

From: [REDACTED]
To: [M25 Junction 10](#)
Subject: Comments regarding: Application by National Highways for an Order granting development consent for the proposed M25 Junction 10/A3 Wisley Interchange (I feel that the climate metrics are flawed)
Date: 28 February 2022 13:38:00

Dear Sir or Madam

My partner and I are worried about Highway England's proposed scheme to widen the motorway around the M25 junction. We live nearby and are very concerned about the scheme's environmental impact (our address is in the footer of this message). We hope that the scheme will not go ahead. As a senior lecturer with a PhD funded by the Engineering and Physical Sciences Council, I have a lot of experience in collecting and evaluating research data. Based on this experience, I feel that the application for the proposed M25 Junction 10/A3 Wisley Interchange has many flaws relating to climate.

I would like to comment on Highways England's response to the Secretary of State's consultation from January 2022. I do not feel that the points in the consultation have been sufficiently addressed. The two key flaws are the unwillingness to conduct proper climate assessments, and the disregard for the new environment bill.

Overall, Highways England seem to only perform the bare minimum that is legally required. In a time where climate change is a big threat, such an oversimplistic tick-box exercise is simply not appropriate for a large-scale development. No alternatives have been considered for the scheme. There is no proof that putting RHS Wisley and the ancient woodland under threat is really necessary. Please see more detail on this below.

WOODLAND AND BIODIVERSITY

- The new environment bill prescribes biodiversity net gain as a condition of planning permission. Since ancient woodlands are poorly understood, this condition can only be ensured if ancient woodlands are not affected.
- Given the immediate loss of 5 hectares of heathland, the loss of parts of the Thames Basin Heaths SPA and increased nitrogen pollution of sensitive heathland habitats, there is an even greater risk to biodiversity. The Thames Basin Heaths Special Protection Area (SPA) is an internationally important heathland habitat protected at the highest level for three species of breeding birds, nightjar, woodlark and Dartford warbler.
- The report only relies on the rather old climate change act, not making reference to anything that was discussed at the very recent COP 26. Similarly, many of National Highways' assessments took place before the new environment bill and are now outdated.
- At COP26, it was agreed that deforestation should end, while the increased need for woodlands as carbon sinks is becoming ever clearer. Clearly the removal of large areas of woodland achieves the opposite effect!
- The suggested amount of replacement land seems to constantly change, and has been reduced for no apparent reason. This does not instill confidence in what exactly will be done here.

- Who will ensure that National Highways complete the project to an appropriate standard?
- Some valuable and irreplaceable old trees at RHS Wisley would be lost. The replacement land will not be fully established, let alone ancient, for a very long time. How will the maintenance of this new land be managed long-term? How is the new land protected from new development?
- The Forestry Commission and Natural England guidance document 'Ancient woodland, ancient trees and veteran trees: protecting them from development' has a long list of recommendations for compensating the loss of ancient woodland, only some of this was addressed by Highways England. The following are omitted:
 - > connect woodland and ancient and veteran trees separated by development with green bridges, tunnels or hedgerows
 - > produce long-term management plans for new woodland and ancient woodland - including deer management
 - > manage ancient and veteran trees to improve their condition
- Nature England suggest that we must "refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless both of the following applies:
 - > there are wholly exceptional reasons
 - > there's a suitable compensation strategy in place"
 The former point has not been addressed at all, and the compensation strategy is patchy since the replacement land area is not even clear, nor its management over time.
- Not all ancient woodlands are registered and can be mixed in with other woodlands - how has this been assessed by independent professional?

CLIMATE CHANGE

- Paragraph 5.2.15. pretty much sums up the lack of engagement with climate change matters
- Paragraph 5.2.40 shows that the Secretary of State's climate concerns have not been addressed, since Highways England do not feel the need to conduct proper climate assessments.
- Regarding paragraph 5.2.4: It is not National Highways' job to decide whether updates to the DMRB matter, this should be assessed by an independent professional.
- Regarding paragraph 5.2.17: A baseline for an assessment must be agreed by an independent professional before all works go ahead, or at least we should see a better carbon forecast. The response here is lazy. This development is as large as developments can get, therefore National Highways should show some initiative.
- National Highways also say "It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets." This kind of statement has absolutely no grounding in science, clearly transport and driving play a huge part in carbon emissions - once again a rather uncommitted response.
- Their argument that "the Government has not identified or adopted any carbon reduction targets at a scale smaller than the UK as a whole" again demonstrates a lack of

commitment. National Highways should work with independent assessors to identify appropriate targets and lead by example.

- Regarding paragraph 5.2.30 - yes, we DO need to think about vehicle fleets. Electric vehicles still cause greenhouse gas emissions in their production, and may or may not be more sustainable. Overall, it is not clear how the scheme motivates people to use sustainable transport.

- Following the 'Paris Agreement', COP26 and the new environment bill, there are many reasons to think more about the environmental impact of the proposed scheme.

But Highways England mainly defend their point by saying what they legally do not have to do. This is not enough. There is no data on projected carbon emissions, which also makes me question any air quality forecasts.

- The air quality assessment can only be flawed when the overall emissions and projected traffic flow are not fully studied - which Highways England feel they do not need to do.

FLAWED EXPERT ASSESSMENTS

- While National Highways seem to stress that their assessments were performed by experts, none hold PhDs and all seem to have been selected with the goal of supporting the scheme

- The assessments were concluded in large parts by biased in-house staff (senior technical advisor working for National Highways), meaning that they are not objective

- Other assessments that do not favour the scheme have been omitted, e.g. the assessment of Dr Steve Melia regarding to driver behaviour

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- Overall, we need to see more assessments by unbiased professionals, not people hired by National Highways to agree with their plans.

TRAVEL PATTERNS

- Existing research shows that drivers do not use 4-lane motorways in the same way as 3-lane motorways, not simply increasing capacity in a linear way - see e.g. above research by Steve Melia into driver behaviour.

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- Travel patterns are shifting in response to pandemic and beyond, with more people working from home - surely this means that the scheme may no longer be required. Has this been assessed?

- Stronger public transport links seem to be a better solution. There is a complete failure of these kind of alternatives being considered.

- Signage, improved traffic lights, carriageway overhead electronic direction and more ongoing monitoring, capture, training and prosecution of poor driving have also not been considered as an alternative to this invasive scheme.

Overall, we are worried about the country not meeting climate targets and the loss of ancient woodland, heathland and biodiversity more locally. We hope that you will take all this into consideration and decline the proposals for the scheme.

Thanks,
Kirsten Hermes

[REDACTED]

Hersham
Walton on Thames
Surrey

[REDACTED]