

M25 junction 10/A3 Wisley interchange TR010030

6.5 Environmental Statement: Appendix 1.1 Scoping opinion responses

Regulation 5(2)(a)
Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended)

M25 junction 10/A3 Wisley interchange

The M25 junction 10/A3 Wisley interchange Development Consent Order 202[x]

6.5 ENVIRONMENTAL STATEMENT: APPENDIX 1.1 SCOPING OPINION RESPONSES

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Appendix 1.1: Scoping Opinion Responses

1.1 PINS comments

Table 1.1.1: PINS Scoping Opinion general comments

PINS Reference paragraph	Topic	Inspectorate's comment	Response
1.1.13	HRA	Inspectorate notes the need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This document must be co-ordinated with the EIA, to avoid duplication of information between assessments. The Applicant should be aware that the 2010 Habitats Regulations (as amended) were replaced by new regulations on 30 November 2017 and must ensure that the assessment accords with the 2017 Habitats Regulations.	As assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) has been carried out and is included in the DCO documentation.
1.2.3	Consultation	The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.	A section giving an overview of the consultation to date and a summary of the consultation received from the Scoping Opinion and the statutory consultation events are included in the ES (section 1.8 Consultation overview). Further details on the consultation can be found in the Consultation Report, submitted along with the DCO application, this appendix 1.1 and the Statements of Common Ground (SoCGs) which form part of the application.
2.3.1	Description of works	The Inspectorate expects that the ES which accompanies the application for DCO should include a detailed description of the Proposed Development which includes all of the works for which development consent is sought.	The ES includes a detailed description of the Scheme (section 2.5 Scheme description), including the associated development works and other ancillary activities that make up the works for which development consent is sought.
2.3.2	Description of works	The length of the Proposed Development (in km) and the size of the application site (in hectares) should be specified in the ES. Details of components such as signage, gantries, lighting, drainage features, landscaping, and environmental mitigation features	The length of the Scheme in kilometres and the size of the application site in hectares is stated in section 2.5 (Scheme description) of the ES.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		should be provided in the ES particularly where these components are relevant to the assessment.	Details of other components of the Scheme are stated in section 2.5 and throughout the ES where relevant. A full scheme description is included in Document 1.2 Introduction to the application and scheme description.
2.3.3	Land take - temporary and permanent	Information relevant to land use during construction should be provided in the ES and should illustrate both temporary and permanent land-take. The Inspectorate recommends that the ES should include detailed information on any requisite demolition works and land use requirements during the construction and operation phases. The ES should clearly identify the land that would be temporarily required during construction (e.g. the location of construction compounds, material stockpiles, borrow pits, and haul roads), as well as the land that would be required for the operational phase. The proposed DCO boundary applied for must allow for the land take associated with all works and project elements proposed as part of the application.	Section 2.5 (Scheme description) of the ES includes details of land use during construction and operation, including temporary and permanent land take. Details of demolition works are also outlined in section 2.5. The DCO boundary allows for all elements of the works.
2.3.4	Description of works	Where flexibility is sought, the ES should set out the parameters that would apply for all components of the Proposed Development including footprint, heights and proposed limits of deviation. The description in the ES should address each stage of the Proposed Development including construction. The ES should make appropriate use of figures/drawings to support the description provided.	The footprint of the Scheme, heights of structures and proposed limits of deviation for both construction and operation are detailed in section 2.5 (Scheme description) of the ES and Document 1.2 Introduction to the application and scheme description. Figures showing these are detailed in Volume 3 Figures of the ES and in other DCO figures.
2.3.5	Construction activities, traffic management	The ES should explain how a phased approach to construction (if adopted) would occur. The explanation should address the likely duration and location of construction activities. The Inspectorate notes the information in paragraph 2.4.15 of the Scoping Report regarding the anticipated year of	Details of construction activities are included in Chapter 2 of the ES which references other documents where necessary to provide further information.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		construction and operation and would expect this to be incorporated into the ES. The anticipated traffic management measures (including construction traffic routes) and road closures or diversions during construction should be explained in the ES and particularly where this information influences the assessment.	
2.3.6	Nature and quantity of materials and natural resources used during construction	The ES should include a description of the nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) to be used during construction. The ES should describe and assess the likely significant effects associated with any particular technologies or substances proposed to be used for the construction phase.	These descriptions are included within the ES as far as can be determined at this stage.
2.3.7	PRoW's	The ES to provide a detailed description of the existing land uses and features across the application site and surrounding area. The Inspectorate notes that all existing footways and other non-motorised routes including Rights of Way in the vicinity of the Proposed Development are to be identified through a desk based assessment supported where applicable by the findings of user surveys that have been undertaken (paragraph 13.7.43). This information should be described in detail in the ES, in particular within the appropriate aspect assessments.	A description of the existing land uses and features across the application site and surrounding area are included in Chapter 2 and Chapter 13 of the ES. Information on and assessments of effects on Rights of Way including a user survey are included in Chapter 13 of the ES
2.3.8	Environmental Constraints Plan	The Environmental Constraints Plan identify a number of landscape, nature conservation, historic, and other features in the immediate vicinity of the application site. These features are not individually identified or referenced and it would provide greater clarity to do so. The plans accompanying the ES should include labels on features such as settlements and road names which will support the reader to identify the application site and improve overall	The Environmental Constraints Plan have been updated to include names of settlements, roads and features as identified in section 2.5 (Scheme description) of the ES. Figures showing the location of features relevant to each topic are provided in the ES.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		clarity. Figures submitted with the ES should be sufficient to cover the full extent of the study area(s) applied in the relevant aspect assessment.	
2.3.10	Alternatives	The Inspectorate would expect to see a discrete section in the ES that provides details of the alternatives considered and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.	An 'Assessment of Alternatives' section is included in the ES (Chapter 3), detailing the history of the alternative options and the assessment of them and how the Applicant has arrived at the preferred option. Further information is given in other DCO documents
2.3.11	Alternatives	Section 3.2 of the Scoping Report refers to an assessment of the options in terms of environmental impact, and in terms of meeting legal and policy considerations. To address alternative this information should be provided with the ES so that it can be understood how environmental effects, and the responses of stakeholders, have been taken into account in the choices made.	An 'Assessment of Alternatives' section is included in the ES (Chapter 3), detailing the history of the alternative options and the assessment of them and how the Applicant has arrived at the preferred option. The responses of stakeholders regarding how the preferred route option was developed is detailed in Chapter 3 (Assessment of Alternatives) of the ES, in section 1.8 (Consultation overview) of the ES and in the Consultation Report, which is submitted with the DCO application.
2.3.12	Alternatives	The Inspectorate also expects that environmental impacts will be taken into account when considering alternatives to the detailed elements of the Proposed Development design (e.g. the installation of culverts or single span bridges) and that this should be reported in the ES.	Environmental impacts have been taken into account when considering alternatives to detailed elements as far as they have been designed at this stage (Preliminary Design)
2.3.14	Rochdale Envelope	The Applicant should attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The Inspectorate notes the intention in this regard stated in paragraphs 4.3.15 to	The Proposed Development has been designed to give certainty on what is proposed as far as is possible at this stage so there should be no question over there being potentially different developments. The scheme is described in Chapter 2 of the ES with further detail given in the Introduction to the application and scheme description

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		4.3.16 of the Scoping Report. The development parameters will need to be consistently and clearly defined in both the draft DCO (dDCO) and the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.	The Scheme includes defined vertical and horizontal Limits of Deviation which set the parameters for the development.
2.3.15	Rochdale Envelope	It should be noted that if the Proposed Development changes substantially during the EIA process prior to submission of the DCO application the Applicant may wish to consider requesting a new scoping opinion.	Comment duly noted.
3.1.2	Scoping in/out justification	In order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasons for scoping them out and justify the approach taken. The Inspectorate has set out in this Opinion where it has/has not agreed to scope out certain aspects or matters on the basis of the information available at this time. The Inspectorate is content that this should not prevent the Applicant from subsequently agreeing with the relevant consultees to scope such aspects/matters out of the ES, where further evidence has been provided to justify this approach.	Comment duly noted. Reasons for scoping out aspects/ matters have been stated in the aspect chapters of the ES.
3.1.3	How mitigation measures are secured	Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultees agree on the adequacy of the measures proposed.	Measures proposed to prevent/minimise adverse effects are set out in the DCO Requirements. The DCO application documentation includes Statements of Common Ground with key stakeholders which confirms their agreement on the adequacy of the measures proposed.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
3.2.2	National Policy Statements	The Inspectorate notes that the National Policy Statement for National Networks is identified in the Scoping Report as a key consideration, and advises that the EIA takes account of this policy document.	The ES references the National Policy Statement for National Networks in section 1.6 (Legislative and policy framework) and within the relevant Legislative and policy framework sections of each chapter.
3.3.1	Assessment process	<p>The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:</p> <ul style="list-style-type: none"> • to demonstrate how the assessment has taken account of this Opinion; • to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects; • to set out the proposed mitigation and/or monitoring measures including cross-reference to the means of securing such measures (e.g. a dDCO requirement); • to describe any remedial measures that are identified as being necessary following monitoring; and • to identify where details are contained in the Habitats Regulations Assessment (HRA) report, such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES. 	Tables will be used wherever possible to provide an ease of reading.
3.3.2	Associated development	The Inspectorate considers that where a DCO application includes works described as 'associated development', that could themselves be defined as an improvement of a highway, the Applicant should ensure that the ES accompanying that application distinguishes between; effects that primarily derive	The Scheme does not include associated development.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		from the integral works which form the proposed (or part of the proposed) NSIP and those that primarily derive from the works described as associated development, for example through a suitably compiled summary table. This will have the benefit of giving greater confidence to the Inspectorate that what is proposed is not in fact an additional NSIP defined in accordance with s22 of the PA2008.	
3.3.3	2017 EIA Regulations requirements	The Inspectorate recommends that the Applicant should ensure that the scope of the EIA adequately meets the requirements of the 2017 EIA Regulations, as referred to in Chapter 4 of the Scoping Report, and not just the Highways England's own Design Manual for Roads and Bridges (DMRB) requirements.	Section 1.3 (Need for Environmental Impact Assessment) and section 4.1 (EIA process) set out how the EIA and subsequent ES meet the 2017 EIA Regulations.
3.3.4	Human health impacts	The Inspectorate notes that the impacts to human health will be addressed in relevant aspect assessments, with the Scoping Report identifying the Air Quality and Noise aspects as particularly relevant. The Inspectorate considers that the Geology and Soils, Materials and Waste, and People and Communities aspect assessments may be of relevance to the assessment of effects on human health.	Impacts to human health are addressed in Chapter 14 of the ES and are based on information within other chapters of the ES.
3.3.5	Historic landfill sites and infrastructure assets	The Inspectorate has had regard to the receiving environment and existing features, including historic landfill sites and infrastructure assets. Any impacts to these sites or assets and their influence on the design of the proposals should be assessed. The Inspectorate advises that consultation with stakeholders is undertaken and taken into account in the ES, which should describe any interactions with infrastructure where significant effects could arise. Consultation responses from the Health and Safety Executive (HSE), National Grid, and Royal Mail	Impacts to these sites or assets and their influence on the design of the proposals is assessed and reported in Chapter 8 and Chapter 10 of the ES which also outlines consultation that has taken place. This is supplemented with Statements of Common Ground with relevant stakeholders.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		Group Ltd are provided in Appendix 2, and contain information about infrastructure which may interact with the Proposed Development, to which the Applicant should have regard.	
3.3.6	Traffic assessment	The Planning Inspectorate expects that impacts associated with changes in traffic and transport must be assessed in the ES. The assessment should explain the methodology applied to the assessment and to preparing a traffic model. Agreement on the approach should be sought from relevant consultees. Transport for London (TfL) has provided some comment in this regard in their response in Appendix 2. The ES must demonstrate how the information gathered as part of the traffic assessment has been applied to other assessments within the ES, for example Air Quality and Noise and Vibration.	Impacts associated with changes in traffic and transport are assessed and reported in the ES, particularly Chapters 5, 6 and 13. Reference is made to the Transport Assessment Report which provides full details of the traffic modelling work.
3.3.7	Decommissioning	The Inspectorate considers that any decommissioning associated with dismantling and replacing particular elements of the Proposed Development once they reach the end of their design life should be assessed where significant effects are likely to occur.	The nature of the proposal is such that decommissioning is not anticipated and this is noted in the ES.
3.3.8	HRA	An up to date HRA report should be produced (the Inspectorate notes the assessment referred to in Chapter 4, paragraphs 4.3.29 to 4.3.30) and should be referenced in the ES. The HRA report should in turn contain references to where the information on which it is based is to be found in the ES.	An HRA report has been produced and is referenced in and refers to the ES.
3.3.9	Reference to the Scheme terminology	Throughout the Scoping Report, reference is made to 'the Scheme,' 'the project', 'the construction site', 'the red line boundary', and 'the site'. Some of these terms appear to be used interchangeably with respect to each other. The ES should be consistent in	Consistency has been applied to the ES when referring to the Scheme as 'the Scheme' throughout.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		applying the terminology used in order to preserve the distinction between terms and aid clarity.	
3.3.10	Baseline scenario	The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.	Each aspect chapter of the ES includes a section on the baseline conditions of the environment for their topic.
3.3.11	Baseline scenario	The Inspectorate notes the information within section 4.3 of the Scoping Report which sets out the temporal scope of the assessments. Reference is made to the use of baseline year and future assessment year or a series of future assessment years but exact scenarios are not committed to in the Scoping Report. The final approach adopted should be defined in the ES and based on the most up to date anticipated project timescales. The approach must be adopted consistently across each aspect chapter of the ES and where any individual aspect assessments depart from that approach it should be explained in the ES.	Noted, the ES refers to specific years where required.
3.3.12	Stating survey years	The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.	Timescales of when surveys have been conducted have been added to the aspect chapters of the ES.
3.3.13	EIA methodology	The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the EIA, which clearly states which effects are 'significant' and 'non-significant' for the purposes of the EIA. Any departure from that methodology should be described in individual aspect assessment chapters.	Chapter 4 (Environmental assessment methodology) of the ES sets out the EIA process, detailing the structure of the ES chapters and the process of assessing the significance of effects.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
3.3.14	EIA methodology	The Inspectorate recommends that the Applicant fully describes and justifies in the ES the methodologies they have used for the assessments, in particular where these depart from standard guidance or where no standard guidance exists. The Inspectorate considers that the ES should present the specific assessment methodology relevant to each individual aspect/matter assessed. If an overarching methodology is applied this should be explained with relevant cross reference, and any departures from the prescribed methodology should be explained and justified.	The aspect chapters of the ES include a section on assessment methodology which describes the guidance used for the assessment, together with the criteria to determine the magnitude of effects and the sensitivity of receptors. Where there is no standard guidance, this is stated, together with the methodology used to undertake the assessment.
3.3.14	Figures of study areas	It would be of benefit to provide figures in the ES that show the extent of the study areas used for the assessments and identify the receptors.	Figures which show the extent of the study areas for each aspect chapter and the identification of receptors on the figures have been included in the ES.
3.3.14	ES appendices	The Inspectorate considers that relevant data which inform the assessments should be appended to the ES.	The ES includes appendices of relevant data which has informed the assessments.
3.3.15	Limitations	The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.	Limitations, difficulties and uncertainties are included in each topic chapter.
3.3.16	Residues and emissions	The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.	These estimates are included in the relevant ES chapters as far as can be determined at this stage.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
3.3.18	Mitigation	Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The predicted significance of effects both prior to and following the implementation of proposed mitigation measures should be identified. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, ideally with reference to specific DCO requirements or other legally binding agreements.	Noted, this information is included in the ES
3.3.19	Vulnerability to risks of major accidents and/or disasters	The ES should include a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change, which are relevant to the Proposed Development. Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.	The ES includes a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change,
3.3.20	Vulnerability to risks of major accidents and/or disasters	The Scoping Report does not address the potential for the Proposed Development to lead to or exacerbate major accidents or disasters. If the Proposed Development could lead to or exacerbate a major accident or disaster this must be assessed in the ES. The Inspectorate notes the proximity of a number of sensitive environmental features, areas	The ES includes a description of the potential vulnerability of the Proposed Development to risks of major accidents and/or disasters, including vulnerability to climate change,

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		exposed to flood risk, infrastructure assets, and historic landfill sites which may be a relevant consideration. The ES should assess these impacts within relevant aspect chapters.	
3.3.23	Transboundary effects	The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected. {Schedule 4 Part 5 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires a description of the likely significant transboundary effects to be provided in an ES. The Applicant has indicated in the Scoping Report that the Proposed Development is unlikely to have significant impacts on another European Economic Area (EEA) State.}	Due to the nature of the proposal it is not considered that significant transboundary effects will arise.
3.3.24	Reference list	A reference list detailing the sources used for the descriptions and assessments must be included in the ES.	References are listed in each chapter of the ES of the ES.
3.4.1	Confidential information	In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate	Badger sett locations and Annex I and Schedule 1 bird species territory locations have been kept separate to the main ES and will remain confidential.

PINS Reference paragraph	Topic	Inspectorate's comment	Response
		would be required to disclose under the Environmental Information Regulations 2014.	
5.0.2	Application documents	Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended).	Comment duly noted. Advice note six has been used as reference to prepare the DCO application.

Table 1.1.2: PINS Scoping Opinion air quality comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
5.4.4	Pollutants	The Scoping Report states that national assessments have demonstrated that there is no risk of exceedance of the air quality objectives set for 1,3-butadiene, benzene, carbon monoxide, lead or sulphur dioxide due to traffic emissions anywhere in the UK, and therefore no further assessment is intended. The Inspectorate agrees with the reasoning in the Scoping Report that significant effects associated with these pollutants are unlikely and is content for further assessment to be scoped out of the ES.	Comment duly noted.
N/A	Pollutants	The Scoping Report does not state if/how impacts resulting from increased PM2.5 emissions will be taken into account. The Inspectorate considers that the ES should include an assessment of impacts associated with increased PM2.5 resulting from the Proposed Development. In determining significance, the assessment should take into account performance against relevant target/limit values.	HE advice is that any impact on PM2.5 emissions would be negligible even with a large change in traffic. This will be discussed within the ES.
5.4.5	Ecological receptors	It is noted that only statutory designated sites are identified as sensitive receptors to the effects of NOx. The Applicant should additionally assess any locally designated and non-designated sites that could be significantly affected by the Proposed Development, for example Ancient	The assessment of ecological sites was discussed with Natural England. NE confirmed that they thought it

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		Woodland. The Inspectorate recommends that the relevant ecological receptors to be included in the assessment should be agreed with Natural England (NE) and other relevant statutory consultees.	would be acceptable to assess designated sites only.

Table 1.1.3: PINS Scoping Opinion air quality comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
5.4.16	Baseline conditions	The Inspectorate advises that the assessment is based on recent and up to date baseline data available, and that agreement is sought with the local authorities on the datasets used. Guildford Borough Council (GBC) has commented in this regard, providing information on available baseline data and the Applicant should have regard to this when undertaking the assessment.	Applicant has consulted with all relevant local authorities to ensure the most up to date baseline data for the ES has been used.
5.2	Study area - construction dust	<p>The meaning of the term 'Construction site boundary' is unclear. Figure 5.2 shows the 'area potentially affected by construction dust' and illustrates that this area partially excludes the area within the proposed DCO boundary. The study area applied to the construction dust assessment must be clearly described in the ES. The study area should be established applicable to the extent of the likely impacts and explained in the ES.</p> <p>With respect to the assessment of construction traffic and operational traffic emissions, the inspectorate notes the intended refinement of the ARN for the local and regional assessments, and advises that the ARN must be clearly defined in the ES. An appropriate cross-reference to the traffic model applied should be included in the ES.</p>	<p>The text has been amended to clarify the likely study area for construction.</p> <p>The revised ARN is provided and described in the ES.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
5.7.5	Significance of construction dust effects	It is unclear how significance of effects resulting from increased dust emissions will be determined. In the absence of appropriate guidance, such as exists for local air quality effects in the form of IAN 174/13, this should be assessed using an evidence-based methodology, and described in the ES. SCC has provided advice in their response on the methodology to be applied. The Applicant should seek to agree the specific methodology for the assessment of dust impacts with relevant consultees including relevant Local Planning Authorities.	Significance for construction dust has been undertaken in line with DMRB guidance (Volume 11 Section 2 Part 5 HA205/08 Assessment and Management of Environmental Effects) which states at paragraph 2.9: <i>"The significance should be assigned after consideration of the effectiveness of the design and committed mitigation measures (in line with the Overseeing Organisation's requirements). That is, significance is assigned with mitigation in place allowing for the positive contribution of all mitigation that is deliverable and committed."</i> Paragraph 3.45 of HA 207/07 notes that mitigation measures to reduce dust emissions should be adopted during construction, and that the measures should be rigorously applied where there are sensitive receptors within 200 m of a construction site. Hence with mitigation measures in place, any effect from construction dust should not be significant. This is in line with the guidance produced by the Institute of Air Quality Management (IAQM), which notes that it is assumed that mitigation will ensure that a potential significant adverse effect will not occur.

Table 1.1.4: PINS Scoping Opinion noise and vibration comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
6.1; 6.2; 6.7	Noise and vibration assessment	The proposed approach to the assessment of noise and vibration in the Scoping Report does not specifically address how vibration impacts will be assessed. The ES should include an assessment of vibration impacts where such impacts may result in significant effects. The assessment	Vibration from the construction and operation phases has been assessed in the appraisal of the Scheme. Further information regarding the vibration assessment methodologies is provided in Section 6.6 of the ES. Any impacts arising from vibration are discussed in Section 6.8 and 6.10.

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		should address all of the impacts that derive from construction and operation.	

Table 1.1.5: PINS Scoping Opinion noise and vibration comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
6.2	Study area	The ES should contain evidence explaining how the extent of the study area for the assessment of noise and vibration has been determined. The Inspectorate advises that the study area should reflect the extent of the like impacts and effort should be made to agree the study areas with relevant local authorities.	The study area for the operation phase road traffic noise and vibration has been calculated in accordance with the DMRB Volume 11 Section 3 Part 7 (HD 213/11), and adjusted to incorporate additional sensitive receptors following feedback from local authorities. The study area for the construction phase noise and vibration assessment is up to 300m from construction activities.
6.4	Sensitive receptors	Sensitive receptors applicable to the assessment should be established having regard to the extent of the likely impacts. The Inspectorate notes the consultation undertaken to date with EBC referred to in their consultation response, and advises that agreement should continue to be sought with the relevant local planning authorities. The Forestry Commission (FC) has highlighted the potential for noise disturbance impacts on ancient woodland in terms of amenity value and biodiversity, to which the Applicant should have regard. The ES should set out clearly if and how information gathered within the noise assessment has been applied to the assessment of these impacts, with cross reference to the Biodiversity chapter as appropriate	Sensitive receptors, including dwellings, schools, medical facilities and places of worship have been considered in the Noise and Vibration assessment, in line with guidance in the DMRB Volume 11 Section 3 Part 7 (HD 213/11). Additional sensitive receptors such as the SPA and ancient woodlands have also been considered and were commented on in the ES. The Noise and Vibration chapter discusses the noise predictions in these locations and how they were predicted to change due to the Scheme. Further discussion of the effects of this, such as whether they are significant or not, has been provided in the Biodiversity or People and Communities chapter. All relevant local authorities have been consulted with regards to the Noise and Vibration assessment.

Scoping Report Reference	Other points	Inspectorate's comment	Response
6.4.10; Table 6.3	Noise important areas	The design and mitigation measures for the Proposed Development relating to the noise important areas should be clearly set out within the ES.	The mitigation measures incorporated in the design of the Scheme have been discussed in the ES.
6.5	Potential impacts	The Scoping Report does not state whether night time working would be required. If it is, the impacts from noise and vibration at night time should be included in the assessment and the findings reported in the ES as should any mitigation measures which may be required to avoid adverse effects. The Scoping Report does not identify the construction activities and associated plant required for the Proposed Development. These should be clearly explained and the associated impacts assessed within the ES. If uncertainty on these matters exists at the time of application, the ES should clearly set out the assumptions which apply to the assessment of construction noise and vibration.	The noise and vibration impacts during the construction phase are discussed in Section 6.8 and Section 6.10 of the ES, and all assumptions relating to this assessment are provided in Section 6.6. Night time construction works are proposed for some construction activities; further details are provided in Section 6.8 and Section 6.10 of the ES. Plant lists are provided in Appendix 6.3. Mitigation measures for the construction phase are set out in Section 6.9.
6.7	Noise surveys	The Planning Inspectorate considers that noise surveys to inform the assessment in the ES should be undertaken to a recognised standard e.g. BS7445-1:2003. Monitoring locations should be agreed with the relevant local authorities. GBC have provided comment in their response relating to survey location and effort. Survey results should be reported as part of the assessment in the ES.	The baseline noise surveys consisted of a mixture of unattended continuous noise monitoring sites and attended short-duration measurements that followed the Shortened Measurement Procedure stated in the Calculation of Road Traffic Noise (1988). Both survey methods were undertaken in compliance with BS 7445-1:2003. This is mentioned in the Noise and Vibration chapter in the ES. Local authorities were consulted on the general areas where data collection was proposed. It was not possible to provide specific monitoring locations as this was subject to access constraints. A summary of the baseline noise monitoring results is provided in the Noise and Vibration chapter in the ES, with more detailed information and calibration certificates in Appendix 6.1 and Appendix 6.2.

Scoping Report Reference	Other points	Inspectorate's comment	Response
6.7.5 - 6.7.8	Significance of effects	<p>The Inspectorate notes the approach described in 6.7.8 of the Scoping Report and advises that the SOAEL and LOAEL thresholds used in the assessment should be clearly set out in the ES, along with details of how these values have been established.</p> <p>The methodology for establishing the significance of effects for construction and operational noise and vibration impacts should be set out in the ES. It should be clear why significant effects on sensitive noise receptors have been identified and whether any mitigation measures are required. The ES should address comments from GBC on the significance criteria applied, and comments from SCC regarding the use of observed effects thresholds.</p>	<p>Methods for establishing significance and appropriate LOAEL and SOAEL thresholds were clearly described in the Assessment Methodology section of the Noise and Vibration chapter in the ES (Section 6.5) for the operation phase and construction phase assessments.</p> <p>Mitigation measures are discussed in Section 6.9 and the impact significance and residual effects are provided in Section 6.10.</p>
6.7.10	Detailed noise modelling	The Applicant should set out the noise modelling software used and all assumptions which affect the modelling within their ES.	This is fully described in Section 6.5 and Section 6.6 of the Noise and Vibration chapter within the ES.
6.9	Mitigation	<p>The Scoping Report indicates that new roadside noise barriers or replacement of existing noise barriers may be required as mitigation against increased noise levels at noise sensitive receptors. The effectiveness of noise barriers should be fully described and assessed. The ES should explain the location(s) where noise barriers will be installed as well as the dimensions of any proposed barriers or changes to existing barriers where these are considered necessary during construction and operational phases. The ES should also confirm at what point in the construction programme the noise barriers would be installed.</p> <p>All of the mitigation measures which are either incorporated into the design of the Proposed Development, as well as any measures required to reduce noise impacts should be described in the ES.</p>	<p>The mitigation measures included in the design of the Scheme that are relevant to noise and vibration are stated in Section 6.9 of the ES and the benefits of these measures were inherent in the results from road traffic noise modelling. The existing noise barriers will be replaced with new noise barriers of the same height. Where new noise barriers are proposed (where their position changes close to Junction 10), the assessment is based on a barrier height of 2.5m.</p> <p>Detailed construction programme information indicating when in the construction phase the noise barriers will be removed and installed is not currently available.</p> <p>Inter-relationships between landscape and biodiversity are considered in the ES.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
		Any interrelationships with other aspects such as the Landscape and Visual assessment or Biodiversity should also be considered.	
6.10.4	BS 5228 assessment	The Applicant refers to the BS 5228 assessment but does not state which assessment method(s) will be adopted. The assessment methodology should be agreed with the relevant consultees and the information should be provided in the ES.	The assessment methodology used to appraise the construction phase impacts of the Scheme is provided in Section 6.5.

Table 1.1.6: PINS Scoping Opinion biodiversity comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
N/A	none	none	Comment duly noted.

Table 1.1.7: PINS Scoping Opinion biodiversity comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
7.4; 7.7.15	Surveys	The Inspectorate notes that a partial suite of surveys have been undertaken to date, and that further surveys will be undertaken in 2018. The Inspectorate advises that a robust suite of ecological surveys are carried out for all areas likely to experience impacts from the Proposed Development, including areas required for mitigation and compensation. The ES should include a full report of the applicable to details to surveys undertaken to inform the assessment. Areas required for any flood risk compensation should be included in the assessment. The Environment Agency (EA) has provided advice in their response regarding surveys for	A full suite of surveys, using methodologies agreed with NE have been undertaken for the Scheme footprint. For compensation areas, the habitats are being enhanced, and features that are already present, such as mature trees will remain protected. Vegetation clearance to enhance habitats will be done under a Precautionary Method of Working that assumes the presence of reptiles and possibly great crested newts. Therefore, ecological surveys of these compensation areas has been confined to tree

Scoping Report Reference	Other points	Inspectorate's comment	Response
		otter, water vole, and breeding birds, and the need to conduct appropriate surveys on compensatory land.	assessments and badger surveys. This has been discussed with PINS.
7.5.9; 7.7.4	Potential impacts	<p>The risk of mortality or injury to protected/notable species, for example badger and barn owl during operation is not specifically mentioned and the Inspectorate considers that this should be assessed in the ES.</p> <p>Hydrological impacts to habitats, particularly potential indirect impacts, are briefly noted in 7.7.4 of the Scoping Report where the assessment approach is described but not identified as potential impacts in paragraph 7.5.6. The ES should set out all potential impacts to be assessed. The Inspectorate highlights advice from the EA in their response on impacts due to changes in the surface water regime and to water quality.</p> <p>Air quality effects on habitats, specifically NO_x deposition and the effects of construction dust, are briefly noted in 7.7.4 of the Scoping Report where the assessment approach is described but not identified as potential impacts in paragraph 7.5.6. The ES should set out all potential impacts to be assessed. The ES should make appropriate cross reference to information gathered in the air quality assessment where this has been used to assess effects on biodiversity.</p> <p>The Inspectorate advises that the potential impacts of the entire development, including the development of compensatory habitats and flood risk compensation areas if required, are assessed. The Inspectorate consider that that these areas should be subject to the same survey effort applied to the rest of the application site, and that more detail about the proposals for these areas will be required in order to inform the assessment. The Applicant should have regard to comments from the EA in their consultation response on these matters.</p>	<p>Risk of mortality has been included in the ES as a potential impact during construction and operation. Air quality and hydrology have been included in the ES as potential impacts.</p> <p>For compensation areas, the habitats are being enhanced, and features that are already present, such as mature trees will remain protected. Vegetation clearance to enhance habitats will be done under a Precautionary Method of Working that assumes the presence of reptiles and possibly great crested newts. Therefore, ecological surveys of these compensation areas has been confined to tree assessments and badger surveys. This has been discussed with PINS.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
7.6.14	Valuation of ecological receptors	The Inspectorate notes that any rivers, ponds and reedbeds that are not identified as part of a designated site, will be evaluated by the Applicant depending on the results of surveys and consultation with NE. The Inspectorate advises that agreement on the approach taken with NE and other relevant consultees should be sought.	Agreed, NE have provided comment on the valuation of these habitats.
7.9; Figure 'Route Protection Plan'	Mitigation, compensation and enhancement measures	<p>The Inspectorate recommends that the Applicant makes effort to agree proposed mitigation and monitoring measures with relevant consultees including NE, EA and the local planning authorities. The ES should provide details for all proposed mitigation measures and demonstrate how they will be secured. The EA, FC and SCC have provided advice on mitigation measures in their consultation responses in Appendix 2 of this Opinion.</p> <p>The reasons supporting the identification of the compensation areas shown as 'replacement land' on the figure entitled 'Route Protection Plan' are not provided in the Scoping Report. The ES should demonstrate why these areas have been selected and assess their suitability. Elmbridge Borough Council (EBC) and Surrey Heath Borough Council (SHBC) have provided comments regarding planning considerations around sites identified for ecological compensation e.g. the delivery of Suitable Alternative Natural Greenspace (SANG). The Applicant should take these into account when establishing the security and effectiveness of the proposed mitigation and compensation measures.</p> <p>The Inspectorate notes that the Scoping Report makes commitments with regard to ecological enhancement, including a green bridge to replace an existing bridge at Cockrow and woodland management works. The ES should commit to achievable ecological enhancement</p>	<p>Mitigation and monitoring have been designed under consultation with stakeholders. This has included SCC, FC, NE, RSPB, SWT.</p> <p>EA have been involved in discussions with regards to watercourse mitigation e.g. culverts, Boldemere lake.</p> <p>ES explains why the compensation areas have been chosen, the proposals for those areas, and the value that these areas will bring. The planning conditions have been incorporated into this assessment.</p> <p>Mitigation and enhancement proposals, including a management plan that details ongoing management and monitoring have been agreed with stakeholders, including FC.</p> <p>It is understood that SPA compensation outside of the SPA could potentially affect local councils under the planning policy, by altering buffers. The compensation package has made provisions for the SPA within the existing SPA boundary.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
		measures, and provide the details for their design which have informed the assessment. The Inspectorate advises the Applicant to discuss the design of these measures with relevant consultees. The FC have provided comments in their response on this matter, including advice on the design of the green bridges proposed as part of the Proposed Development. Details of ongoing monitoring and management of compensation and enhancement habitat following their completion should be included in the ES.	
7.5.8 - 7.5.9	Protected species licensing	The Inspectorate notes the potential impact on protected species, including a main badger sett which may have implications for the design of the Proposed Development. These implications should be taken into account in the assessments in the ES. The ES should confirm whether any EPS licenses and/or mitigation licenses for other protected species would be required. If so, assurance should be provided to the ExA that the necessary license(s) are likely to be obtained. The Applicant should seek to obtain letters of no impediment (LoNI) from NE. These should be appended to the ES. Advice from NE on this matter is contained in the Inspectorate's Advice Note 11, Annex C.	Impacts on protected species have been considered in the ES. The ES has included the requirement for EPS licences (or other protected species licences). We have worked with NE through their DAS to obtain LoNI for our draft licences, prior to the DCO. These have been appended to the ES.

Table 1.1.8: PINS Scoping Opinion road drainage and the water environment comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
8.4.20 - 8.4.21	Aquatic ecology/ ecological effects on nature conservation designated sites	The Inspectorate agrees this matter does not need to be assessed in the Road Drainage and Water Environment aspect chapter of the ES because the Scoping Report states that	Comment duly noted. Risk of mortality has been included in the ES as a potential impact during construction and operation.

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		this matter will be assessed in Chapter 7 (Biodiversity) of the ES. The Applicant is referred to comments above in Table 4.3, comment 2 in this regard.	<p>Air quality and hydrology have been included in Chapter 7 (Biodiversity) of the ES as potential impacts.</p> <p>For compensation areas, the habitats are being enhanced, and features that are already present, such as mature trees will remain protected. Vegetation clearance to enhance habitats will be done under a Precautionary Method of Working that assumes the presence of reptiles and possibly great crested newts. Therefore, ecological surveys of these compensation areas have been confined to tree assessments and badger surveys.</p>

Table 1.1.9: PINS Scoping Opinion road drainage and the water environment comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
8.2.1	Study area	It is stated that the study area may extend beyond 1km to encompass potential effects beyond this distance, such as downstream flood risk and hydromorphological changes. As identified, the study area should be determined by the extent of the likely impacts from the Proposed Development and fully explained and justified within the ES. The ES should make appropriate use of plans or figures to depict the study area and to support the explanation.	Chapter 8 (Road drainage and the water environment) of the ES defines the study area which has been determined by the extent of the likely impacts of the Scheme. Figures which accompany the chapter show the study area.
8.4.13; 8.7.6	Methodology - WFD assessment	The scoping WFD assessment is missing from Appendix D of the Scoping Report. The approach to the WFD assessment should be clearly explained and appropriately referenced in the ES. The approach taken for the WFD	The Environment Agency has been consulted regarding the WFD compliance assessment. The approach to the assessment has been explained in Chapter 8 (Road drainage and the water environment) of the ES and references to the assessment included.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		compliance assessment should be agreed with the EA and the lead local flood authority before submission of the ES. The EA has provided advice regarding the approach to the WFD assessment in their response.	
8.4.7; 8.7.4	Potential impacts - ponds/watercourses	The Inspectorate is concerned by the approach that known ponds will only be scoped in if there are potential impacts from changes in groundwater. The Inspectorate considers that potential impacts arising from changes to the surface water regime and water quality should also be assessed in the ES. The EA have provided further comment in their response in this regard.	Chapter 8 (Road drainage and the water environment) of the ES includes an assessment of ponds/lakes within the study area. This assessment considers whether the ponds/lakes are connected to the Scheme via surface water and/or groundwater. Those which are connected to the Scheme have been assessed.
General	Flood risk - interrelationships	The outcomes of the FRA (such as the provision of flood compensation areas) may have implications for other assessments in the ES, and the Inspectorate advises that this be addressed in the ES. The EA has provided comments on the approach to FRA in their response in Appendix 2 of this Opinion.	This is addressed in Chapter 8 (Road drainage and the water environment) of the ES and the comments on the approach to the FRA have been noted.
8.4.21; Table 8.3	Hydrological impacts to nature conservation designated sites	The Inspectorate notes that Table 8-3 only lists three of the designated sites identified in the Biodiversity chapter and advises that it be clearly explained in the ES why other sites are excluded from the scope of the assessment. The Inspectorate notes that the hydraulic connectivity of the designated sites within the study area is currently being researched. The Inspectorate considers that this information will also be required in order to assess ecological effects and to complete the WFD assessment.	The Road drainage and the water environment chapter (Chapter 8) of the ES only considers statutory protected sites so there may be differences between the two chapters. The hydraulic connectivity of the designated sites within the study area has been considered in the assessment in the ES.

Scoping Report Reference	Other points	Inspectorate's comment	Response
8.6	Proposed level and scope of assessment	<p>Information is provided in the Scoping Report pertaining to the approach to the WFD assessment and FRA, however, the Scoping Report does not set out the approach to the EIA and this information must be provided in the ES. The Applicant should seek to agree the methodology with the relevant consultees. The EA and GBC have provided comment on the approach to the assessment in their responses in Appendix 2.</p> <p>The Inspectorate considers that the outcomes of the FRA and the WFD assessment are likely to influence the assessment in the ES and the design of mitigation measures. Where this is the case, this should be fully explained in the ES.</p> <p>The Scoping Report states that additional information may require a change in the study area, the baseline data and potentially change the relevant receptors. If this does occur, the ES should include a discussion of why these changes have occurred.</p>	<p>The approach to EIA is provided in section 8.5 of Chapter 8 (Road drainage and the water environment) of the ES and other comments noted. The EIA follows a standard accepted approach from the DMRB.</p> <p>The approach to the WFD Compliance Assessment and FRA has been discussed and agreed with the EA.</p> <p>The outcomes of the FRA and WFD compliance assessment will influence the assessment in the ES and the design of mitigation measures. The ES includes the conclusions from the FRA and WFD compliance assessment and this information has influenced the assessment in the ES.</p> <p>The study area remains as 1 km from the Scheme boundary.</p>
8.9.2	Potential mitigation measures	<p>The Inspectorate expects that WFD compliant design requirements should be based on environmental as well as financial considerations. If embedded mitigation is relied upon to minimise significant environmental effects (such as the use of a single span bridge instead of a culvert) then the ES should demonstrate how it will be secured through the DCO process.</p> <p>Paragraph 2.3.12 of this Opinion provides further advice regarding proposal 'alternatives'.</p>	Comment duly noted.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		The EA have provided advice on mitigation in their consultation response in Appendix 2 to which the Applicant should have regard.	
8.10.1	Assumptions and limitations	The Inspectorate advises that where specific details are uncertain and where the design will be based on parameters a 'worst case scenario approach' is applied to the assessments in the ES. The ES should clearly set out the basis for the assessment and justification for the approach taken where uncertainty remains around the predicted impacts of the Proposed Development.	Comment duly noted. Where specific details are uncertain, for example the groundwater flow direction, the assessment of the impact of the Scheme on groundwater quantity has been assessed using two 'realistic' worst-case scenarios of groundwater flow direction.

Table 1.1.10: PINS Scoping Opinion landscape comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
9.2	Landscape and visual receptors beyond 1.5km from the perimeter and edge of the Scheme	The meaning of 'the perimeter of the Scheme' and 'the edge of the Scheme' are not defined in the Scoping Report, and no justification is provided for the study area. It is not clear how the 1.5km relates to determining a Zone of Theoretical Visibility (ZTV) for the assessment. Without this information, it is not clear that sensitive receptors beyond 1.5km would not be subject experience impacts with the potential to result in significant effects and therefore the Inspectorate cannot agree to scope out an assessment of impacts to these receptors.	The extent of the study area is set out and justified in the ES
9.4.2; Table 9.3	National landscape character	The Applicant states that the Proposed Development would not give rise to the alteration of key characteristics of landscape character at the national level (Table 9-3 also states regional level). The justification presented in the Scoping Report states this is 'due to the localised nature and scale of the proposals'. Given the limited information presented, the Inspectorate cannot agree to scope this matter out at this stage and advises that	Comment duly noted. The justification for scoping out the key characteristics of landscape character at a national and regional level is further justified in Chapter 9 (Landscape) of the ES.

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		adequate reasoning and justification for this conclusion is presented in the ES.	
Table 9.4	Views from Seven Hills Hotel (located within 500 m)	The Scoping Report proposes to scope this out given the presence of extensive woodland screening around this receptor. The Scoping Report does not include figures to depict the locations of visual receptors and there is no indication that the ZTV for the Proposed Development has been established. The Inspectorate does not consider that sufficient information has been provided in the Scoping Report to support a decision to scope this matter out. In the absence of this information the Inspectorate does not agree that an assessment for this receptor can be scoped out of the ES.	This receptor is now not scoped out and was considered in the assessment of visual effects in the ES.

Table 1.1.11: PINS Scoping Opinion landscape comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
9.2; 9.6.6	Study area, figures	<p>The study area in the ES should be established based on the extent of the likely impacts of the Proposed Development. Agreement should be sought with the relevant consultees in this regard, and with respect to the receptors which should be included in the assessment. It is likely to be helpful to consultees to provide appropriate figures depicting the study area and any ZTV established, as well as the location of individual receptors.</p> <p>The ES should describe the ZTV has been defined and how this has been refined to take account of topography, existing built form, and the maximum parameters of the Proposed Development. It should be clear how the ZTV has been used to identify sensitive receptors for inclusion in the visual impact assessment.</p>	The study area in the ES has been established based on the extent of the likely impacts of the Proposed Development. Consultation with relevant stakeholders has taken place with figures depicting the study area having been produced. A computer generated ZTV model was not deemed necessary due to the extensive mature woodland in which the scheme is located, and which severely restricts views from the surrounding area.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		GBC have provided comments on the study area in their consultation response.	
9.4	Baseline conditions	The Applicant should ensure that the baseline conditions used to inform the assessment are complete and robust. Information should be sought from the relevant consultees, and the Inspectorate draws the Applicant's attention to the response from GBC which contains further information on potential receptors.	Details of the baseline conditions are provided in section 9.7 (Baseline conditions) of the ES. Information from relevant consultees has been sought in completing the baseline conditions.
9.5	Potential construction and operational impacts	<p>The Scoping Report does not provide any detail on lighting proposals for the Proposed Development, and the Inspectorate considers that the impacts from lighting should be assessed. The potential for lighting impacts from night time working during construction should also be assessed. GBC have also commented in this regard in their response.</p> <p>The Inspectorate notes the mention of arboricultural surveys in the Scoping Report, but it is not clear how this information will inform the assessment. Impacts to any existing landscape features in particular mature trees and those associated with landscape designations should be assessed in the ES. The Applicant should have regard to comments from Historic England in relation to the implications for the Registered Park and Gardens affected by the Proposed Development of changes to landscape features. Appropriate cross-reference to the Cultural Heritage assessment should be made in the ES.</p>	<p>Details of the lighting proposals are included in Chapter 2 of the ES and the effects both during construction and operation are assessed in Chapter 9 (Landscape) of the ES.</p> <p>Further details with cross referencing to comments on the Cultural heritage assessment has been examined in the ES.</p> <p>Arboricultural surveys have been carried and used to inform the assessment of the scheme.</p> <p>Comments from Historic England have been considered with further engagement having taken place and cross references to the Cultural Heritage chapter having been included.</p>
9.6; 9.7	Assessment methodology	The ES should expand upon the information provided in paragraph 9.7.3 of the Scoping Report to clearly explain how the significance of effect will be determined. It should be clear where professional judgement has been applied.	Further definition regarding the assessment methodology is provided in section 9.5 (Assessment methodology) of the ES and in Appendix 9.1.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		The assessment methodology does not clearly set out what level of effect will be considered significant. This should be explained in the ES.	
9.5; 9.9	Mitigation	<p>The proposed landscaping strategy for the Proposed Development should be described in the ES in sufficient detail to inform the assessment. The Applicant should seek agreement with the relevant consultees on the mitigation measures proposed. An appropriate aftercare period for any proposed landscaping should also be agreed.</p> <p>It should be clear in the ES any the proposed landscaping would mitigate impacts on landscape and visual receptors, and take into account the performance when it matures. The ES should assess the interactions of the proposed mitigation measures with other aspect areas, for example Biodiversity and Cultural Heritage.</p>	The proposed landscape strategy is described in Chapter 9 of the ES. This has been developed in consultation with relevant stakeholders and with other relevant topics including Heritage and Biodiversity. The chapter describes how this would mitigate adverse effects on receptors as it matures. Details of maintenance, management and monitoring of the proposals are included in appendices to the ES.
9.6.6	Representative photographic viewpoints	<p>The Inspectorate welcomes the intention to produce representative photographic viewpoints as part of the visual assessment, and advises that these should provide views during both winter and summer periods. In particular, photomontages and other plans/figures (as set out in IAN 135/10) should be used to illustrate the visual appearance of new structures which would result in changes to landscape character and visual amenity (in particular the new and widened structures, gantries, earthworks and the alignment of any new slip roads).</p> <p>The locations of the viewpoints and photomontages should be agreed with the relevant local planning authorities. GBC and SCC provide comments in their responses regarding photomontages.</p>	Representative images have been taken during summer and winter from the selected viewpoints. Photomontages have not been produced partly because scheme development objections have been overcome and partly because of the lack of significant viewpoints affected, due to the surrounding dense woodland. It was felt that photomontages would not significantly enhance the understanding of the effect of the scheme. Details of structures are included within the DCO documentation.

Table 1.1.12: PINS Scoping Opinion geology and soils comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
10.6.5; Table 10.7	Re-use of soils and waste soils	The Applicant states that this matter will be discussed within chapter 12 Materials and Waste and has therefore been scoped out. The Inspectorate notes that chapter 12 does not include information on the assessment of soils and waste soils and therefore, the Inspectorate cannot agree that this matter can be scoped out of the ES.	Assessment of waste soils is included in Chapter 12 (Materials and Waste) of the ES, so this statement has been left in.

Table 1.1.13: PINS Scoping Opinion geology and soils comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
10.2.1	Study area	The Scoping Report gives little justification for the study area extending 500m from the DCO red line boundary. The ES should include a justification for the study area applied within the ES, ensuring that it encompasses the extent of the likely impacts resulting from the Proposed Development.	Since the Scoping Report, the study area has been redefined to include areas within 250m of the red line boundary, as discussed in section 10.4 (Study area) of the ES. Justification includes the area of influence of any potential dewatering at the Scheme, the hydraulic conductivity of the soils and flow rate of groundwater underlying the Scheme. It is unlikely that any sources would migrate to the site beyond this distance and likewise that any off-site receptors beyond this distance would be affected by the Scheme.
10.6.2	Proposed level and Scope of Assessment	The Scoping Report states that ground investigation (GI) work will be undertaken and used to inform the Scheme design (including mitigation design). However, the Scoping Report also implies that this information will not be available to inform the baseline assessment in the ES. The Inspectorate considers that the baseline assessment in the ES should be established using the most appropriate information available and this should include results from	Although the amount of ground information is limited in terms of geoenvironmental chemical data, there is a generous amount of information of geology conditions, primarily soil stratigraphy and water strikes. This information has been compiled from various sources in Appendix H-6 of the ES. There is also one borehole with geoenvironmental laboratory testing at Painshill Junction from November 2010 and several locations

Scoping Report Reference	Other points	Inspectorate's comment	Response
		<p>any relevant GI work undertaken. GBC also express concerns in this regard in their scoping consultation response.</p> <p>The Applicant states that a ground investigation specification has been drafted. The Applicant should include the specification of the ground investigations used to inform the assessment within the ES.</p> <p>Agreement should be sought from relevant consultees on the scope of the investigation. The EA and GBC have provided advice in their consultation responses in this regard.</p>	<p>within Wisley Airfield, completed in 2014. These have been presented in section 10.5 of the ES. Although some geoenvironmental contaminant testing is available, it is not sufficient to address soil and groundwater quality across the entirety of the Scheme. The position regarding GI for the Scheme has been discussed with the Environment Agency.</p>
10.7.9	Proposed assessment methodology	<p>The Scoping Report states that an assessment of ground conditions and geology as a valuable resource has been undertaken. This assessment and the results have not been included within the Scoping Opinion. The ES should include the information gained from the assessment and explain how it influences the determination of significant effects.</p>	<p>An assessment of ground conditions and geology as a valuable resource, including the significance of effects and magnitude of impact, has been provided in section 10.8 of the ES.</p>

Table 1.1.14: PINS Scoping Opinion cultural heritage comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
11.4.4 to 11.4.6	<p>Impacts on setting for:</p> <ul style="list-style-type: none"> • twelve named listed buildings within the study area where no impacts on setting are predicted; and • seven named assets outside the study area but within Painshill Park 	<p>The Scoping Report proposes to scope out an assessment of impacts to these assets on the basis that the Option Selection stage established there would be no impacts on setting from the Proposed Development.</p> <p>The Scoping Report does not include a Zone of Visual Influence (ZVI) or ZTV and no figure has been provided to depict the locations of these assets. In</p>	<p>No ZTV or ZVI has been prepared, and therefore was not used to identify setting impacts. However, the assessments completed for the ES identified a study area consistent with that used by Landscape and Visual Assessment (LVIA) to identify potential setting issues, as well as providing assessments of significance and setting for the highest value heritage assets within the study area. Figures 11.1 and 11.2 of the ES identify the locations of the cultural heritage</p>

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		<p>absence of this information the Inspectorate does not consider sufficient information has been provided in the Scoping Report to rule out significant effects to these assets.</p> <p>The relevant evidence from the Option Selection demonstrating no significant effects, including a statement of agreement with the relevant consultees, should be appended to the ES. This information should be updated as necessary taking into account design changes and relevant consultation prior to submission.</p> <p>The Inspectorate cannot agree to scope out impacts to the setting of these heritage assets on the basis of the information in the Scoping Report.</p>	<p>assets discussed in Chapter 11 (Cultural heritage) of the ES.</p> <p>Statements of Common Ground with Historic England and other relevant consultees have been prepared as part of the DCO application documentation.</p>
Table 11.1	Potential for undiscovered archaeology (operational phase)	<p>The Applicant has scoped out the assessment of potential effects on previously undiscovered archaeological remains during the operational phase of the Proposed Development.</p> <p>Given the nature of the proposals, and the information provided in the Scoping Report, the Inspectorate is content that the Proposed Development would not result in significant effects on any undiscovered archaeology during the operational phase of the Proposed Development and agrees that this can be scoped out of the assessment.</p>	Comment noted

Table 1.1.15: PINS Scoping Opinion cultural heritage comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
11.2	Study area	<p>It is noted that no ZVI or ZTV is set in the Scoping Report for this assessment and no reference is made to how one will be established. The ES should include a justification in support of the proposed 500m study area, in particular explaining why it is appropriate to capture all heritage assets which could experience impacts on their setting.</p> <p>The study area applied to the assessment in the ES must be clearly defined and described reflecting the extent of the anticipated impacts. The Applicant should seek agreement with relevant consultees in this regard.</p> <p>The Inspectorate recognises that there is likely to be an inter-relationship between the study area applied to this aspect and other aspects such as the landscape and visual impact assessment, and recommends that appropriate cross-reference is made in the ES.</p>	<p>Chapter 11 (Cultural heritage) of the ES provides further clarification on the identification of the study area and its appropriateness, as well as additional information and assessment of the setting of heritage assets.</p> <p>Statutory consultees (Historic England and the local planning authorities) agreed to the study area during consultation on the Preliminary Environmental Information Report in early 2018.</p> <p>Cross referencing between the cultural heritage study area and the landscape study area has been added to section 11.4 of Chapter 11 (Cultural heritage) of the ES.</p>
11.4	Baseline conditions	<p>The baseline assessment in the ES should include robust information on local and regional heritage assets, including any updates necessary since the Proposed Development will be further refined and the study area may evolve. It is not clear from the Scoping Report what further investigations are required in order to establish a robust baseline for the assessment. The data gathered to support the assessment should be fully reported in the ES. The Applicant should endeavour to agree the extent of studies with consultees.</p> <p>Advice has been provided by Historic England on the approach to further data gathering and on current baseline conditions in the vicinity of the application site.</p>	<p>Comment duly noted. Chapter 11 (Cultural heritage) of the ES includes further studies, including a Desk-Based Assessment and Statements of Significance for the two Registered Parks and Gardens. Locally listed buildings are assessed and the methodologies for further archaeological investigations are outlined in the Outline Construction Environmental Management Plan (submitted with the DCO application).</p> <p>The extent of further studies was consulted during the statutory consultation period in early 2018 and has resulted in the production of Statements of Significance.</p>
11.5; 11.10	Potential impacts	<p>The description of potential impacts in the Scoping Report identifies affected receptors but does not explain what the predicted impacts they may experience are.</p>	<p>Comment duly noted. Chapter 11 (Cultural heritage) of the ES references the LVIA and noise studies.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
		<p>The ES should identify and characterise all impacts considered, both direct and indirect. The ES must take into account updated information on the proposed design including the location and nature of construction areas and compensation land. Where uncertainty remains, the ES should clearly explain the implications for the assessment.</p> <p>The Inspectorate is aware that the Proposed Development may result in changes to noise levels during construction and operation and this should be considered in the assessment of impacts to setting of heritage assets.</p> <p>Advice has been provided by Historic England on the potential impacts of the Proposed Development in their consultation response.</p>	<p>Section 11.8 of Chapter 11 (Cultural heritage) of the ES includes a table of impacts for construction and operation, which includes direct and indirect impacts. Where the location and nature of construction areas and compensation land are known these have been included in Chapter 11 (Cultural heritage) of the ES. The Outline Construction Environmental Management Plan provides guidance for treatment of heritage assets where the nature of construction areas and compensation land are not yet known.</p>
11.7	Methodology	<p>The methodology to be applied in the assessment must be clearly set out in the ES, in particular what is considered to constitute a significant effect. The Applicant should seek to agree the methodology with relevant consultees. GBC and Historic England have provided comment on the proposed methodology in their consultation responses.</p>	<p>The Scoping Report with methodologies were sent to consulting parties and comments have been incorporated into Chapter 11 (Cultural heritage) of the ES.</p>
11.9	Mitigation measures	<p>The Applicant should provide details in the ES of avoidance measures and the specific mitigation measures designed to ameliorate any significant effects. Preservation in situ is not mentioned as a potential mitigation measure in section 11.9, and the Inspectorate considers that this should be investigated.</p> <p>The Applicant should seek to agree mitigation measures with consultees. Historic England have provided detailed comment on potential avoidance and embedded mitigation measures.</p>	<p>Comment duly noted. Embedded mitigation for the Scheme is outlined in section 2.5 of Chapter 2 of the ES. Design, mitigation and enhancement measures for cultural heritage assets are outlined in section 11.9 of Chapter 11 (Cultural heritage) of the ES. Further requirements for mitigation is outlined in the Outline Construction Environmental Management Plan and will be developed in detail in consultation with the local planning authorities and Historic England.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
11.10	Assumptions and limitations	<p>The Scoping Report includes assumptions relating to the baseline and value of features and regarding the impacts of the as yet unknown elements of the Proposed Development (e.g. the location of construction compounds). These assumptions are premature in advance of further design detail and the necessary assessment being carried out.</p> <p>The Inspectorate advises that any assumptions relied upon for the purposes of the assessment are critically reviewed, taking into account up to date design information and consultation responses. The Inspectorate draws the Applicant's attention to comments from Historic England in this regard.</p>	Comment duly noted. Further assessments conducted as part of the Outline Construction Environmental Management Plan (submitted with the DCO application) will address as-yet unknown impacts to archaeological remains. The ES includes Statements of Significance to support the assessments of impacts to the Registered Parks and Gardens and constituent parts, including individually listed buildings within.

Table 1.1.16: PINS Scoping Opinion materials and waste comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
12.6.5; Table 12.4	Change in demand for key construction materials during the operational phase	<p>Having considered the information in the Scoping Report and the nature of the Proposed Development, the Inspectorate considers that the quantities of materials required during operation are not likely to cause significant effects to the demand for key construction materials.</p> <p>The Inspectorate agrees that this matter can be scoped out of the assessment.</p>	Comment duly noted.
12.6.5; Table 12.4	Change in baseline regional waste arisings during the operational phase.	Having considered the information in the Scoping Report and the nature of the Proposed Development, the Inspectorate considers that the amount of waste generated during operation is not likely to	Comment duly noted.

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
		cause significant effects to the regional baseline waste arisings. The Inspectorate agrees that this matter can be scoped out of the assessment.	
12.6.5; Table 12.4	Change in capacity of regional waste infrastructure during the operational phase.	Having considered the information in the Scoping Report and the nature of the Proposed Development, the Inspectorate considers that the amount of waste generated during operation is not likely to cause significant effects to the capacity of regional waste infrastructure. The Inspectorate agrees that this matter can be scoped out of the assessment.	Comment duly noted.

Table 1.1.17: PINS Scoping Opinion materials and waste comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
12.2	Study area	It is not clear how the study areas applied have been determined. Where professional judgement has been used in place of standard guidance this should be stated in the ES and justified.	Section 12.4 (Study area) of the ES contains a statement to this effect.
12.4.8	Material resource baseline	The Inspectorate notes that the Applicant has not established an estimate of future baseline for the assessment of these matters. The Applicant should ensure that the baseline(s) used in the assessment are appropriate and the ES should justify the approach taken. The Inspectorate notes from the Scoping Report that information from SCC relevant to the assessment was not yet available. This is addressed by SCC in their consultation response.	Applicant has consulted with the relevant local authorities and used the most up to date, relevant data, where possible.
12.4.12	Waste infrastructure baseline		

Scoping Report Reference	Other points	Inspectorate's comment	Response
		The Applicant should consult with relevant local authorities in order to establish a robust baseline assessment. GBC have provided advice in their response with respect to baseline information which should be taken into account in the assessment.	
12.5	Potential impacts	It is not clear from the Scoping Report how impacts associated with the transportation of materials and waste will be assessed. The consideration of the use of natural resources is limited, focusing on the use of timber and aggregate in the context of national demand. The Inspectorate considers that regional information should also be applied where available. Consultation should be undertaken with local authorities and the Inspectorate draws the Applicant's attention to the response from GBC in Appendix 2.	The impacts associated with the transportation of materials and waste is assessed in Chapter 12 of the ES. The ES considers use of natural resources and regional data for materials, where available. Applicant has consulted with the relevant local authorities on this matter.
12.7.7; 12.9	Mitigation	Both these sections of the Scoping Report discuss avoidance and mitigation measures, and it is not clear what will be committed to within the design of the Proposed Development and what represents additional mitigation. Embedded mitigation and additional mitigation should be clearly set out in the ES, including the means by which measures will be secured.	The ES details embedded mitigation in section 2.5 (Scheme description) and additional mitigation is addressed in the aspect chapters of the ES. Details of how additional mitigation measures are to be secured are included in aspect chapters of the ES.
12.7.9	Vulnerability to Major Accidents and Disasters	The Scoping Report does not provide any detail or evidence to support the conclusions in this section. The ES should include this information.	Chapter 4 of the ES and Appendix 4.2 includes details on the vulnerability to major accidents and disasters.
12.10.1, para 9	Assumptions and limitations	The Scoping Report does not state how contaminated soils will be treated/disposed of. The report states that 'contaminated soils will be considered separately' but does not go on to discuss how they will be considered. The Applicant should provide details of how contaminated soils will be considered within the ES. Furthermore, chapter 10 Geology and Soils states that this Aspect chapter will discuss the re-use of soils and	The identification of contaminated soils and their re-use, if possible, is addressed in Chapter 10 (Geology and Soils) of the ES, while the treatment/disposal of them is addressed in Chapter 12 (Materials and Waste) of the ES.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		waste soils, however, these matters are not discussed. The Applicant should provide details of the re-use, treatment, and disposal of soils within this aspect chapter in the ES.	

Table 1.1.18: PINS Scoping Opinion people and communities comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
13.7.73; 13.11.2; Table 13.17	Vulnerability to major accidents and disasters	<p>The Applicant states that vulnerability to major accidents and disasters as a result of the Proposed Development is considered to be sufficiently low to not warrant further consideration.</p> <p>No specific information or justification is provided in the Scoping Report. Based on the nature of the Proposed Development and the information within other chapters of the Scoping Report, the Inspectorate considers that insufficient information has been provided in this chapter and that significant effects on people and communities arising from the Proposed Development's vulnerability to major events should be assessed in the ES. Therefore, the Inspectorate does not agree to scope this matter out.</p> <p>The Applicant should also have regard to the comments in paragraphs 3.3.19 and 3.3.20 of this Opinion above with respect to assessment of this matter.</p>	Assessment of vulnerability to major accidents and disasters is covered in Chapter 4 of the ES and Appendix 4.1

Table 1.1.19: PINS Scoping Opinion people and communities comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
13.2.1	Study area	<p>The Applicant must ensure that the study area for the assessment is clearly defined and justified in the ES. The Applicant should seek to agree the study area and receptors to be included within the assessment with relevant consultees. GBC and SCC have provided advice and information relevant to determination of the study area in their responses, which the Applicant should take into account.</p> <p>The Inspectorate notes that DMRB Volume 11, Section 3, Part 8, Para 2.2, states that community facilities 'and their catchment areas' should be included in the assessment. It should be clear in the ES how this requirement has been taken into account in the selection of appropriate study areas. The ES should explain how the routes affected by the Proposed Development have been identified for the purposes of the assessment of community severance, accessibility and connectivity.</p>	<p>The study areas are defined individually for each environmental topic, according to the geographic scope of the potential impacts relevant to that topic or of the information required to assess those impacts. It draws on guidance in Highways England's Design Manual for Roads and Bridges (DMRB) Volume 11 and associated documents where this specifies the extent of study areas and other guidance where appropriate. The study areas are defined within each relevant topic in the Environmental Statement Chapter 4 Environmental Assessment Methodology. (DCO Document reference TR010030/APP/6.3)</p> <p>The Scheme may result in changes in amenity experienced at community facilities or land used by the community. Amenity and traffic effects (including air quality, noise, vibration, and visual impact caused either directly by the Scheme itself or by changes in traffic flows brought about by the Scheme) have been considered individually in detail elsewhere in the ES namely the Air Quality (Chapter 5) and Noise assessment (Chapter 6). The People and Communities chapter has considered instances where users of a community facility or land used by the community may experience a combination of such effects, leading to a cumulative deterioration in amenity. In-combination effects are also</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
			<p>considered in Cumulative Effects Assessment (Chapter 15).</p> <p>Some travel and access disruption from the works could impact the local business base and residents' access to employment and community facilities. A Traffic Management Plan, produced by the contractor, should be used to mitigate a number of negative effects for road users during construction and to ensure the businesses that require customer, supply chain and delivery access are not impacted significantly. ES Chapter 13 Table 0.15 sets out the magnitude of impact criteria used for the assessment of NMU's. ES Chapter 13 Table 1.20: Amenity and Severance effects on NMU during operation details the impact on each NMU facility.</p>
13.4	Baseline conditions	<p>The ES should clearly reference the information on changes to traffic flows on the road network used to inform the assessment of effects of the Proposed Development on People and Communities.</p> <p>It would be helpful to understand the impacts of the Proposed Development, and to aid consultation, to include appropriate figures illustrating the baseline conditions within the ES. Receptors included within the assessment should be set within the context of the proposed DCO boundary and study area and labelled clearly.</p>	<p>Amenity and traffic effects (including air quality, noise, vibration, and visual impact caused either directly by the Scheme itself or by changes in traffic flows brought about by the Scheme) have been considered individually in detail in the ES namely the Air Quality (Chapter 5) and Noise assessment (Chapter 6) (DCO Document reference TR010030/APP/6.3). The People and Communities chapter has considered instances where users of a community facility or land used by the community may experience a combination of such effects, leading to a cumulative deterioration in amenity. In-combination effects are also considered in Cumulative Effects Assessment (Chapter 15).</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
			<p>The Traffic Flow information is summarised in Section 5 of ES chapter 13.</p> <p>Traffic flows during construction and operation have been discussed in Operational Traffic Report which states:</p> <p><i>'The predicted operation of the M25 Junction 10 and surrounding highway network has been assessed using S-Paramics, ARCADY/PICADY and LinSig. 2022 and 2037 demands have been taken from the respective SATURN models. The S-Paramics model has been coded as per the provided drawings, with improvements coded for the M25 Junction 10, Painshill/Seven Hills, Ockham, and the A3 mainline. Various changes have been made to the models to reflect the predicted changes in the behaviour of the network in the future.'</i></p> <p>Figure 13.1 in the PEIR Volume 3 has been prepared and will be amended as required for the ES to illustrate the baseline conditions and location of the study area and receptors.</p>
13.4.7 - 13.4.10	Baseline - agricultural land	The Scoping Report states that 'none of the affected land is expected to be of Best Most Versatile quality' but states that land is grade 3-4. While it is understood that impacts to soils are to be assessed under Geology and Soils, this information will underpin the assessment of the significance of effects to agricultural holdings in this aspect chapter. The Applicant should ensure consistency between	The Agricultural Land Assessment (Agricultural Land Classifications and Farm Holdings) is reported in People and Communities, with information on soils being referred to in Geology and Soils.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		the two assessments in terms of agricultural land classification grade and identified land take. A figure detailing the location and grade of the agricultural land classifications within the study area should be included within the ES.	A figure detailing the location and grade of agricultural land classifications shall be included in the ES (DCO Document reference TR010030/APP/6.3)
13.5	Potential impacts	<p>Adverse impacts from construction have been identified as being temporary. The ES should explain the duration of impacts and what constitutes temporary impact, ensuring consistency with the other aspect assessments.</p> <p>In the assessment of impacts to development land, the ES should demonstrate regard to the comments from EBC and SHBC on planning considerations related to the areas identified as replacement land (and compensation habitats). GBC have also provided information on the Guildford Borough Submission Local Plan which the Applicant should take into account.</p>	<p>Construction effects are reported in the ES</p> <p>The ES (DCO Document reference TR010030/APP/6.3) includes Development Land information provided by the boroughs and the boroughs have been consulted on the proposed list.</p> <p>The ES will address comments on planning considerations related to the areas identified as replacement land (and compensation habitats).</p>
13.7	Assessment methodology - general	The Scoping Report sets out where assessment criteria have been taken from the DMRB and where they have been based on professional judgement. Where standard guidance is not used and professional judgement is applied this should be fully explained and justified in the ES.	This was addressed in the PEIR and will also be explained in the ES (DCO Document reference TR010030/APP/6.3)
13.7.6	Assessment Methodology - Private Land Take and Severance	The Scoping Report states that the 'Scheme is not currently expected to result in demolition of any dwellings' if this changes and demolition of dwellings is required, the impacts associated must be assessed in the ES.	Comment duly noted. It is not anticipated that this will change.
13.7.18	Assessment Methodology - Community Assets:	The Applicant has undertaken a land use survey for Common Land but has not included the results or the survey within the Scoping Report. The Applicant should include the survey and the results within the	Details of the survey and the results will be included in the ES.

Scoping Report Reference	Other points	Inspectorate's comment	Response
	Land Take and Severance	ES to the level of detail which has informed the assessment.	
13.7.27; Table 13.7	Proposed Assessment Methodology - Community Assets: Amenity	In determining the magnitude of impact the Scoping Report states that a 'large number of people' and 'many people' but has not defined these phrases. The Applicant should provide definitions of these phrases within the ES.	Tom? Did you have numbers in mind? Definitions of these phrases will be provided within the ES.
13.9.1	Mitigation measures	The Scoping Report states that mitigation will be implemented where significant adverse effects are identified. No specific mitigation measures have been included within the Scoping Report and the Applicant should provide a detailed discussion of proposed mitigation measures within the ES. The ES should demonstrate the efficacy of mitigation measures and how these will be secured through the DCO process.	Mitigation measures will be identified in the ES and how they will be secured.

Table 1.1.21: PINS Scoping Opinion climate comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
Table 16.1	Sea level rise	This matter is listed in the summary chapter of the Scoping Report and not discussed in Chapter 14. The Applicant is referred to advice in Section 3 of this Opinion regarding the need to clearly set out the matters which have been scoped in or out of the ES. However, given the statement in Table 16.1 and the nature of the Proposed Development the Inspectorate accepts that the Proposed Development is unlikely to contribute or be vulnerable to significant effects resulting from sea level rise. The Inspectorate is therefore content for this matter to be scoped out of the ES.	Comment duly noted.

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
14.2.4	Preliminary studies and investigations; direct operational GHG emissions; operational water use; other processes; end of life.	<p>The Scoping Report states that these matters will be excluded from the study due to likely negligible emissions or the life cycle stage not being applicable to the Proposed Development.</p> <p>With the exception of 'direct operational GHG emissions', given the nature of the Proposed Development, it is agreed that significant effects are unlikely to arise, but the Inspectorate asks that the evidence for excluding these processes is included in the ES.</p> <p>In the case of 'direct operational GHG emissions' see comment 14.6.1 below.</p>	<p>Exclusions from the assessment are justified and evidenced in Chapter 15 (Climate) of the ES.</p> <p>'Direct operational GHG emissions' do not include traffic from use, rather the ongoing emissions from the infrastructure itself. This is clarified in Chapter 15 (Climate) of the ES.</p>

Table 1.1.22: PINS Scoping Opinion climate comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
14.2	Study area information	<p>The Inspectorate notes that the study area will be dependent on the availability of design and construction information and if this data is unavailable, part or all of the affected lifecycles will be excluded from the assessment. The study area should be determined by the extent of the predicted impacts of the Proposed Development, and if applicable based on professional judgement in the absence of known data.</p> <p>If necessary the ES should clearly set out the assumptions applied to this assessment in place of any information that is unavailable, and any implications this may have had for the robustness of the assessment.</p> <p>It is not made clear in the Scoping Report how the study area for the assessment of the Proposed Development's vulnerability to climate change has been determined or what the study area's limits are considered to be. This should be explained and justified in the ES.</p>	<p>Noted that the scope of the assessment should be based on predicted impacts rather than availability of data. Assumptions that are made to achieve this have been based on professional judgement and are clearly set out in Chapter 15 (Climate) of the ES, along with discussion of the implications this has on the robustness of the study.</p> <p>Section 15.20 of Chapter 15 (Climate) of the ES sets out the extent and justification for the selected climate vulnerability study area.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
14.3.1	Climate resilience assessment	<p>UK climate projections 2009 (UKCP09) are referenced in paragraph 14.3.1, but no reference is made to the potential revision of climate projections when the updated UKCP18 projections are available. The Applicant should clearly state the range of climate projections used for the purposes of any adaptation or resilience assessment, taking into account the anticipated updated projections in 2018.</p> <p>The Scoping Report does not explicitly set out the methodology that will be used to assess the resilience of the Proposed Development to climate change. The methodology should be set out within the ES.</p>	The assessment methodology in section 15.20 of Chapter 15 (Climate) of the ES sets out the range of climate projections used.
14.6.1	Significance of effects	<p>The Inspectorate notes that there is currently no specific guidance for carbon emission thresholds, which if exceeded, is considered to be significant. The ES should therefore set out the criteria used to report on the significance of effects.</p> <p>The assessment of significance in the ES should be placed in context to the UK carbon budgets, the associated reduction targets, and in the context of the climate resilience of wider systems over time.</p>	Due to the lack of relevant guidance, the significance assessment of the Scheme's emissions is limited to consideration of the magnitude of the emissions for the relevant Scheme scenarios and comparison to UK carbon budgets. This is addressed in Chapter 15 (Climate) of the ES.
14.7.3 - 14.7.6	Calculation of greenhouse gas emissions	<p>The Scoping Report states that the Applicant will use the Atkins Carbon Knowledgebase (CKB) software to calculate emissions during all the lifecycle of the Proposed Development. Details of this carbon calculation and analysis software tool should be provided within the ES.</p> <p>This section implies that all traffic emissions will be assessed and therefore appears inconsistent with paragraph 14.2.4 which proposes to scope out 'direct operational' GHG emissions (see comment 2 above). On this basis, the Inspectorate considers that insufficient information has been provided and cannot agree to scope out 'direct operational GHG emissions'. Where no impacts which could give rise to significant effects are anticipated the ES should clearly report this, with supporting evidence.</p>	<p>The assessment has used the Highways England Carbon Calculation Tool in place of the Atkins Carbon Knowledgebase at the request of Highways England and details of this is included within Chapter 15 (Climate) of the ES.</p> <p>'Direct operational GHG emissions' do not include traffic from use, rather the ongoing emissions from the infrastructure itself. This is clarified in Chapter 15 (Climate) of the ES.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
14.11	Assumptions and limitations	The Scoping Report states that for consultation purposes a detailed emissions assessment is not required and where project specific data is unavailable, suitable proxy data will be used where engineering and construction expertise can be obtained to generate this data. The Inspectorate advises that the Applicant should consult with relevant stakeholders on what data they would require for consultation purposes.	Previous experience suggests that stakeholders do not have the expertise to define their data requirements. Professional judgement has been used to determine what data is required for the detailed emissions assessment.

Table 1.1.23: PINS Scoping Opinion assessment of cumulative effects comments

Scoping Report Reference	Applicant's proposed matters to scope out	Inspectorate's comment	Response
N/A	none	none	Comment duly noted.

Table 1.1.24: PINS Scoping Opinion assessment of cumulative effects comments

Scoping Report Reference	Other points	Inspectorate's comment	Response
Table 15.1	Zone of influence/ study area	<p>The information presented shows the study areas used for the other aspect assessments to identify potential impacts. The study area applied to the assessment of cumulative effects should be fully explained and justified in the ES. The Inspectorate advises that the Applicant adopt the approach detailed in Advice Note 17, including when determining the study area and refining the list of other developments to take into account in the assessment.</p> <p>The Applicant should make an effort to seek information and agreement from consultees. GBC and Woking Borough Council (WBC) have provided information in their response on other</p>	<p>The Zones of Influence (ZoI) for the aspects sets the combined effects study areas for the Scheme.</p> <p>The study area for the cumulative effects is considered appropriate to the Scheme and the spatial thresholds for the CEA list of developments exceeds the ZOI established for most environmental topics (with the exception with Materials & Waste and Climate Change which are assessed on a regional and national level).</p> <p>The approach given in PINS Advice Note 17 has been adopted when compiling the list of other development, as presented in the PEIR. This approach will be used to refine the list and presented in the ES.</p>

Scoping Report Reference	Other points	Inspectorate's comment	Response
		developments and plans which the Applicant should take into account in the assessment	The local authorities GBC, EBC, WBC and MVDC were provided with provisional lists in December 2017 for their review and further information was requested. The information provided by the boroughs will be collated and the tiered approach as set out in PINS Advice Note 17 will be applied. The boroughs will be consulted on the final proposed development schedule to ensure they are satisfied. The final other development schedule will be assessed and presented in the ES.
15.2.11	Scope of assessment	<p>The list of developments to be included in the assessment does not indicate their distances from the application site. In accordance with the tiered approach described in Advice Note 17, a level of 'certainty' should be applied to each of the 'other' developments considered. The Inspectorate recommends the use of tables to aid clarity of presentation.</p> <p>The Inspectorate also recommends the use of labelled figures to illustrate the location of the developments included in the assessment in relation to the application site.</p>	<p>This has been addressed in the PEIR. A table has been provided setting out the distances from the Scheme in Volume 1 of the PEIR and an Appendix has been provided in Volume 2 presenting the level of certainty using the tiered approach as recommended in PINS Advice Note 17. An updated table and Appendix will be provided in the ES.</p> <p>A labelled Figure 15.1 has been produced for the PEIR and will be updated for the ES.</p>
Table 15.1	Assessment of cumulative effects	The environmental aspect of climate has been omitted from the assessment of cumulative effects and this should be explained within the ES. If climate is not anticipated to give rise to any potential cumulative effects this should be clearly explained in the ES.	Climate Change has been added into the ES.
15.3	Assessment methodology	The Scoping Report does not distinguish between methodologies for the two elements of the assessment identified under the DMRB - cumulative effects from one project (i.e. from a number of impacts on a particular receptor) and cumulative effects from different projects. The	This has been addressed and will be set out clearly in the ES.

Scoping Report Reference	Other points	Inspectorate's comment	Response
		assessment methodology should be clearly set out in the ES.	
15.4.6; Table 15.2	Significance of cumulative effects	The Applicant should provide a clear description and justification in the ES of how significant effects have been determined. This should include a definition of the terms 'short-term', 'long-term', and 'temporary'.	<p>The following will be included in the Cumulative Effects chapter.</p> <p>Construction/temporary/short term effects. These arise during the building of the scheme itself and could arise from things like construction noise or dust; footpath diversions; construction compounds, materials stockpiles, construction plant movements, road closures etc.</p> <p>Operational/permanent/long term effects. These are the effects of the scheme when it has been built and when it is in operation, so it includes the physical works themselves and the effects of changes to traffic (motorised and NMU) as a result of the scheme.</p>

1.2 Other respondent comments

Table 1.2.1: Scoping Opinion comments - Bracknell Forest Council

Topic	Comment	Response
	Thank you for consulting Bracknell Forest Council (BFC) on Highways England's Scoping Report for the improvements proposed to the M25/A3 junction at Wisley. BFC does not wish to comment on this Scoping Report.	Comment duly noted.

Table 1.2.2: Scoping Opinion comments - Elmbridge Borough Council

Topic	Comment	Response
Air quality	P53 - there should be reference to the more recent 2017 IAQM guidance for Planning.	The air quality assessment follows guidance in the DMRB and interim advice notes for Highways England road schemes, rather than the IAQM guidance.
Noise and vibration	P70, para 6.4.3 - Elmbridge Borough Council has already responded to Highways England enquiries in November 2017 about noise sensitive receptors within/around the Scheme boundary, suggesting that additional potential noise sensitive receptors should be referenced. Potential receptors highlighted include properties in Convent Lane, Seven Hills Road, Pointers Road, Ockham Lane and Hatchford Park.	The additional sensitive receptors identified by Elmbridge Borough Council were included in the Noise and Vibration assessment within the ES.
Biodiversity	P109, para 7.8.1 - The list of organisations to be consulted should also include Countryside Officers within the relevant local authorities.	Efforts were made to arrange a meeting with Countryside Officers within the relevant local authorities but a suitable date agreeable to all was not found.
	P110, para 7.9.1 references compensatory habitat land. Alongside biodiversity considerations that will be investigated through the EIA, the designation of additional SPA land could have a significant impact on the borough in planning policy terms. Additional land designated as SPA could impact the buffer zones within which mitigation is required for new development. This mitigation takes the form of provision of SANG land and any requirement for additional SANG land will be an important consideration in Local Plan preparation.	SPA compensation land areas have been carefully designed with a number of stakeholders, including Guildford Borough Council and Surrey County Council. The SPA compensation land areas have been carefully selected to ensure that they do not alter any SPA buffer zones within which mitigation is required for new development.

Topic	Comment	Response
Cultural heritage	Chapter 11 is entitled Cultural Heritage, which albeit having an ICOMOS definition, has the potential to be confusing without clarification as it covers Built and Natural Environments and Artefacts plus tangible and intangible forms. The Scoping Consultation appears to concentrate on Built tangibles so perhaps titling it “Heritage” would cover the historic environment elements, making clear that although inevitably there is a hierarchy, designated and non-designated historic assets must be taken into account.	Comment duly noted. Section 11.1 of Chapter 11 (Cultural heritage) provides a definition of cultural heritage that has been used for the assessment. Chapter 11 is titled Cultural heritage in line with guidance in Highways England Design Manual for Roads and Bridges Volume 11 Section 1, Part 1 HA 200/08 and DMRB Volume 11 Section 3, Part 2 HA208/07. This is the standard guidance for assessing cultural heritage significance and effects from road schemes managed by Highways England.
	P179, para 11.8 Proposed Consultation appears to ignore the local authority Heritage Managers, although they are included at para 11.11.3. 10. A consistency in approach is required.	The consultation sub-section of section 11.5 of Chapter 11 (Cultural heritage) of the ES has been consolidated and clarified the consultation undertaken to date and with whom.
	P179, para 11.9 highlights the need for further investigations which are crucial. Landscaping is referenced as mitigation to screen visual impacts, although this could also have a negative impact on the setting and interpretation of the historic environment.	Further details regarding landscape mitigation and its impact on the setting and interpretation of the historic environment is provided within the ES.
People and Communities Planning policy	P199, para 13.3.27 the assessment will need to refer to the Council's most recent Local Development Scheme which sets out that adoption of the Local Plan will be by December 2019, following examination in August/September of that year. This clarification will be needed at other points within the assessment where Local Plan timescales are referred to, such as p16.	Updates will be made to all references to the adoption of the EBC Local Plan in the ES, in line with the most recent Local Development Scheme.
Cumulative effects	P241, para 15.2.12 the Council is currently working to provide Highways England with additional detail on developments within the vicinity of the Scheme. This will include clarification that site allocation DEV/COB9 should be removed from ongoing consideration as it is no longer included in land availability assessments due to uncertainty around deliverability.	EBC have provided details on applications and will provide shape files. The proposed final 'other development' schedule will be provided to EBC for review before the assessment. EBC advice regarding site allocation DEV/COB9 has been noted and this site will be removed from the Other Development schedule and from Development Land in the People and Communities chapter of the ES.
	P240, para 15.2.12 for both planning applications 2017/0524 and 2016/4204 Highways England has requested that Road Safety Audits be undertaken in advance of determination of the applications.	Thank you for providing this useful information – a Road Safety Audit has been undertaken as part of this project.

Table 1.2.3: Scoping Opinion comments - Energy Assets

Topic	Comment	Response
	Can confirm EAP do not have any comment.	Comment duly noted.

Table 1.2.4: Scoping Opinion comments - Environment Agency

Topic	Comment	Response
Flood Risk	We strongly advise that the Flood Risk and Water Quality topic areas (Chapter 8 - Road Drainage and Water Environment) should be separated out into two separate chapters in their own right. This will avoid any confusion as the risks and opportunities associated with each topic area are very different. We made it very clear in our predevelopment meeting with the applicant previously that this was our expectation.	A separate FRA report has been produced but Chapter 8 (Road drainage and the water environment) of the ES includes water quality and flood risk as the EIA follows the approach set out in the DMRB HD 45/09 which covers water quality and flood risk.
	We are concerned that there is very little information on fluvial flood risk within this chapter. The wording within the chapter is also confusing. Fluvial flooding is listed under a section referring to 'Surface Water'.	The baseline conditions of Chapter 8 (Road drainage and the water environment) of the ES has been expanded to include a section on fluvial flood risk within the sub-heading flood risk. Headings within the flood risk section have been amended.
	We are pleased that there is a commitment to carry out a detailed Flood Risk Assessment (FRA) to support the ES. We advise that fluvial (river), pluvial (surface water) and groundwater flooding should all be split up within the FRA and ES as separate issues. Mitigation for each of these different sources of flooding are unlikely to be linked and so it makes sense to address each individually.	The various types of flooding have been separated out in Chapter 8 (Road drainage and the water environment) of the ES.
	We are slightly confused by the ranking of risk (importance) within Table 8-5. Why is the Stratford Brook is listed as 'high' importance and the River Mole listed as 'very high'? Both seem to have the same number of receptors? No clear explanation is given.	An explanation of the rankings is provided in the Assessment Methodology section (Section 8.5) of Chapter 8 (Road drainage and the water environment) of the ES. The reader is referred to Section 8.5 and within the description column of Table 8.15: Fluvial flood risk importance classifications reason(s) for the importance ranking is provided.

Topic	Comment	Response
	At the scoping stage it is sometimes useful to outline the methodology of the FRA and get our advisory comments. The scoping opinion just states that it will be carried out in accordance with the (National Planning Policy Framework (NPPF). We would recommend that you arrange a technical meeting with ourselves to discuss the detailed requirements for the FRA and get this agreed before you proceed.	The EA have been consulted regarding the requirements of the FRA. A meeting to specifically discuss the FRA has held on 13 th April 2018.
	You will need to carry out detailed flood modelling of the Stratford Brook as part of the FRA. We can provide you with advice on the general modelling requirements and the new climate change allowances which will need to be applied to this development. Please find attached our requirements for modelling and Thames guidance for climate change allowances.	Comment duly noted. Detailed flood modelling, which includes climate change allowances has been undertaken and signed off by the EA.
	<p>From our experience of other similar infrastructure projects, the key aspects of the FRA will need to include:</p> <ul style="list-style-type: none"> • Sequential approach - including the Sequential Test and Exception Test when required. Non-essential infrastructure and higher vulnerability development associated with the Scheme should be located in areas of lowest flood risk. • Floodplain Compensation - if embankment widening or other infrastructure is required within areas at risk of flooding, mitigation for the loss of floodplain storage will be required, on a level for level basis where possible. Early consideration of this will make it easier and cheaper to achieve this, preventing flood risk being increased elsewhere. • Watercourses - any works on or near watercourses has the potential to increase flood risk. New culverts should be avoided where possible. • Flood flow routes - assessment will be needed of any proposals that will affected flood flow routes, this includes the construction of any new under bridges or closing off of existing under bridges or culverts. 	Comment duly noted. Where it has been appropriate to include these aspects of the FRA they have been included.
Biodiversity	Our main concerns are with the ecological and geomorphological impacts of the proposed culverting, works affecting water supply to water-dependent habitats, works affecting Bolder Mere Lake, loss of floodplain habitat and road run-off affecting water quality.	Noted, these are addressed in the ES, WFD and FRA.
Otter and Water Vole	We welcome the further otter and water vole survey to be carried out on the Stratford Brook - presumably this is what the 'wet ditch' refers to? Otter and water vole surveys should also be carried out on the rivers Mole and Wey where the allocated 'replacement land' is adjacent to these rivers. An otter survey	Further otter and water vole surveys have been undertaken.

Topic	Comment	Response
	should also be carried out on the Guilehill Brook due to its proximity to the compound area at the A3 Ockham Park junction and potential for otter to use the surrounding terrestrial habitat. In addition, otter and water vole surveys should be carried out on any ordinary watercourses affected by the Scheme, e.g. the watercourse which exits Bolder Mere lake.	
Bolder Mere Lake	Bolder Mere lake should be assessed for its potential for breeding and wintering birds	Bolder Mere lake has been surveyed for breeding birds. It is considered unlikely that Bolder Mere lake is important for wintering birds and there are no records to indicate this. Therefore, winter bird surveys of Bolder Mere lake have not been undertaken.
Ecological enhancements	There is no mention of ecological enhancements in chapter 7. Ecological enhancements that demonstrate an overall net gain in biodiversity should be included in the EIA.	A series of extensive ecological measures are described in the ES and HRA.
Scope of assessment	Paragraph 7.6.14 states that "Rivers, ponds and reedbed should be valued in consultation with Natural England". The Environment Agency should also be involved in this consultation as the responsible body for implementing the Water Framework Directive.	Comment duly noted.
Road drainage and the water environment Water Framework Directive	We welcome the commitment to carrying out a Water Framework Directive assessment although we are unclear with the approach referred to in paragraph 8.7.6 and unfortunately the preliminary WFD assessment is missing from appendix D. This will be particularly important for assessing the impacts of the proposed culverting and encroachment into Bolder Mere lake.	The approach to the WFD assessment has been discussed with the EA at various consultation meetings / telephone conferences on 8 th , 19 th and 29 th March 2018, 13 th April 2018, 18 th August 2018 and 2 nd November 2018. A WFD compliance assessment has been produced and is included as part of the DCO application.
	Paragraph 8.4.7 states that lakes and other surface water features will only be scoped in if there are potential affects due to changes in groundwater. Please note that these surface water features should be scoped in if there are any potential impacts, i.e. also relating to water quality and direct habitat loss.	Agree, surface water features have been scoped in where there are potential impacts to water quality and groundwater.
	The assessment of the impacts on watercourses and recommended mitigation measures should be based on River Corridor Surveys (RCSs) of the affected reaches. Channel surveys should also inform the design of the crossings. Table	A River Corridor survey has been completed along Stratford Brook. Ecological walkover surveys have also been completed on all other

Topic	Comment	Response
	8.4 does not refer to River Corridor Surveys but instead states that a River Habitat Survey and fluvial audit will be used to inform the WFD assessment where available. Please note that a River Corridor Survey would be more suitable and should be carried out.	surface water features identified within or adjacent to the red line boundary.
	The areas proposed to offset the impacts on the SPA/SSSI should also be subject to the same suite of surveys as the rest of the Scheme. More detail should be provided as to what is proposed for these areas. Please note that works within the floodplain/close to the river may require a Flood Risk Activity Permit from the Environment Agency and therefore early consultation with us is recommended.	Comment duly noted. The WFD Compliance Assessment details proposed enhancements to water features. Feasibility studies will be undertaken to assess the viability of the options and its effectiveness in mitigation impacts of the Scheme. Early consultation with EA has taken place.
	Table 8.5 values the biodiversity importance of waterbodies at less than 'good' status as 'low'. The Water Framework Directive requires all waterbodies to reach good ecological and chemical status and therefore no waterbody should be valued as low.	Comment duly noted. In the ES all waterbodies are assigned at least a high importance based on HD 45/09 which states WFD waterbodies with a good status/potential should be assigned a high importance. Even if the waterbody is not at good status/potential it will be assigned a high importance as the aim of the WFD is for waterbodies to eventually reach good status/potential.
	Paragraph 8.9.1 states that adverse impacts will be mitigated if significant. Please note that all adverse impacts should be mitigated or compensated for, regardless of whether they're significant.	Comment duly noted. Where possible all adverse impacts will be mitigated.
	When carrying out the WFD assessment the Applicant will need to look at the current WFD Cycle 2 data (available here: https://data.gov.uk/dataset/wfd-classification-statuscycle-2) and assess whether their proposal will impact upon each of the classification elements (i.e. the receptors). They will need to assess potential impacts against the WFD objectives outlined in the Thames River Basin Management Plan (found here: https://www.gov.uk/government/publications/thames-river-basin-district-river-basinmanagement-plan) and how they intend to avoid, mitigate or compensate for those impacts.	Comment duly noted. The process for undertaking the WFD assessment follows the current WFD Cycle 2 data and the Thames River Basin Management Plan.
	It may be useful to look at the reasons for failure (available at: https://data.gov.uk/dataset/wfd-classification-status-cycle-2) to ensure that the	Comment duly noted. Reasons for not Achieving Good Status have been reviewed

Topic	Comment	Response
	assessment recognises existing problems and targets mitigation in the best way that can alleviate existing issues.	and some relevant reasons for failure can be linked to proposed mitigations.
Mitigation measures	We would welcome further involvement in the mitigation measures proposed once further detail on the crossings and impact on Bolder Mere lake have been provided. Mitigation may be appropriate on a site by site basis, particularly if the habitat affected is of high quality or where an opportunity exists, e.g. to improve fish passage or re-instate a more natural river channel where a watercourse is to be diverted. However, it may be more beneficial to combine mitigation resources (i.e. where several culverts are proposed) to deliver mitigation in an area, potentially away from where the impact will occur, which is of known greater ecological value or with greater restoration potential.	Consultation with Environment Agency and Natural England is continuing and a meeting to specifically discuss WFD compliance was held on 9 th March 2018. A meeting to discuss mitigation measures with the Environment Agency was also held on 2 nd November 2018.
Clear span bridges and culverts	Paragraph 8.9.2 highlights our preference for clear spanning bridges as opposed to culverts, this is for flood risk alongside biodiversity reasons; this section also recognises the additional cost associated with bridges. Please note that cost alone is not a sufficient justification for proposing culverts over bridges and we would expect to see further reasoning for the selection of any culverts.	Comment duly noted. Where a new crossing of a WFD designated watercourse is proposed a single span structure extending across the floodplain in order to retain existing plan and cross sectional channel form has been embedded into the design.
Construction impacts	We are concerned that the compound at the Ockham Park junction on the A3 is extremely close to the Stratford Brook - the plans should be revised to show a 10m minimum buffer between the compound and the bank top of the Brook to minimise any risk of pollution and protect the river corridor.	The Scheme Layout Plans have been revised to ensure there is at least a 10 m buffer between the compound and the bank top of Stratford Brook to minimise any risk of pollution and protect the river corridor.
Environmental permitting and other regulation	This development may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated 'main rivers'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits .	The consents required for the development have been considered and a consent register has been produced for the Scheme.
Groundwater and Contaminated Land	Sustainable Drainage Systems (SUDs) are mentioned in section 8.9.1 with the possibility of infiltration being used. We doubt the ability of the Bagshot Beds to be suitable for sufficient infiltration and we expect a series of infiltration tests will	Agree, the bedrock is not ideal for infiltration, however soakaway tests are included in the Ground Investigation (GI) scope and the results of these tests can inform further

Topic	Comment	Response
	be undertaken to assess the suitability of this method of drainage before committing to this approach.	whether this drainage method could be suitable. The GI is currently planned to occur May 2019.
	Historic landfills have been mentioned in Chapter 10 as a possible source of contamination that require further investigation (section 10.6.2). We note that it specifically refers to additional surface water analysis, but we would also like to see groundwater quality analysis undertaken in any investigation. Groundwater sampling should include parameters related to landfilling, such as metals and ammonium and also those related to current motorway use such as petroleum hydrocarbons.	Groundwater quality analysis has been implemented into the ground investigation in order to determine the impact of landfills on the Scheme. This is outlined in a separate document, the Ground Investigation Specification. Applicant will be analysing for metals and inorganics, petroleum related parameters, inorganics, asbestos, and polycyclic aromatic hydrocarbons (PAHs), at a minimum, at boreholes and well locations in the vicinity of landfills. Ground gas will also be monitored at select landfills, in particular Old rectory farm, Chatley Farm, and land at east of Buxton wood, which are located within 50m or less of the Scheme.
	We agree the scope of further assessment in principle and note that further detailed discussion may be required for earthworks and materials management, especially in relation to any made ground or reworked materials potentially being re-used under the Definition of waste code of practice. Appropriate ground water monitoring would be required to assess disturbance effects before, during and after any earthworks activities are undertaken.	Comment duly noted. Groundwater monitoring, including monitoring activities during the construction and operation phase have been outlined in the Ground Investigation Specification. Groundwater monitoring will be utilized to analyse the disturbance effects of intrusive activities, such as piling, earthworks, retaining walls, during the proposed ground investigation.
	{Requirements for completing computer river modelling for Flood Risk Assessments document attached to response}.	

Table 1.2.5: Scoping Opinion comments - ESP Gas Group Ltd

Topic	Comment	Response
	I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.	Comment duly noted.

Topic	Comment	Response
	<p>ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter {27 December 2017}. If your proposed works start after this period of time, please re-submit your enquiry.</p> <p>Important Notice Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espipelines.com</p>	

Table 1.2.6: Scoping Opinion comments - Forestry Commission

Scoping Report reference	Comment	Response
	<p>The Forestry Commission's summary points are:</p> <ul style="list-style-type: none"> • Ancient Woodlands and Veteran Trees* are acknowledged as an irreplaceable habitat and a part of our Natural Heritage asset. Where loss is unavoidable, then, any compensation woodland creation should be significant. For instance, Highways England suggested a ratio of 30:1 in a presentation to us on 5th October 2017. 	Noted, the Scheme includes compensation woodland
	<ul style="list-style-type: none"> • Encourage wider mitigation of any loss of trees and woodlands within the project boundary. 	The Scheme includes extensive mitigation for loss of trees and woodland
	<ul style="list-style-type: none"> • Ancient woodland habitats adjacent to the road improvements will be impacted by: <ul style="list-style-type: none"> – Pollution: aerial gases/nutrients/salt/heavy metals/litter; and – Noise disturbance. 	The potential noise impacts to ancient woodlands are discussed the Chapter 6 of the ES and air quality effects in Chapter 5
	<ul style="list-style-type: none"> • Where appropriate, recommended mitigation for impacts would include establishing a "continuous cover" management regime that maintains a dense multi-storey woodland structure in a belt at least 30 metre buffer adjacent to the roadside boundary (i.e. edge of road curtilage not edge of carriageway). 	The Scheme has been designed to maintain a woodland buffer adjacent to the new highway boundary.
	<ul style="list-style-type: none"> • Encourage you to design the associate infrastructure (green space, woodlands, public footpaths and cycleways) to build on the evolving network of green infrastructure linking the adjacent conurbations to the countryside. There are a range of options for green infrastructure delivery and the Forestry Commission would 	Noted, the Scheme includes replacement open space and common land as well as new footways and cycleways.

Scoping Report reference	Comment	Response
	draw your attention to what has already been achieved in just 10 years at Jeskyns ¹ .	
	<ul style="list-style-type: none"> Ensuring woodlands are protected and managed will also contribute to meeting the new requirements of Schedule 4 of the EIA Regulations (2017). Careful consideration of the role trees and woodlands play in the Scheme will ensure delivery of a more resilient landscape and contribute towards reducing greenhouse emissions, increasing carbon sequestration and to the wider climate change agenda. 	Noted
	<ul style="list-style-type: none"> Locally sourced timber is used in construction of appropriate structures including sound baffles. 	Locally sourced materials will be used where possible.
	(*Note: Ancient Woodlands includes Ancient Semi-Natural Woodland (ASNW) and Plantations (including conifers) on Ancient Woodland Sites (PAWS)).	Noted.
	<p>Overall, we recommend that Highways England consider how they can optimise the Natural Capital Value of the compensation woodland creation and woodland management to enhance the network of greenspace in this rapidly growing area. As highlighted in the Government's recently release document: A Green Future: Our 25 Year Plan to Improve the Environment²:</p> <p>"The value of natural capital is routinely understated. If we look at England's woods and forests, for example, as a national asset, using a natural capital approach, the value of the services they deliver is an estimated £2.3bn. Of this sizeable sum, according to a recent study, only a small proportion - 10% - is in timber values. The rest derives from other benefits provided to society, such as human recreation and carbon sequestration".</p>	Noted
	The Forestry Commission is the Government Department that works with others to protect, improve and expand our nation's forests and woodland, increasing their value to society and the environment. As	Noted

¹ <https://www.forestry.gov.uk/jeskyns>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environmentplan.pdf

Scoping Report reference	Comment	Response
	<p>recognised in the Government Forestry and Woodlands Policy Statement (2013)³:</p> <p>“New and better managed woodland also has a role in making our rural and urban landscapes more resilient to the effects of climate change. Our objectives for sustainable woodland creation and management will improve woodlands’ resilience to climate change and other threats and enhance its contribution to wider climate change adaptation. Carbon will be sequestered through the growth of new woodlands. The wood products that are harvested from England’s woodlands will help to reduce greenhouse emissions from the energy sector directly as woodfuel and from other sectors where timber replaces more energy intensive materials. In addition, our focus on protection will help to ensure that we can safeguard the large store of carbon in England’s woodlands.”</p>	
	The Forestry Commission is the Government experts on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms And Procedures) Regulations 2009) ⁴ for major infrastructure (Nationally Significant Infrastructure Projects (NSIPS)) that are likely to affect the protection or expansion of forests and woodlands (Planning Act 2008) ⁵ .	Comment duly noted.
	The Forestry Commission’s response is based on information provided in the Highways England M25 Junction 10/A3 Wisley interchange Environmental Scoping Report dated 6 December 2017. This response highlights matters which should be resolved as part of the pre-application process. We believe that these issues should be addressed by the applicant as part of the examination and consenting process before development consent is granted.	Noted
1.4 Structure and contents of the Scoping Report	This section of the Report outlines the requirements of The Infrastructure Planning (Environmental Impact Assessment)	Chapter 15 (Climate) of the ES includes a description of the likely significant effects of the development on the environment resulting from the impact of the

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221023/pb13871-forestry-policystatement.pdf

⁴ <http://www.legislation.gov.uk/ukxi/2009/2264/contents/made>

⁵ <http://www.legislation.gov.uk/ukxi/2009/2264/schedule/1/made>

Scoping Report reference	Comment	Response
Climate change	Regulations (2017) ⁶ , and the approach taken in the Report to meet these requirements. The Report has also noted the new requirement of the EIA Regulation (2017) to address Climate. As noted in Schedule 4, Part 5(f) ⁷ , this must also include a description of the likely significant effects of the development on the environment resulting from “the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change”.	project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change.
1.7 Key legislation and policy Policy Overview Cumulative effects	The Report has correctly highlighted that Regulation 5 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the EIA to identify, describe and assess direct and indirect significant effects of the proposed development on biodiversity (with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC), Land, soil, water, air, climate, cultural heritage and the landscape.	Comment duly noted.
	To ensure compliance with the requirements of Part 2c, Regulation 14 of Infrastructure Planning (Environmental Impact Assessment) Regulations (2017), it is important that the applicant includes at least “a description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment” ⁸ . As recognised in the European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment, “climate change and biodiversity are generally complex issues with long-term impacts and consequences. EIAs that aim to properly address biodiversity and climate should take this into account and assess the combined impact of any number of different effects. This requires an understanding of evolving baseline trends and an assessment of the cumulative effects of the project on the changing baseline.” ⁹	Noted – these measures are included in the Scheme

⁶ <http://www.legislation.gov.uk/ukxi/2017/572/contents/made>

⁷ <http://www.legislation.gov.uk/ukxi/2017/572/schedule/4/made>

⁸ <http://www.legislation.gov.uk/ukxi/2017/572/regulation/14/made>

⁹ <http://ec.europa.eu/environment/eia/pdf/EIA%20Guidance.pdf>

Scoping Report reference	Comment	Response
2.2. Project objectives	<p>This section of the Report outlines the Client Scheme Requirements including:</p> <ul style="list-style-type: none"> support compliance with the UK's legally binding limits and targets on air quality and water quality status and support targets to cut greenhouse gas emissions; and through good design, ensure the Schemes' contribution to the quality of the surrounding environment, addressing existing problems wherever feasible, avoiding, mitigating or compensating for significant adverse impacts and promoting opportunities to deliver positive environmental outcomes. 	Comment duly noted.
Climate change, sustainable woodland creation, carbon sequestration	<p>To meet the requirements, the Forestry Commission would like to reiterate the importance of all woodlands in making our rural and urban landscapes more resilient to the effects of climate change and contribution to wider climate change adaptation. Consideration for how sustainable woodland creation and management of England's Woodlands can be secured and the use of timber as a construction material is utilised within this Scheme will secure the role that woodlands have in reducing greenhouse emissions and carbon sequestration.</p>	<p>Carbon offsetting – including vegetation for sequestration – is specifically excluded from the quantification exercise in Chapter 15 (Climate) of the ES. Whilst increased sequestration may have a positive effect on climate, there are a number of challenges in quantifying its effects. Sequestered carbon is not stored indefinitely; biological and other terrestrial carbon sinks are ephemeral by nature and will at some point release that carbon back into the atmosphere. This could well be within the lifecycle of the Scheme, but the timeframes for carbon uptake and release are not predictable. There will also be associated indirect carbon releases from the ongoing management of planted areas, and initial releases through disturbance of the soil during planting. These releases cannot be readily predicted or easily accounted for, leading to inaccuracies in any reported offsetting figure at this stage. Any carbon savings achieved through offsetting should be reported separately.</p>
	<p>To this end, the Forestry Commission would recommend consideration of the role trees and woodlands would contribute towards the Schemes' ability to deliver a more resilient landscape and contribute towards reducing greenhouse emissions, increasing</p>	<p>Carbon offsetting – including vegetation for sequestration – is specifically excluded from the quantification exercise in Chapter 15 (Climate) of the ES. Whilst increased sequestration may have a positive effect on climate, there are a number of</p>

Scoping Report reference	Comment	Response
	carbon sequestration and contribution to wider climate change mitigation and adaptation.	challenges in quantifying its effects. Sequestered carbon is not stored indefinitely; biological and other terrestrial carbon sinks are ephemeral by nature and will at some point release that carbon back into the atmosphere. This could well be within the lifecycle of the Scheme, but the timeframes for carbon uptake and release are not predictable. There will also be associated indirect carbon releases from the ongoing management of planted areas, and initial releases through disturbance of the soil during planting. These releases cannot be readily predicted or easily accounted for, leading to inaccuracies in any reported offsetting figure at this stage. Any carbon savings achieved through offsetting should be reported separately.
4.3. Proposed EIA approach for the Scheme Establishment of baseline conditions Natural Capital Assessment	The Report acknowledges the need to establish a baseline and to clearly identify receptors that may be affected and their value or sensitivity to potential change. The Forestry Commission would suggest taking a Natural Capital Assessment approach at an early stage. As well as ensuring the environmental costs are adequately considered in assessing public benefit, a Natural Capital approach will also give the applicant a baseline with which to use when planning compensation / mitigation. The applicant will be able to demonstrate for example the current Natural Capital value of a woodland asset before the Scheme commences, then plan how that woodland can be managed in the future to increase its Natural Capital value and therefore the Ecosystem Service benefits that will be derived from it. This approach will also help to demonstrate how net biodiversity gain will be achieved.	Suggested approach noted.
7. Biodiversity 7.3. Planning and policy context National Policy Statement for	The Forestry Commission welcomes the recognition and inclusion of ancient woodlands and veteran trees. Also, through the assessment of local planning policies, the recognition for the need: (Elmbridge Borough Council: CS15 - Biodiversity) <ul style="list-style-type: none"> to protect all woodlands, including ancient woodlands from damaging development and land uses; 	Comment duly noted

Scoping Report reference	Comment	Response
National Networks 2014 National Planning Policy Framework 2012 Local Planning Policy	<ul style="list-style-type: none"> Promoting the effective management, and where appropriate, extension and creation of new woodland areas including, in association with areas of major development, where this helps to restore and enhance degraded landscapes, screen noise and pollution, provide recreational opportunities, help mitigate climate change, and contributes to floodplain management; Replacing woodland unavoidably lost through development with new woodland on at the same scale; Promoting and encouraging the economic use of woodlands and wood resources, including wood fuels as renewable energy source; and Promoting the growth and procurement of sustainable timber products. (Elmbridge Borough Council: DM6 - Landscape and trees) <ul style="list-style-type: none"> Encourages adaption to climate change, for instance by incorporating Sustainable Drainage Systems (SuDS), providing areas for flood mitigation, green roofs, green walls, tree planting for shade, shelter and cooling and a balance of hard and soft element; Adequately protects existing trees including their root systems prior to, during and after construction process; Would not result in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees, unless in exceptional circumstances the benefits would outweigh the loss; and Includes proposals for the successful implementation, maintenance and management of landscape and tree planting schemes. 	
	In addition to the regulatory and policy framework outlined in the report, the Forestry Commission considers the relevant documents and guidance notes outlined below as being pertinent to this DCO in relation to woodlands including ancient woodland and veteran trees and should also be included in the report considerations.	Noted

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> • The UK Forestry Standard (4th edition published August 2017) • Managing ancient and native woodland in England (last updated August 2016) • National Planning Practice Guidance - Natural Environment Guidance (published January 2016) • Our plan to protect and increase biodiversity - Highways England biodiversity plan (published June 2015) • Standing Advice for Ancient Woodland and Veteran Trees (published April 2014, updated November 2017) • European Commission Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (published 2013) • Natural England Commissioned Report (NERC 132) Edition 3 (published November 2013) • BS 42020:2013 Biodiversity. Code of practice for planning and development (published August 2013) • Ancient and other veteran trees: further guidance on management (published February 2013) • Government Forestry and Woodlands Policy Statement (published January 2013) • Impacts of nearby development on ancient woodland - addendum (published December 2012) • BS 5837:2012 Trees in relation to design, demolition and construction - Recommendations (published April 2012) • Biodiversity 2020: a strategy for England's wildlife and ecosystem services (published August 2011) • Natural Environment White Paper "The Natural Choice" (published June 2011) • Impacts of nearby development on the ecology of ancient woodland (published October 2008) • Keepers of Time - A Statement of Policy for England's Ancient and Native Woodland (published June 2005) 	

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> A Habitats Translocation Policy for Britain - (published July 2003) Veteran Trees: A guide to good management - (published February 2000) 	
7.4 Baseline conditions	The report outlines the sources used to identify the ecological baseline conditions for the Scheme. Once again, the Forestry Commission welcomes the recognition and inclusion of ancient woodlands and veteran trees as part of this assessment. To meet the new requirements for climate outlined in Regulations 5 and 14 of the EIA Regulations (2017), the Forestry Commission would recommend that all woodlands are included as part of the ecological baseline conditions assessment.	All woodlands which fall within or are adjacent to the DCO boundary are included in the baseline conditions assessment.
Designated Sites Ancient Woodlands and Veteran trees outside of ancient woodlands Habitats	Ancient woodlands and veteran trees are included in the list of protected species as highlighted on the Natural England website ¹⁰ . The Forestry Commission welcome the recognition in the Report given to ancient woodlands as being an irreplaceable habitat.	Comment duly noted
	In the absence of an environmental constraints map that outlines the 1km boundary, it is not possible for the Forestry Commission to fully comment on impact of ancient woodland and other woodland sites that fall within the 1km boundary.	Comment duly noted
	As highlighted in the Natural Environment section of the National Planning Practice Guidance (NPPG) under Biodiversity and ecosystems ¹¹ : “Both Ancient Semi-Natural Woodland (ASNW) as well as Plantations on Ancient Woodland Sites (PAWS) are ancient woodland. Both types should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework.”	Comment duly noted
	All ASNW, PAWS and ancient woodland areas should be included in the study area to:	Comment duly noted

¹⁰ <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>

¹¹ <https://www.gov.uk/guidance/natural-environment>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> ensure these areas are treated equally in terms of protection afforded to ancient woodlands; and to secure the future of one of the most diverse ecosystems in perpetuity 	
	The habitats section of the report has recognised that veteran pedunculated oak trees are present in the woodlands to the north-west of the Scheme. Therefore, the Forestry Commission would recommend that the location of the veteran pedunculated oak trees is confirmed and included in the Ancient Woodlands and Veteran trees outside of ancient woodlands section of the report.	These trees have been included, as part of an assessment conducted by an arboricultural specialist and the effects on them reported in the ES.
	In line with the NPPG, the Forestry Commission recommends that these tables clearly defines the status of all ancient woodland sites, Ancient Semi-Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS), veteran trees and woodland habitats recognised as a habitat of principal importance under Section 41 of the NERC Act 2006 ¹² are included in all survey work and study reports. This will ensure that a thorough assessment will acknowledge the impacts on any potential losses of irreplaceable and important woodland habitats.	Comment duly noted
	Ancient woodlands and veteran trees are irreplaceable and are considered important for their wildlife, soils, recreation, cultural value, history and contribution to the landscape. Therefore, ancient woodlands and veteran trees must be included in all future habitat* and species surveys in relation to the Scheme within the application boundary of the Project. The Forestry Commission have noted the comment that through the desktop study, no ancient or veteran trees have been located within 50m of the Scheme, and that an arboricultural assessment of the Scheme has not yet been conducted.	Surveys for veteran trees have been undertaken by an arboricultural specialist. Ancient woodlands have been surveyed. These are reported in the ES

¹² <http://www.legislation.gov.uk/ukpga/2006/16/section/41>

Scoping Report reference	Comment	Response
	(*Note: When using a BS5837:2012 Cascade chart ¹³ for tree quality assessment, ancient woodlands would automatically be classified as A3 due to their natural heritage and ecological value.)	
	Due to the nature of ancient woodlands and veteran trees being an irreplaceable habitat, the Forestry Commission recommends that every effort is afforded to avoid this Scheme affecting ancient woodlands or veteran trees. The Planning Inspectorate and applicant should start by looking for ways to avoid the development affecting ancient woodland or veteran trees e.g. by redesigning the Scheme in line with the recommendations outlined in BS 5837:2012 ¹⁴ . It is not possible to fully compensate for the loss or damage to ancient woodlands, thus compromising Highways England's aim to achieve no net loss of biodiversity by 2020 as set out in their strategy document: 'Our plan to protect and increase biodiversity' (Highways England 2015) ¹⁵ .	Comment duly noted, the Scheme has been designed to minimise effects on ancient woodland.
	Consideration must also be given to lowland beech, lowland mixed deciduous woodland, wet woodland, wood pasture and parkland ¹⁶ . Under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 ¹⁷ , these habitats "are of principal importance for the purpose of conserving biodiversity." Therefore, these woodland habitats must also be included in all future habitat surveys to ensure adherence to the requirements of the National Policy Statement National Networks (NPSNN) report as outlined below: Paragraph 5.25 "As a general principle, and subject to the specific policies below, development should avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives. The applicant may also wish to make use of biodiversity offsetting in devising compensation	Comment duly noted. HPIs are included in the assessment.

¹³ http://www.flac.uk.com/wp-content/uploads/2012/09/Table-1_flac.pdf

¹⁴ <https://shop.bsigroup.com/ProductDetail/?pid=000000000030213642>

¹⁵ http://scate.org.uk/wp-content/uploads/2015/07/Highways_England_Biodiversity_Plan.pdf

¹⁶ <http://jncc.defra.gov.uk/page-1437>

¹⁷ <http://www.legislation.gov.uk/ukpga/2006/16/section/41>

Scoping Report reference	Comment	Response
	proposals to counteract any impacts on biodiversity which cannot be avoided or mitigated. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought."	
	The habitats section of the report has recognised that the most abundant habitat within the Scheme is mixed woodland. The Forestry Commission would welcome the opportunity to work with the applicant to review how the Natural Capital value of these woodlands can be increased.	Comment duly noted
Biodiversity and climate change	To ensure compliance with the climate change requirements outlined in Schedule 4 of the EIA Regulation, and in recognition of the role that forestry and woodlands have in contribution to wider climate change adaptation as outlined in the Government's Policy Statement on forestry and woodlands (2013), the Forestry Commission would also recommend inclusion of all woodland sites that fall within the Scheme boundary.	All woodlands which fall within or are adjacent to the DCO boundary are included in the baseline conditions assessment.
7.5. Potential impacts Designated sites	The section of the report outlines the permanent and temporary land take that will occur during delivery of the Scheme. As outlined in the Government Forestry and Woodland Policy Statement, the Government is fully committed to protecting our trees, woods and forests, improving our valuable woodland assets, expanding our woodland resource to 12% by 2060 and realising more of our woodlands' value. In recognition of this, the Forestry Commission would request further information on how much of this land take has tree cover to avoid net deforestation through delivery of this Scheme.	The ES includes an assessment of the area of HPIs within the DCO boundary.
Ancient Woodlands and Veteran trees outside of ancient woodlands	In regard to loss of ancient woodland, the report has proposed that temporary loss of ancient woodland will count as permanent loss. The Forestry Commission appreciate the recognition given to the impacts to ancient woodland soils that any disturbance will have. Please note comment above which highlights ASNW and PAWS sites are afforded the same status as ancient woodlands.	Comment duly noted
	Due to the nature of ancient woodlands and veteran trees being an irreplaceable habitat, the Forestry Commission recommends that every effort is afforded to avoid this Scheme affecting ancient	Comment duly noted

Scoping Report reference	Comment	Response
	woodlands or veteran trees. The Planning Inspectorate and applicant should start by looking for ways to avoid the development affecting ancient woodland or veteran trees e.g. by redesigning the Scheme in line with the recommendations outlined in BS 5837:2012 ¹⁸ . It is not possible to fully compensate for the loss or damage to ancient woodlands, thus compromising Highways England's aim to achieve no net loss of biodiversity by 2020 as set out in their strategy document: 'Our plan to protect and increase biodiversity' (Highways England 2015) ¹⁹ .	
	The Forestry Commission would also highlight the Irreplaceable habitats including ancient woodland and veteran trees section of the National Policy Statement National Networks (NPSNN): Paragraph 5.32 "Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of irreplaceable habitats including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the national need for and benefits of the development, in that location, clearly outweigh the loss. Aged or veteran trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals, the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons for this."	Comment duly noted
Notable Habitats	The Forestry Commission recommends that all woodland habitats recognised as a habitat of principal importance under Section 41 of the NERC Act 2006 are included in all future survey work to ensure that a thorough assessment will acknowledge the impacts on any potential losses of an irreplaceable habitat.	Comment duly noted. HPs are included in the assessment.

¹⁸ <https://shop.bsigroup.com/ProductDetail/?pid=000000000030213642>

¹⁹ http://scate.org.uk/wp-content/uploads/2015/07/Highways_England_Biodiversity_Plan.pdf

Scoping Report reference	Comment	Response
	The Forestry Commission would welcome the opportunity to work with the applicant to look at how to minimise any loss, and to avoid loss of ancient woodland and notable habitats through temporary land take.	Comment duly noted.
7.6. Proposed level and scope of assessment Table 7-8: Nature conservation receptors that will be subject to further assessment Table 7-9: Valuation of nature conservation features	The Forestry Commission note that ancient woodlands and notable habitats, including lowland mixed deciduous woodland, wood pasture and parklands are included in Table 7-8: Nature conservation receptors that will be subject to further assessment.	Comment duly noted.
	The Forestry Commission appreciate nature conservation features including ancient woodland and veteran trees have been valued in accordance with the Interim Advice Note 130/10Ecology and Nature Conservation: Criteria for Impact Assessment ²⁰ as outlined in Table 7-9.	Comment duly noted.
	The Forestry Commission would seek clarity of the status and location of all woodland including ancient woodland and lowland mixed deciduous woodland habitats within the Scheme boundary.	Details provided in ES
	The Forestry Commission acknowledge that the Report has recognised that the final Scheme Design has the potential to result in the direct loss of some ancient woodland and other lowland mixed deciduous woodland, wood pasture and parkland. The Forestry Commission would welcome the opportunity to provide advice at the appropriate time to ensure the most applicable measures are adopted to minimise and / or compensate for the impacts on all woodlands, particularly Ancient Woodland sites.	Comment duly noted.
	To meet the Government's objective to improve woodlands' resilience to climate change and contribute to climate change adaptation, along with addressing climate change as part of the new requirements outlined in Schedule 4 of the EIA Regulation (2017), the Forestry Commission would recommend that impacts to all woodlands are assessed to allow an in-depth appreciation of the beneficial and adverse environmental consequences at the	Comment duly noted. FC have been consulted with on compensation measures and refining scheme design.

²⁰ <http://www.standardsforhighways.co.uk/ha/standards/ians/pdfs/ian130.pdf>

Scoping Report reference	Comment	Response
	geographic scale of the Scheme. From these results, the Forestry Commission will be able to work with the applicant to identify appropriate measures that will avoid, reduce and / or compensate for significant effects to woodlands due to the construction and operation phases of the Scheme.	
Ancient Woodlands	As the government experts on forestry & woodland and a statutory consultee (as defined by Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009) for major infrastructure (Nationally Significant Infrastructure Projects (NSIPs)), the Forestry Commission would welcome the opportunity to discuss with the applicant to value ancient woodlands and to consider options for addressing issues with regard to the M25 junction 10 / A3 Wisley interchange NSIP.	Comment duly noted.
7.7. Proposed assessment methodology	This section of the report outlines the desk-based and field-based surveys that will be undertaken to gain an understanding of the baseline environmental condition within the Ecological zone of Influence. Assessments will take into account onsite impacts and those that may occur to adjacent and more distant ecological features. This will include direct loss and fragmentation or isolation of habitats.	Comment duly noted.
	The work to be carried out will follow guidance from the Guidelines for Ecological Impact Assessment in the UK and Ireland and IAN 130/10 Ecology and Nature Conservation: Criteria for Impact Assessment. The Forestry Commission would recommend that all assessments also comply with the requirements of the NPSNN and the NPPF.	Agreed.
	Where significant effects are considered likely, the assessment will determine the features that require measures to mitigate potential impacts, and to guide the type and scale of mitigation and / or compensation required, in consultation with key stakeholders. The assessment will also consider cumulative effects as described in Chapter 15.	Comment duly noted.

Scoping Report reference	Comment	Response
	In landscapes fragmented by development, the Lawton Report ²¹ has concluded that isolated habitats and nature reserves are not sufficient to maintain ecological connectivity because species are unable to move. Therefore, the principle of “no net loss of biodiversity by 2020” must be quality rather than quantity.	Compensation areas focus on proving linkages between existing areas of woodland.
	The Forestry Commission would be pleased to work with the applicant to consider the impacts of this Scheme to maximise the environmental benefits that can be achieved by working in partnership. We would be pleased to advise further on these opportunities to consider biodiversity impacts and possible cumulative impacts at the wider landscape scale.	FC have been included in consultations
7.9. Potential mitigation measures	<p>The Report has made design suggestions based on current understanding of the nature conservation constraints and opportunities. These include:</p> <ul style="list-style-type: none"> • “Opening up of the woodland either side of the new Cockrow bridge, in order to encourage heathland regeneration, and create a continuous connected belt of heathland habitat between the two quadrants” <p>The Forestry Commission would recommend retention of the visual impact of woodland adjacent to the A3 for screening purposes. For the remaining areas, where felling of woodland to use the land for a different purpose is proposed, this may be subject to Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999. The Forestry Commission website²² provides further advice on the area threshold for proposed projects. Consequently we recommend that a heathland connection is established as a ‘heathy woodland’ rather than open heath.</p>	Comment duly noted.
	<ul style="list-style-type: none"> • “Restoration of heathland and sandy habitats within temporarily cleared areas of woodland within the SPA/SSSI. Cleared areas will be managed to allow heathland regeneration, and excess sandy soils will be used to create features, such as exposed 	FC have been included in consultation on the replanting and/or management of these temporary cleared areas.

²¹ <http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>

²² <https://www.forestry.gov.uk/england-eia>

Scoping Report reference	Comment	Response
	<p>banks to support key invertebrates, a qualifying feature of the SSSI"</p> <p>The Forestry Commission requests clarity of the strategic view of what the habitat requirement post Scheme development will be. Where land cover is currently woodland, then conversion to heathland must be clearly justified. Assuming the temporarily cleared woodlands are for the proposed locations of the works sites then proposals need to reflect the best after-use of that part of the site.</p> <p>If the proposed area is adjacent to the road and within the road curtilage, then the Forestry Commission would recommend that the applicant and Natural England work with the Forestry Commission to agree what the woodland immediately outwith the curtilage of the refurbished road will need to deliver. A belt of woodland managed under a Continuous Cover regime would provide visual and to a degree audible and air filtering screening between the well-used commons and the road.</p>	
	<ul style="list-style-type: none"> A multi-functional bridge linking the south-west and north-west quadrants. This bridge could be designed to support vegetation and provide connectivity between Wisley Common and the woodland and heathland within the north-west quadrant. This bridge may contain vegetation, connecting the habitats on either side of the bridge. <p>This is in keeping with paragraph 5.36 of the National Policy Statement National Networks (NPSNN) which states "opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals, for example through techniques such as the 'greening' of existing network crossing points, the use of green bridges and the habitat improvement of the network verge." The Forestry Commission welcomes this suggestion and would refer the applicant to the A21 at Scotney Castle in Kent example²³.</p>	Comment duly noted.

²³ <https://www.gov.uk/government/news/green-bridges-safer-travel-for-wildlife>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> “Felling of some wooded areas within the north-west quadrant, in order to encourage heathland regeneration and increase the existing areas of heathland within this quadrant” <p>Any loss of woodland would require mitigation to ensure compliance with the Government's commitment to no net loss of woodland. Therefore, where conversion of woodland to a different land use is proposed, this may be subject to Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999.</p>	Comment duly noted. It is understood that this will depend on the percentage of woodland being cleared. FC have been consulted on the compensation package.
	<ul style="list-style-type: none"> “Soil from any ancient woodland to be lost to be translocated to a compensation area for woodland planting” <p>As highlighted in the Joint Nature Conservation Committee (JNCC) Habitat Translocation Policy document²⁴:</p> <p>“Available information shows that it is not possible to move species assemblages without substantial changes taking place in the structure of the habitat and its species composition, thus rendering the translocation unsuccessful.”</p> <p>Through a literature review of case studies to address environmental impacts of linear transport infrastructure on protected species and habitats, Edition 3 of the Natural England Commissioned Report (NERC 132)²⁵ reiterates the message that “translocation of ancient woodland soils and coppiced stools does not imply that these methods mitigate the loss of ancient woodland.” and that “the measure should not be interpreted as a successful means of mitigating the fragmentation of ancient woodland; a resource which cannot be re-created through tree planting or habitat translocation due to its complex structure and wider-ranging biodiversity.”</p>	Comment duly noted. This is only one aspect of a compensation package.
	The Planning Inspectorate should use planning conditions or obligations to secure compensation measures and subsequent ecological monitoring. The joint Standing Advice, prepared by Forestry Commission and Natural England, provides advice and the	Comment duly noted.

²⁴ http://jncc.defra.gov.uk/pdf/habitats_policy.pdf

²⁵ <http://publications.naturalengland.org.uk/publication/6184646404472832>

Scoping Report reference	Comment	Response
	assessment tools to be used when assessing the impacts of the A2 Bean and Ebbsfleet Junction Improvement NSIP.	
	Where the impacts cannot be fully avoided, compensatory habitat provision will be required. The Forestry Commission will of course provide advice on impacts to ancient woodland outside of SSSI sites. For ancient woodlands within SSSI sites, we would provide advice alongside colleagues from Natural England as the Scheme progresses towards the submission stage.	Comment duly noted.
	The Forestry Commission would also encourage the inclusion of measures to build the evolving network of green infrastructure to link the adjacent conurbations to the countryside. This will aid the promotion of help encourage people to access the countryside by the local community for quiet enjoyment. There are a range of options for green infrastructure and the Forestry Commission would draw attention to what has been achieved at Jeskyns. Linking Jeskyns to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of landscape scale green infrastructure.	Comment duly noted.
Conclusion	<p>From the information supplied in the Report, we advise that in respect of loss of any woodland, particularly the loss of irreplaceable habitats which are part of our Natural Heritage and principally important habitats and ecosystems must be included in the applicant's assessment. Paragraph 5.130 of the NPSNN states:</p> <p>"The Secretary of State should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities - including their economic vitality. The Secretary of State should also take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting)."</p>	Noted

Scoping Report reference	Comment	Response
	<p>For the loss of any woodland, the Forestry Commission would ask:</p> <ul style="list-style-type: none"> To explore with you how this loss could be further reduced and how direct and indirect impacts on ancient woodlands can be minimised; How best to target the creation of new woodland to compensate for the loss of trees and woodlands; That the applicant engages with the Forestry Commission at the earliest opportunity so that our expertise can be used to support the development of options and design of the chosen way forwards. 	FC have been consulted in these processes. The Scheme has been designed to reduce as far as possible impacts on woodland and other vegetation.
	<p>Outlined above are the key areas of information would be required in order to allow the applicant to proceed with delivery of this Scheme with least detrimental impact to the surrounding environment, and the Examining Authority properly to undertake its task or where further work is required to determine the effects of the project and/or to flesh out compensation proposals to provide a sufficient degree of confidence as to their efficacy.</p>	Comment duly noted
	<p>Forestry Commission's headline points are that on the basis of the information submitted, if approved, the project must be subject to all necessary and appropriate requirements which ensure that unacceptable environmental impacts either do not occur or are sufficiently compensated, as proposed in the proposed Code of Construction Practice.</p>	Comment duly noted.
	<p>If you disagree with our recommendations for the above schemes, then please consult the Forestry Commission.</p>	Comment duly noted.
	{Forestry Commission appendices attached to response}	

Table 1.2.7: Scoping Opinion comments - Guildford Borough Council

Scoping Report reference	Comment	Response
	The Council would welcome further consultation with Highways England as the Scheme progresses.	Comment duly noted and consultation has taken place.
General Comment	The Scoping Report details potential mitigation measures within each topic chapter, however the report does not consider any environmental enhancement measures (measures that go above and beyond mitigation) - the Council believes enhancement measures should be considered throughout the preliminary design of the Scheme due to the sensitive nature of the environment in this location.	The Scheme includes a wide range of measures that will enhance the area.
Chapter 1 Introduction Section 1.2.4	The local planning authority is not the decision maker for the project.	Comment duly noted. This section outlines the need for EIA generally, hence the reference to the local planning authority. The Secretary of State represented by the Planning Inspectorate as the decision maker is noted in the ES..
Chapter 1 Introduction Section 1.4.6	Noted that an Equality Impact assessment (EqIA) and Health Impact Assessment (HIA) will be reported separately to EIA.	Health will be reported in the ES with EqIA as a separate report.
Chapter 1 Introduction Section 1.4.6	It is understood that a separate HIA will be undertaken for the Scheme, however It is not clear whether 'population and human health' will be considered in the ES - in accordance the Infrastructure Planning (EIA) Regulations 2017 this needs to be considered and reported in the ES. It should be made clear in the ES where this will be considered.	Health is now reported in the ES
Chapter 1 Introduction Section 1.7.3	Should use the title of the organisation of 'Guildford Borough Council' rather than the words 'Borough of Guildford'. (We note that the paragraph uses the title 'Elmbridge Borough Council' for the neighbouring lower tier authority.)	Reference to Guildford Borough Council updated in the ES.
Chapter 1 Introduction Section 1.7.3	The Scoping Report has not taken into account the Guildford Borough Proposed Submission Local Plan: strategy and sites (Guildford Borough Council, June 2017), which was consulted upon under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, or	The Guildford Borough Council Proposed Submission Local Plan was taken into account in the People and

Scoping Report reference	Comment	Response
	the Guildford Borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017).	Communities chapter and the Cumulative Effects Assessment chapters of the Scoping Report.
Chapter 1 Introduction Section 1.7.3 and Table 1.2	<p>The Guildford Borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> • the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); • the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and • the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account those in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), in particular the following policies:</p> <ul style="list-style-type: none"> • Policy S2: Planning for the borough - our spatial development strategy • Policy P5: Thames Basin Heaths Special Protection Area • Policy ID1: Infrastructure and delivery, which cross-references at point (4) the Appendix C Infrastructure Schedule of which schemes referenced SRN3, SRN5, SRN9 and SRN10 are of relevance • Policy ID2: Supporting the Department for Transport's 'Road Investment Strategy' • Policy ID3: Sustainable transport for new developments • Policy A35: Former Wisley airfield, Ockham 	<p>The Submission Local Plan December 2017 was published as the Scoping Report was submitted and will be reviewed and take account of in the ES.</p> <p>We welcome GBC's input regarding the planning policy and site allocations.</p>

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	<ul style="list-style-type: none"> • Policy A38: Land to the west of West Horsley • Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley • Policy A40: Land to the north of West Horsley • Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley • Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common • Policy A58: Land around Burnt Common warehouse, London Road, Send 	
Chapter 2 The Project Section 2.3.2	Overall it is recognised that the location of the Scheme is set in a visually attractive area with a large amount of public open space. The M25 Junction 10/A3 Wisley interchange junction is set within a predominantly wooded area to the south-west of Cobham and south of Byfleet and it is an attractive area despite the presence of the A3 and M25. Much of the area around junction is covered by the internationally designated Thames Basin Heaths Special Protection Area (SPA) and nationally designated Ockham and Wisley Commons Site of Special Scientific Interest (SSSI), as well as designations as a Local Nature Reserve (LNR), Site of Nature Conservation Interest (SNCI) and ancient woodland. The Council would like reassurance that the construction and operation of the Scheme would not significantly impact on the visually appealing setting of the area and on the ecologically designated sites. The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) states as one of its Strategic Objectives is "To protect those areas designated as Thames Basin Heaths Special Protection Area, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty for their biodiversity and landscape characteristics".	Comment duly noted. The Scheme has been developed to maintain and enhance where possible the ecological and landscape value of the site.
Chapter 2 The Project Section 2.4.15	Specific construction, operational and long term management arrangements are not known in detail at this stage of the Scheme. Potential locations of construction compounds for the contractor have been identified and are included within the temporary land take for the Scheme. However, the Scoping Report does not detail where the construction compounds are to be located. Depending on the location these could have impacts on human health due to construction dust and noise. The Council would like to know where abouts the contractor construction compounds are planning on being located? Please note that; previously part of the former Wisley Airfield has been used as a construction depot. Please can the site of any depot be identified, as the old airfield site use has and is the subject of considerable local concern regarding both permanent and temporary use.	This information has now been prepared and is included in the DCO and reported in the ES.
Chapter 3 Alternatives	A good level of detail has been given regarding the alternative options considered, at this scoping stage. A little more detail focussing on the differences in environmental effects from each option would be useful in the ES.	Comment duly noted. Environmental effects of the alternative options is outlined

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		in Chapter 3 (Assessment of Alternatives) of the ES.
Chapter 4 Scope of the Assessment Section 4.1.3	It has not been made clear where 'Population and Human Health' is covered under existing topics - this should be clarified in the ES. We also recommended that a combined / cumulative assessment is undertaken for human health, to assess the cumulative impact on human health from the Scheme, acknowledging the outcomes of assessment on human health in each of the relevant environmental topics.	Human health impacts are reported in the ES which also includes the cumulative impact assessment.
Chapter 4 Scope of the Assessment Section 4.3.25	The study area outlined here for Materials and Waste only considers waste arisings (within the County of Surrey), and does not consider the study area used for (the source of) material resources. This should be outlined here as per Paragraph 12.2.2 in Chapter 12 Materials and Waste.	The ES contains a materials and waste chapter which sets out the study area for waste arisings and materials
Chapter 4 Scope of the Assessment Section 4.3.30 HRA	It has been noted that a Habitat Regulation Assessment (HRA) will be undertaken in regards to the Thames Basin Heaths SPA European designated site. The Council is concerned because at this stage the HRA screening matrix has identified that Significant effects on habitats are considered likely. Consultation with Natural England has been mentioned in the Scoping report as ongoing. The Council would like to see evidence of the outcomes of such consultation and would expect Highways England to implement appropriate mitigation to ensure that no significant effects on the SPA would result.	The DCO contains a full HRA which has been prepared in consultation with NE.
Chapter 5 Air Quality General Comment	This chapter of the scoping report closely follows all required DMRB guidance and considered appropriate for the assessment of impacts from large road schemes.	Comment duly noted.
Chapter 5 Air Quality Section 5.4	<p>The background monitoring data does not include the most up to date data from the 2017 Air Quality Annual Status Report (ASR) (Guildford Borough Council, July 2017) that sets out:</p> <ul style="list-style-type: none"> • The declaration of an AQMA in The Street, Compton. • The Ministerial direction dated July 2017 for Guildford Borough Council amongst other councils to undertake a Feasibility Study of air quality in and around the A331, this location having been identified by Defra's PCM model. Available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633803/air-qualitydirection-2017.pdf. 	<p>The ES includes the most up to date data in the ASR and acknowledges the AQMA in The Street, Compton although this is outside of the study area.</p> <p>For HE road schemes the air quality assessment follows the guidance in the DMRB</p>

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	Whilst both of these sites are some distance from M25 Junction 10, the assessment criteria that the Council is required by the Joint Air Quality Unit (JAQU) at Defra to use for the A331 study is somewhat different to that used in the Local Air Quality Management (LAQM) process. Accordingly, we would ask HE to explain why it does not propose to use the assessment criteria that the Council is required by the Joint Air Quality Unit (JAQU) at Defra to use for the A331 study. For the A331 study, the receptor is defined as being the nearest public access, not residence or other receptor as in LAQM process (which is what HE appears to be proposing to use - see para 5.4.14). It is noted that Defra's PCM has not covered this area, but we do believe that parts of the A3 have been assessed with this model to date.	HA207/07 which requires an assessment at properties where people might experience a change in air quality. Assessment of the risk of compliance with the EU Directive is undertaken following interim advice note (IAN) 174/13 which looks at the change in magnitude with the scheme and applies this to the nearest PCM links to see whether compliance with the EU Directive is maintained in the opening year of the Scheme.
Chapter 5 Air Quality Section 5.4.13	It is not clearly stated which scenario has been used from the PCM model (baseline, CAZ or CAZ + additional measures.) Baseline scenario should be used to provide a worst case assessment.	The reference year, 2015, was used to inform the baseline section of the report. The baseline scenario from the PCM model has been used in the assessment when assessing compliance with the EU Directive.
Chapter 5 Air Quality Section 5.6.1	Modelling of construction vehicles would be welcomed. The number of construction vehicles for construction should be quantified. A clear rationale for scoping out a simple or detailed construction phase assessment should be included in the EIA when construction vehicle numbers are available.	A detailed assessment of the effects of construction vehicles on air quality has been included in the ES.
Chapter 5 Air Quality Section 5.7.6	This section notes that a simple level of assessment will be undertaken for regional emissions of NOx, PM10 and CO2 for the opening and design years, no reasoning has been given regarding this decision - this needs to be clarified in the ES.	This has been clarified in the ES. It should be noted that a detailed assessment was undertaken rather than a simple one, to take into

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		account all changes in emissions. This is noted in the ES.
Chapter 5 Air Quality Section 5.7.7	The EIA should confirm that the opening year (currently 2022) is worst case in terms of air quality impacts.	This has been noted in the ES.
Chapter 5 Air Quality Section 5.7.20	We note that there will be consideration of vulnerability to major accidents and disasters. If this is included within the assessment, modelling of short term impacts should be undertaken in accordance with Defra guidelines.	Noted
Chapter 5 Air Quality Section 5.8	Consultation - which local authorities will be consulted with in terms of ensuring relevant receptors are included in assessment, as the scoping report mentions several local authorities that are both within and without the ARN area? The Council requests more information on the level of consultation that has occurred to date.	All local authorities within the air quality study area have been consulted regarding the air quality assessment.
Chapter 6 Noise and Vibration Overall	Overall this document describes noise policy and the assessment methodology in general terms but, with the exception of consideration of receptors and NIAs, does not address the specific issues relating to this Scheme in any great detail. This is appropriate at the scoping stage but more detail will be required as the project progresses.	Comment duly noted.
Chapter 6 Noise and Vibration Section 6.2.3	6.2.3 states that the study area has been determined, but the subsequent para. 6.2.4 states that it will be determined. In either case, it would be helpful if the text made clear whether this is the study area for operational noise only or for both construction and operation. This needs to be made very clear in the ES.	The study areas for the construction and operation phase assessments are detailed in Section 6.4 of the ES.
Chapter 6 Noise and Vibration Section 6.4.10	There are a large number of Noise Important Areas (NIAs) that have been identified within the study area.	Comment duly noted. Not all of the NIAs identified in the Scoping Report were within the study area for the ES. An updated list of NIAs within the study area has been provided in the Section 6.7 'Baseline Conditions' in the ES.

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Chapter 6 Noise and Vibration Section 6.5	The construction phase is potentially controlled by the Control of Pollution Act 1974 and it is recommended that a Section 61 Prior Consent application is made to the local authority. It may need to be cross boundary with Elmbridge BC. The detail will need to be comprehensive, but is usually dealt with at the start of construction.	Comment duly noted.
Chapter 6 Noise and Vibration Section 6.7.1	The location of the baseline noise surveys should be agreed with the Council. The Council is aware of the proximity of the dwellings in Pond Farm, Wisley Village, Foxwarren Park and Katz Castle (both in Redhill Road), and would like to raise if they require additional noise measures.	Guildford Borough Council has been consulted on proposed locations for baseline noise surveys and the properties listed in the Scoping Opinion comment have been included in the assessment.
Chapter 6 Noise and Vibration Overall	The document does not state how night-time noise will be calculated or assessed. This needs to be clarified in the ES.	This information is provided in the Noise and Vibration chapter in the ES (Section 6.5 and Section 6.6).
Chapter 6 Noise and Vibration Overall	Aircraft noise is mentioned as a potential noise source. The document does not specify how this source of noise will be (a) calculated or (b) combined with road traffic noise. In this context, it is noted that the L10 noise index used for road traffic noise cannot be used directly for aircraft noise which is transient.	Occasional aircraft flyovers were noted as contributing to the existing noise levels during the baseline noise surveys, however, the dominant noise sources were the M25 and the A3. The Scheme does not propose any changes to air traffic and therefore assessments of air traffic are outside the scope of the Scheme.
Chapter 6 Noise and Vibration Overall	Although SOAEL is mentioned, the criteria for a significant adverse impact are not. In particular, it would be helpful to know if a significant adverse effect is associated simply with receptors exposed to noise levels above SOAEL or if there is also a requirement for a particular increase (such as the values of 1dB or 3dB cited in 6.2.1 in the short term and long term respectively.) Note that current	The significance criteria used to appraise the Scheme are provided in Section 6.5 of the ES.

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	advice from HE is that a significant adverse effect arises when receptors are exposed to noise above SOAEL and there is an increase of 1dB in either the short term or long term.	
Chapter 6 Noise and Vibration Overall	The document sets out the case for the definition of LOAEL and SOAEL but does not propose any values for these so they are not available for discussion or review yet are a vital element of the assessment methodology.	The significance criteria used to appraise the Scheme are provided in Section 6.5 of the ES.
Chapter 6 Noise and Vibration Overall	It is not clear if vibration will/not be within scope of the assessment.	Vibration during the construction and operation phases has been discussed in the ES.
Chapter 7 Biodiversity Section 7.3	The planning and policy context section does not refer to policy NRM6 Thames Basin Heaths Special Protection Area of the South East Plan. This is probably the most significant policy for the SPA. Note: The South East Plan has not been fully withdrawn - NRM6 remains in force and carries full weight.	This has been added to ES
Chapter 7 Biodiversity Section 7.4	The baseline section has no mention of badgers, otters or water vole - have these surveys/assessments not been undertaken yet or been scoped out? Please clarify these have not been mentioned in baseline conditions.	These surveys have been undertaken and are included in the ES.
Chapter 7 Biodiversity Section 7.4	There are 23 parcels of ancient woodland within 1 km of the Scheme. The Woodland Trust website identified no veteran trees within 50 m of the Scheme boundary. However, an arboriculture assessment of the Scheme footprint has not yet been conducted. This survey may identify additional veteran trees. We are highlighting this as a concern now and await details of the survey.	An arboriculture survey which identifies previously unrecorded veteran trees has been conducted and is reported in the ES
Chapter 7 Biodiversity Section 7.4.3	There is one European designated SPA, three nationally designated SSSIs and one LNR within 2km of the Scheme, this poses a large number of ecological constraints. In addition, two SACs where bats are listed as one of the qualifying features of the designation were identified within 30 km of the Scheme, and Seventeen SNClS were identified within 2 km of the Scheme boundary. There is the need to ensure appropriate surveys and assessment are undertaken of all designated areas. The Surrey Transport Plan Environmental Report (Surrey County Council, January 2011) made recommendations that "any new transport related developments make use of land that is not known, or found to be on further investigation, of significant ecological value." In particular, it mentions the safeguarding of sites of national (SSSIs), international (Ramsar Sites) and European	Comment duly noted. Every effort has been made to reduce, mitigate and compensate for impacts.

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	<p>(SACs and SPAs) nature conservation importance and to protect European Protected Species from damage and harm. It also recommends that that any new transport related developments and all maintenance works be designed and delivered in ways that minimise any risks of damage, loss and disturbance to which the ecological assets of the areas affected might be exposed as a consequence of the projects. And that opportunities for habitat creation and enhancement associated with the further development or maintenance and improvement of the transport network and associated infrastructure be maximised.</p> <p>The Council is concerned over the appropriate safeguarding of nearby designated ecological in line with the Surrey Transport Plan Environmental Report (Surrey County Council, January 2011) recommendations.</p>	
Chapter 7 Biodiversity Section 7.4.13 onwards	The Scoping report gives no detail as to the survey methodology/timings. For example, reptile presence/absence surveys were undertaken August to October 2017 but the number of surveys is not provided. Is it seven undertaken or was it more as you have the presence of EPS species such as sand lizard? Is it possible that smooth snakes have been missed by the surveys due to the months surveyed? When have dormouse checks been undertaken - April to November or were they stopped in September assuming a point score of 20 was achieved etc?. A little more detail in this section would have been beneficial for the reviewer to see, please ensure all this detail is outlined in the ES.	Survey details have been provided in ES appendices. There are no records of smooth snakes occurring in these locations.
Chapter 7 Biodiversity Section 7.5.2	The Scheme will involve an approximate permanent land take of 25.7 ha and an additional temporary land take of 32.8 ha. The Council is concerned because of this area the Scheme will cause the direct loss of approximately 22.4 ha of permanent land take of HPI habitat, and an additional 22.4 ha of temporary land take.	Comment duly noted.
Chapter 8 Road Drainage and the Water Environment Overall	Some aspects of the presentation could be improved for clarity over how the receptors and potential impacts will be assessed in the EIA compared to within the FRA and (updated) WFD assessments. A clearer link should be made to ecological aspects of the WFD that are mentioned in this chapter with the biodiversity / ecology chapter - it is cross-referenced in passing but as ecological value and impacts are mentioned throughout the chapter it should be made clear where these links will be made in the EIA. We have not reviewed the existing WFD Assessment as this is not in the Scoping Report appendices provided - albeit paragraph 8.4.13 states that full details of the scoping WFD assessment are provided in Appendix D - so have made no comment on its content or outcomes.	Comment duly noted. Presentation in Chapter 8 (Road drainage and the water environment) has been altered.
Chapter 8 Road Drainage and	The following statement is not clear "WFD full walkover surveys of the affected watercourses and lakes will be undertaken as part of this stage". It is not clear if the walkover surveys have now been done at Scoping Stage or would be done during EIA?	The WFD walkover surveys will be undertaken during the EIA. Details of the surveys are

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the Water Environment Section 8.4.1		documented in the WFD compliance assessment report.
Chapter 8 Road Drainage and the Water Environment Sections 8.4.3 and 8.4.6, and Table 8.2	Four WFD surface water bodies are identified in 8.4.3 and Table 8.2 which are all rivers, and then a lake is added in 8.4.6. It would be better to include all in Table 8.2 as the lake is a surface water body. We recommend that for the ES the WFD water bodies are presented together and in a more clear and understandable format.	Comment duly noted. The wording of the headings has been altered to ensure it is clear whether WFD river waterbodies or WFD lake waterbodies are being discussed. Watercourses and lakes are now also all discussed under one heading of surface water. As there is only one WFD lake waterbody, the information for this waterbody has not been presented in a table as it was felt this wasn't necessary.
Chapter 8 Road Drainage and the Water Environment Section 8.4.13	The WFD Assessment has been referred to in the text as Appendix D but Appendix D is not present in Scoping Document. Therefore this has not been reviewed.	Comment duly noted. The WFD Assessment is included as a separate document to the ES, and forms part of the documentation presented for the DCO application.
Chapter 8 Road Drainage and the Water Environment Section 8.4.17	Flood zones 2 and 3 are associated with nearby surface watercourses which are adjacent to the Scheme. In addition, the hydrogeological character of the study area means that groundwater flood risk may be an issue. This is an issue for the Council because a key recommendation of the Surrey Transport Plan Environmental Report (Surrey County Council, January 2011) was that "any new transport related developments make use of land that is not located in areas that are subject to significant risk of flooding from all sources, and that does not increase flood risk elsewhere as a consequence of the development."	Comment duly noted. Groundwater flood risk has been considered in the assessment within Chapter 8 (Road drainage and the water environment) of the ES.

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Chapter 8 Road Drainage and the Water Environment Section 8.6.3 and Table 8.5	This table seems unnecessarily overcomplicated and confuses resources and receptors. We recommend that more thought is taken into the presentation of information (especially in tables) in the ES.	Comment duly noted. This exact table is not included in the ES because the methodology used for the assessment has changed. In the scoping report the method for assessment was Transport Appraisal Guidance. In the ES the method for assessment is HD 45/09 from the DMRB. Importance for each water feature has been assigned throughout the baseline section of the ES. There is not one overall table defining importance for each feature.
Chapter 9 Landscape Section 9.2	This section states that 'any effects upon landscape receptors/ on visual receptors beyond the study area are unlikely to be significant and have been scoped out of further assessment', however any elevated long distance views will need to be identified and considered in the assessment, if none exist then this should be stated.	This has been clarified in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.3	Guildford Borough Council has a Historic Parks and Gardens Gazetteer which includes the following sites within the area: <ul style="list-style-type: none"> • Ockham Park, Ockham • Dunsborough Park, Ripley • Send Grove, Send • Sendholme, Send • Foxwarren Park, Wisley. These should be referred to/ruled in or out and included in Appendix F as non-designated heritage assets and also need to be considered in the landscape assessment.	This has been clarified in Chapter 9 (Landscape) of the ES and in Appendix 9.1 of the ES.
Chapter 9 Landscape	There are sections of the NPPF 2012 which would also be pertinent to this report including valuing landscapes (NPPF para 109) and visual impacts (NPPF para 143).	These sections of the NPPS 2012 have been investigated

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Section 9.3.5		and where appropriate referenced in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.3.18	Guildford Borough Council Local Plan 2003 Policy HE12 Historic Parks and Gardens applies as written. Although, in the main policy text for registered parks and gardens, the text also covers the further assessment of areas of historic landscape importance i.e. the gazetteer.	The Guildford Borough Council Local Plan 2003 Policy HE12 has been investigated and where appropriate referenced in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.4.5	Are RF7, RV4, SS10, SW6 LR2 character areas not considered relevant in this report?	These character areas have been investigated and where appropriate referenced in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.4	The main receptors include the users of PROWs and Wisley and Chatley Heath Commons. Other visual receptors include people in Painshill Park and RHS Garden Wisley, local communities, visitor to publicly accessible sites, schools, and road users.	These receptors have been reviewed and referenced in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.5.14	This paragraph seems to overstate the replacement environmental design. Environmental measures and reduction of environmental effects should be provided as standard and assessed as part of EIA.	This has been clarified in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6	Will there be an assessment of lighting effects during construction and/or operation? We recommend including one.	Further details regarding the lighting proposals both during construction and operational is provided in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.4	Will photomontages or photo visualisations will be provided? We recommend including this information in the ES. These should be AVRs (accurate visual representation).	Photomontages have not been produced as design development meant that stakeholders did not require

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		them and because the wooded nature of the site made them of little value.
Chapter 9 Landscape Section 9.6.6	Is "Outline Landscape Design" different to a Preliminary Landscape Design, or are these comparable? Please make it clearer in the ES.	These are comparable, further detail is clarified in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.7	Are the selection of "woodland areas around M25 Junction 10" and "Areas of vegetation including semi mature and mature trees, hedgerows along the road corridors approaches to the M25 Junction 10 junction" considered as receptors, consistent with the GLVIA3 guidance? Are these selected because they contain Open Access Land? Please make the justification clear in the ES.	Further clarification of these has been provided in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.7	There may be some confusion between what an "effect" and a "receptor" are. An effect is the outcome of the impact upon a landscape character area as a receptor.	Additional clarification of this has been provided in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.7	Residential receptors appear to be missing from the list of landscape receptors that are scoped in.	The addition of residential receptors has been reviewed and is updated in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.8	Table 9.3: There appears to be some confusion with what constitutes a "receptor" traditionally areas of vegetation and "effects" are not receptors.	Additional clarification of this has been provided in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.6.9	Table 9.4: The distance of receptors does not offer much detail on their relationship to the Scheme. For example, if RHS Wisley adjoins the Scheme it is misleading to describe it as being with 2000m when other areas which "adjoin" are described at being 500m away.	Distance of receptors to scheme has been reviewed and updated.
Chapter 9 Landscape Section 9.6.9	Table 9.4: There appears to be residential receptors missing from the table.	The addition of residential receptors has been reviewed and updated where required.
Chapter 9 Landscape Section 9.7.2	Will design alternatives be covered in an separate preceding chapter and then revisited in this chapter? It may be more efficient to make a reference to their earlier inclusion.	Chapter 3 (Assessment of Alternatives) of the ES considers the alternatives

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		looked at in the previous design stages. Any landscape impacts of the alternatives is addressed in Chapter 3.
Chapter 9 Landscape Section 9.7.6	We recommend referring to IAN 135/10 (2.16 Table 1) on visual sensitivity and typical descriptors.	Reference to IAN 135/10 is included in Chapter 9 (Landscape) of the ES.
Chapter 9 Landscape Section 9.8.1	The proposed consultation section should include likely actions and objectives of consultations and who consultees would be e.g. Identification of key views, Statutory Environmental Bodies etc.	Section 1.8 (Consultation overview) of the ES gives an overview of the consultation undertaken to date, including who has been consulted, a summary of their consultation comments and how we have taken into account their consultation comments. Further details on the consultation can be found in the Consultation Report, submitted along with the DCO application.
Chapter 9 Landscape Section 9.9.1	It would be helpful to include some assumptions and limitations that will effect the future assessment. These should include accessibility to receptors and representative views, the type of data used, whether site visits are undertaken in the summer or winter period etc.	Section 9.6 (Assumptions and limitations) of the ES includes assumptions and limitations of the landscape assessment.
Chapter 9 Landscape Section 9.1	It would be helpful for the Conclusion to make some statements regarding an overview as to what has or has not been scoped in, and what the predicted effects are for landscape and visual receptors are as a whole.	At the end of Chapter 9 (Landscape) of the ES, there is a summary section which summarises the effects of the scheme on landscape. There is also an executive summary at the start of Chapter 9 which summaries the chapter.

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Chapter 10 Geology and Soils Section 10.2.1	A study area of 500m has been selected, however the 500m study area boundary has not identified on figure within Chapter 19. It would be useful to include this study area on the figure in the ES submission.	The study area has been changed to 250m from the Scheme boundary, as explained in section 10.4.1 of the ES.
Chapter 10 Geology and Soils Section 10.4	As part of the baseline conditions, is previous ground investigation information available (highlighted in 10.6.1 and 10.7.2, second bullet point) including ground model information? This should be considered for the ES.	Although the amount of ground information is limited in terms of geoenvironmental chemical data, there is a generous amount of information of geology conditions, primarily soil stratigraphy and water strikes. There is also one borehole with geoenvironmental laboratory testing at Painshill Junction from November 2010 and several locations within Wisley Airfield, completed in 2014. These have been presented in section 10.5 of the ES. Further, a ground investigation could not be completed prior to DCO submission due to timescales associated with the procurement process and the scale of the ground investigation, which is anticipated to take 5 months. This decision was approved by the Environment Agency but as a consequence an updated

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		ground investigation could not be used to advise the ES.
Chapter 10 Geology and Soils Section 10.4.2	Refers to BGS geological mapping, however, there is no further detail regarding the name/details of the map(s)/source of information. Is it possible to be more specific about what superficial deposits will be encountered and where? The text currently provides a general list and states that these deposits are anticipated. Same comment regarding bedrock. This should be taken on board for the details in the ES.	BGS geological mapping is in reference to the BGS Geology of Britain online map viewer. More detailed information regarding the anticipated geology within the Scheme is provided as Appendices 10.6 and 10.7 of the ES. The table titled 'Summary of anticipated geology within the Scheme' goes into much more detail on the description of the soils and bedrocks, the periods they were formed in, and if these formations are located on site and where within the study area.
Chapter 10 Geology and Soils Section 10.4.3	Historical landfills and other existing infrastructure anticipated to be present throughout the Scheme - Is there any further details available? Please include these details in the ES.	The different boroughs and relevant councils (Environment Agency, Surrey County Council, Elmbridge Borough Council, and Guildford Borough Council) have been contacted to obtain more information about the landfills within the study area. This information is provided in section 10.7.61 and Table 10.10 of the ES. The correspondence is also provided in Appendix 10.8 of the ES.

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Chapter 10 Geology and Soils Section 10.4.4	No geological SSSIs or Local Geological Sites are located within the study area - assuming "study area" is within 500m? Please clarify this in the ES.	This has been updated to show that there are SSSI within the study area and within the new study area boundary 250m from the Scheme (Ockham Common and Wisley Common Site of Special Scientific Interest, Ockham and Wisley Local Nature Reserve, and the Thames Basin Heath Special Protection Area).
Chapter 10 Geology and Soils Section 10.4.6	BGS mineral resources map identified that the western, southern and northern extents of the Scheme fall within sand and gravel mineral resource zones, associated with the River Wey and River Mole. Details of the mineral maps should be disclosed in the ES.	Applicant has provided these maps as part of Appendix 10.3 (Envirocheck Report) of the ES.
Chapter 10 Geology and Soils Section 10.4.8	A review of the Highways Agency Geotechnical Data Management System (HAGDMS) was undertaken on 30 November 2017 and identified 96 No. earthworks and 21 No. geotechnical defects within the Scheme extents - Will this information be detailed within a different report? It is recommended that this is included/append to ES.	A superseded version of this sentence is included in the Preliminary Sources Study Report (document ref: HE551522-ATK-HGN-2-RP-C-4400, V2.0, dated 19 June 2017), however, the sentence refers to information correct as of April 2017: "A review of HAGDMS (Highways England, 2017) undertaken on 05 April 2017 identified 105 No. earthworks and 22 No. geotechnical defects within the Scheme extents."

Scoping Report reference	Comment	Response
		<p>The information was updated in the Scoping Report to reflect a change in the number of earthworks and geotechnical defects. This was a result of changes to the site extents/highways design, and a phase of geotechnical inspections that were carried out in April 2017. The Scoping Report is the only document that makes reference to the information correct as of November 2017 and is not included in the ES.</p>
<p>Chapter 10 Geology and Soils Section 10.4.13 - 10.4.16</p>	<p>There are several water courses which are impacted by the Scheme and could be affected in the event that contaminated shallow groundwater migrates towards them, and they could also be affected by surface water transport. Further discussion is within Chapter 8. Has the impact of the Scheme on these individual water courses and potential mitigation measures been discussed? This needs to be considered in the ES.</p>	<p>The risk of this pathway and the Schemes' effect on on-site waterbodies, during both the operational phase and construction phase, is provided in section 10.8 of the ES. This is summarised in Table 10.11 and described in full in Appendix 10.11. Each of the on-site water bodies have been identified as receptors (or pathways depending on the PCL) within Table 10.11 and Appendix 10.11. Mitigation measures are provided in section 10.9 of the ES.</p>

Scoping Report reference	Comment	Response
Chapter 10 Geology and Soils Section 10.4.17	We envisage that this information has been obtained by analysing the 1:250,000 ALC maps by Natural England. Is this correct/can a reference for this information be provided?	Agricultural land has been removed from Chapter 10 (Geology and Soils) of the ES and is included in Chapter 13 (People and Communities) of the ES. ALC maps and soil surveys have informed the assessment.
Chapter 10 Geology and Soils Section 10.4.18	Noted that a full review of potentially contaminated land uses will be completed in the ES.	This has been provided in section 10.7 (Baseline conditions) of the ES.
Chapter 10 Geology and Soils Section 10.4.19	Historical landfill sites and a number of pollution incidents have been reordered within the study area. This should be referenced in the ES.	Comment duly noted, they have been included as part of section 10.7 (Baseline conditions) of the ES. Table 10.10 provides information on historical landfill sites. Pollution incidents are summarised in section 10.7.67 and are described in Appendix 10.10 of the ES.
Chapter 10 Geology and Soils Section 10.5	No impact on agricultural land are listed in the 'Potential impacts' in section 10.5, however section 10.10 indicates these may be present. This is more of an observation, as soils and agricultural land are scoped-in to be assessed further so their omission from 10.5 has not precluded further analysis.	Agricultural land has been removed from Chapter 10 (Geology and Soils) of the ES and is included in Chapter 13 (People and Communities) of the ES.
Chapter 10 Geology and Soils	Section 10.6.1 states "limited ground information is currently available for the Scheme", however section 10.7.2, second bullet point states "Previous ground investigation and limited remediation	Comment duly noted and have removed the contradiction from the ES. There is some

Scoping Report reference	Comment	Response
Section 10.6.1	have been undertaken at the site of the Scheme". Further clarification required about the ground investigation, slightly conflicting comment.	ground investigation information available for the Scheme and study area. The information from HAGDMS, BGS, and WSP Wisley airfield report has been tabulated in Appendix 10.6 of the ES.
Chapter 10 Geology and Soils Section 10.6.2	Providing an assessment of the groundwater regime at the site - As part of the contamination testing regime, will the surface water features be tested within the "study area" to confirm baseline levels? This needs to be clarified in the ES.	Yes - the surface water in the study area will be tested, particularly at Bouldemere Lake and Stratford Brook. This is described in 10.5.17 of the ES, stating the ground investigation will include 'Sample identified surface water receptors to derive site specific environmental quality standards'. This is also outlined in the Ground Investigation Specification for the Scheme, which is summarised in Appendix 10.2 (summary of the purpose of the GI) of the ES.
Chapter 10 Geology and Soils Section 10.6.3	The ES will review the soils and geology issues at baseline, albeit based on desk based information only in the absence of ground investigation data which will not be available in time to be reported in the ES. Is data available from previous ground investigations undertaken? Limited ground investigation highlighted in section 10.6.1 and previous ground investigation highlighted within 10.7.2 second bullet point.	Although the amount of ground information is limited in terms of geoenvironmental chemical data, there is a generous amount of information on geologic conditions, primarily soil/bedrock stratigraphy and groundwater strikes. This information has been compiled from various sources in

Scoping Report reference	Comment	Response
		Appendix 10.6 of the ES. There is also one borehole with geoenvironmental laboratory testing at Painshill Junction from November 2010 and several locations within Wisley Airfield, completed in 2014. These have been presented from section 10.7.68 (historical contamination data) of the ES.
Chapter 10 Geology and Soils Section 10.6.3	The Council is concerned that the Scheme specific ground investigation data will not be available in time to be reported in the ES, and that this will jeopardise the validity of the assessment. The ground investigation results are required to inform appropriate mitigation measures.	The Environment Agency has stated in their e-mail dated 16 January 2018 that it was confirmed that there were no issues emerging from the ground investigation based on what they had been presented so far. The Environment Agency was also satisfied that any issues can be dealt with adequately through any requirements on the DCO. Therefore, no issues were raised with the proposal to submit the DCO application prior to the completion of the ground investigation reporting. The e-mail is provided in Appendix 10.8 of the ES.
Chapter 10 Geology and Soils	Section 10.6.3 states that ground investigation data will not be available to inform the ES, however in section 10.7.2 it states that the ground investigation results will be used to inform the risk assessment, which will be produced before the impact assessment. Clarification is required as to	The ground investigation work and subsequent report has not been completed for DCO submission. However, they will be provided as separate

Scoping Report reference	Comment	Response
Sections 10.6.3 and 10.7.2	when the ground investigation data/results will be available. If available, this data should be used to inform the EIA presented in the ES.	documents at a later date, prior to the operational phase of the Scheme. The ground investigation is expected to take five months to complete with subsequent baseline monitoring, laboratory analysis, assessments and reporting. In light of this, the associated assessments and reporting will subsequently be made available as soon as possible.
Chapter 10 Geology and Soils Section 10.7.2	Highlighted previous ground investigation and limited remediation have been undertaken at the site. Can this ground model information be included with the baseline conditions? How old is this ground investigation (GI) and the contamination results? Has there been significant development since this GI and would these results be relevant?	There is one borehole with geoenvironmental laboratory testing at Painshill Junction from November 2010 and several locations within Wisley Airfield, completed in 2014. These have been presented in section 10.5 of the ES. It has been used to inform some of the baseline information but does not provide good coverage of the Scheme.
Chapter 10 Geology and Soils Section 10.7.26	It is considered that the proposed level and scope of assessment detailed in section 10.5 will be sufficient to assess baseline conditions - Is this based on using existing ground investigation data? Clarification is required as to whether the ground investigation data for the Scheme will be available to inform the ES.	Some existing ground investigation data from HAGDMS, BGS, and a WSP Wisley airfield report will be used to assess baseline conditions, and is summarized in Appendix 10.6 of the ES. Some historic ground investigation data is available for the ES, but the updated

Scoping Report reference	Comment	Response
		ground investigation will not be completed prior to DCO submission and therefore will not be included in the ES.
Chapter 10 Geology and Soils Overall	There are no Part IIA sites in Guildford Borough. Apart from the nearby commercial uses at former Wisley Airfield, Wisley Sewage works and RHS Garden Wisley, there are no known potentially contaminated sites within the area. Please note that a full historical search if required will only be conducted on payment of the appropriate fee to the Council.	Comment duly noted.
Chapter 11 Cultural Heritage General	Throughout the document there is a lack of reference to non designated built heritage assets. If these have not been assessed as part of this scoping exercise this needs to be included in the limitations. If they have been assessed then this needs to be more explicit in the assessment in the report.	Comment duly noted, Chapter 10 (Cultural heritage) of the ES includes non-designated heritage asset references. The term 'undesigned' is also used in Chapter 10 (Cultural heritage) of the ES relating to terminology used by policy and planning guidance.
Chapter 11 Cultural Heritage Section 11.2.1	Can the study area be clarified. By alignment is it meant from the centre line, the works boundary, the carriageway edge? This needs to be clarified in the ES.	Comment duly noted. The study area is clarified in section 11.4 of Chapter 10 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.2.1	We would like to know if the study area will be revised to reflect locations of works compounds, ecological mitigation, balancing ponds, replacement common? We recommend that it should be for the ES.	Where this information is available at the time of writing the ES, these additional features have been included in the section 11.4 of Chapter 10 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage	National Planning Policy Framework - think this needs expanding to more fully reflect consideration of heritage assets and significance and how the report and evidence will appropriately acknowledge and respond, so for example:	National Planning Policy Framework has been updated to the 2018 issue and includes

Scoping Report reference	Comment	Response
Section 11.3	<p>NPPF 128 - includes that applicants should '.....describe the significance of any heritage assets affected, including and contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk - based assessment and, where necessary, a field evaluation'.</p> <p>Perhaps link this more closely to how this has this already been considered (11.4 Baseline conditions), how will this be done for all areas where there are historic assets/ settings/ archaeological sites that may be effected, or within vicinity of works - including mapping, visuals, photomontages etc.. and how they have been considered ruled in or out....</p> <p>NPPF Policy 131 includes the 'desirability of new development making a positive contribution to local character and distinctiveness'</p> <p>NPPF Policy 132 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the assets' conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting'..... 'Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments,.....grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'</p> <p>NPPF Policy 133. 'Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...'</p> <p>NPPF Policy 134 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including optimum viable use.' If there is some harm, but less than substantial harm to any heritage assets is identified (Wisley, Ockham, Painshill, settings etc ?) can the Scheme be judged to balance this harm with protecting, but also assisting in for e.g. viability of RHS Wisley/others through for eg. improved access etc. as well as the wider public benefits to road users overall? Any mitigation to be provided that would limit harm identified...?</p> <p>NPPF Policy 135. The effect of an application on the significance of a non-designated heritage asset should be taken into account. In weighing applications that effect directly or non-designated</p>	<p>paragraphs relevant to heritage assets.</p>

Scoping Report reference	Comment	Response
	<p>heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. (Need to consider for example impact on setting of gardens in the Guildford Borough Council has a Historic Parks and Gardens Gazetteer if appropriate/ or no impact)</p> <p>NPPF policy 139. Non-designated heritage assets of archaeological interest that area demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</p>	
Chapter 11 Cultural Heritage Section 11.3.3	The Scoping report just refers to non-designated archaeological assets. Definitions of all non-designated heritage assets should be included. Both NPS and NPPF note that all non designated assets should be taken into account in decision making. Please take this into account for the assessment at ES stage.	Chapter 11 (Cultural heritage) of the ES considers all non-designated assets.
Chapter 11 Cultural Heritage Section 11.3.7	The definition of substantial harm is incorrect and significantly plays down the level of harm required which would result in substantial harm. Total loss is substantial harm. See NPPG para 017 for a description of how to identify substantial harm, the NPPG description is not reflected here.	This has been addressed in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.3.8	Please clarify here that substantial harm to designated assets means a strong presumption against development. This needs to better reflect the balance between harm and public benefit i.e. the more harm the stronger the justification in terms of public benefit needs to be.	This has been addressed in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.3.7	The Council is concerned about the use of the word degradation. NPPF notes that deliberate neglect should not be taken into account in decision making. Can this be reflected in how degradation is defined here i.e. not deliberate neglect.	The term 'degraded' is only used in text relating to the wording of the guidance given by DMRB. The type and level of degradation is considered in the individual assessments, in line with NPPF.

Scoping Report reference	Comment	Response
Chapter 11 Cultural Heritage Section 11.3.9	Less that substantial harm needs defining in more detail. It is likely that most of the impacts/effects are going to result in less than substantial harm, therefore this section needs to be more robust in its definition. It particularly needs to show an understanding of the levels/spectrum of less than substantial harm and how this relates to the need to balance between the harm and the public benefits of a scheme.	This has been addressed in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.3.10	<p>Please note that consultation on the Guildford borough Proposed Submission Local Plan: strategy and sites (Guildford Borough Council, June 2017) is now complete and that the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017. Examination is expected to begin in spring/early summer 2018 whilst the current published timetable anticipates adoption in December 2018.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> • the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); • the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and • the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account those in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017).</p> 	Reference of the Proposed Submission Local Plan: Strategy and Sites (Guildford Borough Council, June 2017) has been added to section 11.3 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage	Policy HE6: Locally listed buildings - there doesn't seem to be any further discussion of locally listed buildings in the chapter to establish whether the scope for the ES will address this policy.	This has been addressed in section 11.7 of Chapter 11 (Cultural heritage) of the ES. Locally designated assets are considered with other

Scoping Report reference	Comment	Response
Section 11.3.11		designated and non-designated assets in assessment text and tables in section 11.10 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.3.11	Will there be any new highway developments within Ripley itself which is within a Conservation Area (such as changes to junctions on existing routes e.g. High Street, Newark Lane) or in Ockham, Send - whereby GBC local plan policies HE1 Proposals which effect Listed Buildings, HE4 New development which affects the setting of a listed building, and HE7 New development in Conservation Areas, may also be relevant and apply? Consideration should also be given to any possible knock on impact of traffic changes within sensitive areas such as Ripley, Ockham. Also, Ockham Mill (hamlet) is a Conservation Area with a number of listed buildings/ settings / views to consider.	Comment duly noted. Section 11.11 of Chapter 11 (Cultural heritage) of the ES addresses cumulative impacts of committed developments from a cultural heritage perspective. Section 11.3 of Chapter 11 (Cultural heritage) of the ES identifies relevant local policies. HE1 is not referenced, as it is superseded by NPFF and NPSNN; HE7 is not relevant as the Scheme does not propose any new development in a Conservation Area.
Chapter 11 Cultural Heritage Section 11.3.13	Legislation is erroneously included here. It needs to be included but is neither guidance or a standard. Also there is no mention of GPA2, Historic England Conservation principles or Ripley Conservation Area Appraisal - please can it be confirmed these were used to prepare the scoping report? Just a note that GPA3 has been updated since this was prepared and the new guidance should be used in the ES.	Reference to Historic England's Good Practice Advice in Planning 2 and 3 and Historic England's Conservation Principles are included in section 11.5 of Chapter 11 (Cultural heritage) of the ES. No work is proposed within the Ripley Conservation Area, so HE7 is not applicable.

Scoping Report reference	Comment	Response
Chapter 11 Cultural Heritage Section 11.4.2	There does not seem to be any non-designated built heritage in the gazetteer, or anything from a local list. As noted above, there does not seem to have been a comprehensive survey of non-designated built heritage to inform the scoping report. This needs to be done to inform the ES.	Both designated heritage assets and non-designated heritage assets are included in Appendix 11.1 Heritage gazetteer of the ES.
Chapter 11 Cultural Heritage Section 11.4.4	The report notes listed buildings are scoped out due to visual connectivity with the Scheme. Has the assessment considered other non-visual relationships which may contribute to setting (for example noise, relationship with other heritage assets, views across the Scheme etc)? This needs to form part of the assessment to fully scope these assets out. Please refer to table 1 in GPA3 for fuller (but non exhaustive) list of factors which may contribute to setting.	Chapter 11 (Cultural heritage) of the ES considers setting impacts on listed buildings from other non-visual sources.
Chapter 11 Cultural Heritage Section 11.4.6	We observed that there are "no setting impacts", there needs to be a brief summary of why no setting impacts were identified so that the reason for scoping out can be fully appreciated.	The assets in question were not within the study area; the site visit was to determine if they should specifically be scoped into further assessment (despite being outside of the study area) because they were within the boundaries of Painshill Park. As the site visit did not identify any compelling reason to include these assets, they were not scoped into further assessment.
Chapter 11 Cultural Heritage Sections 11.4.7 - 11.4.8	No indication of what is scoped in or out - similar to how the section on designated assets is dealt with. Clarification is required as to what aspects are scoped in or out.	Sections 11.7 and 11.8 of Chapter 11 (Cultural heritage) of the ES identify which assets have been scoped into the assessment. All assets within the study area were scoped in to the ES at the time of writing the Scoping Report due to

Scoping Report reference	Comment	Response
		insufficient design information of the Scheme.
Chapter 11 Cultural Heritage Section 11.5	There is no indication as to what is scoped in or scoped out of the assessment. It is assumed that everything mentioned in this section is scoped in, however can this be made more explicit?	Comment duly noted, reference to what has been scoped into the assessment has been addressed in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.5	Areas for works and access for the development proposals? What land is to be used and where for temporary periods - will this effect or impact on heritage assets and landscapes and their settings. Any harm? Mitigation? Reinstatements. Other long term benefits that might be negotiated as part of the Scheme?	Comment duly noted, section 11.10 of Chapter 11 (Cultural heritage) of the ES includes assessment of potential impacts within the red-line boundary of the Scheme, which includes the location of any temporary works, including compounds and access. Detailed design will assess all the temporary and permanent works of the Scheme.
Chapter 11 Cultural Heritage Section 11.5.2	Please can "direct impacts" be clarified? Direct impacts can either be physical impacts to the asset or impacts to the setting. This should be clarified in the ES.	This has been addressed in section 11.8 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.5.6 - 11.5.9	Road widening in Ockham and any likely impact on setting of curtilage listed estate walls, gates and parkland as part of the Ockham Park estate - will any of these be affected?	Ockham Park and its associated features were identified in the Desk Based Assessment Appendix (Appendix 11.2), and noted in section 11.7 of Chapter 11 (Cultural heritage) of the ES.

Scoping Report reference	Comment	Response
		The Scheme does not include any work within the curtilage of the listed buildings, nor does it impact Ockham Park. Impacts to Ockham Park are identified in section 11.8 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.5.17	Are any impacts with regard to unknown archaeology expected at Elm Lane, as such is this scoped in or out? Clarification is required.	Comment duly noted. Impacts to as-yet unknown archaeological assets throughout the Scheme are addressed in sections 11.8 and 11.9 of Chapter 11 (Cultural heritage) of the ES. Impacts to as-yet unknown archaeology are anticipated throughout the Scheme, including at Elm Lane, and have been scoped into the ES.
Chapter 11 Cultural Heritage Section 11.6.4	Is non-intrusive investigation also proposed? Clarification is required.	Comment duly noted. Archaeological evaluation, including non-intrusive investigations are dealt with in Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.7.1	Not clear whether this is the methodology for ES or for the scoping report, assume it is the methodology proposed for ES - this needs to be explicit. The methodology used for the EIA needs to be fully outlined in the ES.	Comment duly noted. The assessment methodology for Chapter 11 (Cultural heritage) has been outlined in section 11.5 of the ES. The methodology in Chapter 11 (Cultural heritage) of the

Scoping Report reference	Comment	Response
		Scoping Report is for the Scoping Report.
Chapter 11 Cultural Heritage Section 11.7.1	Regarding archaeological evaluation, a programme should be designed and undertaken during preliminary design to inform the design and mitigation. The Council is concerned that if this is left to after detailed design, then there will be no opportunity to mitigate through avoidance of assets or design amendments to minimise the impact. It should be noted that evaluation and recording is not mitigation - para 141 of the NPPF notes "However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted".	Assessment of impacts on known and unknown archaeological assets has been undertaken throughout the preliminary design to evaluate and characterise the archaeological resource. This is addressed in Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.7.2	It is not clear whether this is how the ES will be assessed or how the scoping has been assessed.	Paragraph 11.7.2 of the Scoping Report outlined the assessment methodology for the EIA. The full methodology for the EIA is provided in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.7.2	The mention of significance should be directly related to heritage significance as defined in the NPPF. Otherwise there is the potential for confusion with significance of effect as defined in EIA terms.	A description of the significance (for heritage policy) from NPPF has been included in section 11.5 of Chapter 11 (Cultural heritage) of the ES. Applicant further states that as DMRB methodology has been used for the assessment, the term 'value' is used in place of 'heritage significance' and thus 'value' is used throughout the chapter to refer to 'heritage significance' to avoid confusion with the term 'significance of effect'.

Scoping Report reference	Comment	Response
Chapter 11 Cultural Heritage Section 11.7.3 and Table 11.2	In the example for very high and high, there is no mention of archaeological sites/remains. In negligible, are assets of no historic interest proposed to be included? If they are of no historic value then they are not a heritage asset as defined in the NPPF.	Archaeological sites/remains have been added to the table and features of 'no historic interest' has been changed to 'negligible historic interest' in the table that sets the criteria for assessing the value of heritage assets in section 11.5 of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.7.4 and Table 11.3	The inclusion of harm in the description and nature of change is misleading and could lead to potential issues in defining where there is a significant impact/effect. Substantial and less than substantial harm are more nuanced than the definitions of major adverse/moderate adverse etc. Saying that all cases of less than substantial harm will result in a significant impact is misleading and could lead to incorrect assessments of the level of significant effect. Also, not all cases of Major adverse impact will be due to substantial harm and similarly may result in incorrect assessments. Limited harm used in minor adverse impact has no definition within policy. Unless better defined both in the table and in 11.3 policy terminology should not be incorporated into the ES assessment terminology. The same definition for the impact of physical alteration appears in both moderate and minor adverse impact leading to issues in defining the level of impact. The word significance is used throughout the table, there is the potential for the use of the word in the heritage context to lead to confusion when discussing significance of effect in the context of the ES assessment.	Comment duly noted. Section 11.5 of Chapter 11 (Cultural heritage) of the ES provides clarification on the definition of substantial harm.
Chapter 11 Cultural Heritage Section 11.7.5	It is not defined what significance of effect would constitute a significant effect. This needs to be outlined in the ES.	Comment duly noted. The ES specifies methodology for determining significance of effect. Section 11.5 of Chapter 11 (Cultural heritage) of the ES states "Though the determination of what constitutes 'harm' in terms of EIA is assessed on an individual basis (see section 11.4.14), moderate to very large adverse or beneficial

Scoping Report reference	Comment	Response
		effects are generally considered to be 'significant' in terms of EIA regulations".
Chapter 11 Cultural Heritage Section 11.7.6	First and fifth bullet point - can these be combined into a single "historic environment desk based assessment" to produce a more proportionate assessment as required by the NPPF? Bullet points two and three - this is confusing when read with 11.7.1 which suggests that all archaeological investigation will be undertaken during detailed design. Please can it be clarified when archaeological investigation/evaluation is expected to take place.	Comment duly noted. Archaeological evaluations will be addressed in a programme of work, outlined in the Outline Construction Environmental Management Plan. Setting was considered as part of the overall assessment of heritage assets, with the exception of Painshill Park and RHS Wisley, where Statements of Significance were produced to assess these complex assets. Rather than a combined historic environment Desk Based Assessment, a standard Desk Based Assessment was produced, with the ES assessments incorporating the evidence from those into setting assessments. Specific documents for Painshill and RHS Wisley were produced, commensurate with their significance and potential impacts.
Chapter 11 Cultural Heritage Section 11.7	Why are there two methodologies which appear to contradict each other. Can one methodology be described with reference to where this has been developed from?	Comment duly noted. The assessment methodology has been clarified in section 11.5

Scoping Report reference	Comment	Response
		of Chapter 11 (Cultural heritage) of the ES.
Chapter 11 Cultural Heritage Section 11.8	Consultation with the conservation officer or relevant planning officer needs to be undertaken alongside the other proposed stakeholder consultations. Also have the Gardens Trust been consulted with regard to the registered parks and gardens?	Comment duly noted. Consultation has continued throughout the preliminary design phase with Historic England, the local authorities and the Gardens Trust, as outlined in section 11.5 of Chapter 11 (Cultural heritage) of the ES. Consultations with Surrey County Council for the overall Scheme included responses regarding their heritage and conservation concerns; these have been addressed in Chapter 11 (Cultural heritage) of the ES and can also be found in the Consultation Report, submitted along with the DCO application.
Chapter 11 Cultural Heritage Section 11.9.1	Investigations proposed here do not constitute mitigation in policy terms (NPPF 141).	Comment duly noted. Section 1.9 of Chapter 11 (Cultural heritage) of the ES clarifies how further work will be required to identify, evaluate, mitigate and record impacts pursuant to NPPF 199 (replacing 141) and following the definitions in NPPF.
Chapter 11 Cultural Heritage	Second bullet point - HER data should have been acquired to see if there was any potential for setting issues from the introduction of gantries - it should be obtained for the ES assessment.	The HER data around the gantry locations refers to a Scheme design that is no

Scoping Report reference	Comment	Response
Section 11.10.1		longer part of the Scheme and such was not acquired for this location.
Chapter 11 Cultural Heritage Section 11.10.1	Third bullet point - how can setting be assessed if the compound is on the edge of the study area and may impact assets outside the study area. Study area should be amended when compound locations are known.	Comment duly noted. The ES reflects the information from the current Scheme design, including compound locations. The cultural heritage study area has been adjusted accordingly.
Chapter 11 Cultural Heritage Section 11.11.1	This seems to suggest that all non designated assets are scoped in for assessment. This should be revised as it would not result in a proportionate assessment as required by policy.	All non-designated heritage assets were scoped in for assessment, pursuant to NPPF and NPSNN which require non-designated assets to be assessed and, where of equal value of designated assets, treated as such, as outlined in section 11.3 of Chapter 11 (Cultural heritage) of the ES.
Chapter 12 Materials and Waste Section 12.2 Study Area	There is no mention of how the study area has been determined, the Council would expect the report to reference/explain that there is no study area for materials defined in the DMRB Vol 2. and as a result the study area has been determined through professional judgement by the influence of the proposed Scheme rather than through a set geographical location.	Reference has been made in the ES that professional judgement has been used to determine the study area for materials and waste.
Chapter 12 Materials and Waste Section 12.3 Planning	The Council would recommend that in the ES the legislation section could be more concise and only relevant legislation should be included. Some key legislation and policy docs/guidance are missing e.g. landfill regs and the Waste Prevention Programme. We suggest removing legislation references to packaging, WEEE, asbestos, batteries and accumulators CLP and PCBs as these are quite specific and for road schemes, where relevant, are mainly covered under other legislation.	Landfill Regulations 2002 have been revoked by Environmental Permitting Regulations 2010, therefore not referenced. The legislation and policy section (section 12.3) has

Scoping Report reference	Comment	Response
Policy and Context		been reviewed and streamlined as appropriate.
Chapter 12 Materials and Waste Section 12.4 Baseline	The report states that it has been written in accordance with the IAN but does not reference DMRB Vol 2 Section 2 part 4, which is the overall document.	Reference to DMRB has been added in the ES.
Chapter 12 Materials and Waste Section 12.4 Baseline	The baseline section should be expanded on in the Scoping Report. It considers national material resources but not more local/regional sources, which is where the impact will be greater. In addition, the baseline data will need reviewing to include more up to date data and sources as it is currently limited to AMRs and Waste Interrogator tools, other sources are available through the DEFRA and EA statistical data and summaries.	Data from the Surrey Waste Capacity Assessment has been used, as recommended by Surrey County Council themselves.
Chapter 12 Materials and Waste Section 12.4.12	Waste facilities within Surrey should be identified and reported in the waste baseline section of the ES.	Data from the Surrey Waste Capacity Assessment has been used, as recommended by Surrey County Council themselves.
Chapter 12 Materials and Waste Section 12.5.2	<p>The potential impacts section is missing quite a lot of detail, the Council recommend that the following details of impacts are included in the ES.</p> <ul style="list-style-type: none"> • Potential impacts/effects from all the material use/waste arisings associated with the project activity and the potential to generate significant effects such as import and use of aggregates and those associated with their generation and disposal of waste. • Potential impacts associated with the use of material resources for the construction of the Scheme is the potential depletion of virgin/natural/non-renewable resources - this has not been considered and also needs to be considered in the ES. 	<p>Impacts of the Scheme are limited to receipt of and use of material on site and disposal of waste. The generation of materials sits outside of the scope of the assessment.</p> <p>Further Surrey County Council is "broadly content with the range of issues that have been identified" in this section.</p>
Chapter 12 Materials and Waste Table 12.5	What is the source of the criteria for classifying the magnitude of environmental effects.	There is no guidance on how the magnitude of environmental effects should be classified, therefore it has

Scoping Report reference	Comment	Response
		been based on professional judgement. This is referenced in the ES.
Chapter 12 Materials and Waste Section 12.7	The general methodology is weak and needs emphasising. It currently focuses on hazardous waste which is only a small part of the waste generated. The proposed methodology needs to consider the level of assessment as identified in the DMRB.	There is no specific guidance on the assessment methodology for materials and waste. As such the methodology in the ES has been based on general points in DMRB Volume 11 and Interim Advice Note 153/11.
Chapter 12 Materials and Waste Section 12.9	The mitigation measures outlined in this section only consider measures to minimise the amount of waste generated. There is also no mention of a SWMP or CEMP. Mitigation measures to reduce the quantity of material resources required to construct the Scheme have not been considered. This should be considered throughout the design of the Scheme and the EIA, for example in line with the measures outlined in Surrey Transport Plan Environmental Report (Surrey County Council, January 2011) which states that "any new developments and all maintenance works maximise the use of recovered and recycled materials, prioritise the use of renewable material resources over non-renewable resources, and re-use materials wherever feasible". In addition, measures outlined in the Surrey Transport Plan Environmental Report (Surrey County Council, January 2011) to minimise waste generation include "any new developments and all maintenance works be designed and delivered in ways that minimise the generation of non-recoverable, non-recyclable and non-reusable waste materials". The ES will need to clarify where and how these materials will be used.	Reference that mitigation measures for waste will also have a positive effect on material use has been made. The use of materials and generation of waste has been considered as part of the design process. Reference has been made to the use of a SWMP as best practice.
Chapter 12 Materials and Waste Section 12.11	The conclusion does not emphasise why the specific level of assessment is being used or mentions that an SWMP or CEMP will be produced to consider the reuse/recycling of materials and the sourcing, transport, use and disposal of materials in a sustainable manner.	The reasoning for the level of assessment is clarified in the ES. Reference is also made to the best practice use of a SWMP or CEMP.
Chapter 12 Materials and Waste	There is no evidence that contaminated land is identified or how/what sources of information will be used to do this, but it is mentioned and is said to be considered separately. As this is a material/waste is needs to be considered in the ES as part of the waste assessment. There is also	Contaminated land is detailed in Chapter 10 (Geology and Soils) of the ES.

Scoping Report reference	Comment	Response
General	no cross reference to other specific topics e.g. transport for waste and materials import/export, air quality and contaminated land/geology and soils.	Transport of material and waste will be considered as part of the transport, air quality and noise and vibration chapters of the ES. Clear cross references to these chapters has been made in Chapter 12 (Materials and Waste) of the ES.
Chapter 13 People and Communities Overall Comment	It is noted that agricultural land will be assessed within this chapter, however this has already been outlined that it will be assessed in Chapter 10 Geology and Soils - clarification is required as to how these assessments would differ and whether will be aligned with each other. It is recommended that the assessment is not repeated.	This was updated for the PEIR and the assessment of impact upon agricultural land will be presented within the People and Communities Chapter only in the main ES. The Geology and Soils Chapter will assess soil degradation only.
Chapter 13 People and Communities Section 13.3	The zone of influence for the 'People and Communities' environmental topic should include the village of Ripley as it is considered that the Scheme, as presently proposed, is likely to increase traffic flows through this village. The present pattern of recurrent peak period traffic congestion in Ripley and associated adverse community and environmental impacts is a concern to Surrey County Council, the Local Highway Authority. In addition, further consideration should also be given to including other settlements nearby to the proposed Scheme, including Wisley, Ockham, East Horsley and West Horsley, within the zone of influence for the 'People and Communities' environmental topic.	Please note that Wisley was captured in the study area for the Scoping Report and the PEIR. The study area will be revised for the ES to include the village of Ripley. TBC re Ockham and Horsleys.
Chapter 13 People and Communities Section 13.3	The Planning and Policy Context section, as presently drafted, is very long, but it is not clear to which planning policy or other social or economic policy or legislation, infrastructure policy or strategy, or transport policy, the Scheme will be required to respond.	The policy section was moved into the Appendices for the PEIR will be updated and refined for the ES.

Scoping Report reference	Comment	Response
Chapter 13 People and Communities Sections 13.3.28 - 13.3.32	Should use the title of the organisation of 'Guildford Borough Council' rather than the words 'Borough of Guildford'. (We note that the paragraphs above introduced by the title 'Elmbridge Borough Council' and those below by the title 'Woking Borough Council' for the neighbouring lower tier authorities.)	Reference to Guildford Borough Council updated in the ES.
Chapter 13 People and Communities Section 13.3.31	The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017. Examination is expected to begin in spring/early summer 2018 whilst the current published timetable anticipates adoption in December 2018.	Planning policy sections will be updated where applicable to reflect policy context at the time of DCO application.
Chapter 13 People and Communities Section 13.3.32	<p>The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account those in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), in particular the following policies:</p> <ul style="list-style-type: none"> Policy S2: Planning for the borough - our spatial development strategy 	<p>Policy compliance or departure will be assessed in detail within the Planning Statement as part of the application process. Your comments are noted regarding emerging planning policy and the weight that should be attached to such policy.</p> <p>The Main ES will consider the Scheme's likely impact on proposed land uses/development land, including proposed designations set out in emerging policy.</p>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> • Policy P5: Thames Basin Heaths Special Protection Area • Policy ID1: Infrastructure and delivery, which cross-references at point (4) the Appendix C Infrastructure Schedule of which schemes referenced SRN3, SRN5, SRN9 and SRN10 are of relevance • Policy ID2: Supporting the Department for Transport's 'Road Investment Strategy' • Policy ID3: Sustainable transport for new developments • Policy A35: Former Wisley airfield, Ockham • Policy A38: Land to the west of West Horsley • Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley • Policy A40: Land to the north of West Horsley • Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley • Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common • Policy A58: Land around Burnt Common warehouse, London Road, Send. <p>In addition, we note that the NPSNN, at paragraph 5.165, states that 'The applicant should identify existing and proposed land uses near the project...', as is referred to in paragraph 13.3.5 of this draft Environmental Scoping Report.</p>	
Chapter 13 People and Communities Sections 13.4.7 - 13.4.9	Most of the land within the Scheme boundary does look like it would be non-agricultural. However, Grade 3 could be BMV land as it is split into Grade 3a (BMV land) and Grade 3b land (not BMV and medium value agricultural land), whilst there looks like there is a pocket of land near Hatchford End which looks like it could be Grade 1 ALC land.	More detail will be provided in the ES along with Agricultural Land Classification figures .
Chapter 13 People and Communities Sections 13.4.7 - 13.4.9	<p>Natural England's 1:250,000 ALC Maps have been used as background information for these paragraphs (as per reference 65). However:</p> <p>Natural England state that the 1:250,000 maps are not sufficiently accurate to identify ALC on a site-by-site basis.</p> <p>The 1:250,000 maps were created before the sub classification of Grade 3 land into Grade 3a (BMV) and Grade 3b (non-BMV).</p> <p>This could be made clearer in the text.</p>	More detail will be provided in the ES along with Agricultural Land Classification figures .

Scoping Report reference	Comment	Response
Chapter 13 People and Communities Section 13.4.10	Will the impact assessment consider impacts on permissive or informal NMU routes as well (including impacts on NMU crossing points)?	Assessment of the Scheme's impact on NMUs will consider all areas with legitimate public access, including all Open Access Land and Common Land, whether set out as a path or not. If the authority is aware of any permissive paths outside of these areas which could be affected by the Scheme, the assessment team would welcome such information.
Chapter 13 People and Communities Section 13.4.11	Should use the title of the organisation of 'Guildford Borough Council' rather than the words 'Borough of Guildford', given that use the title of 'Elmbridge Borough Council' from paragraph 13.4.12.	Reference to Guildford Borough Council updated in the PEIR and the ES.
Chapter 13 People and Communities Table 13-1	Should use the title of the organisation of 'Guildford Borough Council' rather than the words 'Borough of Guildford', given that use the title of 'Elmbridge Borough Council' in Table 13-2.	Reference to Guildford Borough Council updated in the PEIR and ES.
Chapter 13 People and Communities Table 13-1	<p>The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and 	<p>Policy compliance or departure will be assessed in detail within the Planning Statement as part of the application process. Your comments are noted regarding emerging planning policy and the weight that should be attached to such policy.</p> <p>The Main ES will consider the Scheme's likely impact on</p>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account the site policies in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), in particular the following:</p> <ul style="list-style-type: none"> Policy A35: Former Wisley airfield, Ockham Policy A38: Land to the west of West Horsley Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley Policy A40: Land to the north of West Horsley Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common Policy A58: Land around Burnt Common warehouse, London Road, Send. <p>In addition, we note that the NPSNN, at paragraph 5.165, states that 'The applicant should identify existing and proposed land uses near the project...', as is referred to in paragraph 13.3.5 of this draft Environmental Scoping Report.</p>	<p>proposed land uses/development land, including proposed designations set out in emerging policy.</p> <p>We note that some of the site allocation policies are beyond our proposed study area but are included in the Traffic Model.</p>
Chapter 13 People and Communities Section 13.4.14	Have any NMU surveys been undertaken or are any planned?	<p>Common Land NMU surveys were undertaken in DATEs on the 24th and 27th September 2017. The findings of these surveys will be presented in the Main ES.</p> <p>NMU counts were undertaken in November 2014 alongside the A3.</p>

Scoping Report reference	Comment	Response
		Regard is also given to NMU usage data gathered [details of stage 1&2 surveys + and Wildlife Trust data?]
Chapter 13 People and Communities Section 13.4.15	<p>The zone of influence for the 'People and Communities' environmental topic should include the village of Ripley as it is considered that the Scheme, as presently proposed, is likely to increase traffic flows through this village, with potential impacts on non-motorised users including community severance which may require mitigation. The present pattern of recurrent peak period traffic congestion in Ripley and associated adverse community and environmental impacts is a concern to Surrey County Council, the Local Highway Authority.</p> <p>In addition, further consideration should also be given to including other settlements nearby to the proposed Scheme, including Wisley, Ockham, East Horsley and West Horsley, within the zone of influence for the 'People and Communities' environmental topic.</p>	<p>TBC</p> <p>Please note that Wisley was captured in the study area for the Scoping Report and the PEIR.</p> <p>The study area will be revised for the ES to include the village of Ripley.</p> <p>TBC re Ockham and Horsleys.</p>
Chapter 13 People and Communities Section 13.5.1	<p>This section needs greater clarity on the temporary and permanent land take that will be required. There is reference to the property impacts later in the chapter but it should appear in this section. The effects of the Scheme on access to properties needs greater clarification. The project description raises that the construction work will require the closer of some access routes to properties. How many properties will be affected?</p>	<p>The PEIR provides preliminary assessment of land take effects including alterations to access. The Main ES will clearly describe temporary and permanent land take and access effects. It is not appropriate to pre-empt the findings of assessment within the Scoping document.</p>
Chapter 13 People and Communities Section 13.5.2	<p>The link between the potential impacts identified (traffic, visual etc) and the effects on residential amenity need to be more strongly drawn here.</p>	<p>The PEIR provides preliminary assessment of land take effects including alterations to access. The Main ES will clearly describe temporary and permanent land take and access effects. It is not appropriate to pre-empt the findings of assessment within the Scoping document.</p>

Scoping Report reference	Comment	Response
Chapter 13 People and Communities Sections 13.5.11 - 13.5.12	Potential for impacts on BMV land? Is there potential for significant effects on agricultural land/farm businesses? Will any mitigation measures be included?	Impacts on and mitigation for impacts on BMV are included in the ES
Chapter 13 People and Communities Section 13.5.14	<p>The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> • the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); • the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and • the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account the site policies in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), in particular the following:</p> <ul style="list-style-type: none"> • Policy A35: Former Wisley airfield, Ockham • Policy A38: Land to the west of West Horsley • Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley • Policy A40: Land to the north of West Horsley • Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley • Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common 	<p>Policy compliance or departure is assessed in detail within the Planning Statement as part of the application process (DCO document reference TR010030/APP/7.1). The comments are noted regarding emerging planning policy and the weight that should be attached to such policy.</p> <p>The Main ES will consider the Scheme's likely impact on proposed land uses/development land, including proposed designations set out in emerging policy.</p>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> Policy A58: Land around Burnt Common warehouse, London Road, Send. <p>In addition, we note that the NPSNN, at paragraph 5.165, states that 'The applicant should identify existing and proposed land uses near the project...', as is referred to in paragraph 13.3.5 of this draft Environmental Scoping Report.</p>	
Chapter 13 People and Communities Sections 13.5.15 - 13.5.19	<p>The zone of influence for the 'People and Communities' environmental topic should include the village of Ripley as it is considered that the Scheme, as presently proposed, is likely to increase traffic flows through this village, with potential impacts on non-motorised users including community severance which may require mitigation. The present pattern of recurrent peak period traffic congestion in Ripley and associated adverse community and environmental impacts is a concern to Surrey County Council, the Local Highway Authority.</p> <p>In addition, further consideration should also be given to including other settlements nearby to the proposed Scheme, including Wisley, Ockham, East Horsley and West Horsley, within the zone of influence for the 'People and Communities' environmental topic.</p>	Noted
Chapter 13 People and Communities Sections 13.5.15 - 13.5.19	Will any new routes or temporary crossings be provided to mitigate impacts on NMUs?	Yes. New crossings and any other NMU impact mitigation will be described within the Main ES.
Chapter 13 People and Communities Section 13.5.16	This refers to an increase in construction traffic and HGV trip numbers with a potential to make road crossing more difficult, dangerous, intimidating or time consuming. Mitigation measures should be identified. We would note that the Health Profile 2016 for Guildford borough, as published by Public Health England, identified that performance for the Killed and seriously injured on roads indicator in the borough was 'significantly worse than England average'.	<p>Noted. Assessment of highway safety related effects will be presented in detail within the [Transport Assessment & RSA].</p> <p>Mitigation for highway safety is likely to be entirely integral to scheme design. However, should additional mitigation be required, this will also be reported within the [Transport Assessment & RSA].</p> <p>The impact of the Scheme on NMU severance, including</p>

Scoping Report reference	Comment	Response
		<p>factors such as danger/perceived danger will be reported in the People and Communities chapter, drawing upon transport assessment where appropriate. It is unlikely that the People and Communities chapter would consider mitigation in this regard beyond that set out within the transport assessment, subject to assessment findings.</p> <p>This comment needs updating to reflect that there will no longer be NMU crossings at the junction.</p> <p>It is unlikely that the People and Communities chapter would consider mitigation in this regard beyond that set out within the transport assessment, subject to assessment findings.</p> <p>This comment needs updating to reflect that there will no longer be NMU crossings at the junction.</p>
Chapter 13 People and Communities Section 13.6	No level of assessment is proposed in this section: simple or detailed assessment should be recommended.	DMRB guidance does not refer to Simple or Detailed assessment levels for subjects within this topic area. The level of assessment proposed is set out within the Scoping Report.

Scoping Report reference	Comment	Response
Chapter 13 People and Communities Section 13.7.34	Is there any significance criteria for effects on agricultural land as a national resource i.e. BMV land?	TBC. Significance criteria for effects on agricultural land is provided in the ES.
Chapter 13 People and Communities Sections 13.7.34 - 13.7.37	Previously the agricultural land sections in this chapter have focussed on both the impact on best and most versatile agricultural land as well as the impact on farm businesses, however this section only outlines the methodology/significance for the assessment on the impact on farm business. Is this because the assessment of best and most versatile agricultural land will be covered in Chapter 10? If so this needs to be clarified, it is not recommended that the assessment is repeated in both the geology and soils and people and communities chapters.	Assessment of impact upon agricultural land will be presented within the People and Communities Chapter only in the main ES. This overlap with the Geology and Soils Chapter was addressed in the PEIR.
Chapter 13 People and Communities Sections 13.7.39 - 13.7.41	<p>The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017.</p> <p>Paragraph 216 of the National Planning Policy Framework (DCLG, March 2012) states that 'From the day of publication, decision-takers may also give weight to relevant policies in emerging plans according to:</p> <ul style="list-style-type: none"> the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given); the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and the degree of consistency of the relevant policies in the emerging plan to the policies in this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).' <p>Whilst the emerging plan currently carries limited weight in decision taking, the weight will increase as we move through the examination process (in particular after the initial hearing sessions which are expected to begin in spring/early summer 2018) and ultimately to full weight at adoption of the new plan (current timetable indicates adoption in December 2018). Given the timescales of this project and the expected Local Plan timetable, we would suggest that the assessment takes into account the site policies in the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), in particular the following:</p> 	<p>Policy compliance or departure will be assessed in detail within the Planning Statement as part of the application process. Your comments are noted regarding emerging planning policy and the weight that should be attached to such policy.</p> <p>The Main ES will consider the Scheme's likely impact on proposed land uses/development land, including proposed designations set out in emerging policy.</p>

Scoping Report reference	Comment	Response
	<ul style="list-style-type: none"> • Policy A35: Former Wisley airfield, Ockham • Policy A38: Land to the west of West Horsley • Policy A39: Land near Horsley railway station, Ockham Road North, East Horsley • Policy A40: Land to the north of West Horsley • Policy A43: Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley • Policy A43a: Land for new north facing slip roads to/from A3 at Send Marsh/Burnt Common • Policy A58: Land around Burnt Common warehouse, London Road, Send. <p>In addition, we note that the NPSNN, at paragraph 5.165, states that 'The applicant should identify existing and proposed land uses near the project...', as is referred to in paragraph 13.3.5 of this draft Environmental Scoping Report.</p>	
Chapter 13 People and Communities Sections 13.7.42 - 13.7.56	<p>The zone of influence for the 'People and Communities' environmental topic should include the village of Ripley as it is considered that the Scheme, as presently proposed, is likely to increase traffic flows through this village, with potential impacts on non-motorised users including community severance which may require mitigation. The present pattern of recurrent peak period traffic congestion in Ripley and associated adverse community and environmental impacts is a concern to Surrey County Council, the Local Highway Authority.</p> <p>In addition, further consideration should also be given to including other settlements nearby to the proposed Scheme, including Wisley, Ockham, East Horsley and West Horsley, within the zone of influence for the 'People and Communities' environmental topic.</p>	Noted
Chapter 13 People and Communities Sections 13.7.42 - 13.7.47	<p>Are NMU surveys going to be undertaken to inform the assessment? DMRB Volume 11 Section 3 Part 8 Chapter 9 states that 'counts of pedestrians and others should be undertaken where this is necessary to achieve the objective of this stage of assessment' i.e. where there are going to be permanent changes to journey times and safety and amenity is likely to be prejudiced. Furthermore, where 'pedestrians and others' travel patterns are complex and a scheme could have a major impact, origin destination surveys should be considered'. Is there any significance criteria that will be used to assess effects of the Scheme on NMUs? How will you determine if an effect is significant or not?</p>	Common Land User surveys were undertaken on the 24 th and 27 th of September 2017. The findings of these surveys will be presented in the Main ES.
Chapter 13 People and Communities	<p>Is this an assumption? Have NMU surveys (including origin destination surveys) been carried out to confirm this?</p>	Para 13.7.46 states that "It is considered likely that the majority of NMU trips in the study area are associated with

Scoping Report reference	Comment	Response
Section 13.7.46		<p>recreation. Recreational trips are generally considered less sensitive to changes in journey length in that users are not necessarily seeking the fastest or most direct route from their location to a specific destination"</p> <p>NMU surveys were undertaken in DATES. The findings of these surveys will be presented in the Main ES. Regard is also given to NMU usage data gathered [details of stage 1&2 surveys + and Wildlife Trust data?]</p>
Chapter 13 People and Communities Section 13.7.48	Is there any significance criteria that will be used to assess effects of the Scheme on amenity for NMUs?	<p>In accordance with DMRB guidance on Changes in Amenity (DMRB Vol 11 Section 3 Part 8), the effects of the Scheme on amenity for NMUS will be assessed using a descriptive approach that will give an overall indication of the change in amenity and the number of journeys affected.</p> <p>No proscriptive significance criteria are proposed.</p>
Chapter 13 People and Communities Section 13.7.50	Is there any significance criteria that will be used to assess effects of the Scheme on severance?	<p>Chapter 4 of the ES (DCO document reference TR010030/APP/6.3) details the assessment of significance overall with topic chapters detailing the effects further.</p>

Scoping Report reference	Comment	Response
		The new PRoW works will re-provide and/or enhance existing NMU routes and connectivity, reduce severance caused by the A3 and provide suitable access to the existing areas of existing registered common and public open space, as well as to the proposed Replacement Land areas that are detailed in Chapter 2 of the ES.
Chapter 13 People and Communities Section 13.7.62	Is there any significance criteria that will be used to assess effects of the Scheme on driver stress?	DMRB significance criteria provided in the PEIR and in the ES.
Chapter 13 People and Communities Section 13.9	Some mention of construction management process would be helpful here to understand how construction impact may be mitigated.	Details of construction management will be detailed in the ES.
Chapter 13 People and Communities Section 13.9.1	Are there any mitigation proposals for agricultural land and NMUs? It is not clear how significant adverse effects will be assessed for NMUs either.	Proposed mitigation measures will be identified in the ES.
Chapter 13 People and Communities Section 13.11.4	Vulnerability to major accidents and disasters - Should the effects of this be scoped out? Junction 10 of the M25 is one of the most congested junctions on the network. Accidents on the A3 cause significant delay. The Scheme proposes closure of a number of side roads on the A3. Where an accident occurs on the A3 road users will seek to use alternative routes. This will include Portsmouth Road and the High Street through the village of Ripley. Where a major accident occurs, and the number of vehicles using the A3 has increased because of the Scheme, there is likely to be	Noted

Scoping Report reference	Comment	Response
	a greater impact on Ripley from traffic seeking to use alternative routes. The impacts of a major incident	
Chapter 13 People and Communities Section 13.11.4	No distinction is made in the summary table between the scoping of construction and operational effects.	Noted
Chapter 14 Climate Overall Comment	Section 14.1.2 outlines that the chapter considers both the potential effects of the Scheme on climate change and the vulnerability of the Scheme to climate change, however the scoping assessment presented within this chapter purely focuses on the effects of the Scheme on climate change. The vulnerability of the Scheme to climate change has not been considered - it is recommended that this is considered and assessed within the ES in accordance with the EIA Regulations 2017.	The separate climate vulnerability impact assessment begins at Section 15.16 of the ES.
Chapter 14 Climate Section 14.4	No baseline conditions for regional climate is given.	Climate is not defined regionally in this way and so a regional baseline is not appropriate.
Chapter 14 Climate Section 14.4.3	In setting the Scheme baseline emissions, what calculation tool has been used and will the same tool be used for this Scheme?	The Highways England Carbon Tool has been used to calculate Scheme emissions. This Tool is used across all Highways England schemes, which allows for comparison.
Chapter 14 Climate Section 14.6.1	Bearing in mind there is currently no DMRB methodology or guidance on how to carry out a "simple" or "detailed" assessment for Climate, how did you draw the conclusion that a "simple" assessment is necessary?	In light of newly released Highways England guidance, the terminology has been altered to no longer refer to a 'simple' assessment. Instead, a proportionate approach has been adopted which focuses on capturing the principal contributing factors to the

Scoping Report reference	Comment	Response
		effects on climate, in line with Highways England guidance.
Chapter 14 Climate Section 14.7.3	Why is the Highways England Carbon Calculation Tool not being used for the final carbon footprint to be reported in the ES, as this will allow the Scheme to be intercompared with other Highways England schemes.	The Highways England Tool has been employed to carry out the construction phase calculations, to allow for comparison between schemes.
Chapter 14 Climate Section 14.7.4	It is noted that the CKB tool will be used for the assessment, and that this tool includes an emissions factor library that is automatically used to convert activity data to emissions data. In line with best practice, to ensure appropriate levels of transparency, it is recommended that the activity data and emissions factors used within the calculations should be presented alongside the calculation methodology in the technical appendix of the ES.	The Highways England Carbon Tool has been used in place of the CKB. The completed Tool has been included as Appendix 15.1 of the ES.
Chapter 14 Climate Section 14.7.6	The references to the tables in this paragraph do not make sense, as this paragraph relates to significance criteria and the tables referenced outline the study area and the relevant legislation/policies. It would have been useful to include the criteria against which effects are classified as major, moderate, minor, negligible or no change specific to the climate change assessment - this needs to be provided in the ES to ensure clarity what constitutes each level of effect.	Due to the lack of relevant guidance, the significance assessment of the Scheme's emissions is limited to consideration of the magnitude of the emissions for the relevant Scheme scenarios, by comparison to UK carbon budgets, using technical expert judgement, as stated in section 15.6 of Chapter 15 (Climate) of the ES.
Chapter 14 Climate Section 14.5.1	The potential impacts section states "there is only one impact, global warming, which occurs with the same level of effect per unit of emissions and is also entirely non-site specific." This is not quite correct as the real impact is climate change, which will include warming but will also have other impacts, such as an increase in extreme weather events and changing rainfall patterns (drier summers, wetter winters).	The only impact of GHG emissions is global warming. Climate change (including extreme weather events etc) is a climate system response to global warming and therefore a secondary impact.

Scoping Report reference	Comment	Response
Chapter 15 Assessment of Cumulative Effects Section 15.1	Reference should be made to PINS Advice Note Seventeen which is the most up-to-date guidance on the methodology for assessing cumulative effects for Nationally Significant Infrastructure Projects.	The methodology was updated for the PEIR with reference made to PINS Advice Note Seventeen and will be included in the ES.
Chapter 15 Assessment of Cumulative Effects Section 15.2.2	The approach to identifying the 'other developments' using proposed thresholds and spatial area (of developments) outlined in section 15.2.2 separately to the identification of the ZOI for each topic in Table 15.1, does not accord with PINS Advice Note Seventeen. PINS Advice Note Seventeen states that the applicant should determine the likely spatial ZOI for each environmental topic area (as has been done in Table 15.1), it then states that 'the applicant undertakes a desk study of planning applications, development plan documents, relevant development frameworks and any other available sources to identify 'other developments' within the ZOI'. Therefore, developments should be identified on the basis of the topic ZOIs (the largest ZOI) not under a separate criteria. However, if chosen to also use the criteria in 15.2.2 then a definition needs to be provided of what constitutes a regionally significant development, a major development and a minor development.	The methodology for identifying the 'other developments' which would be considered when assessing in combination and cumulative effects was clarified for the PEIR. Definitions of what constitutes a regionally significant development, a major development and a minor development were added to the PEIR and will be included in the ES.
Chapter 15 Assessment of Cumulative Effects Section 15.2.5	This sentence states that 'the traffic model will take account of the operational effects of major developments in the area and the wider surrounding region' - the air quality and noise assessments use the traffic model data within their assessments, therefore cumulative operational assessments for air quality and noise are often already undertaken. If this is the case, this should be stated within the methodology and included for clarity.	Noted. This will be clarified in the ES.
Chapter 15 Assessment of Cumulative Effects Sections 15.2.6 - 15.2.12	It would be useful to have identified the distance of the developments from the Scheme; this should be outlined in the ES as per Appendix 1 Matrix 1 of PINS Advice Note Seventeen - additionally, it is recommended that a series of drawings are produced to accompany the ES, showing the proposed Scheme in relation to each of the 'other developments' and the ZOIs.	This was included in the PEIR and the ES.

Scoping Report reference	Comment	Response
Chapter 15 Assessment of Cumulative Effects Sections 15.2.6 - 15.2.12	A 'level of certainty' for each development has not been assigned. In accordance with PINS Advice Note Seventeen, this should be done for each development (see Table 3 in PINS Advice Note Seventeen) and presented within the ES.	This was included in the PEIR and will be part of the ES.
Chapter 15 Assessment of Cumulative Effects Sections 15.2.6 - 15.2.12	It is recommended that the information on the 'other developments' is presented within a table, as per Appendix 1 Matrix 1 of PINS Advice Note Seventeen, for the purpose of clarity and ease of comprehension.	This was included in the PEIR and will be part of the ES.
Chapter 15 Assessment of Cumulative Effects Section 15.2.7	The site area for this proposed allocation was enlarged to 95.9 ha in the updated Guildford borough Proposed Submission Local Plan: strategy and sites (Guildford Borough Council, June 2017) although the allocation of 2,000 homes was not changed.	Noted.
Chapter 15 Assessment of Cumulative Effects Section 15.2.8	The Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) was submitted to the Secretary of State in December 2017. Examination is expected to begin in spring/early summer 2018 whilst the current published timetable anticipates adoption in December 2018.	Noted. The ES will be consistent on these dates.
Chapter 15 Assessment of Cumulative Effects	An updated and consolidated Land Availability Assessment (2017) was submitted alongside the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017) in December 2017. This includes a Housing Trajectory which indicates that development of the Former Wisley airfield site (Policy A35) as commencing in 2022/23 and completing by 2033/34.	Noted. This will be updated for the ES.

Scoping Report reference	Comment	Response
Section 15.2.9		
Chapter 15 Assessment of Cumulative Effects Section 15.2.9	As above comment, Examination is expected to begin in spring/early summer 2018 whilst the current published timetable anticipates adoption in December 2018.	Noted. The ES will be consistent on these dates.
Chapter 15 Assessment of Cumulative Effects Section 15.2.10	It is unlikely that a decision on the planning appeal for the refused Former Wisley airfield planning application will be made until late 2018. The Inspector has indicated that his report to the Secretary of State will not be ready until mid-March 2018.	Noted. The ES will be consistent on these dates.
Chapter 15 Assessment of Cumulative Effects Section 15.2.11	We note the thresholds in para 15.2.2 however would suggest that lower, more sensitive thresholds may be appropriate. There are significant developments proposed along the A3, south of Junction 10. Notably these include proposed site allocations: A43 Garlick's Arch (400 homes), A43a new southbound and northbound slips onto the A3, A58 Land at Burnt Common warehouse (minimum of 7,000 sqm industrial floorspace), A25 Gosden Hill (residential led development for 2,000 homes), A24 Slyfield Area Regeneration Project (1,500 homes), A26 Blackwell Farm (residential led development for 1,800 homes). These proposals are all likely to impact to some degree upon the north/south movement along the A3 and other routes.	These are included in the traffic model where appropriate.
Chapter 15 Assessment of Cumulative Effects Sections 15.2.11 and 15.4.5	We suggest that the schemes referenced SRN9 and SRN10 for north facing junctions to be provided to the A3 at the A247 Burnt Common interchange, as included in Appendix C Infrastructure of the Guildford borough Submission Local Plan: strategy and sites (Guildford Borough Council, December 2017), and cross-referenced as a Requirement for Policy A35 Former Wisley airfield, Ockham, should be included in the assessment. The Submission Local Plan was submitted to the Secretary of State in December 2017. Examination is expected to begin in spring/early summer 2018 whilst the current published timetable anticipates adoption in December 2018. Whilst this Scheme is not confirmed at this time, paragraph 15.2.1 states with respect to the list of types of nearby potential developments that should be considered in the assessment that it is 'not necessarily limited to' those listed. As stated in the Topic Paper: Transport (Guildford Borough Council, December 2017), which accompanied the Guildford borough Submission Local Plan:	SRN9 and SRN10 are included in the comment above as Site Allocation A43a 'new southbound and northbound slips onto the A3.'

Scoping Report reference	Comment	Response
	strategy and sites (Guildford Borough Council, December 2017): 'These junctions are being promoted to mitigate the impact of the level of strategic planned growth and in particular the development traffic flows resulting from the development of a new settlement at the former Wisley airfield site (site Policy A35), as well as limiting any increase in traffic joining and leaving the A3 at the Ockham interchange.'	
Chapter 15 Assessment of Cumulative Effects Section 15.4	The methodology is lacking and does not seem to follow the staged approach set out in PINS Advice Note Seventeen - it is recommended that this approach is followed and outlined in the ES. In addition, the methodology does not differentiate the differing methodologies required for the two types of cumulative effects (cumulative effects for a single scheme and cumulative effects from different schemes). The methodology should reflect the differing approaches in the ES.	The methodology was updated for the PEIR with reference made to PINS Advice Note Seventeen and will be used for the ES.
Chapter 15 Assessment of Cumulative Effects Table 15.1	<p>The zone of influence for the 'People and Communities' environmental topic should include the village of Ripley as it is considered that the Scheme, as presently proposed, is likely to increase traffic flows through this village. The present pattern of recurrent peak period traffic congestion in Ripley and associated adverse community and environmental impacts is a concern to Surrey County Council, the Local Highway Authority.</p> <p>In addition, further consideration should also be given to including other settlements nearby to the proposed Scheme, including Wisley, Ockham, East Horsley and West Horsley, within the zone of influence for the 'People and Communities' environmental topic.</p>	Noted
Chapter 15 Assessment of Cumulative Effects Section 15.7.3	No assessment has been undertaken in this chapter, therefore the Council is unsure how it can be concluded that 'the main developments that could cause combined and cumulative effects are the highway intervention schemes the M25 Junction 10 - 16 Smart Motorway Programme (SMP) and the A3 Guildford scheme, the RHS Wisley improvement works and the former Wisley Airfield adjacent the Scheme'. Further information gathering and assessment is required to inform this conclusion, and therefore this should not be used as a basis to rule out 'other developments' from the cumulative assessment. The assessment process will need to be fully reported, in accordance with PINS Advice Note Seventeen, to ensure that the reasons for excluding any development from further consideration is clearly recorded and to clearly record any decisions made by the applicant in the assessment process.	<p>Noted. The preliminary assessment was provided in the PEIR.</p> <p>Further information gathering and assessment is taking place for the ES and the development schedule is being updated.</p>
Chapter 16 Summary Table 16.1	Climate section of the table - the effects listed in this table correspond to the 'vulnerability of the Scheme to climate change', however as noted in comments above the 'vulnerability of the Scheme to climate change' has not been considered in the climate chapter. Therefore, how can it be concluded that these effects would result if this has not been considered in the chapter? Additionally, this table does not conclude the information that has actually been considered in the	Climate effects are fully reported in the ES and included in the Summary section.

Scoping Report reference	Comment	Response
	climate chapter which focusses on the 'effects of the Scheme on climate change'. Clarification is required as to what exactly the climate chapter/assessment of the ES will consider - it is recommended that both the 'effects of the Scheme on climate change' and the 'vulnerability of the Scheme to climate change' is considered and assessed in the ES.	

Table 1.2.8: Scoping Opinion comments - Health and Safety Executive

Topic	Comment	Response												
	<p>HSE does not comment on EIA Scoping Reports but the information attached is likely to be useful to the Applicant.</p> <p>HSE's land use planning advice</p> <p><u>Will the proposed development fall within any of HSE's consultation distances?</u></p> <p>The red line DCO boundary falls within the consultation zones for two major accident hazard pipelines:</p> <table><tr><th>HSE Ref</th><th>Operator</th><th>Pipeline ref</th><th>Name</th></tr><tr><td>6964</td><td>Southern Gas Networks</td><td>1236</td><td>Cobham PT / Cobham PRS</td></tr><tr><td>6963</td><td>Southern Gas Networks</td><td>1235</td><td>Hooley (V38) Ripley Pig Trap</td></tr></table> <p><u>Hazardous Substance Consent</u></p> <p>The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.</p> <p>Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.</p> <p><u>Explosives sites</u></p> <p>HSE has no comment to make as there are no licensed explosive sites in the vicinity</p>	HSE Ref	Operator	Pipeline ref	Name	6964	Southern Gas Networks	1236	Cobham PT / Cobham PRS	6963	Southern Gas Networks	1235	Hooley (V38) Ripley Pig Trap	Noted
HSE Ref	Operator	Pipeline ref	Name											
6964	Southern Gas Networks	1236	Cobham PT / Cobham PRS											
6963	Southern Gas Networks	1235	Hooley (V38) Ripley Pig Trap											

Table 1.2.9: Scoping Opinion comments - Highways England

Topic	Comment	Response
	<p>Highways England Spatial Planning Team have been in consultation with the M25 Junction 10/A3 Wisley Improvement project team since project inception and therefore have had opportunities to feed into the creation of the current proposals. I therefore do not have any specific comments to add at this time.</p> <p>Thank you for the opportunity to comment now and in the future as the project progresses through the Development Consent process.</p>	Comment duly noted.

Table 1.2.10: Scoping Opinion comments - Historic England

Topic	Comment	Response
	<p>We are providing pre-application advice to Highways England focussed on the potential for this highways related development to have significant effects upon designated heritage assets and/or their settings. This has so far concentrated on the two registered historic parks and gardens - RHS Wisley and Painshill Park but now needs to include the full range of heritage assets that will be affected. We provided advice which has been used as part of the announcement of the preferred design option, but we retain concerns about some of the conclusions reached and we will expect these to be further scrutinised as part of the EIA process. We are in contact with Highways England about how we can continue to engage with their proposals as they work on a DCO application and an Environmental Statement.</p>	Comment duly noted.
	<p>We think that the principal historic environment issues applicable to this proposal will be:</p> <ul style="list-style-type: none"> • Direct physical impacts upon designated heritage assets (most notably the two high grade registered historic parks and gardens) • Indirect effects upon the significance of designated heritage assets by virtue of change within their settings affecting the contribution that these make to such significance 	Comment duly noted

Topic	Comment	Response
	<ul style="list-style-type: none"> Effects upon the operation and viability of designated heritage assets under their established uses Direct and Indirect effects upon non-designated heritage assets (specifically potentially those with archaeological value), some of which may yet to be recognised. <p>In general the above issues have been appropriately identified as matters to be addressed through the EIA process and we make the comments below to inform this.</p>	
Direct physical impacts upon heritage assets	<p>Appendix F provides a gazetteer of the heritage assets to be taken into account. We are content that for the most part relevant designated and undesignated examples have been identified. However the Temple of Bacchus at Painshill Park is part of the RPG and is a structure that is now approaching complete restoration by the Trust. It is a heritage asset close to the location of the proposed works to widen the A3 and it therefore deserves individual consideration and inclusion in the gazetteer.</p>	<p>Comment duly noted. The Temple of Bacchus is discussed in the Statement of Significance for Painshill. It is not recorded as an asset on the HER, nor is it a listed building. Therefore, it is not included in the gazetteer.</p>
	<p>We note that the significance of Painshill Park in some part of the scoping report is understated, including when compared with the description of RHS Wisley (compare paras 9.3.2 & 9.3.3). We think there needs to be a read across between chapters 9 and 11 and that the statements of significance for these two high grade landscapes need to be fully accurate. Effects on that significance should then be more easily understood and mitigated. Painshill Park (grade 1 RPG) is of international significance as a one of the most important picturesque landscapes of the 18th century. It is open to the public for thousands of visits each year. Statements of Significance for both Painshill and RHS Wisley (grade II* RPG) as prepared by their owners exist and these should now be used to inform the proposal.</p>	<p>Comment duly noted. Statements of significance in relation to the Scheme have been included as Appendix 11.3 of the ES and the results of those assessments presented in sections 11.8 and 11.10 of Chapter 11 (Cultural heritage) of the ES. No evidence for the Statements of Significance for Painshill Park and RHS Wisley were found. The applicant's archival searches and consultations with the RPGs did not locate these documents.</p>
	<p>We also urge caution that some of the descriptions quoted in the Scoping Report come from older documents that are no longer accurate, such as table 9.2 for Elmbridge BC Landscape Character Areas or appendix F for National</p>	<p>Comment duly noted. The current state of these features are discussed in the Statements of Significance, reflecting the site visits and assessments conducted for the Statements of Significance. The most recent version of the</p>

Topic	Comment	Response
	Heritage List for England data. For example, at Painshill Park both the Water Wheel and Grotto have now been fully conserved. The EIA team will be familiar with such issues as this and will we trust make their own assessments based on the present day position.	NHLE has been used in the assessment; the NHLE itself has not been updated. The Elmbridge Borough Council Landscape Character Areas has been referenced in Chapter 9 (Landscape) of the ES.
	The illustrative material for the preferred design (drawings DR-CH-000001 - 11) is of a scale which makes it difficult for us to fully understand what land-take will be required from both of the RPGs but some such direct impact will be required. It appears to us to be more significant for Painshill Park than for RHS Wisley but we wish to understand this better. Loss of any registered land is to be regretted and we wish to understand why this is necessary. The contribution to significance made by the land so affected needs to be assessed so as to understand levels of harm, but in addition other less direct effects will also need to be considered. For example the continued viability for the existing uses made by RHS Wisley of land adjacent to the A3 requires consideration.	Consultation with Historic England, as outlined in section 11.5 of Chapter 11 (Cultural heritage) of the ES included sharing of more detailed design drawings and discussions of land-take for the final Scheme design, including changes made to the final design on the land adjacent to RHS Wisley and Painshill Park.
	Clarification of which trees would be lost is required and the significance of these, either individually or as part of the historic landscapes, is required. At Painshill Park we think that the land take will be more significant and again the effect on significance is required. Individual trees here might be individually less significant than at RHS Wisley but the relevance of these in providing screening (both visual and for noise) from the A3 needs to be considered. In addition attention is required as to how any tree removal and new structures might alter the existing environmental condition within the park, including for wind patterns. It will need to be demonstrated that agreed changes will not have unintentional consequences for the rest of the park and its planting, including for its longevity and vulnerability to storm events.	Appendix 11.3 (Statements of Significance) address the role of plantings at RHS Wisley and Painshill Park. The effect of the land-take is addressed in section 11.8 of Chapter 11 (Cultural heritage) of the ES. The Scheme would not remove any specimen trees of historic significance from RHS Wisley and Painshill Park. Land take around Painshill Park and RHS Wisley has reduced as the Scheme design has progressed. The amount of vegetation to be removed within the two parks has also reduced to a level that is unlikely to cause any change to wind patterns and the longevity and vulnerability of the parks to storm events. Further details of the effects of the Scheme on Painshill Park and RHS Wisley can be found in the Landscape (Chapter 9) and Biodiversity (Chapter 7) chapters of the ES.
Indirect effects by virtue of change within	Change within the settings of designated heritage assets has the potential to cause harm to significance. This is relevant to the RPGs, potentially to some other listed buildings and for	Comment duly noted. Assessment of impacts to the settings of specific heritage assets are included in section

Topic	Comment	Response
the settings of heritage assets	the scheduled monuments located close to the existing M25 junction 10 or adjacent to Painshill Park.	11.8 of Chapter 11 (Cultural heritage) of the ES, with an assessment of the effects in Section 11.10 of the ES.
	Proposals for new overbridges at Wisley Lane and close to Redhill Road each have the potential to harm RHS Wisley and Painshill Park respectively. For the latter the proposed bridge in close proximity to the Gothic Tower (listed II*) is of particular concern. We wish to understand why less harmful solutions, such as a crossing nearer the San Dominico site, have not been adopted and whether re-consideration of this element is still possible. The EIA process will provide more precise understanding of the level of harm to be caused by a new bridge next to the high grade listed tower. We will expect harm to be minimised including by considering alternative designs and or locations. If harm cannot be avoided we understand that mitigation of harmful effects can be provided by Highways England. We think that opportunities to enhance the setting of designated heritage assets should form part of the proposed mitigation for unavoidable harm. For example the existing electricity pylons close to the Gothic Tower are very harmful and we think opportunities should be taken to relocate these as a public benefit that might help offset harm to be caused by the new works.	Comment duly noted. Following Scheme design changes that altered the designs of the overbridges at Wisley Lane and Redhill Road, along with consultations with Historic England, RHS Wisley, and Painshill Garden Trust (outlined in section 11.5 of Chapter 11 (Cultural heritage) of the ES) have resulted in agreement that the current Scheme as described in the ES would not result in significant harm to RHS Wisley and Painshill Park.
	The scheduled barrow at Cock Crow Hill is already very close to the existing junction 10 and will remain so with on-going harm to its setting. We think that an improved management regime for this monument could be one way of mitigating some of that harm, particularly if existing trackways close to it are to be closed off. Agreement of a management plan for this barrow and any other archaeological remains that might now be identified (and the funding to carry this into effect) might be one form of mitigation of unavoidable harm.	Comment duly noted. Mitigation and enhancement measures are included in the Outline Construction Environmental Management Plan. Consultation with Historic England included discussions regarding impacts to the scheduled barrows and have been taken into consideration in the production of the Outline Construction Environmental Management Plan. Management of the scheduled barrows will be negotiated through a Statement of Common Ground.
	Effects on the setting of heritage assets are most often described in visual terms but other factors are also relevant, of which noise is an important one. At present both RPGs experience significant levels of road noise and it needs to be demonstrated how this will change under the proposals and	Comment duly noted. Chapter 6 (Noise and vibration) of the ES states that there will be no significant increase in noise levels within the RPGs. As such, the Scheme is not expected to have any impacts on heritage assets as a result of changes to setting through noise.

Topic	Comment	Response
	<p>what forms of mitigation, that are acceptable in historic environment terms, might now be possible. This might mean noise attenuation barriers but it could also be noise reduction road surfaces. The aim should be to achieve an improvement over the existing position and certainly not to make it worse. The operation of both RPGs includes opening to visitors and is hence affected by road noise. At Painshill Park this is of particular relevance to its existing and future operational viability. Funding to sustain the heritage asset and to continue its conservation is increasingly earned from fees for filming opportunities at the site and already road noise is an issue affecting how often the site is selected as a location and thus the income to be earned. This important source of income should not be reduced as a result of the proposal.</p>	
<p>Undesignated heritage assets, including the potential for as yet unrecognised examples</p>	<p>The Scoping Report includes the potential for there to be as yet unrecognised heritage assets which might be harmed by the proposal. This potential is possibly at its highest for the land near the scheduled barrows, since it is common for other buried archaeological remains to be found around such funerary or ceremonial structures. The report advances a fairly standard approach to understanding whether such remains exist and if they do for the effect of the proposal upon the significance of these. Walkover and geophysical surveys both have a role but we think that trial trenching will also be necessary (including potentially to verify that absence of evidence is indeed a reliable indicator that nothing exists). There is a potential role for analysis of LIDAR data in areas with existing tree cover and heathland in order to explore whether earthwork remains too subtle to be readily visible to the human eye might in fact be present.</p>	<p>Comment duly noted. The Outline Construction Environmental Management Plan includes conditions for an archaeological programme of works, including non-intrusive surveys and, where necessary, archaeological evaluation trenching and excavation.</p>
	<p>Para 11.10 of the report describes assumptions and limitations should additional heritage assets not currently in the HER data be identified. At 11.01.1 it is wrongly assumed that such remains might only be of local to regional importance. It is possible that as yet unrecognised archaeological remains of a higher significance might be revealed and in which case these should be considered under</p>	<p>Comment duly noted. Assumptions and limitations of the cultural heritage assessment has been addressed in section 11.6 of Chapter 11 (Cultural heritage) of the ES.</p>

Topic	Comment	Response
	<p>NPPF criteria, whereby remains of an equivalent significance to scheduled monuments would under para 139 be treated as if they were a designated heritage asset. It should not be assumed that archaeological investigation to record significance will be the only appropriate option, since the presumption for nationally important archaeological remains begins with their physical preservation in situ, for example through design changes.</p>	
	<p>Finally para 11.10.1 also refers to “auxiliary work” of a temporary or permanent nature to include such issues as construction compounds, service diversions or habitat mitigation. It is stated that these will be restricted to within the study area. It is essential that this is the case since major harm to heritage assets can be caused if such activities are not planned in from the earliest stage and their environmental effects understood and mitigated. For temporary effects, such as construction compounds, harm to any heritage assets (including archaeological remains of regional or local importance) should be avoided or minimised wherever possible since once caused this cannot be undone and all archaeological remains are worthy of consideration for physical preservation.</p>	<p>Comment duly noted. Section 11.9 of Chapter 11 (Cultural heritage) of the ES specifies that design, mitigation and enhancement measures are addressed through the Outline Construction Environmental Management Plan.</p>
	<p>Should you have any questions about any of the advice contained in this letter please do not hesitate to contact us. We look forward to continuing our discussions with Highways England and indeed we have a meeting fixed for later this month in order to do so.</p> <p>Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the historic environment.</p>	<p>Comment duly noted.</p>

Table 1.2.11: Scoping Opinion comments - London Borough of Bromley

Topic	Comment	Response
	Take notice that the Council of the London Borough of Bromley, as an adjoining local planning authority in exercise of its powers under the Town and Country Planning Act 1990, has raised NO OBJECTIONS to the following development referred to in the documents received on 13 th December 2017.	Comment duly noted.

Table 1.2.12: Scoping Opinion comments - London Borough of Hounslow

Topic	Comment	Response
	From the information submitted and made available on the National Infrastructure Planning website, the London Borough of Hounslow does not wish to make any comments.	Comment duly noted.

Table 1.2.13: Scoping Opinion comments - National Grid

Topic	Comment	Response
	<p>NGET wish to express their interest in further consultation while the impact on our assets is still being assessed.</p> <p>In respect of existing NGET infrastructure, NGET will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.</p> <p>National Grid Electricity Transmission Assets affected by the Order</p> <ul style="list-style-type: none"> • ZM Overhead Line 275kV Route. Towers potentially affected: ZM007 to ZM025 (see attached plan) <p>Where the Promoter intends to acquire land, extinguish rights, or interfere with any of NGET's apparatus, both will require appropriate protection and further discussion on the impact to its apparatus and rights.</p> <p>Please see relevant guidance for working near NGET assets below.</p>	Noted, though this is not specifically an environmental issue but it will be passed to the design team.
Specific Comments - Electricity Infrastructure	National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset	Noted
	Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 - 8 Technical Specification for "overhead line clearances Issue 3 (2004) and also shown in the following National Grid Document: http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=6169	Noted

Topic	Comment	Response
	If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.	Noted
	The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.	Noted
	Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.	Noted
	Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.	Noted
	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Noted, the planting will take account of these restrictions
	Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.	Noted
	National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.	Noted
	To view the SSW22 Document, please use the link below: http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968 To view the National Grid Policy's for our Sense of Place Document. Please use the link below: http://www2.nationalgrid.com/uk/services/land-and-development/publications/	Comment duly noted.

Topic	Comment	Response
	To download a copy of the HSE Guidance HS(G)47, please use the following link: http://www.hse.gov.uk/pubns/books/hsg47.htm Further information in relation to in proximity to National Grid's apparatus can be found at: http://www2.nationalgrid.com/UK/Safety/Library/	
	{National Grid map of overhead line towers plan attached}	

Table 1.2.14: Scoping Opinion comments - National Trust

Topic	Comment	Response
	We have now had the opportunity to review the relevant documentation and, in this instance, have no comment to make on the content of the Environment Statement. We are taking this view on the understanding that this does not prejudice our ability to comment on subsequent consultations for this major road works.	Comment duly noted.

Table 1.2.15: Scoping Opinion comments - NATS Safeguarding

Topic	Comment	Response
	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal, however, we would request that the development does not exceed 45m in height.	Comment duly noted.
	However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.	Comment duly noted.
	If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.	Comment duly noted.

Table 1.2.16: Scoping Opinion comments - Natural England

Topic	Comment	Response
	Having reviewed the Regional Investment Programme M25 Junction 10/A3 Wisley interchange Environmental Scoping Report, dated 6th December 2017, Natural England can confirm we are satisfied with the proposed scope of the assessment. Furthermore, we would offer the following detailed advice:	Comment duly noted.
Air quality	<ul style="list-style-type: none"> In relation to assessment of air quality impacts Natural England is pleased to see the proposal to apply a precautionary approach and to use recommended standards for levels of NO_x deposition which pose a risk of impacts on sensitive vegetation types. Lowland heathland is vulnerable to adverse impacts arising from nutrient deposition, including elevated levels of NO_x. This can change the character of heathland from heather-dominated vegetation to more grass-dominated types, and encourage the growth of trees and shrubs thus rendering the habitat less suitable for ground-nesting birds. This risk has been recognised in the document. The proposal to limit assessment of potential impacts on sensitive vegetation to 200 metres is in line with agreed policy between Highways England and Natural England. 	Comment duly noted.
Noise and vibration	<ul style="list-style-type: none"> In relation to assessment of noise impacts Natural England is pleased to see proposed consideration of the use of noise barriers to ameliorate potential disturbance effects on sensitive breeding birds. 	Comment duly noted.
Biodiversity	<ul style="list-style-type: none"> In relation to biodiversity, Natural England is satisfied with the proposed limits of the study area. 	Comment duly noted.
	<ul style="list-style-type: none"> Natural England is satisfied with the interpretation of chapter 5 (Biodiversity) of the National Policy Statement for National Networks as set out in the document. 	Comment duly noted.
	<ul style="list-style-type: none"> Natural England is satisfied that the proposed ecological studies and surveys are sufficient and appropriate to inform the Environmental Impact Assessment. 	Comment duly noted.
	<ul style="list-style-type: none"> Natural England is satisfied with the proposed valuation of environmental resources and receptors. These are in accordance with advice provided by Natural England during informal consultation. I can confirm that Natural England and Highways England are in regular and continuing communication over the scope of ecological surveys as stated in the document. 	Comment duly noted.
	Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.	Comment duly noted.

Table 1.2.17: Scoping Opinion comments - Public Health England

Topic	Comment	Response
	Our response focuses on health protection issues relating to chemicals and radiation. Advice offered by PHE is impartial and independent.	Comment duly noted.
	We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.	Geology and soils chapter to cover some aspects of human health relating to contaminated land.
	In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made the promoters should fully explain and justify their rationale in the submitted documentation.	Comment duly noted.
	The attached appendix outlines generic areas that should be addressed by all promoters when preparing ES for inclusion with an NSIP submission. We are happy to assist and discuss proposals further in the light of this advice.	Comment duly noted.
	{Appendix: PHE recommendations regarding the scoping document appended to the response}	
General approach	The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA ²⁶ . It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.	Noted
	It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.	Noted
	Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the	Noted – alternatives considered in

²⁶ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/>

Topic	Comment	Response
	environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES ²⁷ .	Chapter 3 of the ES
	The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.	Noted
Receptors	The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.	Distances of sources and receptors from the Scheme are outlined in the Baseline conditions section of each topic chapter of the ES.
Impacts arising from construction and decommissioning	Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.	Noted
	We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.	Noted
Emissions to air and water	Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.	Noted
	When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these: <ul style="list-style-type: none"> • should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary; 	Noted

²⁷ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

Topic	Comment	Response
	<ul style="list-style-type: none"> • should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment; • should consider the construction, operational, and decommissioning phases; • should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts • should fully account for fugitive emissions • should include appropriate estimates of background levels • should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air) • should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data • should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels) <ul style="list-style-type: none"> – If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1 – This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion • should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development. 	
	<p>Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.</p>	Noted
	<p>PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.</p>	Noted

Topic	Comment	Response
Additional points specific to emissions to air	<p>When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:</p> <ul style="list-style-type: none"> • should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs) • should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions) • should include modelling taking into account local topography 	Noted
Additional points specific to emissions to water	<p>When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:</p> <ul style="list-style-type: none"> • should include assessment of potential impacts on human health and not focus solely on ecological impacts • should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.) • should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure • should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water 	Comment duly noted and has been included in the impact assessment and significance of effects. Sources, receptors, and pathways have also been outlined in the study area section of the report.
Land quality	<p>We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.</p> <p>Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed²⁸ and the potential impact on nearby receptors and control and mitigation measures should be outlined.</p> <p>Relevant areas outlined in the Government's Good Practice Guide for EIA include:</p> <ul style="list-style-type: none"> • effects associated with ground contamination that may already exist 	Information of known contamination, based on historical information has been provided in section 10.5 of the ES. Effects associated with

²⁸ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

Topic	Comment	Response
	<ul style="list-style-type: none"> effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc. 	the potential for polluting substances that are used (during construction/op eration) to cause new ground contamination issues on a site, has been identified within the ES and re-use of soils should be provided in Chapter 12.
Waste	<p>The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).</p> <p>For wastes arising from the installation the EIA should consider:</p> <ul style="list-style-type: none"> the implications and wider environmental and public health impacts of different waste disposal options disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated 	Noted
Other aspects	<p>Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.</p>	Noted
	<p>The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.</p>	Noted

Topic	Comment	Response
	<p>There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report²⁹, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within EIAs as good practice.</p>	Noted
Electromagnetic fields (EMF)	<p>This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available in the following link:</p> <p>https://www.gov.uk/government/collections/electromagnetic-fields#low-frequencyelectric-and-magnetic-fields</p> <p>There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends to reduce with distance from such equipment.</p> <p>The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.</p>	Comment duly noted.
Policy Measures for the Electricity Industry	<p>The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:</p> <ul style="list-style-type: none"> • https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf <p>Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available:</p> <ul style="list-style-type: none"> • https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf • https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf 	Comment duly noted.
Exposure Guidelines	<p>PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:</p> <ul style="list-style-type: none"> • http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/ 	Comment duly noted.

²⁹ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Topic	Comment	Response
	<p>Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):</p> <ul style="list-style-type: none"> http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500 	
Static magnetic fields	<p>For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.</p>	Comment duly noted.
Power frequency electric and magnetic fields	<p>At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects.</p>	Comment duly noted.
Long term effects	<p>There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.</p>	Comment duly noted.
The Stakeholder Advisory Group on ELF EMFs (SAGE)	<p>SAGE was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government: http://www.emfs.info/policy/sage/</p> <p>SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available here:</p>	Comment duly noted.

Topic	Comment	Response
	<p>http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124</p> <p>The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages (see first link above).</p>	
Ionising radiation	Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection ³⁰ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards ³¹ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.	Not relevant to this scheme
	PHE expects promoters to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.	Not relevant to this scheme
	When considering the radiological impact of routine discharges of radionuclides to the environment PHE would expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group). Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated ³² . The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate. The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012' ³³ . It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).	Not relevant to this scheme

³⁰ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

³¹ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation

³² HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at <https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dosecoefficients>

³³ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA). Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

Topic	Comment	Response
	Any radiological impact assessment should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.	Not relevant to this scheme
	The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed. Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities ³⁴ . PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years. The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased. For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose. For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered. The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.	Not relevant to this scheme
Annex 1 Human health risk assessment (chemical pollutants)	<p>The points below are cross-cutting and should be considered when undertaking a human health risk assessment:</p> <ul style="list-style-type: none"> • The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES • Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used • When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account 	Noted

³⁴ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

Topic	Comment	Response
	<ul style="list-style-type: none"> When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach³⁵ is used 	

Table 1.2.18: Scoping Opinion comments - Royal Borough of Kingston upon Thames

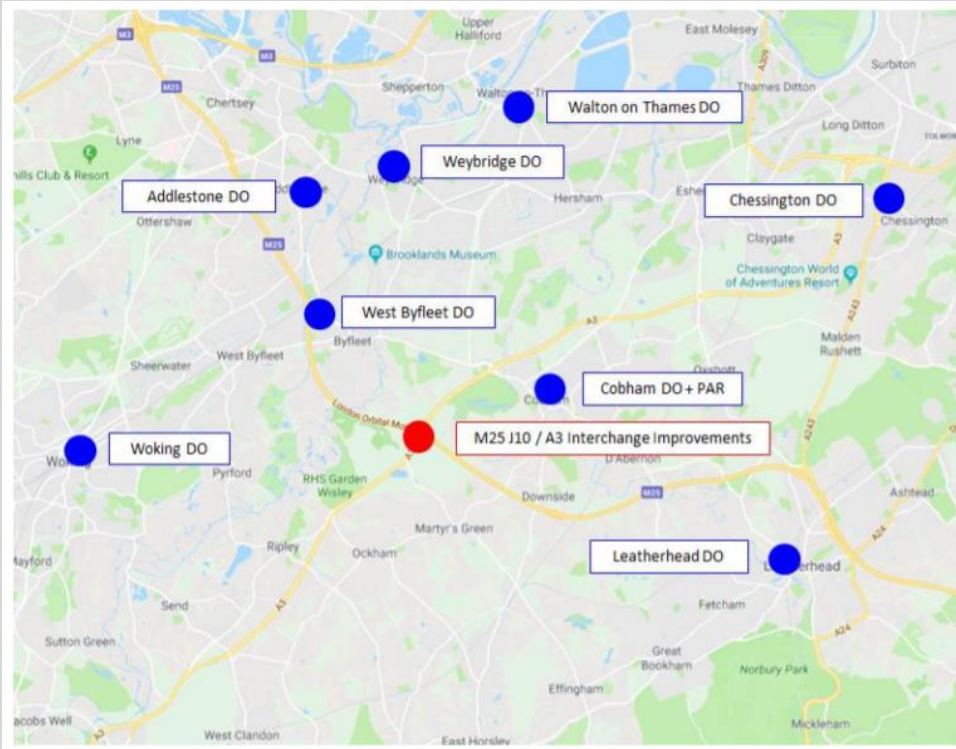
Topic	Comment	Response
	On initial inspection, the Scoping Report appears comprehensive, and this authority has no specific observations at this time. However, we would be grateful to be maintained as a consultation body and to be fully informed of any future developments, with the opportunity to comment at the appropriate time.	Comment duly noted.

Table 1.2.19: Scoping Opinion comments - Royal Mail Group Ltd

Topic	Comment	Response			
	<p>Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.</p> <p>Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.</p> <p>Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.</p> <p>Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed road scheme.</p> <p>Royal Mail's has nine operational properties within 10.2 miles of the proposed DCO boundary as listed and shown on plan below:</p> <table border="1"> <tr> <td>Cobham Delivery Office</td><td>1 High Street, Cobham KT11 3EL</td><td>2.4 miles</td></tr> </table>	Cobham Delivery Office	1 High Street, Cobham KT11 3EL	2.4 miles	Noted
Cobham Delivery Office	1 High Street, Cobham KT11 3EL	2.4 miles			

³⁵ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

Topic	Comment				Response
	West Byfleet Delivery Office	Tiltwood, Hog Hill Lane, Cobham KT11 2AQ	2.9 miles		
	Cobham Vehicle Park	Circuit Centre, Avro Way KT13 0XG	4.7 miles		
	Weybridge Delivery Office	1 Elmgrove Road, Weybridge KT13 8AA	5.5 miles		
	Walton on Thames Delivery Office	73 Hersham Road, Walton-on-Thames KT12 7LN	5.8 miles		
	Addlestone Delivery Office	75 Station Road, Addlestone KT15 2AA	6.4 miles		
	Leatherhead Delivery Office	Station Road, Leatherhead KT22 7AE	7.6 miles		
	Chessington Delivery Office	Elm Road, Chessington KT9 1AA	9.3 miles		
	Woking Delivery Office	White Rose Lane, Woking GU22 7ZZ	10.2 miles		

Topic	Comment	Response
		
	<p>The M25 and A3 are both strategically important distribution routes for Royal Mail operational traffic. Also, in exercising its statutory duties Royal Mail vehicles use on a daily basis all of the local roads that may potentially be affected by additional traffic arising from the construction of the proposed junction improvements.</p>	Noted
	<p>It is envisaged that the proposed M25 Junction 10/A3 Wisley interchange Improvements will, once constructed, reduce congestion which will have benefits for Royal Mail operational traffic movements. However, Royal Mail is concerned about the potential for disruption to its operations during the construction phase. In particular, Royal Mail requires more information and certainty about traffic management measures that will be put in place to mitigate construction impacts on traffic flows on the M25 and A3 and the surrounding local highway network.</p>	Noted

Topic	Comment	Response
Royal Mail's comments on information that should be provided in Highways England's Environmental Statement	<p>In view of the above, Royal Mail has the following comments / requests:</p> <ul style="list-style-type: none"> The ES should include information on the needs of major road users (such as Royal Mail) and acknowledge the requirement to ensure that major road users are not disrupted though full advance consultation by the applicant at the appropriate time in the DCO and development process. The ES and DCO application should include detailed information on the construction traffic mitigation measures that are proposed to be implemented by Highways England / its contractor, including a draft Construction Traffic Management Plan (CTMP). Royal Mail is fully pre-consulted by Highways England / its contractor on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The ES should acknowledge the need for this consultation with Royal Mail and other relevant major road users. 	
	Royal Mail is able to supply Highways England with information on its road usage / trips if required.	Comment duly noted.

Table 1.2.20: Scoping Opinion comments - Rushmoor Borough Council

Topic	Comment	Response
	I confirm that Rushmoor Borough Council has no comments to make in respect of this consultation. Nevertheless, it is noted that that the application site involves some sections of land designated as SSSI and also component parts of the Thames Basin Heaths Special Protection Area (SPA). Accordingly any decision to be made must take this into account in order to remain Habitats Regulations compliant.	Comment duly noted. A HRA has been undertaken.

Table 1.2.21: Scoping Opinion comments - South Downs National Park Authority

Topic	Comment	Response
	The Authority does not wish to comment on the Scoping Opinion and do not consider it needs to be a statutory consultee for this development.	Comment duly noted.

Table 1.2.22: Scoping Opinion comments - Spelthorne Borough Council

Topic	Comment	Response
	I can confirm that Spelthorne Borough Council has no comments.	Comment duly noted.

Table 1.2.23: Scoping Opinion comments - Surrey County Council

Scoping Report reference	Comment	Response
	<p>The County Council has reviewed the information presented in the prospective applicant's environmental scoping report, and has a number of recommendations to make in respect of the proposed scope of the EIA for the Scheme.</p> <p>Due to the relatively short period of time allowed for the consultation, we have been unable to review the submitted material in as great a depth as might otherwise have been the case. Consequently our comments and advice are somewhat limited, in terms of the level and depth of detail provided.</p>	Comment duly noted.
<p>Air Quality - Chapter 5 (pp.48 - 66) of the Environmental Scoping Report</p> <p>Definition of Study Area:</p>	<p>Section 5.2 (p.48) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on air quality. A study area extending to some 200 metres from the defined site boundary is specified with reference to the potential effects of the construction phase (paragraph 5.2.1, p.48), and of the operational phase (paragraph 5.2.4, p.48). The County Council concurs with the proposed extent of the study area for the operational effects of the development, but recommends that for the construction phase the study area be extended to 350 metres from the site boundary, in line with the Institute of Air Quality Management (IAQM) 'Guidance on the assessment of dust from demolition & construction' (2014).</p>	<p>The air quality assessment for the road scheme has been undertaken following guidance in the DMRB for assessment of both construction and operational effects.</p>
<p>Description of Baseline Conditions:</p>	<p>Section 5.4 (pp.51-59) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. Measured and modelled information is provided for background levels of particulate matter and nitrogen dioxide at the proposed site and in the wider surrounding area (paragraphs 5.4.3 to 5.4.24, pp.52-55, and Tables 5-2, p.53 to 5-7, pp.58-59). The location of sensitive receptors, in terms of both human health and ecology, that are located in close proximity to the site of</p>	Comment duly noted

Scoping Report reference	Comment	Response
	the proposed development, is covered in paragraphs 5.4.25 to 5.4.29 (p.58) and Table 5-7 (pp.58-59). The County Council has no comments to make on the sources of baseline that it is proposed be relied upon, nor on the sensitive receptors that would be covered by the assessment.	
Proposed Method of Assessment:	Section 5.5 (pp.59-60) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme. Those impacts include emissions of dust for the construction phase, and emissions from vehicles for the construction and operational phases. The County Council concurs with the types of impacts that have been identified as requiring assessment during the construction and demolition phases of the Scheme.	Comment duly noted
	Section 5.6 (pp.60-61) and section 5.7 (pp.61-64) of the Environmental Scoping Report discuss the way in which the assessment of impacts on air quality would be undertaken, and cite the guidance that would be followed (DMRB and associated IANs, and Defra's local air quality management technical guidance).	Comment duly noted
	For the construction phase, a qualitative assessment of dust impacts is proposed (paragraph 5.7.5, p.61), which would be carried out in line with the method set out in the DMRB. The County Council advises that, for construction effects, the assessment should follow the methodology set out in the IAQM's 'Guidance on the assessment of dust from demolition & construction' (2014), which includes a specific risk assessment methodology for construction dust.	The air quality assessment for the road scheme has been undertaken following guidance in the DMRB for the assessment of construction dust.
	For the construction phase, a quantitative assessment of the traffic impacts of the Scheme would only be undertaken if suitable and sufficient information, on vehicle numbers, flows, composition and speeds, and traffic management measures were available (paragraph 5.7.5, p.61). The	The assessment of changes in traffic during construction has been undertaken and included in the ES.

Scoping Report reference	Comment	Response
	County Council recommends that the applicant estimate the vehicle movements that would be expected to arise from the construction phase, and compare those numbers with the criteria cited in the DMRB for determining which roads would be affected. Where impacts are identified (i.e. the relevant criteria are exceeded), it is recommended that modelling be undertaken to establish the likely significance of the predicted effects.	
	For the operational phase, the proposed method of assessment is set out in paragraphs 5.7.6 to 5.7.20 (pp.62-64), and would consider the impacts of operational traffic on local air quality, on regional emissions, and the effect on the development of major accidents and disasters. The County Council concurs with the proposed method of assessment in respect of operational air quality effects.	Comment duly noted.
	For cumulative effects, it is noted that a zone of influence of 200 metres from the affected road network is specified for air quality impacts in chapter 15 (cumulative effects) of the Environmental Scoping Report. The County Council recommends that such a distance is appropriate for the operational phase of the project, but that a distance of 350 metres be used for the assessment of construction phase impacts.	The air quality assessment for the road scheme has been undertaken following guidance in the DMRB for the assessment of construction dust, which requires a distance of 200 m to be used.
Mitigation Measures:	Section 5.9 (pp.64-65) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme.	Comment duly noted.
	For the construction phase, the County Council recommends that the mitigation and control measures described in the IAQM's 'Guidance on the assessment of dust from demolition & construction' (2014), be applied.	Appropriate mitigation measures will be included within the CEMP.
	For the operational phase, the need for mitigation of effects on sensitive human receptors appears to have been ruled out in advance of the assessment having been undertaken.	The assessment has considered the effect on sensitive human health receptors without any mitigation measures.

Scoping Report reference	Comment	Response
	The County Council recommends that a transparent assessment of the likely effects be provided, and that appropriate mitigation measures be identified and deployed.	
Noise & Vibration - Chapter 6 (pp.67 - 77) of the Environmental Scoping Report Definition of Study Area:	Section 6.2 (p.67) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on background levels of noise and vibration. Paragraph 6.2.3 (p.67) indicates that the study area would cover land situated within 600 metres of the carriageway edge of any affected road links that are located within 1 kilometre of the proposed Scheme, and was determined in line with the guidance set out in Volume 11, Part 3, Section 7 HD 213/11 Noise of the DMRB. The County Council confirms that the approach used to define the study area is acceptable.	Comment duly noted.
Description of Baseline Conditions:	Section 6.4 (pp.70-72) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. Paragraph 6.4.1 (p.70) refers to a number of data sources that would be used to determine background noise conditions for the affected area of land, and to identify noise sensitive receptors in the vicinity. A preliminary suite of noise sensitive receptors is identified in paragraphs 6.4.2 to 6.4.6 (pp.70-71), and the sources of information that would be used to define the baseline noise climate, including noise surveys, are described in paragraphs 6.4.7 to 6.4.11 (pp.71-72). The County Council agrees with the preliminary list of noise sensitive receptors, and the sources of baseline information that would be used. The County Council would welcome the opportunity to review and comment upon any changes that may be made to the list of sensitive receptors as the assessment proceeds, and on any amendments that may be made in respect of the proposed baseline monitoring method and locations.	In addition to the unattended continuous noise monitoring proposed to collect baseline noise data, short-term attended noise measurements have also been completed in accordance with the Shortened Measurement Procedure stated in the Calculation of Road Traffic Noise (1988). This has enabled us to obtain baseline noise levels at locations where there are access constraints for longer term measurements. The extent of the study area for the operation phase assessment is shown in Figure 6.1 and Figure 6.2, which was set based on the DMRB requirements and consultation with local authorities.

Scoping Report reference	Comment	Response
Proposed Method of Assessment:	Section 6.5 (pp.72-73) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme. For the construction phase the impacts would be temporary, and would arise from the physical works, and from temporary traffic control measures (paragraphs 6.5.2 and 6.5.3, p.73). For the operational phase, the impacts would be associated with changes in traffic (type, volume, density, and speed), and with changes in the alignment of the road network relative to sensitive noise receptors (paragraph 6.5.4, p.73).	Comment duly noted.
	Section 6.6 (p.73) and section 6.7 (pp.74-76) of the Environmental Scoping Report discuss the way in which the assessment of the proposed Schemes' impacts on the noise environment would be undertaken. Paragraph 6.6.1 (p.73) states that traffic data for the noise assessment would be sourced from the South East regional strategic traffic model (SERTM). Paragraphs 6.6.3 (p.73), and paragraphs 6.7.1 to 6.7.10 (pp.74-75) report that the assessment of operational impacts would be carried out in accordance with the detailed appraisal method defined in the DMRB HD 213/11 guidance. The County Council understands that the DMRB is currently under review, and therefore recommends that the assessment take account of the likely changes to that guidance, by including assessment of night-time noise, and including the use of 'no observed effects levels' (NOELs), 'lowest observed effects levels' (LOELs), and 'significant observed effects levels' (SOELs).	The assessment methodology for operation phase road traffic noise was based on a combination of guidance provided in the DMRB HD 213/11 and threshold noise levels selected based on reported impacts to human health to take into account emerging guidance and best practice on assessing significance. Further information on the assessment criteria used to complete the appraisal of the Scheme is provided in Section 6.5. Reporting of significant effects is provided in Section 6.10.
Mitigation & Residual Effects:	Section 6.9 (p.76) of the Environmental Scoping Report identifies the mitigation measures that would be deployed to address the noise impacts arising from the Scheme. The proposed mitigation would be focused on the operational phase of the Scheme, and would primarily comprise of low noise road surfacing, and the construction of noise barriers or bunds alongside the carriageway. The County Council	The Scheme proposes to renew the existing noise barriers at Junction 10 and extend them slightly near the Important Area at Pointers Road.

Scoping Report reference	Comment	Response
	recommends that consideration also be given to the potential for the Scheme to deliver improvements in existing noise mitigation measures situated within the proposed application area.	
Biodiversity - Chapter 7 (pp.78 - 112) of the Environmental Scoping Report Definition of Study Area:	Section 7.2 (pp.78-79) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on ecological assets and systems. The extent of the proposed study area is dependent on the ecological aspect under consideration, ranging from 50 metres for veteran trees, to one kilometre for Ancient Woodlands, notable habitats, and notable or protected species, to two kilometres for conservation verges, non-statutory Sites of Nature Conservation Importance (SNCIs), and statutory nature conservation designations (SSSIs, SPAs, SACs, Ramsar Sites, NNRs and LNRs), to ten kilometres for bats, and to thirty kilometres for SACs where bats are a qualifying species. The County Council concurs with the proposed study area, and with the aspects of the natural environment to be covered by the assessment.	Comment duly noted.
Description of Baseline Conditions:	Section 7.4 (pp.85-100) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. The sources of baseline information to be used in the assessment are listed under paragraph 7.4.1 (pp.85-86), and include both existing records and the findings of surveys commissioned for the purposes of the Scheme. Paragraph 7.4.1 (pp.85-86) reports that a Phase 1 Habitat Survey and a NVC survey have been carried out on the publically accessible land around Junction 10, and surveys of a range of fauna have been carried out in 2016 and 2017 on land surrounding the junction. The County Council is content that the proposed ecological baseline covers all relevant aspects of the natural environment.	Comment duly noted.

Scoping Report reference	Comment	Response
Proposed Method of Assessment:	<p>Section 7.5 (pp.100-101) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme, with reference to ecology. The primary impact of concern is the permanent removal of land that is currently subject to statutory and non-statutory nature conservation designations, which extends to some 25.7 hectares, with a further 32.8 hectares subject to temporary change of use (paragraph 7.5.2, p.100). In terms of habitat loss, paragraph 7.5.6 (p.101) reports that some 22.4 hectares of habitats of principal importance would be permanently altered, and a further 22.4 hectares of habitats of principal importance would be affected by a temporary change of use. Paragraphs 7.5.8 and 7.5.9 (p.101) report that impacts, including disturbance, disruption of migration and commuting routes, loss of foraging areas, population fragmentation, and the risk of death or injury, could arise in respect of a range of protected and notable faunal species. The County Council notes that no reference is made in section 7.5 of the Environmental Scoping Report to the potential ecological effects of changes in air quality, noise disturbance or hydrology, but acknowledges that such matters are raised in section 7.6 (pp.101-106) and 7.7 (pp.106-109) of the report.</p>	<p>Comment duly noted. Effects of changes in air quality, noise disturbance or hydrology on biodiversity have been assessed in the ES.</p>
	<p>Section 7.6 (pp.101-106) and 7.7 (pp.106-109) of the Environmental Scoping Report discuss the way in which the assessment of impacts on the ecological interest of the affected land would be undertaken. Table 7-8 (pp.102-103) in section 7.6, reports that the assessment would cover impacts on a wide range of ecological assets, including statutory and non-statutory designated sites, and protected and notable habitats and species. A list of the organisations that are considered to be key stakeholders with respect to the natural environment is provided in paragraph 7.6.3 (pp.101-102), to which the County Council requests that it be added, as a major landowner, alongside the Surrey Wildlife Trust, which</p>	<p>Surrey CC have been included in ongoing consultation</p>

Scoping Report reference	Comment	Response
	manages Ockham & Wisley Commons on the County Council's behalf.	
	Paragraph 7.7.3 (p.106) of section 7.7 of the Environmental Scoping Report indicates that the assessment would be undertaken in line with the published CIEEM guidance on ecological impact assessment, and relevant parts of the DMRB Volume 11. Paragraph 7.7.15 (pp.108-109) reports on the surveys, of habitats and species, that commenced in May 2017, and will continue throughout the preliminary design stage of the project, and paragraph 7.7.16 (p.109) reports that an arboricultural assessment of veteran trees would be undertaken. The County Council is generally content with the range of surveys proposed, but would recommend that the survey of veteran trees include an ecological assessment, due to their potential to harbour important assemblages of bats and invertebrates.	Trees have also been subject to surveys for bat roost potential.
Mitigation & Residual Effects:	Section 7.9 (pp.110-111) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme. Paragraph 7.9.1 (pp.110-111), at the eighth bullet point, makes reference to the purchase of land, which would be managed to create compensatory heathland and woodland habitats, to offset the losses incurred by the SSSI and the SPA as a consequence of the proposed Scheme. The County Council notes that the report does not explain the methodology that would be used to calculate the amounts and types of compensatory habitat required, and recommends that the approach outlined in the Defra publication 'Technical Paper: the metric for the biodiversity offsetting pilot in England' (2012) (copy enclosed) could be appropriate. The County Council also notes that, although the need for compensatory habitat is identified, the discussion of mitigation does not extend to the longer term management of those areas, and it is recommended that arrangements for such are developed in light of the guidance set out in the Surrey Nature Partnership's 'Biodiversity	Detail on the compensation for loss of SPA is given in the HRA and ES.

Scoping Report reference	Comment	Response
	Opportunity Area Policy Statement TBH06 Wisley, Ockham & Walton Heaths' { copy enclosed }.	
Road Drainage & the Water Environment - Chapter 8 (pp.113 - 128) of the Environmental Scoping Report Definition of Study Area:	Section 8.2 (p.113) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on the water environment. Paragraph 8.2.1 (p.113) reports that the assessment would cover all components of the water environment located within 1 kilometre of the area of land affected by the proposed Scheme, extending beyond 1 kilometre where effects could arise further afield (e.g. downstream flood risk, hydromorphological change). For the underlying groundwater body, the Chobham Bagshot Beds, paragraph 8.2.1 (p.113) indicates that the assessment would cover the entire waterbody. The County Council concurs with the proposed study area, and with the aspects of the water environment to be covered by the assessment.	Comment duly noted.
Description of Baseline Conditions:	Section 8.4 (pp.116-119) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. Paragraphs 8.4.2 to 8.4.7 report on the aspects of the water environment that would be covered by the assessment, including surface water bodies and other surface water features, groundwater bodies, licensed abstractions and discharges, and all sources of flood risk. The County Council recommends that a hydrogeological risk assessment is undertaken, to inform the groundwater impact assessment, and to provide information about existing groundwater levels, and the quality of groundwater and surface waters. The County Council also recommends that the assessment cover the potential physical effects (e.g. truncation or diversion of flows, changes to base flows to surface water features, etc.) of the proposed Scheme on the groundwater environment, in addition to the potential chemical effects of contamination.	Further consultation with Surrey County Council on 8 th October 2018 has determined that the Council do not expect the Environmental Statement for the DCO application to include a hydrogeological risk assessment.

Scoping Report reference	Comment	Response
Proposed Method of Assessment:	Section 8.5(pp.119-120) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme, with reference to the water environment. For the construction phase, paragraphs 8.5.2 (p.119) and 8.5.4 (p.120) report that the main issues of concern would be the release of sediments or contaminants into watercourses, the mobilisation of contamination, and changes in flood risk from fluvial, pluvial and groundwater sources. For the operational phase, paragraph 8.5.5 (p.120) reports that the main issues of concern would be physical and chemical effects on surface waters and groundwaters, and changes in flood risk associated with the permanent changes in land use.	Noted
	Section 8.6 (pp.120-124) and section 8.7 (pp.124-125) of the Environmental Scoping Report discuss the way in which the assessment of impacts on the water environment and flood risk would be undertaken. Table 8-4 (pp.120-121) reports that the assessment would cover the impacts of the proposed Scheme on surface waterbodies and lakes, on groundwater bodies, on abstractions and discharges, on flood risk, on the Water Framework Directive status of nearby waterbodies that are subject to monitoring under that regime, and on water dependent designated nature conservation sites. The methods that would be applied with respect to the aspects of the water environment requiring assessment are outlined in paragraphs 8.7.1 to 8.7.7 (pp.124-125). The County Council is generally content with the proposed approach, but would recommend that a hydrogeological risk assessment be included with reference to groundwater, and that account be taken of the most up-to-date guidance with reference to flood risk assessment and climate change allowances.	Further consultation with Surrey County Council on 8 th October 2018 has determined that the Council do not expect the Environmental Statement for the DCO application to include a hydrogeological risk assessment.
Mitigation & Residual Effects:	Section 8.9 (pp.125-126) of the Environmental Scoping Report identifies the mitigation measures that would be	Noted

Scoping Report reference	Comment	Response
	deployed during the construction and operational phases of the Scheme with reference to management of the impacts of the Scheme on the water environment and flood risk. The County Council is broadly content with the approach proposed, with reference to the identification of mitigation measures.	
Landscape - Chapter 9 (pp.129 - 147) of the Environmental Scoping Report Definition of Study Area:	Section 9.2 (p.129) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on the landscape and visual amenity. For landscape effects, paragraph 9.2.2 (p.129) the study area would extend to 1.5 kilometres beyond the perimeter of the land covered by the proposed Scheme. A similar study area is proposed in paragraph 9.2.5 (p.129) with reference to visual impacts. The County Council concurs with the proposed extent of the study area for landscape and visual effects, subject to there being no substantial alterations to the proposed Scheme.	Noted
Description of Baseline Conditions:	Section 9.4 (pp.132-135) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area, with reference to landscape character and the visual environment.	Noted
	For landscape character, paragraphs 9.4.2 to 9.4.7 (pp.132-135) identify and summarise the National Character Areas and local Landscape Character Areas relevant to the affected land. It is noted that reference is made to the 2015 Surrey Landscape Character Assessment with reference to those parts of the Scheme situated in the borough of Elmbridge, but not for those parts situated in the borough of Guildford. The County Council recommends that the baseline description of landscape character make reference to the County level LCA (2015) across the entire area of the Scheme, in addition to national and local level assessments.	Added to baseline description

Scoping Report reference	Comment	Response
	For the visual environment, paragraphs 9.4.8 to 9.4.11 (p.135) identify and summarise the key categories of visual receptors to be taken into account in the assessment. The County Council concurs with the proposed list of potentially affected visual receptors that would be taken into consideration during the assessment.	Added to text
Proposed Method of Assessment:	Section 9.5 (pp.135-137) of the Environmental Scoping Report identifies the main impacts on landscape character and visual amenity that it is proposed would be addressed through the assessment, for both the construction and operational phases of the Scheme. For landscape character, paragraphs 9.5.2 to 9.5.7 (p.136) identify the key impacts as being, changes in land use and land form, changes in tranquillity, and the introduction of new built elements into the area. For visual amenity, paragraphs 9.5.8 to 9.5.14 (pp.136-137) identify the key impacts as being, changes in land use and land form, and the introduction of new built elements into the area. The County Council concurs with the impacts and effects that the assessment proposes to cover.	Noted
	Section 9.6 (pp.137-140) and section 9.7 (pp.140-146) of the Environmental Scoping Report discuss the way in which the assessment of impacts on landscape character and visual amenity would be undertaken. The scope of the landscape character assessment, and the aspects of the landscape to be taken into account, is discussed in paragraphs 9.6.7 to 9.6.8 and Table 9-3 (p.138). The scope of the visual impact assessment, and the visual receptors to be taken into account, is discussed in paragraph 9.6.9 (p.139) and Table 9-4 (pp.139-140). The proposed methods of assessment for landscape character and visual amenity are discussed in paragraphs 9.7.1 to 9.7.14 (pp.140-146), with paragraph 9.7.1 (p.140) reporting that the assessment would be carried out in line with the 'Guidelines for Landscape & Visual Impact Assessment' (3rd edition, Landscape Institute & IEMA). The County Council is broadly content with the proposed	Noted, photomontages have not been produced due to their limited value in this well wooded landscape. Key stakeholders have been consulted and not required photomontages.

Scoping Report reference	Comment	Response
	methodology, but would recommend that photomontages are used to illustrate the changes to key views, and that the Landscape Institute's 'Technical Guidance Note 02/17' is followed.	
Mitigation & Residual Effects:	Section 9.9 (p.146) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme with reference to management of the impacts of the Scheme on landscape character and visual amenity. The County Council is broadly content with the approach proposed, with reference to the identification of mitigation measures.	Noted
Geology & Soils - Chapter 10 (pp.148 - 165) of the Environmental Scoping Report Definition of Study Area:	Section 10.2 (p.148) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on geology and soil resources. Paragraph 10.2.1 (p.148) reports that the study area would extend to 500 metres from the perimeter of the land affected by the proposed Scheme. The County Council concurs with the proposed extent of the study area for geology and soils, subject to there being no substantial alterations to the proposed Scheme.	Comment duly noted. However, a 250m perimeter from the Scheme has been used as the study area. Rationale for this boundary extent is provided in section 10.4 (Study area) of the ES.
Description of Baseline Conditions:	Section 10.4 (pp.149-151) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. The range of issues to be covered by the description of baseline conditions is broad, including geology, hydrogeology, hydrology, agricultural soils, land contamination, and unexploded ordnance. The County Council would recommend that the topics of hydrogeology and hydrology be more appropriately tackled in the water environment chapter of the Environmental Statement, to avoid potential duplication of assessment. The County Council would also advise that the area of land affected by the proposed Scheme does not coincide with any of the Mineral	<p>Comment duly noted - hydrology and hydrogeology is assessed in Chapter 8 (Road Drainage and the Water Environment) of the ES. However, Chapter 10 (Geology and Soils) assesses hydrology and hydrogeology (controlled waters) in terms of contaminated land receptors and sources and details are presented herein to determine sensitivity/value only.</p> <p>As the land that will be affected by the Scheme does not coincide with any Mineral Safeguarding zones these have not been discussed further within the assessment.</p>

Scoping Report reference	Comment	Response
	Safeguarding Areas defined under the Surrey Minerals Plan, and consequently the Scheme is considered unlikely to result in the sterilisation of significant minerals resources.	
Proposed Method of Assessment:	Section 10.5 (p.152) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme. The main issues of concern include the potential for contamination of the land, the potential to create new areas of instability, and the potential to give rise to contamination of ground and surface waters. The County Council is broadly content with the range of issues that have been identified as requiring assessment with respect to geology and soils.	Comment duly noted.
	Section 10.6 (pp.152-153) and section 10.7 (pp.154-162) of the Environmental Scoping Report discuss the way in which the assessment of impacts on geology and soils would be undertaken. Paragraph 10.6.2 (pp.152-153) reports that ground investigations have been specified and would be undertaken to inform the assessment, and paragraph 10.6.4 (p.153) reports that a range of physical and chemical impacts would be covered by the assessment. Paragraphs 10.7.2 to 10.7.17 (pp.154-160) report on the contaminated land risk assessment and impact assessment that would be undertaken, and on which the Environment Agency would be consulted. Paragraphs 10.7.18 to 10.7.24 (p.161) report on the agricultural soils assessment that would be carried out, which would follow the method set out in Volume 11 of the DMRB. The County Council is broadly content with the approach that has been proposed to the assessment of the Schemes' effects on land contamination, and on agricultural soils. The County Council would recommend that a land instability risk assessment be undertaken as part of the assessment for geology and soils.	Comment duly noted. A ground stability risk assessment is included as part of section 10.8 (Assessment of likely significant effects) of the ES. However, agricultural land is no longer being considered as part of Chapter 10 (Geology and Soils) of the ES, but is considered in Chapter 13 (People and Communities) of the ES.
Mitigation & Residual Effects:	Section 10.9 (pp.162-164) of the Environmental Scoping Report identifies the mitigation measures that would be	Comment duly noted.

Scoping Report reference	Comment	Response
	deployed during the construction and operational phases of the Scheme with reference to management of the impacts of the Scheme on geology and soils. The County Council is broadly content with the approach proposed, with reference to the identification of mitigation measures.	
Cultural Heritage - Chapter 11 (pp.166 - 181) of the Environmental Scoping Report Definition of Study Area:	Section 11.2 (p.166) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on heritage assets. Paragraph 11.2.1 (p.166) reports that the study area would extend some 500 metres beyond the perimeter of the land affected by the proposed Scheme. The County Council concurs with the proposed extent of the study area for cultural heritage, subject to there being no substantial alterations to the proposed Scheme.	Comment duly noted.
Description of Baseline Conditions:	Section 11.4 (pp.170-172) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. The designated and undesignated heritage assets that are situated within the specified study area are shown on Figure 2.1, with details of those assets recorded in Appendix F (Gazetteer of Heritage Assets) (pp.302-320) to the Environmental Scoping Report. The County Council is broadly content with the heritage baseline that has been defined and described in section 11.4 of the Environmental Scoping Report, but notes that a number of assets are missing from the gazetteer presented in Appendix F, although they are shown on Figure 2.1. The missing heritage assets that need to be included within the gazetteer are the one Grade I Listed Building, the five Grade II* Listed Buildings, and five of the Grade II Listed Buildings that have been identified as being located within 500 metres of the land covered by the proposed Scheme.	Comment duly noted. The gazetteer has been updated with the missing heritage assets and is included as Appendix 11.1 of the ES.
Proposed Method of Assessment:	Section 11.5 (pp.172-175) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction	Comment duly noted.

Scoping Report reference	Comment	Response
	and operational phases of the Scheme. In both cases potential is identified for the Scheme to impact upon known heritage assets, including features of archaeological interest, on unknown archaeological assets, and upon the context and setting of a range of heritage assets. The County Council is broadly content with the range of issues that have been identified as requiring assessment with respect to the archaeological, built and cultural heritage.	
	Section 11.6 (p.175) and section 11.7 (pp.175-179) of the Environmental Scoping Report discuss the way in which the assessment of impacts on the archaeological, built and cultural heritage would be undertaken. Paragraph 11.7.1 (pp.175-176) reports that the assessment would initially take the form of a desk based exercise, with the need for further archaeological investigation determined on the basis of the findings of that preliminary work. Paragraph 11.7.6 (pp.178-179) reports on the range of assessments that would inform the EIA process, which would include the desk-based assessment, archaeological evaluation and trial trenching or geo-physical surveys (where necessary), the preparation of statements of significance for the nearby Registered Parks & Gardens and assessment of their settings, and assessment of the settings of those heritage assets potentially affected by the Scheme. Where the applicant has indicated that the need for further investigations, and the form and focus of those investigations, would be determined in consultation with relevant bodies, and the County Council would welcome the opportunity to participate in those discussions.	Comment duly noted. Statements of significance have been prepared to support the ES and are included as Appendix 11.3. The further investigations will be undertaken as part of the Outline Construction Environmental Management Plan, which Surrey County Council will be consulted upon as the archaeological schemes of investigation are developed.
Mitigation & Residual Effects:	Section 11.9 (pp.179-180) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme with reference to management of the impacts of the Scheme on archaeology and the built and cultural heritage. The County Council is broadly content with the approach proposed, with reference to the identification of mitigation measures, and would welcome the opportunity to	Comment duly noted. All evaluation and mitigation strategy documents will be developed in consultation with Surrey County Council, as is required by the Outline Construction Environmental Management Plan.

Scoping Report reference	Comment	Response
	comment on any schemes of investigation and evaluation prepared in light of the findings of the initial assessment.	
Materials & Waste - Chapter 12 (pp.182 - 195) of the Environmental Scoping Report Definition of Study Area:	Section 12.2 (p.182) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on material resources and waste. The County Council concurs with the proposed extent of the study area for materials and waste, subject to there being no substantial alterations to the proposed Scheme.	Comment duly noted.
Description of Baseline Conditions:	Section 12.4 (pp.186-189) of the Environmental Scoping Report provides an account of baseline conditions in terms of material resources and waste that are relevant to the proposed Scheme. For material resources consideration is given to the availability of relevant materials at the national level. For waste arisings and waste management capacity information is provided for construction, demolition and excavation waste and for hazardous waste at the Surrey level. The County Council would direct the applicant to the recently published waste capacity assessment that has been prepared to inform the review of the Surrey Waste Plan as a source of current information on waste arisings and existing management capacity within the county.	Comment duly noted.
Proposed Method of Assessment:	Section 12.5 (p.189) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme. Paragraph 12.5.2 (p.189) identifies the issues to be addressed as, the market for the key construction materials required for the Scheme, the wastes expected to arise from the construction phase of the Scheme, and the capacity of existing waste infrastructure. The County Council is broadly content with the range of issues that have been identified as requiring assessment with respect to materials and waste.	Comment duly noted.

Scoping Report reference	Comment	Response
	Section 12.6 (pp.189-191) and section 12.7 (pp.191-194) of the Environmental Scoping Report discuss the way in which the assessment of impacts on materials and waste would be undertaken. The County Council is broadly content with the approach that has been outlined with reference to the assessment of the Schemes' effects on demand for material resources and on the management of waste arisings.	Comment duly noted.
Mitigation & Residual Effects:	Section 12.9 (p.194) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme with reference to management of the impacts of the Scheme on demand for materials and on waste arisings. The County Council is broadly content with the approach proposed, with reference to the identification of mitigation measures.	Comment duly noted.
People & Communities - Chapter 13 (pp.196 - 223) of the Environmental Scoping Report Definition of Study Area:	Section 13.2 (p.196) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on communities and the human population. The County Council recommends that the study area include those elements of the local road network, for example the B2215 in Ripley, that would be affected as a consequence of the changes made by the Scheme.	Comment duly noted.
Description of Baseline Conditions:	Section 13.4 (pp.200-205) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. The aspects of the community covered by the description of baseline conditions includes residents, businesses and community assets, agricultural land (which would be better addressed under the geology and soils chapter), development land (in terms of land subject to proposals for development, or identified as suitable for development through Local Plans), and vehicular and non-vehicular users of the local road network. The County Council is keen to ensure that full consideration is given to the impacts of the	Comment duly noted.

Scoping Report reference	Comment	Response
	proposed works on the wider local road network and its users, and would encourage the applicant to include baseline traffic information for all potentially affected road links as part of the assessment.	
Proposed Method of Assessment:	Section 13.5 (pp.205-207) of the Environmental Scoping Report identifies the main impacts that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme. Consideration would be given the potential effects of land take, severance and changes in amenity for residents and community assets (paragraphs 13.5.1 to 13.5.8, pp.205-206), and on local businesses, and agricultural and development land (paragraphs 13.5.9 to 13.5.14, p.206). For users of the local road network, consideration is given to the length of journeys, to patterns of travel, to amenity, to severance, to views, and to the likelihood of stress (paragraphs 13.5.15 to 13.5.22, pp.206-207). The County Council is broadly content with the range of issues that have been identified as requiring assessment with respect to the impacts of the Scheme on the community.	Comment duly noted.
	Section 13.6 (p.207) and section 13.7 (pp.207-221) of the Environmental Scoping Report discuss the way in which the assessment of impacts on the community would be undertaken. The County Council is broadly content with the approaches that have been outlined with reference to the assessment of the Schemes' effects on residents, businesses and community assets (paragraphs 13.7.5 to 13.7.33, pp.208-214), on agricultural land and development land (paragraphs 13.7.34 to 13.7.41, pp.214-215), and on vehicular and nonvehicular users of the local road network (paragraphs 13.7.42 to 13.7.73, pp.216-221).	Comment duly noted.
Mitigation & Residual Effects:	Section 13.9 (p.221) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme. The County Council would expect appropriate	Comment duly noted.

Scoping Report reference	Comment	Response
	mitigation or compensatory measures to be identified in respect of each of the aspects of the community adversely affected by the proposed Scheme.	
Climate - Chapter 14 (pp.224 - 237) of the Environmental Scoping Report Definition of Study Area:	Section 14.2 (pp.224-226) of the Environmental Scoping Report defines the extent of the area that would be covered by the assessment with reference to the impacts of the proposed development on the climate. The County Council concurs with the proposed extent of the study area for climate change, subject to there being no substantial alterations to the proposed Scheme.	Comment duly noted.
Description of Baseline Conditions:	Section 14.4 (pp.229-231) of the Environmental Scoping Report provides an account of baseline conditions at the proposed application site, and in the surrounding area. The County Council concurs with the approach that is proposed to define the baseline for the Scheme with reference to the issue of climate change, in terms of emissions of greenhouse gases.	Comment duly noted.
Proposed Method of Assessment:	Section 14.5 (p.232) of the Environmental Scoping Report identifies the main impact that it is proposed be addressed through the assessment, for both the construction and operational phases of the Scheme, which in this instance comprises the global atmosphere. The County Council agrees that the applicant has identified the key impact of concern with reference to the climate.	Comment duly noted.
	Section 14.6 (p.232) and section 14.7 (pp.232-233) of the Environmental Scoping Report discuss the way in which the assessment of impacts on the climate would be undertaken. The proposal to provide a quantified assessment of the Schemes' likely contribution to greenhouse gas emissions is welcomed by the County Council.	Comment duly noted.
Mitigation & Residual Effects:	Section 14.10 (pp.234-235) of the Environmental Scoping Report identifies the mitigation measures that would be deployed during the construction and operational phases of the Scheme. The County Council is content with the	Comment duly noted.

Scoping Report reference	Comment	Response
	approach to mitigation of the greenhouse gas emissions that has been proposed by the applicant.	
Final Comments	We hope that the above comments are of value to the process of defining the scope of the EIA for the proposed Scheme, and would welcome the opportunity to engage further with the applicant as the development of the Scheme and the associated assessment progresses. Please do not hesitate to contact us should you require any further information, or wish to seek clarification of any of the comments that we have made.	Comment duly noted.
	{Defra, 'Technical Paper: the metric for the biodiversity offsetting pilot in England' (2012) attached to response} {Surrey Nature Partnership, 'Biodiversity Opportunity Area Policy Statement TBH06 Wisley, Ockham & Walton Heaths' attached to response}	

Table 1.2.24: Scoping Opinion comments - Surrey Heath Borough Council

Topic	Comment	Response
	Surrey Heath Borough Council, along with ten other Local Authorities, is impacted by the Thames Basin Heaths Special Protection Area (TBHSPA) and the need to provide avoidance measures to mitigate the impact of residential development on the TBHSPA. The avoidance measures are set out in the Thames Basin Heaths Supplementary Planning Document http://www.surreyheath.gov.uk/residents/planning/planningpolicy/supplementary-planning-documents/thames-basin-heaths-special . These measures have been agreed by Natural England and the eleven Local Authorities. The measures include a 400m exclusion zone and the need to provide avoidance measures for residential development within a 5-7km radius of the TBHSPA. The avoidance measure is through the provision of Suitable Alternative Natural Greenspace (SANG).	Noted, detailed information is provided in the HRA
	The proposed M25 junction/A3 Wisley interchange Improvement will require the loss of at least 8 hectares of TBHSPA. This loss will have to be re provided as new TBHSPA elsewhere.	Compensation for loss of SPA is included in the Scheme
	Surrey Heath Borough Council raise concerns that the re provision of the new TBHSPA could impact on the on the avoidance measures required in respect of the new TBHSPA. It may require a new 400m buffer zone or lead to an extension of the 5-7km zone where avoidance measures are required. It could also	SPA Compensation is provided where it will not affect existing buffers

Topic	Comment	Response
	impact in respect of the provision of new SANG. This could impact on an authority's ability to achieve avoidance measures and therefore on housing delivery.	
	The Scoping Opinion should therefore identify where the new TBHSPA will be provided and that avoidance measures can be achieved.	
	In addition there needs to be a robust assessment of the proposed interchange improvements on air quality and soil quality on the TBHSPA in the vicinity of the proposal.	These assessments are included in the ES.

Table 1.2.25: Scoping Opinion comments - Transport for London

Topic	Comment	Response
	The following comments are made by TfL City Planning officers on a 'without prejudice' basis and are intended to ensure that this policy document is in line with relevant London Plan transport policies and reflects the draft Mayor's Transport Strategy. You should not interpret them as indicating any subsequent Mayoral decision and these comments do not necessarily represent the views of the GLA.	Comment duly noted.
	TfL's initial comments relate to the lack of a separate traffic and transport section in the scoping opinion. Whilst there is some acknowledgement of the need for strategic transport modelling in terms of air quality and noise, there is no detail on the methodology.	Detail on traffic modelling is included in the Transport Assessment Report and summarised in the ES.
	TfL would expect strategic highway modelling using fully calibrated and validated models to webTAG, as well as demand response modelling to measure induced traffic from the capacity increase and to quantify the traffic and environmental impacts of this Scheme. Some more substantive text on their proposed modelling / assessment approach would be welcomed.	See above
	I trust that the above provides you with an understanding of TfL's current position on EIA Scoping Opinion.	Comment duly noted.

Table 1.2.26: Scoping Opinion comments - Wales and West Utilities Ltd

Topic	Comment	Response
	With regards to your below request, this is not Wales & West Utilities area. This falls within Southern Gas Network's area, contact details for them below: Email: plantlocation@sgn.co.uk Telephone: 0845 070 3497	Comment duly noted.

Table 1.2.27: Scoping Opinion comments - Waverley Borough Council

Topic	Comment	Response
	As requested in your letter dated 13 December 2017 we confirm that at this stage of the process we have no comments to make. However, as the Scheme progresses through the DCO process and more information is made available this may change and we request that you continue to consult with us throughout the process.	Comment duly noted.

Table 1.2.28: Scoping Opinion comments - Woking Borough Council

Topic	Comment	Response
Cumulative effects	Officers have considered the proposal and wish to draw the applicant's attention to potential highway mitigation measures being considered by Woking Borough Council and Surrey County Council to improve junction performance along the A245, especially at the A245 Byfleet Road/Seven Hills Road Junction. The potential mitigation measures study (Woking Local Plan, Potential Mitigation, Document No. 53613T44/07, dated 4th October 2017) is a draft and the conclusions may vary.	Thank you for bringing this to our attention. The draft potential mitigation measures study (Woking Local Plan, Potential Mitigation, Document No. 53613T44/07, dated 4th October 2017) was requested from Woking Borough Council. Woking advised on 13 February 2018 that Surrey County Council cannot provide the document until formally published and that SCC is keen to discuss matters concerning both the A245/Seven Hills Road junction and Ripley as part of the M25/A3 proposed junction improvement scheme and so will be in touch to arrange a meeting.
Planning	In addition to the above potential mitigation measures being considered along the A245, the Council wish to draw the applicant's attention to a joint study by Surrey County Council, Woking Borough Council and Guildford Borough Council titled: 'Guildford and Woking Transport Infrastructure: A3 Economic Impact Assessment, March 2015'. The study explores the potential economic benefits to businesses and residents of improving the A3 corridor. This study has a direct bearing on M25 Junction 10/A3 Wisley interchange Improvements.	Noted, this is considered in the Transport Assessment Report
	We request that the aforementioned documents are considered and that the potential impact of the proposals on the surrounding network (including during the construction phase) form part of the scope of any Environmental Statement submission.	Comment noted. The effects are considered in the DCO and ES

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