

From: [REDACTED]
To: [M25 Junction 10](#)
Subject: M25J10 A3 proposed work
Date: 03 September 2021 09:24:16
Attachments: [HE M25 A3 Written Response from OPC Sept 2021.docx](#)

Dear Sirs

Please find attached a written representation from Interested Party Ockham Parish Council with regard to the proposed work at M25J10 A3

With many thanks
Imogen Jamieson
for Ockham Parish Council

September 2021: Written representation from Ockham Parish Council

HE M25/A3 proposed interchange upgrade works

Written Representation from Ockham Parish Council in response to Department of Transport letter dated 16th August 2021

1st September 2021

TO: M25Junction10@planninginspectorate.gov.uk

Further to your letter of 16th August 2021, we comment on the Highways England response to the Secretary of State's letter of 26th July 2021 as follows:

We believe that the application is in breach of Environmental Impact Assessment (EIA) regulations as the applicant has failed to provide evidence of the proposal's cumulative climate impacts when considered with other proposed road and housing schemes and how these will meet national climate targets.

The statistics provided by Highways England to illustrate their statement at 2.1.14 of their representation that *the increase in carbon emissions associated with the scheme is not a reason to refuse development consent. The increase would have no material impact on the ability of Government to meet its carbon reduction commitments* do not take into account cumulative impacts of RIS2 in addition to local proposed developments.

Highways England have suggested that alternate road and rail networks shown in Figures 1, 2 and 3 of their response of 26th July *would provide local resilience in the event of climate vulnerability impacts in the area* (3.1.16). Figures 1, 2 and 3 do not show the additional impacts caused by other significant developments proposed.

When considered with other projects proposed under RIS2, we believe that the schemes collectively exceed the requirements set out within The Carbon Budget Order 2021 and that Highways England have failed to demonstrate this.

As stated in previous representations, we do not support any reductions in Replacement Land and with so many changes proposed that will impact on local ecology, all replacement land is of paramount importance to attempt to recover some of the damage to the environment within and surrounding the DCO red line. We support the RHS who state at 3.3 of their representation of 19.11.20 that *removal of the Replacement Land renders the existing Environmental Statement out of date and inadequate for the purposes of a proper, reasoned assessment of significant effects on biodiversity*.

In summary, we refer to our written representation REP1-016 and the specific concerns stated on the viability of the project. The issues stated stand and when the project is considered with other proposed road and housing schemes, the cumulative climate impacts render the proposal out of line with national climate targets and the information provided inaccurate and misleading.