - ***Rep12-xxx – Appendix A to RHS responses to REP11-007 – ACQ Report April 2008 [para 6.1.55].***
 - ***REP12-xxx – Land and Works Agreement Heads of Terms.***
 - ***REP12-xxx – Letter from the Director General of the RHS.***
 - ***REP12-xxx – Submissions on the DCO Scheme in relation to Regulations 63, 64 and 68 of the Conservation of Habitats and Species Regulations 2017.***
 - ***REP12-xxx – Closing submissions of Robert Walton QC.***

Highways and traffic impacts

4. The RHS response to REP11-007 is attached as **REP12-xxx**.

Air quality and biodiversity

5. The RHS response to REP11-007 is attached as **REP12-xxx**.

Socio-economic impacts

6. The RHS response to REP11-007 is attached as **REP12-xxx**.

LAND AND WORKS AGREEMENT (LWA) AND CONSTRUCTION IMPACTS

7. Signed Heads of Terms are attached as **REP12-xxx**.

DCO

8. 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

9. The RHS response to REP11-007 is attached as **REP12-xxx**.

CONCLUSIONS

10. The RHS thanks the ExA for their diligent conduct of the Examination.
11. Attached as **REP12-xxx** is a letter to the ExA from the Director General of the RHS.
12. Attached as **REP12-xxx** is are the RHS Submissions on the DCO Scheme in relation to Regulations 63, 64 and 68 of the Conservation of Habitats and Species Regulations 2017

13. Attached as **REP12-xxx** are the closing submissions of Robert Walton QC on behalf of the RHS.

14. In light of all the evidence submitted during the Examination and the new material contained in these Deadline 12 submissions, the RHS reiterates its view that the ExA cannot recommend to the Secretary of State that the DCO Scheme is approved.

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

10 July 2020