

Our Ref: RM:JS:100255.0001

6 September 2021

The Secretary of State for Transport  
c/o The M25 Junction 10/A3 Wisley Team  
The Planning Inspectorate  
Eagle Wing 3/18  
Temple Quay House  
Bristol  
BS1 6PN

By email to [M25Junction10@planninginspectorate.gov.uk](mailto:M25Junction10@planninginspectorate.gov.uk)

Dear Sir

**Planning Act 2008 (as amended) and the Infrastructure Planning (Examination Procedure) Rules 2010**

**Application by Highways England (“the Applicant”) for an Order granting development consent to make improvements to the M25 Junction 10/A3 Wisley Interchange (“the Proposed DCO”).**

**REQUEST FOR COMMENTS FROM THE APPLICANT AND INTERESTED PARTIES**

We are instructed in this matter by The Royal Horticultural Society (“RHS”). The RHS is an Interested Party.

We are responding on behalf of the RHS to the request for comments from Interested Parties in the Secretary of State’s consultation letter of 16 August 2021 on the Applicant’s response to the Secretary of State’s consultation letter dated 26 July 2021.

**RHS Comments**

The Applicant dealt with the matters referred to in the Secretary of State’s consultation letter dated 26 July 2021 in its document **9.162 - Applicant’s Response to the Secretary of State’s letter – 21 July 2021**<sup>1</sup>, in which it addressed the compliance of the Proposed DCO scheme with the sixth carbon budget, as it relates to increased carbon emissions arising from the Proposed DCO scheme.

The RHS would invite the Secretary of State to take into account, when reaching his decision, that the RHS Alternative Scheme, as submitted to the Examination, would produce fewer carbon emissions than the Proposed DCO scheme. The RHS Alternative Scheme

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<sup>1</sup><https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010030/TR010030-001344-21.08.10-HE-Response-to-SoS.pdf>

would thus be more consistent with the Government's aim to meet its sixth carbon budget, than would the Proposed DCO scheme.

The RHS first made this clear in its Relevant Representation to the Examination dated 6 September 2019 (**RR-024, paras 27 & 28, page 8** <sup>2</sup>) reproduced below:

*27. The DCO scheme will increase the distance travelled by RHS traffic which will add to emissions of the greenhouse gas carbon dioxide (CO<sub>2</sub>) at a time when these emissions should be being reduced. The RHS alternative solutions for south-facing slip roads for the AQ at Ockham Roundabout would remove the increased traffic through the SPA and therefore reduce the adverse impact of the DCO scheme.*

*28. The RHS alternative solutions for south-facing slip roads for the A3 at Ockham Roundabout and the re-instatement of the left turn from Wisley Lane will reduce the distance travelled by visitors using the A3 from the south by around 7.3 miles per vehicle per visit, and visitors from the north by around 1.5 miles per vehicle per visit.*

The comparisons between distances travelled by traffic wishing to access the RHS Wisley site with the Proposed DCO scheme and with the RHS Alternative Scheme are set out more fully in **REP5-046** <sup>3</sup>. Whilst the Applicant never modelled the full RHS Alternative Scheme, its modelling of the south facing slips component alone showed that when compared to the Proposed DCO scheme, annual travel on the Local Road Network would be reduced by 1,049,000 vehicle kilometres and, in combination with the Strategic Road Network savings the south facing slips would reduce annual travel by 1,740,000 vehicle kilometres (**REP11-035** <sup>4</sup>).

The change in emissions of carbon dioxide with the RHS Alternative Scheme as compared to the Proposed DCO scheme are set out on page 10 in **REP3-050** <sup>5</sup>. The findings, based on the Applicant's calculations, are set out by the RHS as follows:

*HE has now calculated the increased emissions that could arise from traffic accessing RHS Wisley to and from the south (their Table 3.1). The results show that the DS CO<sub>2</sub> emissions would be 4,064 t/yr higher than the DM if this traffic follows the signposted route along the A3. If the traffic were all to go through Ripley, this would be 639 t/yr lower (or 15.7% lower). The emissions would be expected to be lower still with the RHS Alternative Scheme (as the distances will be less than for the route through Ripley), thus the RHS Alternative Scheme would reduce the excess CO<sub>2</sub> emissions that the DCO Scheme would give rise to by more than 16%, which would be a significant reduction in the additional harmful emissions that arise*

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<sup>2</sup><https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000300-Royal%20Horticultural%20Society%20Relevant%20Representation.pdf>

<sup>3</sup><https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000739-Royal%20Horticulture%20Society%20-%20Appendix%20A%20-%20Distance%20Table%20Route%20Comparison.pdf>

<sup>4</sup>[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-001110-RHS%20REP11-xxx%20-%20Response%20to%20REP8-040%20and%20REP10-003%20\(South%20Facing%20Slips\).pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-001110-RHS%20REP11-xxx%20-%20Response%20to%20REP8-040%20and%20REP10-003%20(South%20Facing%20Slips).pdf)

<sup>5</sup><https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000581-Royal%20Horticultural%20Society%20-%20APPENDIX%203%20FINAL%20Response%20to%20REP2-022.pdf>

*with the DCO Scheme. This further illustrates the benefits of the RHS Alternative Scheme.*

This issue is also recorded as a 'Matter Not Agreed' in the Statement of Common Ground between the Applicant and the RHS in **REP8-031 item NA9 page 24** <sup>6</sup>, where the RHS's position is set out as follows:

*With traffic following the signed route emissions of carbon dioxide would be 4,064 t/yr higher. The RHS Alternative Scheme, would reduce this overall increase in emissions with the Scheme by more than 16%. This is a significant reduction in the additional emissions (see REP3-050, page 10 for details).*

Yours faithfully



**RICHARD MAX & CO**

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<sup>6</sup>[https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000952-TR010030\\_Volume\\_9.38%20\(1\)%20-%20Statement%20of%20Common%20Ground%20with%20The%20Royal%20Horticultural%20Society.pdf](https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/TR010030/TR010030-000952-TR010030_Volume_9.38%20(1)%20-%20Statement%20of%20Common%20Ground%20with%20The%20Royal%20Horticultural%20Society.pdf)