

M25 junction 10/A3 Wisley interchange TR010030

9.12 Applicant's Comments on Relevant Representations

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Planning Act 2008



Infrastructure Planning

Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended)

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

9.12 APPLICANT'S COMMENTS ON RELEVANT REPRESENTATIONS

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1. Introduction

- 1.1.1 The purpose of this document is to set out the comments of the applicant, Highways England, in response to the relevant representations submitted to the Planning Inspectorate on or before 6 September 2019.
- 1.1.2 Highways England provides a response in this document to all of the interested parties' relevant representations apart from the following:
- (1) Local authorities who will be submitting a joint Local Impact Report at Deadline 2 - Elmbridge Borough Council (RR-001), Surrey County Council (RR-004) and Guildford Borough Council (RR-062); and
 - (2) Those interested parties who have indicated that they will or might be providing a written representation or a further response at Deadline 1 - Painshill Park Residents Association (RR-022), Royal Horticultural Society (RR-024) and Wisley Property Investments Limited (RR-030).
- 1.1.3 Highways England will provide a response to the interested parties set out in (1) and (2) above at Deadline 2 (in the case of written representations) and Deadline 3 (in the case of local impact reports) once Highways England had an opportunity to consider the documents submitted.
- 1.1.4 Highways England has also not provided a response to those interested parties who have not raised any issues in their relevant representation, namely:
- (1) Surrey Heath Borough Council (RR-005) (no issues raised).
 - (2) Public Health England (RR-023) (no issues raised).
 - (3) Laurence Greaves (RR-041) (expressed support).
 - (4) Molly James (RR-045) (expressed support).
- 1.1.5 The County Commissioner for Girlguiding Greater London West (AS-027), the Guide Association Trust Corporation (AS-028) and Kilnside Farm (AS -029) have provided additional submissions in response to the Rule 6 Letter. Highways England is considering these submissions and is intending to provide a response to those submissions at Deadline 2.

RR-002 OCKHAM PARISH COUNCIL

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-002	Our areas of concern include, but are not limited to the following:	
RR-002	Air quality – during construction and beyond	<p>The air quality assessment in Chapter 5 of the Environmental Statement (APP-050, APP-064, APP-065, APP-080) shows that during construction, with the application of appropriate mitigation measures secured in the outline Construction Environmental Management Plan (Outline CEMP) (APP-134), no significant residual effects are predicted at nearby sensitive receptors (paragraph 5.10.3, APP-050).</p> <p>Mitigation measures to be used by the principal contractor during construction to minimise impacts on air quality include, but are not limited to:</p> <ul style="list-style-type: none"> • Regular water-spraying and sweeping of unpaved and paved roads to minimise dust and remove mud and debris. • All vehicle engines and plant motors shall be switched off when not in use. • Storing dusty materials away from site boundaries and in appropriate containment (e.g. sheeting, sacks, barrels etc.). <p>The CEMP is secured under Schedule 2 Requirement 3 (Construction and handover environmental management plans) of the draft DCO (APP-018).</p> <p>During operation of the Scheme, the air quality assessment in the Environmental Statement shows that there is not expected to be an overall significant adverse effect on air quality at Elm Corner.</p>
RR-002	Noise pollution – during construction and beyond	<p>The noise and vibration assessment in Chapter 6 of the Environmental Statement (APP-051) shows that no significant effects from road traffic noise are likely during the construction phase of the Scheme (APP-051 Table 6.24, paragraph 6.10.11), through the use of mitigation measures secured in the Outline CEMP (APP-134), such as:</p> <ul style="list-style-type: none"> • Machines in intermittent use shut down when not in use or where this is impracticable throttled down to a minimum. • When handling materials, care shown not to drop materials from excessive heights.

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		<ul style="list-style-type: none"> Where practicable, machinery with directional noise characteristics orientated to minimise noise at nearby properties. <p>Under Requirement 3 of Schedule 2 to the dDCO, a CEMP must be approved by the Secretary of State for the relevant part of the works before they can begin and the CEMP must be adhered to in accordance with Requirement 3(3). The CEMP must also substantially accord with the Outline CEMP submitted as APP-134.</p> <p>During operation of the Scheme, the noise and vibration assessment in the Environmental Statement shows that there is not expected to be an overall significant adverse effect at Elm Corner. As set out in paragraph 6.8.33, Table 6.15 of Chapter 6 of the Environmental Statement shows that in the opening year of the Scheme, 9 dwellings were predicted minor increases in daytime road traffic noise levels compared with noise levels without the Scheme. The affected receptors were located at Hatch Lane (Yew Tree Cottage and 2 Yew Tree Cottages) and Ockham Lane (The Cottage, Appstree Cottage, 2 Appstree Cottages, Red Rose Cottage, Beech Cottage, Bridge End, and Ivy Cottage). Minor noise decreases were predicted at several locations within the study area including Elm Corner. Other than a moderate noise decrease at an ancient woodland near the Former Wisley Airfield, no moderate or major changes in daytime noise level are predicted. Negligible long-term changes were predicted at the majority of locations within the study area, including Elm Corner.</p>
RR-002	Light pollution – during construction and beyond	<p>The landscape assessment in Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting during construction and identifies no likely significant effects in terms of light pollution during construction. The assessment takes account of mitigation, including:</p> <ul style="list-style-type: none"> Construction compounds, such as the compound at Wisley Airfield would have lighting which would be activated by motion sensors to prevent unnecessary usage. The main site compounds would be lit as required during hours of darkness. Lighting would be directional, and positioned sympathetically, to minimise light spill and disturbance for highly sensitive receptors. <p>The CEMP is secured under Schedule 2 Requirement 3 of the draft DCO (APP-018) and includes the requirement for a management plan to be approved for construction site artificial lighting prior to the commencement of that part of the Scheme.</p>

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		The landscape assessment in Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting during operation and identifies no likely significant effects in terms of light pollution during operation.
RR-002	<p>The two construction compounds within Ockham</p> <ul style="list-style-type: none"> mitigating noise, disruption, dust, light pollution, traffic delays. 	<p>Responses on construction related noise, dust and light pollution are set out above.</p> <p>Traffic management will be in place on the A3 during construction, which will facilitate construction traffic being able to arrive at and leave these construction compounds without causing congestion. Under Schedule 2 Requirement 4 (Traffic management during construction) of the draft DCO (APP-018), a traffic management plan relevant to the part of the works involved must be submitted to and approved by the Secretary of State following consultation with the relevant planning authority and the relevant highway authority before the works can start. By these means traffic will be managed appropriately in order to avoid, so far as practicable, effect on the road network.</p>
RR-002	Ensuring safety to both road users and pedestrians and equestrian.	<p>The Planning Statement (APP-133) section 2.3 states that safety is a key requirement of the Scheme.</p> <p>Provision for pedestrians, cyclists and equestrians (non- motorised users (NMUs)) will be improved with a new path along the A3 corridor, suitable for all user groups and segregated from the A3 carriageway. This will link to existing provision and to new crossings over the A3 and the M25 at dedicated NMU overbridges. Therefore, pedestrians, cyclists and equestrians will be able to move through the area without conflict with trunk road traffic. Cyclists will be prohibited from using the A3 through the Scheme and will be directed onto the upgraded facility.</p> <p>Environmental Statement Chapter 13 People and Communities (APP-058) assesses the amenity, journey length and severance impacts on NMUs in Table 13.42 (Construction) and Table 13.43 (Operation). As highlighted in paragraph 13.5.46, safety of equestrian users is an important consideration when assessing effects. During construction there will be significant adverse effects on NMUs mainly due to severance. During operation there will be major beneficial effects due to higher quality connectivity, better, more and upgraded routes.</p>
RR-002	Preservation of Conservation areas at Ockham Mill and Church End which will be disrupted by site traffic and those trying to avoid the construction work and then ongoing protection of these areas into the future.	A response on construction related traffic is set out above. As set out in Chapter 11 of the Environmental Statement (Cultural Heritage) (APP-056) the Scheme will not have a direct impact on any conservation areas. Temporary increases in traffic will not adversely affect the characteristics that contribute to the significance of these

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		<p>conservation areas, nor will it adversely affect the protections provided to them by their designation as conservation areas.</p>
RR-002	<p>Loss of Ancient Woodland at Elm Lane and around new Cockcrow Bridge – how this can be mitigated as 16. Chapter 17 summary states no mitigation to be taken due to irreplaceable nature of ancient trees</p>	<p>As described in Section 7.4.1 of Chapter 7 of the Environmental Statement (APP-052), the Scheme has been refined to minimise the impacts on ancient woodland. This has resulted in a reduction of ancient woodland loss from approximately 1.0 ha to 0.4 ha across the Scheme. The loss of 0.4 ha is unavoidable due to the location of ancient woodland parcels immediately adjacent to the A3 at Elm Corner woods and Heyswood. There is no ancient woodland near the new Cockcrow bridge.</p> <p>The ecological design has been based on the mitigation hierarchy to avoid and minimise losses as far as practicable, allied to a landscape scheme (required under Requirement 6 (Landscaping) of Schedule 2 to the draft DCO (APP-018)) that will provide compensation to deliver long-term benefits for nature conservation.</p> <p>Highways England have worked with Natural England, Forestry Commission, RSPB, Surrey Wildlife Trust and Surrey County Council to identify a range of compensatory measures for the loss of woodland as a result of the Scheme. The Scheme will provide a suite of compensatory measures for the impacts on the SPA that includes 24.9 ha of woodland enhancement and 8.1 ha of wood pasture creation. The Scheme includes the planting of 9.8 ha of woodland (tree and shrub) within replacement land parcels, and a further 20.2 ha of woodland enhancement (including rhododendron removal). It is also proposed that enhancement works will be carried out within the Elm Corner SNCI.</p> <p>The soils from the 0.4 ha of ancient woodland being lost will be translocated to a receptor woodland creation site at PBF2 in Park Barn Farm (as referred to in paragraph 7.4.8 of the Biodiversity chapter of the Environmental Statement (APP-052)), where it will be managed for 25 years to ensure that an appropriate habitat successfully establishes (please see paragraph 7.4.6 of the Landscape and Ecology Management and Monitoring Plan (APP-106)).</p> <p>Mitigation is not possible if ancient or veteran trees are lost, due to their irreplaceable nature. However, specific measures to protect retained veteran trees are identified in paragraphs 7.10.15–16 of Chapter 7 of the Environmental Statement (APP-052). These include, wherever possible, the location of access tracks, haul roads and site compound and material storage areas to be sited outside designated sites and ancient woodland, away from retained veteran trees (and outside of notable</p>

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		<p>habitats), and a buffer zone to be implemented around these receptors where works are not limited by the existing carriageway.</p> <p>Possible compensatory measures are identified in paragraphs 7.10.19-25 of Chapter 7 of the Environmental Statement (APP-052) and include translocating veteran trees and dead wood to the wood pasture compensatory land. Dead wood habitat will also be provided using material from other trees felled onsite.</p>
RR-002	Loss of habitats and protected species during the works.	Chapter 7 of the Environmental Statement (APP-052) assesses the impacts of the Scheme on habitats and protected species, as a result of the construction and operation and identifies appropriate mitigation (please see section 7.10 in Chapter 7 of the Environmental Statement (APP-052)).
RR-002	Contamination of both land and water within TBHSPA	<p>Paragraphs 7.2.53-66 of the Habitat Regulations Assessment (HRA) Stage 2 (APP-043) Appropriate Assessment determined that, with the embedded measures in place, the impacts of the Scheme on water quality will be negligible, both during construction and operation, and there will be no adverse effects on the integrity of the SPA.</p> <p>This assessment was undertaken in consultation with Natural England, Surrey Wildlife Trust and the RSPB and the findings of the Appropriate Assessment were agreed (as documented in the minutes for meetings held on the 28 June 2018 and 09 October 2018 in the Consultation report (APP-041)).</p>
RR-002	Relocation of areas of TBHSPA	<p>The HRA Stage 2 (APP-043) Appropriate Assessment identified the need for a suite of compensatory measures, including SPA compensation land.</p> <p>Details of the suite of compensatory measures can be found in section 5 of the HRA Stages 3-5 (APP-044) and the selection of the SPA compensation land is described in HRA Annex C (APP-042). The suite of compensatory measures was carefully designed in consultation with Natural England, Forestry Commission, Surrey Wildlife Trust, RSPB and Surrey County Council. The location of the SPA compensation land, and the proposed works on these areas, has been carefully considered and is agreed to be appropriate by the listed stakeholders.</p>
RR-002	Disturbance to aquatic species in Bolder Mere and Stratford Brook	Chapter 7 of the Environmental Statement (APP-052) assesses the impacts of the Scheme on the aquatic species of Bolder Mere and Stratford Brook, as a result of the construction and operation. Chapter 8 of the Environmental Statement (APP-053) also considers the impacts of the Scheme on the wider water environment of Bolder

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		<p>Mere and Stratford Brook. Mitigation and enhancement measures have been identified and outlined in sections 7.10 and 8.9 of the Environmental Statement.</p> <p>In addition, the impact of the Scheme on the Bolder Mere and Stratford Brook water bodies has been assessed in the Water Framework Directive Assessment Report (APP-045). Measures have been carefully developed to mitigate the effect of the Scheme on the Bolder Mere water body, in consultation with the Environment Agency, Natural England and Surrey Wildlife Trust. Consultation on the Stratford Brook water body has been undertaken with the Environment Agency. The mitigation measures are set out in Section 5 and Appendix F of the Water Framework Directive Assessment Report (APP-045).</p>
RR-002	<p>Detailed design for access from Old Lane to A3 and Old Lane and new Elm Lane</p> <p>Redesign of Ockham Bites carpark.</p> <p>We request that a consideration of the design is to support the prevention of antisocial behaviour.</p>	<p>The preliminary design as shown on the Scheme Layout Plans (APP-012 and APP-013) show these features.</p> <p>Requirement 5 (Detailed design) of the dDCO requires the detailed design of the Scheme to be compatible with the preliminary design of the Scheme as submitted.</p> <p>Highways England will continue to engage with Surrey County Council and Surrey Wildlife Trust in relation to Ockham Bites Car park.</p> <p>Highways England is aware of anti-social behaviour at this location, but enforcement in relation to such problems is beyond the scope of the Scheme.</p>
RR-002	Water overrun into Bolder Mere and Stratford Brook.	<p>The Scheme includes a sustainable drainage system designed to manage both the quality and the quantity of highway runoff discharged to the water environment. Further details can be found in Chapter 8 of the Environmental Statement (APP-053), the Water Framework Directive Compliance Assessment Report (APP-045) and the Flood Risk Assessment (APP-046).</p>
RR-002	Preservation of archaeological remains discovered during the construction period	<p>Section 11.9 of the Environmental Statement (APP-056), in conjunction with the outline CEMP (APP-134), requires a programme of archaeological works to be undertaken to identify, evaluate and record both known and as-yet unknown archaeological remains affected by the Scheme.</p> <p>Requirement 14 (Archaeology) in Schedule 2 to the draft DCO requires that for each part of the Scheme, before works commence, that a written scheme of archaeological investigation and mitigation is approved by the Secretary of State in consultation with the relevant local planning authority and county archaeologist. The requirement includes making provision for the protection of remains being found that have not been previously identified.</p>

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RR-002	Preservation of heritage landmarks during the construction period	Chapter 11 of the Environmental Statement (APP-056) has completed an assessment of the Scheme against the heritage assets. It concluded that there is potential for adverse effects on designated and non-designated heritage assets within the Scheme boundary and study area. A total of nine heritage assets that are likely to be subject to significant effects during construction, comprising one large adverse effect to one heritage asset and moderate adverse effects to eight heritage assets. One significant effect, a large adverse effect on the Bell Barrow on Cockcrow Hill scheduled monument has been identified during operation. With mitigation, this effect will be reduced to a slight adverse effect, which is not significant. Appropriate mitigation is secured through the dDCO (APP-018) Requirement 14 (Archaeology) and the CEMP (APP-134).
RR-002	Preservation of Ockham Village Green	<p>As evident from the assessment in the Environmental Statement, Ockham Village Green will not be adversely affected by the Scheme.</p> <p>Each chapter of the Environmental Statement, within each study area identifies all assets and receptors. If the receptors are found to be affected then mitigation measures are identified. Chapter 13 Peoples and Communities of the Environmental Statement, (APP-058) table 13.32 has identified Ockham Village Green as a low sensitivity receptor with the assessment concluding:</p> <ul style="list-style-type: none"> • No amenity effects • Neutral noise and vibration • No significant air quality effect • No visual effect anticipated
RR-002	Seeking solutions that satisfy homeowners within Ockham whose properties will be affected by the works – such as Orchard Cottage and others within Elm Corner	Highways England will continue to engage with Elm Corner residents throughout the development and implementation of the Scheme. The CEMP (APP-134) sets out the commitments to carrying out the works in an appropriate manner and this will be updated before construction to take account of concerns expressed by residents and businesses affected.
RR-002	We remain convinced that the road bridge to RHS Wisley is not the best access solution.	<p>Alternative options assessed were discounted in favour of a road bridge to connect Ockham Park junction due to the environmental impacts on RHS Garden Wisley, Wisley Common and the safety of the travelling public.</p> <p>The consideration of alternatives is set out in Statement of Reasons (APP-022) and Chapter 3 of the Environmental Statement (APP-049).</p>

RR-003 ROYAL BOROUGH OF KINGSTON UPON THAMES

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RR-003	Kingston supports the principle of the proposals put forward for the improvement of Junction 10 and associated changes that have subsequently been made to the scheme design. We recognise that this intersection has become very busy with the need to reduce conflicts and associated accident risk. In particular we support the scheme on the grounds of improved safety with the aim of reducing collision frequency and severity and also minimising the impacts on the surrounding road network. The smoothing of traffic flows at the junction and slip roads and associated reduction in stopping and starting should improve the current situation.	Noted.
RR-003	<p>It is pleasing to see that certain aspects of the scheme have, where possible, been reduced in scale to minimise the overall land take and associated environmental impacts (for example those identified as Map References 12, 14, 15 and 17 on pages 7/8 of the HE consultation booklet).</p> <p>It is also preferable to see, where practical, improvements being achieved through better management and/or improvement of existing infrastructure in preference to large scale new infrastructure projects.</p>	Noted.
RR-003	<p><u>A3 improvements in Kingston</u></p> <p>We recognise the need to support economic growth in the area and the associated additional trips that will inevitably be generated. However, we also strongly support the concept of progressing sustainable travel options where possible (which we understand are being promoted by Surrey County Council as the highway authority) to provide a choice of travel</p>	An important feature of the Scheme is the substantial improvements it includes for the benefit of non-motorised users. In particular, there are improved arrangements for cyclists and horse riders and major improvements to the network of footpaths and bridleways around the junction to make them more enjoyable, useful and safer to use. For certain journeys in and around the junction and its vicinity walking and cycling would become a much more attractive option than they are at the moment.

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	options and encourage travel by these modes thereby helping to reduce the scale of the necessary highway improvements and associated environmental impacts.	
RR-003	We understand that input by Highways England to the A3 Hook intersection improvement has been put on hold pending the outcome of this piece of work on the M25 Junction 10. We are therefore keen to see the Junction 10 improvements progressed at the earliest opportunity to enable work on the Hook intersection to recommence enabling further easing of current issues and the unlocking of development potential in the area. It is important to note that the development capacity of the Tolworth area cannot be realised without these improvements as the network is already at capacity. It is crucial that the lack of transport infrastructure does not hold up delivery of homes and jobs.	It is Highways England's intention to implement the Scheme at the earliest opportunity. The opening of the completed Scheme is expected in autumn 2023, following the completion of the construction phase.
RR-003	<u>Sustainable Transport Modes</u> We strongly support measures (including those proposed in the changes) to assist non-motorised forms of transport which will enhance the experience for the more vulnerable road users and encourage more people to choose these modes of travel in preference to motorised travel (for example the proposed improvement of the existing pedestrian crossing facilities). However, we consider it would have been helpful if the consultation material had clearly identified existing and new facilities on separate plans, for example the proposed new cycle routes.	The Streets, Rights of Way and Access Plans (APP-008) and the Scheme Layout Plans (APP-012 and 013) clearly show the proposed non-motorised user routes in the context of the existing facilities, so that the resultant network and connections can be seen. Summary plans can be found in Appendix C to the Statement of Reasons (APP-023), which make it easier to see the proposed facilities in the context of the local communities and the common land and open space.
RR-003	<u>Local Traffic Issues</u> We are supportive of most of the proposals to stop-up side road accesses and associated measures to re-route traffic with new connections.	Noted.

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RR-003	<u>Local Traffic Issues</u> Speed management of A3 southbound traffic at this location will be an important consideration, consequently we would be interested to see details of proposed speed limits and any associated enforcement measures.	<p>The proposed speed limits can be found in Schedule 3 of the draft DCO (APP-018) and are shown on the Speed Limit and Traffic Regulation Plans ((APP-011).</p> <p>The speed enforcement signalling is to be provided on the overhead gantry signals which are illustrated on the Engineering Drawings and Sections (APP-014) drawings: Typical Gantry Type Plans A3 Mainline.</p>
RR-003	<u>Local Traffic Issues</u> Regarding the loss of some of the existing lay-bys, we would like reassurance from Highways England that they are satisfied there are sufficient alternative facilities in the area.	<p>A lay-by occupancy survey was carried out between Junction 10 and Guildford. The survey found that there is adequate space in the surrounding lay-bys along the A3 to accommodate the displaced HGVs throughout all hours of the day.</p>
RR-003	<u>Local Traffic Issues</u> The Ockham junction requires a slip road onto the A3 southbound otherwise traffic (including heavy goods vehicles) from the RHS heading southbound will either travel via Ripley village or head north and U-turn via J10, with neither of these options being particularly desirable.	<p>Highways England does not consider there to be any highway justification to include any south slip roads at the Ockham Junction as part of the Scheme. The reason for this is explained in detail in Highways England's response to Cobham Conservation and Heritage Trust (RR-009).</p>
RR-003	<u>Local Traffic Issues</u> From Kingston's perspective, the one potential concern over the highway improvement scheme is regarding the dedicated slip road which delivers traffic from the M25 onto the A3 northbound (and other capacity improvements proposed at Junction 10) which is likely to speed up delivery of traffic onto the A3 heading towards Kingston. Immediately to the south west of Kingston borough boundary is the point at which the number of lanes on the A3 reduces from 3 to 2, the lane widths reduce and the speed limit decreases to 50mph (due to the urban nature of the area). Traffic also feeds into the A3 eastbound from Esher (A309) at this location. We wouldn't want accident risk to increase in our area (or anywhere	<p>One of the key elements of the Scheme is to improve traffic flows and safety at M25 Junction 10, which, in safety terms, is currently the worst performing motorway junction on the strategic network. This location suffers from congestion related collisions which the free-flow lanes are designed to address.</p> <p>The Esher junction is approximately 4 miles north of M25 J10 and the northbound A3 is national speed limit for over 6 miles before the Kingston borough boundary where the 50mph limit starts. This provides ample time and distance for traffic to condition to the existing speed limit; it is not envisaged that there will be any detrimental effect on safety on the A3 as a result of the scheme.</p> <p>In the event of delays on the A3, upgraded signals, provided by the Scheme will be able to advise users accordingly.</p>

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	<p>else) as a result. However, we do acknowledge that an A3 improvement scheme has been implemented at this location (Kingston borough boundary) in recent years including the realignment of the road and installation of new speed cameras in an attempt to improve safety and ensure that traffic obeys the 50mph speed limit. Hence it is recognised that these concerns may have already (in part) been designed out, however, there are still significant and frequent delays at this location during peak times.</p>	
RR-003	<p>Children from the Royal Borough of Kingston currently enjoy access to the facilities at the Heyswood Campsite used by the Girl Guides. The proposed route of the access road would dissect and split the facilities apart. We would support this element of the proposals being reviewed to see if a better solution could be found.</p>	<p>Access to the Heyswood Campsite is to be provided by a private means of access from the Painshill junction southbound on-slip.</p> <p>The alignment of the proposed route has been chosen to minimise land take from the ancient woodland. Whilst it is acknowledged that the new route (that will be fenced) will cross through the campsite, most of the campsite lies to the east of the new road, including all of the buildings except for a care taker cottage that will lie to the west. Accordingly, the operation of the campsite will not be materially affected. Further, the level of use of the new access road will be very low and a security gate will be provided at the northern boundary as shown on sheet 7 of the Scheme Layout Plans (APP-012).</p>

RR-006 WAVERLEY BOROUGH COUNCIL

PINS APP Reference	Relevant Representation Issue	Highways England Response
REP-006	<p>The A3 trunk road and to a certain extent the M25 and M3 motorways are the key strategic roads connecting Waverley Borough to the wider region and beyond. Therefore, our interest with regards to plan making relates to the M25 to Solent (A3 and M3) and the London Orbital and M23 to Gatwick route strategies. The Waverley Borough Local Plan Part 1: Strategic Policies and Sites was formally adopted by Waverley Borough Council at its meeting on 20 February 2018. The Plan supports the delivery of at least 11,210 additional homes in Waverley in the period 2013 to 2032 (an average of 590 homes a year). The importance of this improvement scheme to Waverley Borough is recognised by its inclusion in our Infrastructure Delivery Plan. The Council does not have any comments to make on the potential environmental issues associated with the proposed route as these issues are outside of the borough. However, the Council would request that any assessment work for the junction improvements takes account of the amount of growth required in the Waverley Local Plan to ensure that the economic benefits of the growth are fully realised in terms of future residents having access to jobs and other facilities including the proposed third runway at Heathrow Airport.</p>	<p>Forecast traffic growth for local planning authorities further away from M25 Junction 10, such as Waverley Borough Council, are considered to be accounted for through use of the National Trip End Model (NTEM), which is itself founded on local planning authorities' expectations, as provided by them to the Department for Transport (DfT).</p> <p>As highlighted in section 3.5 of the Transport Assessment Report (APP-136), the traffic modelling process requires the production of a 'core' scenario that represents forecast future conditions against which the Scheme is assessed. The core scenario provides a sound basis for decision-making given current evidence. It must be robust and evidence-based taking on board different factors and uncertainties affecting travel demand in the future as listed in the uncertainty log. The core scenario used for assessment of the Scheme was developed based on:</p> <ul style="list-style-type: none"> • The NTEM forecasts on travel demand growth in the south east. • Sources of local uncertainty that are more likely to occur than not. • Appropriate modelling assumptions. <p>The management of the uncertainties in formulating the core scenario follows relevant DfT's major scheme appraisal guidance (WebTAG) which recommends the establishment of an uncertainty log, and subsequently forming a core scenario based on the level of uncertainty identified. In the uncertainty log, each likely change in the future is classified according to the likelihood that they will occur. Where a scheme or land use change is considered "near certain" or "more than likely", it has been included in the core scenario.</p> <p>The uncertainty log was agreed with the three local planning authorities in the vicinity of the Scheme, Woking Borough Council, Elmbridge Borough Council and Guildford Borough Council.</p>

RR-007 AFFINITY WATER LIMITED

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-007	Approx.4.8Km of a single 6" PVC-U tapering to a 4"CI single distribution main will be affected.	<p>The draft dDCO (APP-018) contains protective provisions for the benefit of water undertakers.</p> <p>The protective provisions offer protection to Affinity Water in respect of its apparatus which may be affected by the construction of the Scheme.</p> <p>The parties are in ongoing discussions and Affinity Water have confirmed to Highways England that they are satisfied with the proposed Protective Provisions subject to a separate form of agreement being entered into between the parties to provide further details and mechanisms in respect of access arrangements for maintenance/repair. Highways England will continue to engage with Affinity Water to discuss the terms of any such agreement.</p>
RR-007	This section of main also supplies several outlying villages, farms and businesses via 4 separate connections and there are also 5 motorway crossings supplying small clusters of properties	Noted
RR-007	It is a single point of failure should a burst or interruption to supply occur on this main affecting all above.	Noted
RR-007	Distribution mains are laid to a depth and location as per our design guidance to ensure safe access and future maintenance. Any changes to depth and access must be sign off by Affinity Water.	Noted
RR-007	Excavating near our water network must be approved in advance with RAMS and other method statements and backed up with internal review and guidance from our Hydraulic Modelling team. Sign-off would need to be approved by Control Ops, local Ops and WQ. Guidance to working near our apparatus will also need to be adhered to. Guidance notes are found on Affinity Water Limited's website	Further discussions will need to take place between Highways England and Affinity Water as regards to the construction of any works, which may affect Affinity Water's apparatus.

RR-008 CHASEMORE FARM

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-008	<p>Representation for horse breeder, Chasemore Farm, contiguous with the M25.</p> <p>The farm experiences significant (and steadily increasing) noise pollution due to the inferior concrete road surface on this section and the lack of sound barriers. Sound levels on the farm frequently exceed 75 decibels which is a chronic stressor for young equine athletes and deters potential clients.</p> <p>Submission petitions that interchange improvements maximise the reduction of noise pollution, in the form of:</p> <ul style="list-style-type: none">- The installation of acoustic barriers on both sides of the M25 and A3 where improvements are being made- Improved road surface to reduce 'road rumble	<p>There are no physical road alterations proposed by the Scheme on the parts of the M25 within the boundary of the proposed Development Consent Order closest to Chasemore Farm. (See Scheme Layout Plans (Sheets 11-31 of 31) (APP-013)).</p> <p>Chasemore Farm is also outside the noise study area (shown in 6.4 Environmental Statement: Chapter 6 Noise and Vibration Figures 1 of 2, Figure 6.3 (APP-066) and therefore is not included in the assessment for this Scheme as a noise sensitive receptor.</p>

RR-009 COBHAM CONSERVATION & HERITAGE TRUST

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-009	Generally, it is of concern that there is insufficient planning gain from the proposals.	<p>The Planning Statement (APP-133), illustrates that there is a clear need for the Scheme and it provides many key benefits. Section 6.3 of the Statement summarises the key benefits, which include:</p> <ul style="list-style-type: none"> • Substantial reduction of delays in traffic movement at this junction. • Improved operation of the Painshill and Ockham Park Junctions, improving traffic flow between local communities across the A3. • Additional highway capacity directly linked to the likelihood of planned growth that can be feasibly delivered. • A reduction in accidents. • A suite of compensatory measures that will offset the negative effects of the Scheme on the Thames Basin Heaths SPA, after mitigation, so that the overall coherence of the Natura 2000 Network is maintained. • A net increase in common land and open space. • Significantly enhanced facilities for pedestrians, cyclists and horse riders through new provision and improvements to the network of PRoW and local road connections. Health benefits should arise from this. <p>The Scheme has been designed to ensure that the Scheme objectives are achieved and include delivering key environmental, social and economic benefits. See Section 2.3 of the Planning Statement (APP-133).</p>
RR-009	There is concern that Highways England are only responsible for the Strategic Road Network and not the Local Road Network (which here becomes the responsibility of Surrey Highways as part of Surrey County Council).	<p>Highways England is the highway authority for the Strategic Road Network (SRN), which includes the A3 and M25. Surrey County Council (SCC) is the highway authority for all other public roads in the vicinity of M25 Junction 10.</p> <p>Under its licence from the Department for Transport as the strategic highways company, Highways England is duty bound to cooperate with relevant local authorities (including SCC) on the operation and management of the SRN and the local road network in conjunction with one another. This cooperation takes place through established forums to ensure that there is a coherent approach. Highways England has worked closely with SCC in developing the Scheme.</p>
RR-009	Easing of traffic through Junction 10 is likely to increase traffic generally and, with that, waiting time on local roads.	<p>Traffic modelling of the Scheme, undertaken as described in the Transport Assessment Report (APP-136), has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both</p>

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		the SRN and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered by the Scheme.
RR-009	Accordingly, Surrey County Council need to be given more financial support.	Highways England is in discussion with SCC in relation to the Scheme works affecting the local road network and other SCC assets, including the adoption and maintenance liabilities for non-standard features that may not otherwise be supported through the usual central Government funding allocations.
RR-009	There are other locations along the A3 that need upgrading.	The A3 is to be upgraded within the Scheme limits from Painshill Junction to Ockham Park Junction. The A3 beyond these junctions is outside of the scope of this Scheme objectives.
RR-009	There is insufficient consideration of the Guildford Local Plan and of strategic sites put forward in that and of the junctions on the A3 at Burnt Common and in the Guildford area.	The effects of the Scheme on the A3 and the Guildford Local Plan has been properly considered by Highways England as noted in the Planning Statement (APP-133) and the Transport Assessment (APP-136) Full details of the methodology, baseline and assumptions made in the undertaking of the traffic modelling process can be found in Section 3 of the Transport Assessment Report (APP-136). Table 3-1 highlights the local developments, including those from the Guildford Local Plan, that were included in the transport modelling, in order to inform the development of the Scheme.
RR-009	There is concern about directions given to RHS Wisley traffic and the effect of that and of traffic that may be generated from any proposed development on the former Wisley Airfield which require adequate controls and/or south facing slip roads at the Ockham Park roundabout to relieve Ripley from an increase in traffic.	<p>There will be signage to direct Wisley Lane traffic via M25 junction 10 and signage for the Wisley Lane Diversion, directing drivers away from the local roads.</p> <p>The traffic predicted to be generated by the proposed development on the former Wisley Airfield is included in the traffic forecasts and traffic modelling used to develop and assess the Scheme, even though the proposed development has not been granted planning permission. This has demonstrated that the Scheme will have sufficient capacity to accommodate forecast traffic growth including that forecast to be generated by the proposed development on the former Wisley Airfield. The modelling has also demonstrated that overall the Scheme will result in minimal additional traffic flows through Ripley, with less than a 4% increase in daily traffic flow through the junction of Ripley High Street/Portsmouth Road with Newark Lane and Rose Lane, which is not significant. This includes any additional Wisley Lane/RHS Wisley traffic that might choose to route through Ripley rather than follow the signed route via M25</p>

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		junction 10. Consequently, there is no justification for the Scheme to provide south-facing slips at the Ockham Park junction, either to accommodate forecast traffic flows at the junction or as mitigation for the Scheme's effects on Ripley or due to the closure of the Wisley Lane/A3 junction. Further detail is given in the Transport Assessment Report (APP-136).
RR-009	There is concern that the Highways England proposals on Painshill Park, our local Grade 1 listed 18th century landscape garden, will have land taken very close to the Gothic Tower and that there are trees of historical and horticultural significance together with associated flora and fauna.	<p>The Scheme has been designed to minimise as far as possible the land take, tree and habitat loss in this area. The effects of the Scheme here are reported in Section 9.10 and Table 9.12 and 9.13 of Chapter 9 of the Environmental Statement (APP-054) and Paragraph 7.11.101 of Chapter 7 of the Environmental Statement (APP-052). Painshill Park Trust have been consulted on the proposals and the development of the Scheme in this area and are largely content with the form of proposals in this area.</p> <p>The Veteran trees and Arboricultural Impact Assessment Appendix 7.3 of the Environmental Statement (APP-089) details the effects of the Scheme on trees in this location. Trees were surveyed within Painshill Park to enable their retention through modifications in design where possible. The work to retain as many trees as possible will continue in the detailed design stage if the Scheme is granted consent.</p> <p>The effects of the Scheme with regard to impacts upon heritage assets are reported in Chapter 11 of the Environmental Statement (APP-056). Following the construction of the Scheme and with the implementation and establishment of mitigation measures, there would be slight adverse residual effects upon the heritage assets of Painshill Park and the Gothic Tower.</p>
RR-009	<p>There is local concern that any expansion of Junction 10 raises the prospect of significant increases in</p> <ul style="list-style-type: none"> • light • air • and noise pollution. 	<p>The Scheme does not propose any increases in lighting but existing columns will be replaced and repositioned to suit the new road layouts.</p> <p>The Air Quality Assessment (APP-050), as documented in the Environmental Statement, showed that during operation of the Scheme there is not expected to be an overall significant adverse effect on local air quality.</p> <p>Chapter 6 of the Environmental Statement (APP-051) showed that no significant adverse effects on noise levels are likely to occur due to the Scheme (APP-051, Table 6.24).</p>
RR-009	These will impact local communities and on land that is SPA (in the Thames Basin Heath Special Protection Area), SSSI and	The impacts on the SPA, SSSI, LNR and SNCIs and on flora and fauna have been considered in Chapter 7 of the Environmental Statement (APP-052) and

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	common land on Ockham and Wisley Commons and on flora and fauna there.	<p>appropriate mitigation and compensation measures have been identified. In addition, the impacts on the SPA have also been assessed in the Habitats Regulations Assessment (HRA Stage 2 (APP-043) and HRA Stages 3-5 (APP-044)).</p> <p>A suite of compensatory measures has been carefully designed in consultation with Natural England, Forestry Commission, Surrey Wildlife Trust, RSPB and Surrey County Council. Details of the suite of compensatory measures can be found in Section 5 of the HRA Stages 3-5 (APP-044) and the selection of the SPA compensation land is described in HRA Annex C (APP-042).</p> <p>Loss of common land and open space will be offset by the provision of suitable replacement land to be designated as common land and open space in accordance with the requirements of the Planning Act 2008. These areas are shown on the Scheme Layout Plans (APP-012 and APP-013), the Special Category Land Plans (APP-009) and described in Appendix C to the Statement of Reasons (APP-023). The effects are reported in the People and communities Chapter of the Environmental Statement (APP-058 and APP-076).</p>
RR-009	Cobham (which has an AQMA) is in the path of the prevailing south westerly wind.	The Air Quality Assessment (APP-050), uses meteorological data to ensure the prevailing wind direction is taken into account. The Scheme does not have an effect on the Cobham AQMA.
RR-009	For the purpose of ensuring conservation of the flora and fauna for the area, there is concern that replacement land is not comparable to the land lost and that sufficient quiet road surfaces are not being provided on both the M25 and the A3.	<p>The impacts on the SPA, SSSI, LNR and SNCIs and on flora and fauna have been assessed in Chapter 7 of the Environmental Statement (APP-052) and appropriate mitigation and compensation measures have been identified in it.</p> <p>The location and management proposals for the replacement land have been carefully designed in consultation with Natural England, Forestry Commission, Surrey Wildlife Trust, RSPB and Surrey County Council. Details of the proposals for these replacement land parcels can be found in the Landscape and Ecology Management and Monitoring Plan in Appendix 7.20 of the Environmental Statement (APP-106). The principal purpose of the replacement land is for provision of common land and open space in exchange for that to be lost to the Scheme, as set out in Appendix C to the Statement of Reasons (APP-023).</p> <p>There would, however also be benefits for flora and fauna in these areas and the Scheme includes measures to enhance their biodiversity.</p> <p>The Scheme will include replacement of existing noise barriers on the M25 and the extension of them along the A3 to the new Cockcrow Bridge Overbridge to</p>

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		<p>the south and to the new Red Hill Overbridge to the north. The assessment found that the majority of the SPA will see changes (increase or decrease) of less than 3 dB as a result of the operational Scheme. Any areas that have increases of greater than 3 dB within the SPA will be localised and confined to within the retained woodland buffer immediately adjacent to the M25, thus not affecting any heathland habitats where the qualifying SPA species occur.</p> <p>Chapter 6 of the Environmental Statement (APP-051) in Section 6.9, Table 6.21 states the noise mitigation measures are incorporated in the Scheme's design. Low noise road surfacing is proposed on the A3 between Ockham Park junction and junction 10, and junction 10 to the Painshill junction. The Scheme does not include any proposals for low noise road surfacing on the M25 as this is not feasible with its existing concrete construction.</p>
RR-009	There is concern that the Highways England proposals have insufficient provision to accommodate public transport.	<p>The Scheme incorporates appropriate alternative provision for the two affected bus services and it provides improvements to those bus stops affected by the Scheme. The reductions in traffic congestion and delay delivered by the Scheme will also reduce delays to bus journey times, which will benefit passengers. Highways England is in ongoing discussions with SCC on this issue.</p>
RR-009	There is concern that there is not sufficient provision for use by equestrians, cyclists and walkers (NMUs), particularly during the period of the work being carried out.	<p>During construction, most of the existing routes across the A3 and M25 will be maintained in use, with some minor diversions. Where bridges are to be replaced (M25 Clearmount, A3 Wisley and A3 Cockcrow), the new structures will be built slightly away from the existing bridges, therefore the existing bridges can remain in use until the new ones become available.</p> <p>The existing crossings at junction 10 will need to be closed during construction, as will the shared use footway/cycle path alongside the A3 carriageway. Diversions for users of this path will be signposted along local roads and bridleways during this period.</p> <p>When complete, the Scheme will provide a new bridleway link along the A3 corridor with a surface also suitable for road cyclists, including new bridges over the M25 and A3, which will provide a more pleasant route than the current shared surface without any need to cross these roads at traffic signals. There will also be new public rights of way defined to provide a better-connected network of bridleways between the bridges and across the common land and open space.</p>

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RR-009	There is a lack of detail about how conflict between NMUs and vehicles will be avoided at some bridges and other locations.	<p>As described in the Scheme Description in the DCO Introduction document (APP-002) the Scheme includes many measures to avoid or reduce conflict between NMUs and vehicles, particularly when compared to the existing situation, including:</p> <ul style="list-style-type: none">• New NMU surfaces and controlled crossings at Ockham Park junction.• A new bridleway alongside Wisley Lane diversion over the A3, with links to existing PRow on both sides of the A3.• A new bridleway route along the A3 corridor but segregated from the trunk road.• New bridleway bridges over the M25 and A3.• Additional controlled crossings at Painshill junction. <p>Some of the bridges and sections of bridleway will also be used as access routes by Surrey Wildlife Trust and others, which is similar to the existing situation and is not expected to give rise to conflict, as the route widths and surfaces will be suitable.</p>

RR-010 ELM CORNER RESIDENTS GROUP

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-010	Our concerns include but are not limited to: Safety of the proposed junction between 'new' Elm Lane and Old Lane	As part of the Scheme, vegetation will be removed to provide improved sight lines in both directions from the junction, which will provide better visibility of oncoming traffic and improve road safety (Work No. 50 as described in Schedule 1 of the draft DCO (APP-018) and shown on sheet 24 of the Works Plans (APP-007)).
RR-010	<u>Exacerbation of lewd and antisocial behaviour on 'old' Elm Lane (concerns shared by SCC and SWT).</u> Inclusion of old Elm Lane in the DCO boundary was urged by residents so it could be returned to nature and thereby dissuade such behaviour in this unlit dead end. HE instead propose to keep it open for occasional maintenance access to drainage attenuation ponds.	Highways England is aware of anti-social behaviour at this location, but enforcement in relation to such problems is beyond the scope of the Scheme. It is the case, that Highways England will be using 'old' Elm Lane for maintenance access. However, this part of Elm Lane will be closed to traffic with no access from the A3. In addition, a gate is being provided as part of the Scheme, as shown on sheet 23 of the Scheme Layout Plans (APP-013) in the vicinity of Orchard Cottage. Therefore, there will be no vehicular access to 'old' Elm Lane from Old Lane.
RR-010	<u>Noise, light and air pollution during the construction phase, and completed scheme.</u> This pollution will be exacerbated by: Construction phase: night works and construction compound location on the former Wisley Airfield adjacent to Orchard Cottage, Blenheim Cottage and Meadows, with works vehicles passing and turning by the other properties, and Final scheme: environmental mitigation including 4 hectares of clearance and 7.3 hectares intense selective thinning in the narrow section of woodland between Elm Corner and the A3 with no detail provided on mitigation.	Generally, the works will not be carried out at night. However, there are some particular circumstances in which works beyond the usual working hours may be permitted and these are set out in Requirement 3(2)(b) of Schedule 2 to the draft DCO (APP-018). As can be seen on sheet 2 of the Temporary Works Plan (APP-015), the construction compound at Wisley Airfield is mostly for use for material storage and mainly topsoil storage. As such it would be little used by machinery apart from at the start and end of the works when the soil would be placed and removed. A small area of land as shown blue on sheet 2 of Temporary Works Plan will be used as a work site to construct the new Wisley Lane Overbridge and associated works but would be decommissioned once these are complete. Lighting would only be required in the small construction compound (i.e. the blue shaded area) when the daytime working hours would be affected by shorter day lengths in the winter months. Access would initially be via the existing Elm Lane off the A3 and subsequently off the Ockham Park junction once the new bridge over the Stratford Brook is completed (which is expected to be early in the construction phase). The existing section of Elm Lane at Elm Corner would not be used for construction traffic apart from those needed to improve Elm Lane/the By-way Open to All Traffic (BOAT) itself. As such the amount of construction traffic operating in this area would be limited.

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		<p>The air quality assessment as documented in Chapter 5 of the Environmental Statement (APP-050, APP-064, APP-065, APP-080), noted that during construction, with the application of appropriate mitigation measures secured in a Construction Environmental Management Plan (CEMP), significant residual effects at nearby sensitive receptors including Orchard Cottage, Blenheim Cottages and Meadows, would be unlikely (paragraph 5.10.3, APP-050). As documented in the Environmental Statement, the air quality assessment showed that during operation of the Scheme there is not expected to be an overall significant adverse effect (Table 5.15, APP-050).</p> <p>The noise assessment documented in Chapter 6 of the Environmental Statement (APP-051) demonstrates that with mitigation measures secured in the Outline CEMP (APP-134) used to minimise construction noise levels, there will be no significant adverse effects are likely at Elm Corner during the construction and operation phases of the Scheme. Examples of the CEMP measures for reducing construction noise are provided in Section 6.9 of the Environmental Statement (APP-051). No significant effects were identified relating to construction traffic (APP-051, 6.10.11).</p> <p>During the operation of the Scheme, minor noise decreases were predicted at Elm Corner in the short term (APP-051, 6.8.33) and negligible changes in the long term (APP-051, 6.8.38). On this basis, no significant effects are likely to occur at Elm Corner (as summarised in APP-051 Table 6.24). These predictions take into account low noise road surfacing on the A3 that is included as part of the Scheme to reduce road traffic noise.</p> <p>The SPA enhancement area around Bolder Mere includes the clearance of woodland around the edge of Bolder Mere and the proposed thinning of some woodland between Elm Corner and the A3. This thinning is intended to increase the diversity of the pine-dominated woodland, and together with new woodland planting (with a proportion of evergreen species) will ensure that a more diverse structure is created with more foliage at lower levels than at present. This will lead to increased visual screening from the A3 for the Elm Corner properties in the long term. Outline details are provided in the HRA Stage 3-5 (APP-044) and the SPA management and monitoring plan (APP-105) and will be refined during detailed design. Highways England would be glad to liaise with the residents to develop the planting proposals.</p> <p>Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting from the Scheme. Lighting on the A3 will be replaced but there will be no additional new lighting. Neither the Wisley Lane Diversion nor the improved Elm Lane/BOAT will be lit. As such there will be no increase in light pollution arising from the Scheme in the Elm Corner area.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-010	Loss of habitat for dormice and other protected species located in sites proposed for construction	Chapter 7 of the Environmental Statement (Biodiversity) (APP-052) assessed the impacts of the Scheme on protected species, as a result of its construction and operation. Dormice surveys carried out over the past two years for the Scheme have assessed that dormice are likely to be absent from the Scheme footprint, and therefore as stated in 7.8.124 of Chapter 7 of the Environmental Statement (APP-052), these were not considered any further in the assessment.
RR-010	Disparity in design detail between information in documents and information provided by project team	Highways England endeavours to ensure consistency of information provided at various points in the design development process. The Scheme has been updated and refined as a result of the three consultation exercises that have taken place since August 2017. The documents submitted as part of the DCO application contain the most up to date Scheme design detail that the Elm Corner Residents Group should refer to and can be found on the Planning Inspectorate website.
RR-010	Widening of a section of Elm Lane which does not require it	The decision to use the Elm Lane/BOAT for access to the local road network was made taking into account the preferences expressed by the Elm Corner residents following consultation. The existing unsurfaced track (BOAT) between Elm Corner and Old Lane is currently unsuitable for most vehicles. To provide access of a suitable standard for vehicular access to Elm Corner (including for public service vehicles such as bin lorries) this section of BOAT will be constructed to Surrey County Council standards which stipulate a 4.1m wide carriageway which will be suitable for all vehicles to access Elm Corner. This is of a similar standard to the current provision where Elm Lane links to the A3.
RR-010	Continuity of vehicular access to properties at all times with minimal disruption to residents	The Scheme maintains and improves access to Old Lane to and from the A3 and thereby, maintains access to Elm Corner residents. The works would be sequenced so that the surfacing of the Elm Lane/BOAT and access to Old Lane would be completed before the existing Elm Lane access to the A3 would be closed. Access over the hard-surfaced, northern end of Elm Lane/BOAT would be maintained at all times. This would ensure that there is no disruption to access for residents.
RR-010	A new elevated section of road over the A3 is not the most appropriate design solution due to the impacts on nearby residents and the SPA, where surveys show dormice and other rare and protected species are detected. Alternative design solutions	Many alternative options were assessed to maintain access to Wisley Lane but owing to the environmental impacts on RHS Garden Wisley and Wisley Common and the safety of the travelling public which would have arisen had other options been proposed, a road and bridge to connect to Ockham Park junction was chosen as the preferred solution. See

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	are available which will reduce the impact and these should be explored further	<p>table 3.1 of the Environmental Statement (APP-049) summarises reasons for the selection of the Wisley Lane diversion alignment.</p> <p>The road would be screened from Elm Corner by retained mature vegetation with noise and air quality impacts being minimal in this context. The bridge has been aligned to ensure that it and the realigned Wisley Lane would not affect the SPA.</p> <p>It should be noted that a bridge in this location would be required even if an alternative solution was proposed as there is a requirement to maintain a bridleway connection over the A3 at this point.</p> <p>Chapter 7 of the Environmental Statement (APP-052) assesses the impacts of the Scheme on protected species, as a result of its construction and operation.</p> <p>It should be noted that dormice surveys have determined that dormice are considered likely to be absent from the Scheme footprint.</p> <p>As identified in Table 7.7 of Chapter 7 of the Environmental Statement (APP-052) traffic movements on the new side roads could have the potential to result in direct mortality or injury to badgers due to traffic collisions. Highways England is willing to investigate the potential for providing a culverted underpass within the embankment on the new section of Wisley Lane during detailed design to facilitate the passage of wildlife.</p>
RR-010	We request engagement with residents regarding remedial accommodation works and reinstatement of boundary features following the acquisition of land, including the owner having the requisite level of input and control over building materials, timing of works, revised boundary treatments/features, etc.	<p>Highways England will continue to engage with residents throughout the development and implementation of the Scheme as is standard on all Highways England improvement schemes.</p> <p>The Construction Environmental Management Plan (CEMP) to be approved by the Secretary of State in accordance with Requirement 3 (Construction and handover environmental management plans) of Schedule 2 to the draft DCO (dDCO) (APP-018) is to ensure the works are carried out in an appropriate manner and includes the need to put in place a community relations strategy.</p> <p>Article 31 of the dDCO contains provisions requiring Highways England to give notice before taking temporary possession of the land and to restore the land upon completion of the works to the reasonable satisfaction of the relevant owner.</p>
RR-010	We request engagement with residents or making available information regarding mitigation for air, noise and light during the construction phase and final scheme	As mentioned above, Highways England will continue to engage with residents throughout the development and implementation of the Scheme as is standard on all Highways England improvement schemes.

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		<p>Information relating to mitigation of air, noise and light pollution likely to arise during construction and operation was initially provided in the Preliminary Environmental Information Report which was published during statutory pre-application consultation.</p> <p>The Environment Statement submitted with the DCO application includes assessment (including any mitigation measures) in respect of air quality (Chapter 5 (APP-050)), noise (Chapter 6 APP-051)) and lighting (Chapter 9 (APP-054)). The Outline CEMP (APP-134) also details the proposed mitigation measures for air quality, noise and light pollution during construction.</p> <p>The Environmental Statement sets out the likely environmental effects of the Scheme both during construction and operation. It identifies appropriate measures for the control of dust during construction (paragraph 5.9.1, APP-050).</p> <p>The air quality assessment showed that during operation of the Scheme there is not expected to be an overall significant adverse effect (Table 5.15, APP-050), so no further mitigation measures are required for air quality during operation of the Scheme.</p> <p>Noise mitigation measures during the construction and operation phases are documented in the Outline CEMP (APP-134) and Register of Environmental Actions and Commitments (APP-134, Appendix G). This includes a commitment to inform local residents about the progress of the construction works and to provide advance notice of any activities likely to generate high levels of noise or vibration (APP-134, Table G.1).</p> <p>The noise mitigation for the operation phase is set out in Table 6.24 of the Environmental Statement (APP-051), but the final selection of materials will be made during the detailed design of the Scheme.</p> <p>Arrangements for control of light pollution during the construction phase are set out in the outline CEMP (APP-134).</p> <p>The contractor for the Scheme will be required under Requirement 3(2)(e) of Schedule 2 to the dDCO to engage with local residents and businesses ahead of the start of works to inform them of proposals and to listen to and respond to concerns over the construction works that are raised.</p>
RR-010	We request that Highways England should work with property owners and residents to ensure that the necessary commitments are entered into in advance of the appointment of contractors and commencement of the works	The construction of the Scheme is subject to a range of controls in the dDCO including a CEMP to be approved by the Secretary of State that must cover a wide range of matters relevant to the construction process and which must also include a community relations strategy (Requirement 3 of the dDCO). In addition, a Traffic Management Plan in relation

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		to the construction process must be approved by the Secretary of State under Requirement 4 (Traffic management during construction) of the dDCO.

RR-011 ENVIRONMENT AGENCY

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-011	1.2 We note that the published protective provisions for the Environment Agency (Schedule 9, Part 3) of the draft Order (reference: TR010030/APP/3.1) deviate from our model provisions, and include some areas of significant concern to us. We have not been advised of these changes	Highways England and the Environment Agency have now agreed a suitable form of protective provisions for the protection of the Environment Agency to be included in the draft DCO (dDCO) (APP-018).
	1.3 Of particular concern to us, the published provisions still refer to 'deemed approval' rather than 'deemed refusal' in part 19(3)(b). Due to legislative changes, we will only approve provisions containing 'deemed refusal'	This issue has been resolved and the 'deemed refusal' provision has been retained as requested.
	1.4 Substantial alterations or deletions have also been made to the indemnity provisions found in our model provisions	Highways England and the Environment Agency have now agreed a suitable form of protective provisions for the protection of the Environment Agency to be included in the dDCO.
	1.5 We also recommend that Requirement 12 (Schedule 2, Part 1) may need to be amended to ensure it reflects the requirements laid out in other application documents	Requirement 12 (Stratford Brook Environmental Mitigation Area) of the dDCO (APP-018) has been revised to address the concerns raised by the Environment Agency
	1.6 We will engage with the representatives of the applicant on these matters shortly. We will ask that the Statement of Common Ground is updated to reflect these new concerns. We will be happy at a later date to provide more detailed written representations should any matters be ongoing.	The parties are continuing to engage in respect of the Statement of Common Ground and hope to provide an updated version by Deadline 3.
	2.0 Flood risk 2.1 Our main flood risk concerns are with works on and adjacent to the Stratford Brook (in the River Wey catchment) to the south-west of the scheme. This work includes a new road bridge over the Stratford	Noted

PINS APP Reference	Relevant Representation Issue	Highways England Response
	Brook, works to/around culverts under the A3 and a construction compound in an area of flood risk.	
	2.2 Works in the River Mole catchment are limited and we agree that the fluvial flood risk of works in these areas is acceptable, notwithstanding any requirements to obtain Permits for works close to watercourses as required.	Noted
	2.3 Due to apparent shortcomings, it is difficult for us to wholly agree with the conclusions of the Flood Risk Assessment (FRA) (reference: TR010030/APP/5.5) that "...the proposed Scheme, with the incorporation of flood risk mitigation/ considerations...is considered acceptable from a flood risk perspective." Because in the report, further information is required for us to support this conclusion.	We have received a detailed comments log from the Environment Agency on this matter and are addressing them in ongoing engagement by means of progressing discussions in relation to Statement of Common Ground (SoCG). It is expected that these discussions and revised information will resolve the Environment Agency's concerns such that agreement on the conclusions of the FRA can be reached.
	2.4 Of particular concern to us following a review of the FRA are a lack of demonstration that appropriate allowances for climate change have been considered, unclear terminology in places, and a number of assumptions made without supporting evidence.	Highways England provided clarification of the climate change assumptions used in the FRA in their letter to the Environment Agency on 24 September 2019. In relation to the other matters referred to, Highways England received a detailed comments log and are addressing them in ongoing discussions.
	2.5 We also note that within the Register of Environmental Actions and Commitments (reference: TR010030/APP/7.3) that we are proposed to review information related to surface water flood risk or drainage. These matters are not within our remit, so other responsible agencies will need to agree to review these details.	The Register of Environmental Actions and Commitments (APP-135) will be amended and submitted to the Examining Authority by Deadline 8 at the latest. These matters will be reviewed by the Lead Local Flood Authority (Surrey County Council) if the DCO is granted.
	2.6 We will engage with the representatives of the applicant on these matters shortly. We will ask that the Statement of Common Ground is updated to reflect these new concerns.	The SoCG will be updated by Deadline 3.

PINS APP Reference	Relevant Representation Issue	Highways England Response
	We will be happy at a later date to provide more detailed written representations should any matters be ongoing	
	3.0 Stratford Brook mitigation works 3.1 We are pleased to have reached a broad agreement on an acceptable package of mitigation measures for impacts to the Stratford Brook, although the application documents have raised some new queries with us.	Noted – see below
	3.2 As we have noted through our pre-application engagement on this scheme, the additional mitigation measures that have been identified for the Stratford Brook (predominantly feasibility and implementation of fish passage measures on the A3/slip road culverts) are required to mitigate the full impacts of works on or adjacent to the Stratford Brook. We require further clarification from the applicant about the timescales for the delivery of these measures, as we have been unable to find this information in the application documents.	The detail of the construction sequence is in Chapter 2, Section 2.7 of the Environmental Statement (APP- 049), and further work by Highways England suggests that this section will be built in March to September 2021.
	3.3 We also have some confusion about the exact nature of the works to the A3 slip road culvert. The works are described in different documents as 'strengthening' or 'straightening'. Our understanding is that there are no works to the culvert itself, only to the slab above it.	The FRA (APP-046) refers to 'straightening' in error and should read strengthening. The existing Stratford Brook Culvert South under the off-slip is a reinforced concrete single span culvert and it is proposed to install a pre-tensioned precast concrete beam solid deck with new foundations to span over the top of the existing culvert, providing a 13m wide structure with a 9m span. This has been referred to as strengthening as it addresses existing structural assessment overstresses.
	3.4 We will engage with the representatives of the applicant on these matters shortly. We will ask that the Statement of Common Ground is updated to reflect these new concerns. We will be happy at a later date to provide more detailed written representations should any matters be ongoing	The SoCG will be updated by Deadline 3 and Highways England will continue to engage with the Environment Agency as the Scheme progresses.

PINS APP Reference	Relevant Representation Issue	Highways England Response
	4.0 Boldermere mitigation works 4.1 Our principal concerns in relation to the works on Boldermere lake are to ensure the Water Framework Directive status of the lake is protected and impacts from the construction of the new retaining wall. Other wider ecology matters are led by Natural England and the local Wildlife Trust.	Highways England notes the Environment Agency's comments in relation to the WFD Assessment.
	4.2 The representatives of the applicant have engaged well with us on these matters and have proposed sufficient mitigation for the identified risks, such that our concerns are allayed by the inclusion of Requirements 10 and 13.	Noted
	4.3 We will continue engage with the representatives of the applicant on these matters, particularly relating to the detailed design of the retaining wall, including reviewing the outstanding groundwater flow information to inform an appropriate design	Noted
	5.0 Groundwater and land contamination 5.1 The applicant has acknowledged that their assessment to date for groundwater and land contamination issues has been limited by a lack of ground investigation data. The applicant made us aware very early during our pre-application engagement that this would be the case and for the matters within our remit, we agreed with this approach	Noted
	5.2 The most significant outstanding concern with the lack of ground investigation data relates to the permeability of the design of the retaining wall in Bolder Mere lake. However the applicant has demonstrated in the application documents that a suitable design can be	Noted

PINS APP Reference	Relevant Representation Issue	Highways Engalnd Response
	provided based on a variety of groundwater flow conditions	
	5.3 We are therefore satisfied that any outstanding issues can be addressed through the appropriate Requirements	Noted
	5.4 We will continue engage with the representatives of the applicant on these matters, and can provide additional commentary should additional ground investigation data become available during the examination process	Noted
	6.0 Water Framework Directive (WFD) 6.1 We are pleased with the scope and detail within the WFD Assessment (reference: TR010030/APP/5.4) submitted with this application. The applicant has demonstrated that, with appropriate mitigation measures in place, the scheme will be WFD compliant	Noted

RR-012 EURO GARAGES

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-012	<p>[The former San Domenico site at Portsmouth Road, Cobham, Surrey, KT11 1EL] ... would be seriously adversely affected... My client controls this strategic roadside service area site which enjoys direct access from the eastbound carriageway of the A3 trunk road. The site represents one of a very limited number of such strategic locations on the feeder roads to the M25 orbital motorway and comprises a Starbucks Coffee drive-thru unit which adequately provides rest and refreshment to passing traffic on the A3. The current access arrangements allow all passing traffic to readily and conveniently access the facilities with limited diversions. In the absence of the proposed scheme, the property would have further development potential to provide comprehensive facilities at this location for the motorists and HGV drivers at this location. It is understood that in the opinion of the promoting authority, the road proposals as presently formulated would require the closure of the existing direct vehicular access to the property from the A3 trunk road. In commercial terms, the loss of this access would not be mitigated by the provision of any alternative access created via the local road network. Consequently, as proposed the scheme would render the property unviable as a roadside location to provide motorists' facilities. This would be the case even with the provision of advance warning signs on the trunk road as the route to access the facilities would require a significant detour and be inconvenient to prospective customers.</p>	<p>The retention of the direct access to and from the A3 from the site of the former San Domenico hotel (San Domenico site) in the Scheme proposals would be unsafe due to the short distance between M25 junction 10 merge and San Domenico site diverge and also between the San Domenico site merge and the Painshill junction diverge.</p> <p>The Design Manual for Roads and Bridges (DMRB), TD 42/95 was used during the Scheme development. Paragraph 2.26 of this design standard is clear, namely that major/minor priority junctions "<i>should never be provided on [dual carriageway 3 lane all-purpose] D3AP roads</i>". Additionally, the DMRB Design Standard TD42/95 was superseded in August 2019 by CD123, which states in paragraph 2.1 "<i>Priority junctions shall not be used on motorways or all-purpose dual three lane carriageways.</i>" By implication a major/minor priority junction on a dual 4-lane all-purpose (D4AP) road (which is what the A3 adjacent to the San Domenico site will become with the Scheme) would therefore be even less acceptable, even though TD42/95 and CD123 do not explicitly refer to D4AP roads with reference to major/minor priority junctions.</p> <p>In addition, the DMRB design standards, Paragraph 4.1 of CD122 states that the weaving length "<i>for all-purpose roads, the minimum length between a full grade separated junction and an at-grade junction, service area and lay-by shall be; 1 km for rural roads.</i>"</p> <p>The weaving length between the existing M25 junction 10 merge and the San Domenico site diverge is 650m and the weaving length between the San Domenico site merge and Painshill Junction diverge is 100m. These are both below the 1km standard length. This further confirms that if the San Domenico site access was retained in the Scheme this would not meet DMRB design standards.</p> <p>For this reason the direct access from the San Domenico site to the A3 is closed off in the Scheme proposals. A substitute access to the site is provided for in the Development Consent Order but it will not be a public vehicular access. Highways England acknowledges that accordingly the site could no longer be used for any use that is dependent upon public vehicular access and this would be a matter for the compensation process.</p>

RR-013 EXTRA MSA COBHAM LIMITED

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-013	<p>1. Advanced Direction Signs</p> <p>There is an existing 1.5 mile advanced direction sign for Cobham Services located on the eastbound carriageway verge immediately east of Junction 10 near marker post M25/B/71.8. This sign was installed in 2012 and is subject to a Traffic Signs Agreement between Highways England and Extra. It is important to note that this sign is not a typical traffic sign as the installation and ongoing maintenance is funded by Extra through a commuted lump sum. On review of Sheet 13 of the scheme engineering drawings it is not clear what action is proposed to relocate or replace this sign. We consider that appropriate arrangements should be agreed between Extra and the Applicant to ensure that the sign is replaced by the Scheme.</p>	<p>The 1.5 mile advanced direction sign for Cobham Services located on the eastbound carriageway verge immediately east of junction 10 near marker post M25/B/71.8 will either be relocated or replaced, as necessary as part of Work No. 26 (as set out in Volume 3.1 draft Development Consent Order (APP-018), Schedule 1). Highways England will work with Extra MSA Cobham Limited to agree an appropriate course of action during detailed design.</p>
RR-013	<p>2. Works in vicinity of Cobham Services</p> <p>The DCO boundary for the scheme extends along the M25 as far east as Bookham Road underbridge, however the scheme engineering drawings do not extend to this distance. The DCO boundary incorporates each of the merge and diverge connections between the Service Area and the M25. It is therefore unclear what activities will take place in close proximity to Cobham Services and to understand the consequent impact on the operation of the Service Area. We consider that the Applicant should disclose the full extent of the construction work around Cobham Services and justify the extent of the DCO boundary.</p>	<p>It is not expected that the proposed works will have a direct effect on the operation of the MSA, including the Slip Roads.</p> <p>The work proposed between M25 junction 10 and the MSA is shown on the Works Plans (APP-007), Sheets 13 to 18, of Volume 2.8 Scheme Layout Plans (Sheets 11-31 of 31) (APP-013), Sheets 13 to 18, and, Volume 3.1 Draft Development Consent Order (APP-018), Schedule 1.</p> <p>In the immediate vicinity of the MSA, under Work No. 24(a), and Work No. 27(a) the works consist of modifications to road markings, signage and existing gantries and associated cabling and ducting works as shown on Sheet 5 and Sheets 10 to 18 of the Works Plans. In detail the works immediately adjacent are a gantry upgrade at Chainage 8155 (Sheet 17), and gantry relocations at Chainage 8817 (Sheet 16) and 9707 (Sheet 15).</p> <p>West of M25 milepost 71.4 (approximately Chainage 10500 on Sheet 14) the works consist of conversion of the existing hard shoulders on the M25 through junction 10, to provide an additional running lane for traffic in both directions, including emergency refuge areas and associated modifications to M25 gantries, signage and road markings; alteration and upgrading of the existing M25 junction 10 roundabout, including elongation and widening of the circulatory carriageway, realignment,</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		lengthening and widening of the junction entry and exit slip roads and demolition of redundant bridge structures; and associated extensive areas of habitat creation and enhancement and other environmental mitigation works (as per section 2.3.1 of the application document Volume 4.1 Statement of Reasons (APP-022)). Chapter 2 of the Environmental Statement (APP-049), section 2.7.13 states <i>"M25 junction 10 and M25 east of junction 10 For works on the M25 eastbound east of junction 10 the contractor will access the works area close to junction 10 and exit onto the M25 mainline and then turn around at the Cobham Services."</i>
RR-013	<p>3. Construction impact on operation of Cobham Services</p> <p>While we understand that temporary traffic management measures will be required to safely deliver the DCO scheme, it will be important for the safety and welfare of the travelling public that full operation of Cobham Services is maintained throughout the duration of the construction works. The applicant should share details of the proposed traffic management around Cobham Services, temporary signing of the Service Area and any closures anticipated as part of the scheme.</p>	<p>In accordance with Requirement 4 (Traffic management during construction) of the draft Development Consent Order (dDCO) (APP- 018):<i>"No part of the authorised development comprising the alteration or improvement of the M25 or A3 is to commence until a traffic management plan relevant to that part of the authorised development has been submitted to and approved in writing by the Secretary of State, following consultation with the relevant planning authority and the relevant highway authority"</i>. As part of preparing the traffic management plan to discharge this Requirement, Highways England will engage with key stakeholders about its traffic management proposals throughout the construction phase and Extra MSA will be invited to regular workshops to remain informed about the works being delivered.</p> <p>In addition, the Construction Environmental Management Plan to be approved by the Secretary of State under Requirement 3 of the dDCO will contain numerous measures to ensure the works will be carried out in an appropriate manner and will include a community relations strategy.</p>
RR-013	An agreed communication and engagement plan should be developed between the Applicant and Extra MSA Cobham Limited. Extra would welcome the opportunity to enter into a dialogue with Highways England on these matters.	Please see reference to community relations strategy above.

RR-014 THE GARDENS TRUST

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-014	Acknowledge the design changes that have been made to reduce the physical and other impacts on the Registered Parks and Gardens sites at RHS Wisley and Painshill Park (especially in relation to the Gothic Tower).	Noted.
	Note the positive discussions that have taken place with RHS and Painshill Park Trust.	Noted.
	Note the Statements of Significance for the two sites and broadly concur with their conclusions.	Noted.
	Accept that the Register area of Painshill Park to the north of and outside the Painshill Park Trust ownership is of a lesser overall significance.	Noted.
	Note that the proposals affecting this lengthy area alongside the A3 have been carefully considered and subject to change.	Noted.
	Note that the assimilation of the new boundaries with structures and landscaping will be the subject of further detailed consideration with land owners as part of purchase procedures and in final construction details.	Noted.
	Note that the topsoil storage area within the Painshill Park Register area will be restored to pre-existing condition.	Noted.
	Strongly support the Painshill Park Trust in their requirement for a replacement access at the western	Highways England notes the Gardens Trust strong support for a replacement access

PINS APP Reference	Relevant Representation Issue	Highways England Response
	<p>end of their ownership for both emergency and land management purposes. Note that this was provided for in earlier proposals without significant impact on the Register area.</p>	<p>to be provided for the Painshill Park Trust on the western end of their ownership for both emergency and land management purposes.</p> <p>The existing access is being closed for safety reasons because there is currently non-standard visibility to the direct access when driving southbound on the A3, the same is true when looking north from the direct access.</p> <p>Additionally, current design standards do not allow for a direct access on to a dual carriageway with more than two lanes. Therefore, it will not be possible to provide a direct access in this location.</p> <p>The previous design that showed Painshill Park having access via the proposed private means of access (PMA), which was presented during consultation, was omitted from the Scheme due to strong objection from local landowners. This is illustrated in Section 6.4 of the Consultation Report (APP-026).</p> <p>To provide a direct access to the western end of the park would entail a new route across privately-owned third-party land to connect to the PMA at Court Close Farm. As the western part of Painshill Park can be accessed via the internal network of maintenance tracks, there is no basis for Highways England to acquire rights across third-party land to provide the Trust with such an access for the Trust's work, including any restoration programme.</p> <p>The speed bumps within the park will not prevent access by a fire appliance and such controls are commonly found in residential areas as a means for traffic calming. In case of an emergency, measures can be put in place by the Trust to ensure gates along the route required within the park can be opened ahead of the arrival of the fire service or other emergency service.</p> <p>We have consulted with the Surrey Fire and Rescue Service whom have confirmed they are able to drive their fire appliance to the Gothic Tower via the existing internal road network at Painshill Park.</p> <p>The issue of providing an access to the western part of the Park has been discussed with the Trust at meetings in 2019. The Scheme does not preclude an access track from the Court Close Farm PMA to the existing park boundary fence. The scope for action in advance of the DCO Examination was discussed and it was suggested that Painshill Park Trust facilitate a meeting with the Girl Guides and Court Close Farm to consider whether there is any common ground on the provision of an access to the Park and mechanisms for achieving it.</p>

RR-015 THE GEORGIAN GROUP

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-015	Painshill Park is grade I statutorily listed, putting it amongst the most valuable landscapes in England. The Georgian Group has been vocal, along with other parties, in the consultations surrounding the development of this project, culminating in Highways England previously making sensible and essential adjustments to the planned routes. Bearing this in mind, it is unfortunate to be made aware, that not all of these adjustments are to be taken forward in the official plans published by Highways England.	Highways England has considered and has had regard to all consultation responses. The Consultation Report (APP- 026 to 037) illustrates the extensive engagement and where the comments of all stakeholders have been considered in the development of the Scheme.
RR-015	The necessity of access onto the A3 at the west end of the park has been highlighted by the Painshill Park Trust and includes the safety of visitors to the grade I park, along with enabling vital restoration works to be carried out. The reasoning behind not ensuring that adequate access is supplied to the grounds, which was that 'time had run out' does not amount to 'clear and convincing justification'	Highways England does not agree with The Georgian Group's comments regarding the necessity of access onto the A3 from the west end of Painshill Park. In summary, the existing access is being closed for safety reasons because there is currently non-standard visibility to the direct access when driving southbound on the A3, the same is true when looking north from the direct access. Additionally, current design standards do not allow for a direct access on to a dual carriageway with more than two lanes. Therefore, it will not be possible to provide a direct access in this location.
RR-015	An aspect highlighted within the NPPF paragraph 194, where it states, 'Any harm to, or loss of, the significance of a designated heritage asset, should require clear and convincing justification'.	As stated in the Planning Statement (APP-133) the NPPF does not provide specific policies relating to Nationally Significant Infrastructure Projects (NSIPs) such as this Scheme. Paragraph 1.17 of the National Policy Statement National Networks (NPS NN) states that the NPS and NPPF are consistent, with paragraph 1.18, stating that the NPPF will be an important and relevant consideration 'but only to the extent relevant to [the] project'. Paragraph 5.133 of the NPS NN states that development consent should not be granted for works that will lead to substantial harm or total loss of significance of a designated heritage asset, unless it can be demonstrated that the harm or loss is necessary in order to deliver substantial public benefits that outweigh that loss or harm. Chapter 11 (Cultural Heritage) of the Environmental Statement (APP-056) has completed an assessment of the Scheme against the heritage assets. It concluded that there is potential for adverse effects on designated and non-designated heritage

PINS APP Reference	Relevant Representation Issue	Highways England Response
		assets within the Scheme boundary and study area. With appropriate mitigation which is secured through the dDCO (APP-018) and the Construction Environmental Management Plan (APP-134) the Scheme will not give rise to significant adverse effects on Painshill Park.
RR-015	Going forward, the Group would like to see the amendments originally made by Highways England brought to fruition in their plans for Painshill Park and the surrounding area. Over the past year, the park has seen a 20% increase in visitors, which can be linked to the vital work undertaken by the Painshill Park Trust. Ensuring the necessary changes are made to the Highways England development would secure the future of one of the finest landscapes in England and allow further work to be undertaken on the grounds.	Highways England understand in this statement that the Group is referring to the previous access arrangements for Painshill Park off the A3, which were modified following additional targeted consultation. The previous design that showed Painshill Park having an additional access to the western part of the site via the proposed PMA, which was presented during consultation, was omitted from the Scheme due to strong objection from local landowners. For further details on this please see paragraph 6.4.7 of the Consultation Report (APP-026) and Highways England's response to the first paragraph of the Georgian Group's relevant representation above.

RR-016 GUILDFORD RESIDENTS ASSOCIATION

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-016	<p>Our concern is the effect of traffic on local roads in Wisley and Ripley in particular. The results of the traffic have led to the conclusion (in 7.4 Traffic Assessment Report) that conditions in Ripley, at Ockham Park junction and on Wisley Lane will be satisfactory. The analysis of journey times is welcome. However, the peak visitor days at RHS Wisley lead to high volumes of traffic trying to access and leave the site, which currently can cause queuing to and from Wisley Lane. The planned growth at the Wisley airfield site and at Burnt Common, and the other sites in Send will increase volumes on local roads, including Ockham Roundabout and in Ripley. While we note the remarks about rerouting via the A245 Byfleet Road and M25 J11, we main concerned about the risk of capacity issues arising on routes linking to the A3.</p>	<p>As explained in the Transport Assessment Report (APP-136) Chapters 7 and 8, the Scheme will result in some differences in traffic flows on local roads but over all these changes are unlikely to have an adverse impact on the operation of the local road network.</p> <p>The assessment takes into account the traffic likely to be generated by planned growth and the revised access arrangements to Wisley Lane.</p> <p>Please also see traffic forecasts presented in the Traffic Forecast Report submitted at Deadline 1 as Volume 9.13.</p>

RR-017 HISTORIC ENGLAND

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-017	<p>Painshill Park</p> <p>Due to the impacts on the grade I registered park, details of the following will need to be provided: full design of the pedestrian bridge and its associated landscaping, acoustic barriers (including new planting) design and location of lighting columns and signal gantries. Design and construction of new balancing pond within the registered landscape and restoration of land used as construction compound. We would wish to see those details and be consulted on their preparation and approval</p>	<p>The preliminary design as shown on the Scheme Layout Plans (APP-012 and APP-013) show these features.</p> <p>Requirement 5 (Detailed Design) of the draft Development Consent Order (dDCO) requires the detailed design of the Scheme to be compatible with the preliminary design of the Scheme as submitted. Generally there is no further requirement to consult as is usual for schemes authorised by DCOs.</p> <p>However the Outline Construction Environmental Management Plan (CEMP)(APP-134) includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments).</p>
RR-017	<p>RHS Wisley</p> <p>We would wish to see details of the noise reduction proposals (including new planting) and the design and location of lighting and signal gantries, and be consulted in their preparation and approval</p>	<p>The preliminary design as shown on the Scheme Layout Plans (APP-012 and APP-013) show these features.</p> <p>Requirement 5 (Detailed design) of the dDCO requires the detailed design of the Scheme to be compatible with the preliminary design of the Scheme as submitted. Generally there is no further requirement to consult as is usual for schemes authorised by DCOs.</p> <p>As noted above, the Outline CEMP (APP-134) includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments).</p> <p>To note that new planting, unless of a very substantial width is not a noise reduction measure.</p>
RR-017	<p>Prehistoric barrow on Cockcrow Hill</p> <p>We would wish to see details of noise reduction measures (including new planting or fencing), the design and location of lighting and how other visual impacts will be dealt with, together with proposals for enhanced public access to and interpretation and</p>	<p>The preliminary design as shown on the Scheme Layout Plans (APP-012 and APP-013) show these features.</p> <p>As illustrated in the Statement of Common Ground (SoCG) between Highways England and Historic England there has been a great deal of positive discussion between the parties. This has included constructive discussions about the heritage</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	management of this monument, and be consulted in their preparation and approval	<p>impacts and taking them into account in arriving at the preliminary design, the subject of the application.</p> <p>Requirement 5 (Detailed design) in Schedule 2 to the dDCO requires the detailed design of the Scheme to be compatible with the preliminary Scheme design as submitted. Generally, there is no further requirement to consult as is usual for schemes authorised by DCOs.</p> <p>However the Outline CEMP (APP-134) includes the requirement for continued engagement with Historic England regarding landscape and noise barrier design (Table Appendix A1) where there is impact upon the settings of high value heritage assets (grade I and II* listed assets and scheduled monuments).</p> <p>Further, the Register of Environmental Actions and Commitments (REAC) (APP-137) provides specifically for designs for noise barriers near the scheduled Bowl Barrow on Cockcrow Hill to be developed in consultation with Historic England to identify potential for improving the setting of the monument.</p> <p>To note that new planting, unless of a substantial width is not a noise reduction measure but it is a visual and landscape benefit.</p>
RR-017	<p>Roman bathhouse at Chatley Farm and pre-historic hengi-form monument at Red Hill</p> <p>Clarity is required as to the impact that the habitat enhancement works might have.</p>	No habitat enhancement works take place within the boundary of these monuments and so neither will be affected by the habitat enhancement works.
RR-017	There is some possibility that other non-designated archaeological remains, perhaps associated with the designated assets and hence potentially of equal significance to them, could be harmed by the proposed works, including replacement habitat creation. A programme of archaeological works will need to be included in the proposal as described in a written scheme of investigation, as a proportionate response to the potential harm to non-designated archaeological assets, as described below.	<p>The archaeological programme of works (Archaeological Strategy) Written Scheme of Investigations required by the CEMP (APP-134, see page 52) and section 11.9 of Chapter 11 of the Environmental Statement, (APP-056)) will include details on the treatment of as-yet unknown archaeological remains of national importance.</p> <p>In addition, Requirement 14 (Archaeology) of the dDCO requires that before any part of the Scheme is commenced, for that part, a written scheme for the investigation and mitigation for archaeological interest, reflecting the mitigation set out in the REAC (APP-137), has been submitted to and approved by the Secretary of State, following consultation with the relevant planning authority and the county archaeologist. There are specific requirements for archaeological remains being revealed that were not previously identified involving reporting to the county archaeologist in accordance with the process set out in Requirement 14 (Archaeology).</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-017	Non-designated archaeological remains There is potential for as yet undiscovered archaeological remains to be harmed by the proposals. It will be important to ensure that the appropriate provisions are secured so that there can be evaluation for all such remains. We are content that the Surrey CC archaeologist, as advisor to the local authorities, should lead for the agreement and implementation of archaeological works in relation to non-designated archaeological remains. However, should any remains of national importance be identified we would need to be consulted and provide our advice.	This is provided for in Requirement 14 (Archaeology) in the dDCO (APP-018).
RR-017	Miscellaneous There are various points of detail within the documents (such as the outline CEMP and draft DCO) which raise issues that will need to be addressed to ensure that the historic environment is safeguarded, and these should be resolved through discussions and submissions of further details during the examination	We have been working closely with Historic England to prepare a Statement of Common Ground (SoCG) (APP-140) to identify and resolve specific concerns. This close working continues with a view to resolving all outstanding matters where practicable to be captured in an updated SoCG.

RR-018 LONDON STRATEGIC LAND

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-018	LSL are in the process of submitting a planning application for a residential development at a site adjacent to the A3 at Send Marsh near Ripley, approximately 5 km from the junction between the A3 and M25.	Noted
RR-018	Any representations submitted on behalf of our clients are anticipated to focus on the potential traffic impacts on the local road network as a result of the construction works associated with the junction improvements.	Noted
RR-018	We would like to be kept informed of the progress of the project and may wish to make further representations at a later stage of the examination	<p>Highways England would direct this respondent to the Planning Inspectorate's (PINS) website: https://infrastructure.planninginspectorate.gov.uk/projects/south-east/m25-junction-10a3-wisley-interchange-improvement/</p> <p>Updates on the DCO application published on the PINS website and in local newspapers and updates on the project more generally will be published on the Highways England website.</p>

RR-019 NATIONAL GRID

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-019	NGET's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.	Part 1 of Schedule 9 (Protective Provisions) to the draft Development Consent Order (dDCO) (APP-018) contains protective provisions for the benefit of electricity undertakers. The protective provisions offer protection to National Grid in respect of its apparatus which may be affected by the construction of the Scheme.
RR-019	NGET may require protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGET will liaise with the Promoter in this regard.	Please see response above. Highways England is in contact with National Grid regarding the interface between the Scheme and National Grid's apparatus and is willing to discuss any concerns raised by National Grid as to the protection of its apparatus.
RR-019	NGET assets which have been identified as being within or within close proximity to the proposed Order limits are: <ul style="list-style-type: none"> OVER HEAD LINE ZM Route 275kV CHESSINGTON - WEST WEYBRIDGE ZM021/ZM022/ZM023/ZM024/ZM025 – Clearances of ZM021-022 (across A3 and new access road), ZM022-023 (across new access road into gas compound), ZM023-024 (across new access road Bellmouth and A3). 	Noted.
RR-019	As a responsible statutory undertaker, NGET's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.	Noted

RR-020 NATURAL ENGLAND

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-020	3.2.1.5 Natural England is keen to continue to work with the applicant to achieve the benefits set out in Appendix 7.19	Highways England welcomes the opportunity to work with Natural England throughout the Development Consent Order (DCO) process. Furthermore, Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) of the draft DCO (APP-018) requires details of the compensatory habitat creation and enhancement measures to be approved by the Secretary of State in consultation with the LPA and Natural England, and therefore Natural England will be closely involved in the approval of these measures.
RR-020	3.2.1.6 It is perhaps important to point out that the proposed SPA enhancement works set out in Appendix 7.19 are additional to existing plans for habitat maintenance and management and, at present, there is no legal obligation on the part of Surrey Country Council or Surrey Wildlife Trust to undertake any of the proposed enhancement works, ie expansion of heathland, creation of 'wood pasture' and enhancement of retained woodland. The proposed enhancement works are not specifically funded in any way through the Countryside Stewardship agreement between Natural England and Surrey Wildlife Trust which pertains to Ockham and Wisley Commons	If the DCO is granted, the works may be carried out by Highways England pursuant to the powers conferred by the DCO and there will be a legal obligation on Highways England (pursuant to Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) of the dDCO (APP-018)) which has been drafted so as to ensure that Highways England (or their appointed contractor, which may include Surrey Wildlife Trust) has the necessary powers to carry out the works and enter the relevant land to do so.
RR-020	3.2.1.8 Natural England is pleased to see that Highways England clearly state that they commit to fund the proposed works set out in the draft SPA management and monitoring plan. This should be a condition of Scheme approval	Highway England is required to carry out the works as part of the Scheme. Highways England's legal team is currently working with SWT and SCC to make arrangements for carrying out the proposed SPA enhancement works, including the appropriate financial arrangements. The carrying out of these works is not dependent upon such arrangements being made. As noted above, the DCO contains the necessary powers in favour of Highways England.
RR-020	3.2.1.10 It will be important to clarify the role, if any, which RHS Wisley may have in the management of 'C2 Wisley Compensation Land' and whether there	Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) of the dDCO (APP-018) sets out Highways England's obligations to agree and carry out maintenance, management

PINS APP Reference	Relevant Representation Issue	Highways England Response
	<p>may be a need for changes in the arrangement between Surrey Wildlife Trust and RHS Wisley to clarify roles and responsibilities, particularly in relation to long term maintenance liability.</p>	<p>and monitoring of the SPA compensatory measures. Highways England's legal team is currently working with SWT and SCC to secure arrangements for the proposed works within the 'C2 Wisley Compensation Land' (as set out in Section 7.3 of the SPA management plan (APP-105)) including appropriate financial measures and the management proposals for the suite of compensatory measures (i.e. the SPA compensatory land and SPA enhancement areas) generally. This work includes considering the existing contractual arrangements involving SWT. The carrying out of these works is not dependent upon such arrangements being made because, as noted above the DCO contains the necessary powers in favour of Highways England. Highways England is happy to co-operate with RHS on this to secure the necessary arrangements for maintenance management and monitoring.</p>
RR-020	<p>3.2.1.11 It will be essential that monitoring of critical aspects potentially affected by the Scheme is in place both during construction and post-Scheme completion in order to provide assurance that the various safeguards and enhancement measures are having the desired effects. Natural England welcomes the proposals for monitoring set out in the application. However, there are some matters of detail over which we would welcome further discussion with the applicant. For example, as set out the proposed monitoring of the SPA enhancement works in C1 and C2 has no direct link to the desired function of these areas ie that they should have the potential to provide feeding habitat for nightjar. It is acknowledged that the proposed monitoring of tree establishment and plant diversity in the grassland will, to an extent, provide a proxy measure of the likely suitability of the areas for nightjar. However, Natural England would encourage consideration of means of measuring habitat suitability and/or usage of the areas by nightjar, such as through use of bio-acoustic technology.</p>	<p>The proposed dDCO includes various provisions in relation to monitoring arrangements. Requirement 3 (Construction and Handover Environmental Management Plans) of the dDCO sets out in (2) (c) (ix) and (2) (d) obligations in relation to monitoring during construction. The requirements for monitoring post-construction are set out under Requirement 8 (g) (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures) of the dDCO. This notes that approval of the proposed monitoring arrangements by the Secretary of State following consultation with the relevant LPA and with Natural England is required. Requirement 15 (Protected Species) provides that no part of the Scheme can commence until for that part, final pre-construction survey work has been carried out to establish whether European or nationally protected species are present on any of the land affected or likely to be affected. The requirement also puts limitations on construction activity within 10 metres of any European or other protected species or nesting bird which was not previously identified but is revealed when carrying out the Scheme.</p> <p>Highways England held a meeting with Natural England on 11 September 2019 where this point was discussed. As outlined in 7.2.7-7.2.9 of the HRA Stage 2 (APP-043), it was agreed that the permanent land take within the SPA does not actually support any qualifying SPA species as foraging or nesting habitat. Therefore, the function of the SPA compensation land is to provide an invertebrate resource for the SPA, rather than to provide additional foraging habitat, and if the SPA compensation land is not used by nightjars, this is not necessarily an indication of failure as long as the invertebrate resource that the SPA compensation land provides increases. With this in mind, the monitoring of usage by nightjars would not be an indication of whether the SPA compensation land is successful. Natural England and Highways</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		England agreed in a meeting on the 11 September 2019 that an assessment of vegetation structure and/or invertebrate abundance would be appropriate in order to determine if the SPA compensation areas are successful.

RR-021 PAINSHILL PARK TRUST

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-021	<p>The Hon. Charles Hamilton created Painshill Landscape Garden in the mid-eighteenth century. At the time Painshill was recognised as one of the foremost examples of the only art form in which England has led the world. Visitors came from many countries and included royalty and two future American presidents. After 1939 it suffered thirty years of neglect and vandalism. By 1970 most of the historic buildings had collapsed or disappeared and the landscape was largely covered by scrub. Over the last 35 years Painshill Park Trust, supported by many millions of pounds of public and charitable money, has restored the landscape and buildings. Painshill is once again recognised as a national treasure. It is a Grade 1 listed landscape garden and is one of the very few that has survived largely intact for over 250 years. In late 2017 Highways England published their proposals for changes to Junction 10 of the M25. Their plans were based on information about Painshill that was more than forty years out of date, before the restoration had begun, and would have seriously damaged the landscape. Collaborative discussions with Highways England and their consultants, Atkins, throughout 2018 eventually resulted in satisfactory proposals which minimised damage to Painshill. Throughout these discussions, the Trust received constant assurances that its access onto the A3 at the western end of the park would either be retained or replaced by a separate access track. Most recently at a meeting held on November 15th 2018 it was minuted that “assurances were given that the Trust will be able to use the access road for emergency purposes and for service vehicles working at the western end of the park”. This is crucial because</p>	<p>Highways England accepts that assurances were given; however, these assurances related to earlier versions of the Scheme that included elements from which a vehicular access into the western part of the park could have been provided directly.</p> <p>The assurance recorded in the November 2018 minutes related to a version of the Scheme that included a non-motorised user (NMU) route past the Gothic Tower to Red Hill bridge that could have provided the basis for a vehicular access into the park, close to the existing access, connected to the private means of access (PMA) to Court Close Farm.</p> <p>Since that time, the NMU route from Red Hill bridge has been moved to the north side of the A3, primarily to accommodate the Girl Guide's Association concerns over safeguarding for the children who visit the campsite, which is considered to be of paramount importance. The Scheme, therefore, no longer includes a new track past the Gothic Tower (and the existing western access to the park) that could be used by vehicles. Relocating the NMU route to the north side of the A3 also accords with the wishes of the Trust and Historic England to minimise impacts on the setting of the tower.</p> <p>This design change was made in the context that the existing direct access from the A3 southbound carriageway could not be re-provided in the Scheme on safety grounds (as it would not be compliant with design standards for four-lane carriageways, sightline distances or weaving lengths) and is not required by the emergency services. We have consulted with the Surrey Fire and Rescue Service (SFRS), who have confirmed they are able drive their fire appliance to the Gothic Tower via the existing internal road network at Painshill Park. SFRS also advised that they would not use the direct access onto the A3 because it is not safe to do so.</p> <p>To provide a direct access to the western end of the park would entail a new route across privately-owned third-party land to connect to the PMA at Court Close Farm. As the western part of Painshill Park can be accessed via the internal network of maintenance tracks, there is no basis for Highways England to acquire rights across third-party land to provide the Trust with such an access for the Trust's work, including any restoration programme.</p> <p>The speed bumps within the park will not prevent access by a fire appliance and such controls are commonly found in residential areas as a means for traffic calming. In case of an emergency, measures can be put in place by the Trust to ensure gates</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	<p>increasing numbers of visitors are using the western end of the park and the final stage of the restoration programme will be concentrating on it. The only alternative access is the route through the staff entrance. It is controlled by speed bumps to protect pedestrians and has a number of gates to be opened. In a recent trial it took a fire tender 15 minutes to reach the Gothic Tower using this route on a day when visitor numbers were light. The Gothic Tower is currently used as a café for visitors but has been used as a residence in the past and is likely to be so again. It has five storeys served by one circular staircase. At a recent meeting with Highways England it was stated that there was no technical reason why the access route could not be extended by 400 meters to the Painshill entrance and that the main reason for not including it in the DCO submission was that time had run out. Last year 120,000 people visited Painshill. This year visitor numbers have increased by about 20% and the Trust has a short-term target to attract 150,000 visitors each year. Visitor safety and the needs of the restoration programme emphasise the importance of a separate access at the west end of the park</p>	<p>along the route required within the park can be opened ahead of the arrival of the fire service or other emergency service.</p> <p>The issue of providing an access to the western part of the Park has been discussed with the Trust at meetings in 2019. The Scheme does not preclude an access track from the Court Close Farm PMA to the existing park boundary fence. The scope for action in advance of the DCO Examination was discussed and it was suggested that Painshill Park Trust facilitate a meeting with the Girl Guides and Court Close Farm to consider whether there is any common ground on the provision of an access to the Park and mechanisms for achieving it.</p>

RR-025 ROYAL MAIL GROUP

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-025	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.	Noted
RR-025	Royal Mail is concerned about the potential for disruption to its operations during the construction phase.	<p>Highways England's approach to construction is to carry out works in a considerate manner with a view to minimising their effects so far as practicable, this is reinforced by numerous policies that are publicly accessible on Highways England's website.</p> <p>Highways England aim to plan and deliver roadworks in a way that customers understand and feel is reasonable, by minimising disruption and providing more information about the long-term benefits.</p> <p>Under requirement 4 (Traffic management during construction) of the dDCO (APP-18) a traffic management plan relevant to the part of the works involved must be submitted to and approved by the Secretary of State following consultation with the relevant planning authority and the relevant highway authority before the works can start. By these means traffic will be managed appropriately in order to avoid, so far as practicable, effect on the road network as used by Royal Mail and others.</p> <p>As a result of these measures it is not expected that Royal Mail operations will be disrupted during construction</p>
RR-025	Royal Mail's has nine operational properties within approximately 10 miles of the proposed DCO boundary, the nearest being Cobham Delivery Office 1 High Street, Cobham KT11 3E which is 2.4 miles distant.	Noted
RR-025	The M25 and A3 are strategically important distribution routes for Royal Mail operational traffic. Any periods of road disruption/closure, night or day, have the potential to impact operations.	See response above.

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-025	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.	Noted, see above.
RR-025	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 be adversely affected by the construction of this proposed scheme.	Noted.
RR-025	<p>In order to address the above concerns Royal Mail requests that:</p> <p>1. The DCO includes requirements that Royal Mail will pre-consulted by Highways England or its contractors on any proposed road closures/diversions/ alternative access arrangements, hours of working and the content of the final Construction Traffic Management Plan.</p> <p>2. The final Construction Traffic Management Plan includes provision for a mechanism to inform major road users about works affecting the local network (with particular regard to Royal Mail's distribution facilities in the area surrounding the DCO application boundary).</p>	<p>It would not be appropriate for the DCO to include a specific requirement to consult Royal Mail but the CEMP will include a community relations strategy (Requirement 3) that will ensure that local people and businesses are kept informed on construction process.</p> <p>The content of the Traffic Management Plan will be developed during detailed design. and must be approved by the Secretary of State and there must be consultation with both the relevant planning authority and highway authority.</p>

RR-026 THE ROYAL SOCIETY FOR THE PROTECTION OF BIRDS

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-026	<p>The RSPB's primary concern with the M25 junction 10/A3 Wisley interchange scheme (the scheme) is with its potential impacts on the SPA. As proposed, the scheme involves a direct land take from the SPA of 5.9 ha permanently and 8.6 ha temporarily. During the pre-application phase, the RSPB has been involved in detailed constructive discussions with Highways England and its consultants to ensure that the impact upon the SPA arising from the scheme is minimised. As a consequence of these discussions modifications to the scheme mean that the land take has been reduced. The RSPB continues to discuss the package of compensation measures proposed by Highways England to ensure that it will fully address the adverse effects of this scheme. To be effective it is essential that there can be confidence in both the ecological effectiveness and the legal and financial security of delivery of the compensation measures as well as their long-term maintenance to ensure that they continue to function in perpetuity. The RSPB is carefully considering the draft Development Consent Order, the Habitats Regulations Assessment, the Outline Construction Environmental Management Plan (the Outline CEMP) and other scheme documents to ensure that these provide the certainty that we seek. The RSPB notes that various of the scheme documents (e.g. the Outline CEMP) are described as 'living' documents that will develop during the course of the Examination. Consequently, we wish to have the opportunity to scrutinise these documents as they develop to ensure that at the end of the Examination that the final compensation package gives us the necessary confidence that it will be ecologically, legally and financially effective. This will ensure the overall coherence of the Natura 2000 network is protected and reflect the requirements of The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations). In addition to the compensation measures, the RSPB has also been in</p>	<p>Highways England worked closely with a number of stakeholders, including the RSPB, from an early stage in the assessment and design process. As a result, the RSPB have played a valuable role in the process of identifying appropriate mitigation and compensation measures for the Scheme. Highways England will continue to work with the RSPB to ensure these measures are secured and delivered. A full record of consultation with RSPB throughout the HRA process can be found in HRA Annex B of the Consultation Report (APP-041). The HRA Stage 2 (APP-043) concluded that it is not possible to ascertain that this habitat loss of land would have no adverse effect on the integrity of the SPA. Therefore, the requirement for Stages 3-5 of the HRA was determined. This included the requirement for compensatory measures, and the RSPB were an integral part (along with Natural England, Forestry Commission, Surrey County Council (SCC) and Surrey Wildlife Trust (SWT)) in designing an appropriate suite of compensatory measures. These can be found in Section 5 of the HRA Stages 3-5 (APP-044). Proposals for monitoring the success of the suite of compensatory measures are outlined in the SPA management plan (APP-105) and have been issued to RSPB for review. The SPA management plan will be further refined under consultation with Natural England, RSPB, SCC and SWT. In addition, Natural England, Forestry Commission, RSPB, SCC and SWT will be invited to join a steering group for monitoring the success of the management plan for the SPA suite of compensatory measures, as outlined in Section 7.2 of the SPA management plan (APP-105). The monitoring will continue for 15 years after construction has been completed for SPA enhancement areas and 20 years after construction has been completed for SPA compensation land. Highway England's legal team is currently working with SWT and SCC to put in place an agreement under which SWT, working with SCC, will undertake the necessary environmental / ecological works such that the necessary measures (i.e. the SPA compensatory land and SPA enhancement areas) are undertaken. However, the securing of these works does not depend on such an agreement being made. The draft DCO (dDCO) (APP-018) provides Highways England with the necessary powers, including in respect of land</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	<p>discussion with Highways England over its proposed package of enhancement measures, set out in various scheme documents. The RSPB will also wish to scrutinise these measures during the Examination to ensure that we have confidence in the ecological, legal and financial effectiveness of the final package of enhancement measures. In addition to the package of enhancement and compensation measures submitted to the Examination the RSPB may wish to comment upon the arguments being advanced by Highways England to justify this damaging development under Regulation 64 of the Habitats Regulations.</p>	<p>acquisition and use, to carry out these works (and in particular works 54-61 as set out in schedule 1 of the dDCO) and the requirement to do the works falls upon Highways England under the DCO - see Requirement 8 (Thames Basin Heaths Special Protection Area (SPA) Compensatory Habitat Creation and Enhancement Measures). The proposed agreement is one way by which Highways England can provide for the necessary compensatory and enhancement works to be done by an appropriate third party (such as SCC/SWT) if Highways England does not wish to carry out the works itself. Highways England welcomes the opportunity to continue working with the RSPB.</p>

RR-027 SURREY WILDLIFE TRUST

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-027	<p>We recognise and understand the justification for the M25 J10/A3 Interchange Improvement Scheme. We regret as inevitable the short-term ecological impacts during construction and immediate operation of the scheme, but support the avoidance, mitigation and compensation strategy that has been developed in close consultation with ourselves to address these impacts and that can be expected to eventually result in long-term net gains for the biodiversity of the protected site. This agreed strategy must be implemented in its entirety, and our wholehearted support is further predicated on the observation of the recommendations of the separate feasibility study undertaken by Atkins advising on the preferred, desirable specification of the proposed green bridge to replace the existing Cockcrow bridge over the A3. As such, this bridge must incorporate a 'green' element at an absolute minimum width of 25 metres to ensure its effectiveness. In our considered opinion 10m will fail to achieve this.</p>	<p>The Scheme will be implemented in full in accordance with the Requirements 7 (Design, layout and implementation of Replacement land), 8 (Thames Basin Heath Protection Area (SPA) Compensatory Habitat Creating and Enhancement Measures), 10 (Bolder Mere Mitigation and Enhancement Area), 11 (Buxton Wood Environmental Mitigation Area) and 12 (Stratford Brook Environmental Mitigation Area) of the draft DCO (dDCO) (APP-018).</p> <p>As highlighted in footnote 14 of the Environmental Statement Chapter 7: Biodiversity (APP-052) the Scheme does not make the ecological severance effects of the A3 any worse and therefore the green bridge cannot be considered essential mitigation.</p> <p>At present the dDCO provides for the possibility of a 10m wide green bridge but Highways England is seeking to bring forward proposals in the DCO (by way of a non-material change application) for a 25m green bridge, which would be subject to designated funds becoming available. By letter dated 4 November 2019, Highways England has notified the Planning Inspectorate of its intention to bring forward a number of changes to the Scheme. A copy of the letter can be found on the Scheme's section of the Planning Inspectorate's website.</p>

RR-028 WEST SURREY BADGER GROUP

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-028	We would like some insight into how a protected species will be mitigated and protected.	<p>The treatment of protected species has been a key consideration in the development of the Scheme. To understand the number and distribution of badgers in the area we undertook badger surveys over several years. These identified a number of setts within or adjacent to the DCO boundary. Although the Scheme has been developed to reduce adverse effects as far as possible it has not been possible to avoid effects on certain of these setts and these will need to be closed to enable the Scheme to proceed.</p> <p>As explained in paragraphs 7.10.46-52 of Chapter 7 Biodiversity of the Environmental Statement (APP-052), the closure of the active badger setts will be carried out under licence issued by Natural England. These closures and the proposed mitigation for them has been approved in principle by Natural England in a Letter of No Impediment (LONI), which was issued after submission of a draft licence.</p> <p>As a final precaution, a pre-construction badger survey will be undertaken to search for new setts and determine the level of activity at badger setts that have potential to be directly or indirectly affected by construction. This is secured by Requirement 15 (Protected Species) of the draft DCO (APP-018).</p> <p>Inactive badger setts requiring closure will be closed under a Precautionary Method of Working. Section 7.10 of Chapter 7 of the Environmental Statement illustrates the mitigation measures that will be provided with regards to badgers.</p>
	We would like the opportunity to see the badger survey and report	Highways England provided the non-redacted version of Appendix 7.16 Badgers (APP 102) to West Surrey Badger Group on 16 August 2019. Receipt of the report was confirmed via email on 19 August 2019.

RR-029 WISLEY ACTION GROUP

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-029	<p><u>Air Quality</u></p> <p>As part of our evidence base for the planning appeal promoting the development of the former Wisley airfield which was dismissed by the Secretary of State in June 2018 we established that the air quality in the SPA on the eastern side of the A3 was already in excess of the legal limit. Since that time a number of EU judgements have been issued which support our expert's argument that additional vehicle traffic will have a negative impact on the SPA which cannot be ignored. Further, case law means that any improvements in technology which may improve car emissions cannot be taken into account for modelling purposes. The project's aim is to improve the capacity of the junction meaning more cars and more pollution which will impact both air quality and nitrogen deposition on the SPA. We are particularly concerned that the applicant relies on evidence used by the developer of the former Wisley airfield, much of which was found to be lacking at the planning appeal.</p>	<p>The estimated concentrations as derived from Government sources of fleet composition and emission rates, which are based on existing policy and legislation, and subsequently verified through monitoring data and sensitivity tested for future trends, can therefore be considered as reasonably certain, and not contrary to case law. They are not based or reliant on evidence used by the developer of the former Wisley Airfield.</p> <p>The Scheme's objectives are set out in Table 2.1 of the Introduction to the Application and Scheme Description (APP-002). These do not include the aim of increasing cars or pollution.</p> <p>The air quality assessment as documented in Chapter 5 of the Environmental Statement (APP-050), included the calculation of concentrations of oxides of nitrogen (NOx) and nitrogen deposition at receptor points within the Thames Basin Heaths SPA for comparison with the critical level and critical loads respectively. The assessment for the opening year showed that both the critical level of NOx concentrations and critical load of nitrogen deposition were exceeded within the SPA, both with and without the Scheme, with concentrations/ deposition rates decreasing with distance from the road. The potential for adverse effects resulting from nitrogen deposition on the integrity of the SPA is considered within the HRA Stage 2 (APP-043). All increases greater than 1% of the critical range are confined to woodland areas within 12 m from the road edge and will have no adverse effect on the habitats used by the SPA qualifying species.</p> <p>The case law referred to in the relevant representation is assumed to be the Court of Justice of the European Union (CJEU) ruling in the case of <i>Coöperatie Mobilisatie for the Environment UA, Vereniging Leefmilieu V College van gedeputeerde staten van Limburg and Stichting Werkgroep Behoud de Peel v College van gedeputeerde staten van Noord-Brabant</i>. (C-293/17 and C-294/17) that a reduction in emissions can only be taken into account in an appropriate assessment if the expected benefits are certain at the time of the assessment. Certainty is taken from previous case law to mean "where no reasonable scientific doubt remains". (Institute of Air Quality Management's Guidance for assessing the air quality impacts on nature sites, paras 3.8 and 3.9).</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>The air quality assessment presented in Chapter 5 of the Environmental Statement (APP-050) follows the Highways England standard methodology for road schemes, using the most up to date tools and datasets available at the time of the assessment. When modelling future concentrations of air pollutants, these are estimated using DEFRA's Emissions Factors Toolkit which takes into account expected improvements in vehicle emissions technology resulting from the European emission standards, together with the Department for Transport's projected vehicle fleet composition.</p> <p>In addition, for Highways England road schemes, a sensitivity test or 'long term trends analysis' is undertaken for nitrogen oxides (NOX) concentrations, to account for the fact that there are uncertainties in future emissions. This analysis gives higher estimated concentrations, and the results were presented in Appendix 5.7 to Chapter 5 of the Environmental Statement (APP-080) and were used in the Stage 2 HRA (APP-043).</p>
RR-029	<p><u>Air Quality</u></p> <p>Furthermore, the proposed routing of visitor traffic leaving the RHS, particularly those heading south, will impact the already close to the limit air quality in Ripley High Street. We estimate this to be 600,000 vehicles per year – the current alternative is to add 7km to their journey and change direction at J10.</p>	<p>The air quality assessment for the Scheme has been undertaken on a scheme-wide basis, taking account of overall changes in traffic volumes, journey distances and traffic speeds. The air quality assessment has not separately evaluated the changes in vehicle emissions specifically related to RHS Wisley Gardens traffic, neither has it evaluated the potential changes in vehicle emissions associated with the RHS proposed alternative. The estimated figures of 600,000 vehicles per year are therefore not accepted.</p> <p>With the Scheme it is likely that some RHS Garden Wisley traffic to the A3 south, and to a lesser degree from the A3 south, will travel via Ripley. However, the A3 will be the signed route for RHS Wisley Gardens with direction signage beginning before Burnt Common junction.</p> <p>The modelled traffic flows through Ripley comprise a relatively small proportion of traffic leaving RHS Wisley Gardens, where the journey times are forecast to be quicker via Ripley than via Junction 10. Should traffic leaving the Gardens and heading south not route through Ripley (e.g. because of signing), the already very modest traffic impact on Ripley on account of the Scheme will be reduced and the impact on air quality reduced.</p> <p>Air quality in Ripley is currently relatively good. In accordance with their local air quality management duties, Guildford Borough Council monitor concentrations of</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>nitrogen dioxide – the key pollutant associated with road traffic – at several roadside or kerbside locations in Ripley: Ripley High Street (until the end of 2017); and two sites on Newark Lane. At all these locations, annual average concentrations were below the national air quality objective set to protect human health in all available years of monitoring (between 2016 and 2018). Further information on monitoring data is available on Guildford Borough Council's website at https://www.guildford.gov.uk/article/19807/Air-quality-monitoring.</p> <p>Four receptors in Ripley were selected for inclusion in the air quality assessment (receptors R59 to R62 as documented in Figure 5.10 of the Environmental Statement (APP- 065)). With the Scheme in place, in the opening year, the change in pollutant concentrations is expected to be imperceptible (less than 0.4 µg/m3), compared to the situation without the Scheme. The assessment was based on the traffic modelling which includes the diversion of Wisley Lane and therefore RHS traffic through Ripley due to the Scheme. This is likely to be a worst case, since contrary to the model output, a proportion of this traffic is likely to use the signposted route via the A3 and Junction 10, rather than the Ripley route.</p> <p>The Scheme is generally expected to have an imperceptible change at receptors near the M25 and M3, and a decrease at receptors along the A244 and in Esher. Along the A3 some receptors are expected to have a small increase and others to have a small decrease depending on their location.</p>
RR-029	<p><u>Ecology</u></p> <p>We do not believe that the impact on the habitats of protected species including those in the SPA has been properly taken into account.</p>	<p>Chapter 7 of the Environmental Statement (APP-052) assessed the impacts of the Scheme on protected species as a result of the construction and operation of the Scheme. In addition, the impacts on the SPA specifically have also been assessed in the Habitats Regulations Assessment (HRA Stage 2 (APP-043) and HRA Stages 3-5 (APP-044)).</p> <p>Details of the suite of compensatory measures and mitigation/enhancement measures can be found in Section 5 of the HRA Stages 3-5 and sections 7.4 and 7.10 of Chapter 7 of the Environmental Statement (APP-052).</p> <p>This comprehensive suite of compensatory measures has been carefully designed in consultation with Natural England, Forestry Commission, Surrey Wildlife Trust, RSPB and Surrey County Council. Natural England is satisfied that the application includes appropriate compensatory and enhancement measures in response to unavoidable</p>

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		impacts arising from the Scheme, as stated in their Relevant Representation (RR-020).
RR-029	<p><u>Impact on Stratford Brook</u></p> <p>We do not believe that the impact on Stratford Brook has been properly taken into account.</p>	<p>The impact of the Scheme on the Stratford Brook water body has been assessed in the Water Framework Directive Assessment Report (APP-045). Chapter 7 of the Environmental Statement (APP-052) considers the effects of the Scheme on aquatic species of Stratford Brook, as a result of the construction and operation of the Scheme. Chapter 8 of the Environmental Statement (AP-053) also considers the effects of the Scheme on the wider water environment of the brook. A range of mitigation and enhancement measures have been included in the Scheme as outlined in sections 7.10 and 8.9 of the Environmental Statement (APP-052 & APP-053).</p> <p>The assessment of effects and consultation with the Environment Agency, as reflected in the draft Statement of Common Ground with the Environment Agency (APP-139), led to refinement of the Scheme proposals. Measures have been carefully developed to mitigate the effect of the Scheme on this water body in consultation with the Environment Agency. These are set out in Section 5 and Appendix F of the Water Framework Directive Assessment Report (APP-045).</p> <p>Requirement 12 (Stratford Brook Environmental Mitigation Area) of the dDCO (APP-018) secures that mitigation will be approved by the Secretary of State in consultation with the Environment Agency and the local planning authority prior to starting of the works.</p>
RR-029	<p><u>Traffic modelling</u></p> <p>It is clear to locals that the impact of the changes to the Ockham Park roundabout have not been properly taken into account including but not limited to:</p> <ul style="list-style-type: none"> - lengthy queues on Ockham Road North in the am and pm peak exacerbated by pm peak - traffic from RHS Wisley and slow-moving waste tankers from Thames Water in Wisley Lane and the proposed 5000 vehicles exiting the former Wisley airfield development 	<p>As presented in the Transport Assessment (APP-136), the traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, including that forecast to be generated by the Wisley Airfield development, whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) and local roads. This includes most of the local roads around Ripley, including the approach from Ockham Road North. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay on it delivered by the Scheme. Although traffic flows at the Ockham roundabout will increase with the Scheme compared to without the Scheme, mainly due to the new link road that will connect Wisley Lane directly to the Ockham roundabout.</p> <p>However, modelling of the operation of the amended Ockham Roundabout with traffic signals has demonstrated that it will operate within capacity with forecast traffic growth, including the Wisely Airfield development, and alleviate traffic congestion and</p>

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		delay at the junction. The traffic modelling accounts for the extra impact that large goods vehicles, such as slow-moving waste tankers, have on the operation of the road network by applying a factor to these vehicles. Such vehicles are given a factor of 2.4, meaning that each one is assessed in the traffic model as having an impact on the operation of the road network equivalent to 2.4 cars.
RR-029	-local roads are not suitable for construction traffic at all as evidenced by the damage done during the Jury Farm waste application in Ripley Lane and the ongoing HGV movement associated with the waste application at the Drift. Local roads are not wide enough.	<p>Highways England will aim to minimise any additional traffic congestion and delay due to construction activities and construction traffic.</p> <p>Part 1 of Schedule 2 of the draft DCO (dDCO) (APP-018) sets out a number of requirements for the Scheme including traffic management during construction. Under Requirement 4 (Traffic management during construction) of the dDCO (APP-018) a Traffic Management Plan relevant to the part of the works involved must be submitted to and approved by the Secretary of State following consultation with the relevant planning authority and the relevant highway authority before the works can start. By these means traffic will be managed appropriately in order to avoid, so far as practicable, effects on the local road network.</p> <p>In addition, the dDCO (APP-018) requires that a Construction Environmental Management Plan (CEMP) be approved by the Secretary of State that will contain numerous measures that will ensure the works are carried out in an appropriate manner. The CEMP will also include a community relations strategy (see Requirement 3 of the dDCO).</p>
RR-029	We do not accept that the projected small improvement in the transit time for J10 amounts to IROPI	Section 4 of the HRA Stages 3-5: Assessment of Alternatives, consideration of the IROPI and compensatory measures (APP-044) explains why there are Imperative Reason of Over-riding Public Interests (IROPI) such that the DCO can be made notwithstanding the adverse effect on the integrity of the SPA.

RR-031 WOODLAND TRUST

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RR-031	<p>The National Planning Policy Framework, paragraph 175 states: "When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists".</p> <p>Paragraph 5.32 of the National Policy Statement for National Networks also contains wording related to the protection of ancient woodland and veteran trees, stating: "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." While the Trust acknowledges that the applicants are proposing measures to compensate for the loss of ancient woodland, including translocation of ancient woodland soil and bringing existing areas of ancient woodland into management, we consider that these measures can only be considered compensation and cannot make up for the loss of irreplaceable ancient woodland. The same applies in the case of veteran trees. In order to avoid impact, veteran trees must be afforded appropriate protection in line with Natural England's standing advice, with buffer zones of 15 times the diameter of the tree or 5 metres beyond the canopy if that is greater. In summary, the Trust is opposed to the proposed scheme on the basis of impacts to ancient woodland and veteran trees and as such we consider that this</p>	<p>The Scheme does not contravene the National Planning Policy Framework (NPPF) or the National Policy Statement for National Networks (NPS NN).</p> <p>The high status given to ancient woodland in the NPPF is recognised. It further notes that at NPPF footnote 58, examples are clearly set out of what is considered to constitute "wholly exceptional circumstances" including "infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat." The Scheme is an NSIP and as such comes under the exemptions in the NPPF.</p> <p>Details of the 'suitable compensation strategy' that is included in the Scheme is set out in the Environmental Statement in Chapters 7 and 9 (APP-052 and APP-054) with extracts included below.</p> <p>In addition the NPS NN at paragraph 5.32 states that "<i>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.</i>"</p> <p>Although the loss of irreplaceable habitats is unavoidable, the Scheme will lead to many positive habitat enhancements. As the Planning Statement (APP-133) demonstrates in Section 6. 4. 24, "<i>when assessed against these relevant policies and material considerations, the M25 junction 10/A3 Wisley interchange Scheme benefits from strong policy support and is acceptable in land use planning terms. Whilst the M25 junction 10/A3 Wisley interchange Scheme will, in common with any national infrastructure project, result in some adverse effects to the environment and local community during construction, these (considered individually or collectively) do not outweigh the important benefits that are achieved with this Scheme creating a more effective and efficient provision of transport infrastructure.</i>"</p> <p>Accordingly the Scheme does not contravene national planning policy.</p> <p>As described in Section 7.4.1 of Chapter 7 of the Environmental Statement (APP-052), the Scheme has been refined to minimise the impacts on ancient woodland. This has resulted in a reduction of woodland loss from approximately 1.0 ha to 0.4 ha. The loss of 0.4 ha is unavoidable due to the location of ancient woodland parcels</p>

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	<p>scheme in its current form contravenes national planning policies due to the loss of irreplaceable habitats.</p>	<p>immediately adjacent to the A3 at Elm Corner woods and Heyswood. This land is required for the widening of the A3 to 4 lanes in these locations. The widening of the A3 to 4 lanes between Painshill junction and M25 junction 10, and between M25 junction 10 and Ockham Park roundabout, is a central objective of the Scheme. The Environmental Statement states that ancient woodland is an irreplaceable habitat, which is why, despite these measures, the loss of 0.4 ha is reported as a permanent negative residual effect. As well as minimising the loss of ancient woodland, it is proposed that enhancement works will be carried out within the 7.3 ha of retained woodland at Elm Corner SNCI (including the retained ancient woodland) and the soils from the 0.4 ha of ancient woodland being lost will be translocated to a receptor woodland creation site at PBF2 Park Barn Farm (as referred to in paragraph 7.4.8 of the Biodiversity chapter of the Environmental Statement (APP-052)).</p> <p>A precautionary approach has been taken with regards to veteran trees. This has resulted in the Environmental Statement reporting an assumed loss of up to 11 veteran trees as a result of the Scheme. However, this will be reassessed at the detailed design stage and it is anticipated that up to nine of these veteran trees may be retained. This assessment will include identifying appropriate buffer zones and this process will be undertaken in consultation with the Forestry Commission and the Woodland Trust should they wish to be consulted.</p> <p>As referred to in paragraph 7.4.2.5 of the Veteran trees and Arboricultural Impact Assessment Appendix 7.3 of the Environmental Statement (APP- 089), as part of the detailed design stage the mapping of the root zones of the veteran trees using sonic tomography could be assessed in order to inform their potential retention. The mapping of the root zones would provide measurable survey data to overlay onto design drawings and establish actual root loss compared with an area of infringement into their root protection areas.</p> <p>As noted in paragraph 7.4.2.5 of the Veteran trees and Arboricultural Impact Assessment Appendix 7.3 of the Environmental Statement (APP- 089). The root protection areas of the veteran trees do not take into account the existing ground conditions surrounding the trees that could impact their morphology. The disturbed or made ground of the soils within the existing highway verges is likely to have affected the morphology of the root zones and limited their extents. This could be due to unsuitable growing conditions or previous severance as part of any construction of the verges or installation of services. So the application of a uniform buffer zone for each veteran tree would appear not to be appropriate where this zone extends in the highway verge. Each tree would need to be taken on its merits with the root zone</p>

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		<p>mapping being used and topography and land form factored into the buffer zone formation.</p> <p>In summary, as set out above, during detailed design Highways England will be undertaking further detailed assessment and we anticipate that the number of trees impacted will reduce.</p>

RR-032 JOHN ANDREWS

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-032	<p>It is important in my view that tail backs from the Wisley interchange junction of the A3/M25 are reduced at all times other entry to the next road is blocked. Long joining lanes would assist in this on all four carriageways with the strongest incentives to prevent rather than merely exhort drivers to remain on the joining lane until it ends. Additionally tail backs caused by the traffic control lights on the roundabout need careful timing to optimise flow of traffic - the current rather lengthy periods seem to me to reduce overall traffic flow rates due to slow response times from drivers.</p>	<p>A primary objective of the Scheme is to reduce traffic congestion and delay at the M25 Junction 10/A3 Wisley Interchange, accounting for forecast traffic growth. The proposed improvements to junction 10 and the benefits of the Scheme on traffic congestion and delay are presented in Section 7.4 of the Transport Assessment (APP-136).</p> <p>The Scheme for junction 10 includes an elongated roundabout, with an increased number of lanes on the circulatory carriageway and free flow left turns, except for the A3 (north) to M25 (east), which is a left turn filter, and optimisation of traffic signal timings. The free flow left turns reduces the volume of traffic under signal control at the roundabout. These improvements will all increase the capacity of the junction and will significantly reduce traffic delays.</p> <p>All slip roads to and from the junction have been designed to be compliant with current relevant highway design standards, taking account of forecast traffic flows.</p> <p>As presented in the Transport Assessment (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered by the Scheme.</p> <p>Modelling of the operation of the amended junction 10 has demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay at the junction, as well as reduce queue lengths such that they will no longer extend back to block the main carriageways on either the M25 or A3.</p>

RR-033 NEIL AUST

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-033	The junction is not the issue and we should not be looking to provide increased road capacity at the time we have called a climate emergency	<p>As stated in the Section 2 of the Planning Statement (APP-133) the need for the Scheme is identified. A number of the transport related strategies including Road Investment Strategy 2015 – 2020 (2016) (RIS) highlight the strategic goals of supporting delivery of environmental goals and the move to a low carbon economy. The Scheme Objectives as highlighted in the Planning Statement (APP-133) indicate this further with the following objective, “<i>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 objectives for local air quality management areas.</i>”</p> <p>The Environmental Statement, Chapter 15 (Climate) (APP-060) assesses the impact of the Scheme on climate by quantifying likely emissions of greenhouse gases to the earth’s atmosphere. The ‘Do Something’ scenario will generate the following change in emissions compared to the ‘Do Minimum’ scenario:</p> <ul style="list-style-type: none"> • Construction: 92,392 tCO₂e • 2022 Opening Year: -860 tCO₂e • 2037 Design Year: 98 tCO₂e (paragraph 15.1.14.3) <p>The construction phase and opening year together will contribute 0.004% of the UK’s 3rd carbon budget. This is not considered to be a significant impact. There is currently no budget for the period covering the Design Year, however the generated emissions are considered to be minor and also not significant.</p>
	or while we cannot afford to maintain the existing road network, especially when all it will achieve is getting cars to the next jam faster.	<p>The Government sets out its long-term investment plan in the road network, and particularly the Strategic Road Network (SRN), in the RIS, which was published in December 2014 and was last updated in November 2016. The “Strategic Vision” within Part 1 of the RIS advises that it expects Highways England to:</p> <p><i>“Make the network safer and improve user satisfaction, while smoothing traffic flow and encouraging economic growth. We want to see [the Applicant] delivering better environmental outcomes and helping cyclists, walkers, and other vulnerable users of the network at the same as time as achieving real efficiency and keeping the network in good condition.”</i></p> <p>Part 2: Investment Plan of the RIS lists key investments on the SRN. A total of £15.2 billion is committed by the Government to the enhancement and long-term</p>

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		<p>maintenance of the network between 2015/16 and 2020/21 including 127 major enhancements. The Scheme is recognised in the RIS as being a key investment on the SRN.</p> <p>The Scheme is specified in the RIS. It is anticipated to be funded from sources within central government, providing that the necessary statutory approvals are granted, and the Scheme demonstrates value for public money. The Scheme also aligns with the objectives detailed within the Strategic Vision outlined within the RIS. The Funding Statement (APP-024) demonstrates that the Scheme will be adequately funded through RIS.</p> <p>Section 4.2 of the Planning Statement (APP-133), which outlines the Economic Case for the Scheme, demonstrates its compliance with the National Policy Statement for National Networks (NPS NN) objective that strategic highway improvements benefit the economy. It assesses and monetises anticipated economic, environmental and social benefits of the Scheme based on a 60-year appraisal period, in accordance with DfT guidelines. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.2. The longer-term operations of the Scheme will provide reduce travel times hence is value for money. The economic/business Case has been scrutinised and approved by the DfT.</p>
	<p>Instead of major changes, spend a fraction of the money on better signage, improved traffic lights, carriageway overhead electronic direction and more ongoing monitoring, capture, training and, in extreme cases, prosecution of poor driving on, off and around motorway junctions</p>	<p>As highlighted above the need for the Scheme has been demonstrated. The Scheme includes a number of the measures that have been referred to in this response, including better signage, improved traffic signalling and overhead electronic direction (see Scheme Layout Plans APP-012 and APP-013).</p> <p>The Scheme Assessment Report (which is publicly available on the Highways England website), provides a summary of the 'do-nothing' consequence and provides a comprehensive analysis of the alternative schemes considered at different stages of the Highways England design process. The process was robust and considered to ensure Highways England chose the most effective scheme, as summarised below.</p> <p>A range of strategic options (similar to the ones raised in this issue) to address the key problems at M25 junction 10 were identified in the Strategy, Shaping and Prioritisation Stage. These strategic options gave high-level consideration to a range of alternatives dealing with transport supply and demand and included options for different modes of travel as well as different scales of highway intervention. At this stage it was apparent that a do-nothing approach would not be a viable option to solve the problems at junction 10. Based on assessments undertaken by the project</p>

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		<p>team a strategic option focussing on localised highway improvements at M25 junction 10 and Painshill junction was confirmed as the preferred solution.</p> <p>Highways England have been through a robust process to identify the need for the improvements, which would deliver the Scheme objectives and make the junction viable for 15 years after opening. Highways England have assessed appropriate alternatives and delivered an appropriate scheme design for the issues that exist within this area of the M25 and A3.</p>

RR-034 AMY BARKLAM

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-034	<p>Alternative access is proposed by Highways England through the construction of a new road to replace the existing BOAT 525 byway, currently unsuitable to most vehicles, that connects Elm Lane and Old Lane to the east. This will require the widening of the existing road and track, creation of turning heads, stopping up of Elm Lane and realignment of existing private access off Elm Lane, which requires the acquisition of land. Part of the Property is proposed to be acquired to facilitate these works. Whilst there has been some engagement with Highways England as to the nature of the works, these discussions have not provided the necessary level of assurance that the works will be undertaken in a fashion that:</p> <p>(i) maintains vehicular access to the Property at all times and minimises disruption to residents;</p>	<p>The principal contractor will ensure that disruption is minimal and vehicular access to properties is maintained at all times during construction. This will be secured through the Traffic Management Plan under Schedule 2 Requirement 4 (Traffic management during construction) of the draft DCO (APP-018).</p> <p>The construction sequence for the Scheme will improve access from Elm Corner to Old Lane prior to stopping up the existing access from the A3 to Elm Corner and will, therefore, maintain access for Elm Corner residents.</p> <p>A bridleway will be designated along the stopped-up length of Elm Lane to maintain the continuity of the public right of way network as shown on the Streets, Rights of Way and Access Plans (APP-008).</p>
RR-034	<p>(ii) minimises the amount of land to be acquired;</p>	<p>As set out in paragraph 2.4.3 of the Statement of Reasons (APP-022), the Scheme has been designed to minimise land take from and interference with the rights of third parties. Detailed design may further minimise land take. The existing unsurfaced track (byway open to all traffic (BOAT)) between Elm Corner and Old Lane is currently unsuitable for most vehicles. This section of BOAT will be constructed to Surrey County Council's standards of a 4.1m wide carriageway and will be suitable for all vehicles to access Elm Corner.</p> <p>Highways England is continuing to engage with landowners throughout the development of the Scheme.</p>
RR-034	<p>(iii) ensures that the works required to the private accesses of properties is properly managed with the owner having the requisite level of input and control over building materials, timing of works, revised boundary treatments/features, etc.</p>	<p>Highways England will continue to engage with Elm Corner residents throughout the development and implementation of the Scheme. The Outline Construction Environmental Management Plan (APP-134) sets out the commitments to carrying out the works in an appropriate manner and this will be updated before construction to take account of concerns expressed by residents and businesses.</p>

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RR-034	(iv) addresses the reinstatement of boundary features following the acquisition of land.	Highways England will ensure that suitable boundary features will be reinstated as part of the works and is continuing to engage with landowners throughout the development of the Scheme.
RR-034	(v) addresses concerns of antisocial behaviour that could arise at the turning head/new end of the road. Highways England should work with property owners and residents to ensure that the necessary commitments are entered into in advance of the appointment of contractors and commencement of the works.	<p>We are aware of the issues of anti-social behaviour in the area but addressing it falls outside of the Scheme's scope and objectives.</p> <p>Highways England will be using 'old' Elm Lane for maintenance access. However, this part of Elm Lane will be closed to traffic with no access from the A3.</p> <p>A gate is being provided as part of the Scheme, as shown on sheet 23 of the Scheme Layout Plans (APP-013) in the vicinity of Orchard Cottage. Therefore, there will be no vehicular access to 'old' Elm Lane from Old Lane.</p>
RR-034	I also hold concerns that the proposed works to create a new elevated section of road over the A3 is not the most appropriate design solution due to the increased impacts on nearby residents from noise pollution. Alternative design solutions are available which will reduce the impact on the Property and other residents at Elm Corner and these should be explored further.	<p>Alternative options were assessed for Wisley Lane and, due to potential environmental impacts on RHS Garden Wisley and Wisley Common and the safety of the travelling public, a road bridge to connect to Ockham Park junction is the preferred solution.</p> <p>The consideration of alternatives is set out in Statement of Reasons (APP-22) and Chapter 3 of the Environmental Statement (APP-049).</p> <p>Chapter 6 of the Environmental Statement (APP-051) shows that no significant effects from road traffic noise are likely during the operation phase and construction phase of the Scheme (APP-051 Table 6.24, paragraph 6.10.11).</p> <p>Section 6.9 of Chapter 6 of the Environmental Statement (APP-051 Table 6.24) states the noise mitigation measures incorporated in the Scheme's design.</p>
RR-034	If this design is to be progressed, Highways England need to detail how the impacts of noise and other negative impacts such as air and light pollution on Elm Corner properties will be mitigated.	<p><i>Noise</i></p> <p>The noise and vibration assessment in Chapter 6 of the Environmental Statement (APP-051) shows that no significant effects from road traffic noise are likely during the construction phase of the Scheme (APP-051 Table 6.24, paragraph 6.10.11), through the use of mitigation measures secured in the outline Construction Environmental Management Plan (Outline CEMP) (APP-134), such as:</p> <ul style="list-style-type: none"> • Machines in intermittent use shut down when not in use or where this is impracticable, throttled down to a minimum. • When handling materials, care shown not to drop materials from excessive heights.

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<ul style="list-style-type: none"> Where practicable, machinery with directional noise characteristics orientated to minimise noise at nearby properties. <p>Under Requirement 3 of the draft DCO, a CEMP must be approved by the Secretary of State for the relevant part of the works before they can begin and the CEMP must be adhered to in accordance with Requirement 3(3). The CEMP must substantially accord with the Outline CEMP submitted as APP-134.</p> <p>During operation of the Scheme, the noise and vibration assessment in the Environmental Statement shows that there is not expected to be an overall significant adverse effect at Elm Corner. Minor noise decreases were predicted in the short term at several locations within the study area including Elm Corner. Only negligible long-term changes were predicted at the majority of locations within the study area, including Elm Corner.</p> <p><i>Air quality</i></p> <p>The air quality assessment in Chapter 5 of the Environmental Statement (APP-050, APP-064, APP-065, APP-080) shows that during construction, with the application of appropriate mitigation measures secured in the Outline CEMP (APP-134), no significant residual effects are predicted at nearby sensitive receptors (paragraph 5.10.3, APP-050).</p> <p>Mitigation measures to be used by the principal contractor during construction to minimise impacts on air quality include, but are not limited to:</p> <ul style="list-style-type: none"> Regular water-spraying and sweeping of unpaved and paved roads to minimise dust and remove mud and debris. All vehicle engines and plant motors shall be switched off when not in use. Storing dusty materials away from site boundaries and in appropriate containment (e.g. sheeting, sacks, barrels etc.). <p>The CEMP is secured under Requirement 3 (Construction and handover environmental management plans) of the draft DCO (Schedule 2 Part 1) (APP-018).</p> <p>During operation of the Scheme, the air quality assessment in the Environmental Statement shows that there is not expected to be an overall significant adverse effect on air quality at Elm Corner.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p><i>Lighting</i></p> <p>Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting of the Scheme as a result of construction and identifies no likely significant effects in terms of light pollution during construction or operation.</p> <p>As can be seen on sheet 2 of the Temporary Works Plan (APP-015), the construction compound at Wisley Airfield is mostly for use for material storage and mainly topsoil storage. As such it would be little used by machinery apart from at the start and end of the works when the soil would be placed and removed. A small area of land as shown blue on sheet 2 of Temporary Works Plan (APP-015) will be used as a work site to construct the new Wisley Lane overbridge and associated works but would be decommissioned once these are complete. Lighting would only be required in the small construction compound (i.e. the blue shaded area) when the daytime working hours would be affected by shorter day lengths in the winter months.</p> <p>The CEMP is secured under Schedule 2 Requirement 3 of the draft DCO (APP-018) and includes the requirement for a management plan to be approved for construction site artificial lighting prior to the commencement of that part of the Scheme.</p>

RR-035 ROBERT J BROWN

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-035	<p>I am opposed to the Highways agency Scheme as detailed on their drawing TRO10030?APP/2.8 Rev 0 [THIS IS SCHEME LAYOUT PLANS but not specified] for the following reasons.</p> <p>a) The junction from the 3 dwellings, New Farm Close Farm and the Guides Camp is too near to Painshill Roundabout and located on the slip road to Junction M25 Jctn 10, and will cause a hazard with vehicles deceleration backing up the Painshill Roundabout.</p>	<p>The proposed private means of access from A3 the southbound on-slip has been assessed as being safer than the existing direct accesses onto the A3 southbound carriageway. It has been designed to incorporate the existing bus stop and provide safer access and egress.</p> <p>As shown on the Scheme Layout Plans (APP-012), sheet 8, a deceleration lane will be provided, which will remove slowing vehicles from the on-slip lanes. This will leave those vehicles joining the A3 unaffected by vehicles ahead reducing speed to turn left into the private means of access.</p> <p>As shown on the Speed Limits and Traffic Regulations drawings, sheet 4 (APP-011), the proposed speed limit is 40mph on the roundabout and A3 southbound on-slip until the end of the merge taper from the private means of access, where the proposed speed limit changes to national speed limit (70mph). The 40mph speed limit will help to keep all vehicles travelling along this part of the slip road (including those leaving and joining the private means of access) at a similar speed.</p> <p>As set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads. Modelling of the operation of the amended Painshill junction (including the private means of access from the southbound on-slip) has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction.</p> <p>There have been no personal injury collisions recorded in the past five years at the junction of the A245 / Painshill Roundabout / A3 southbound on-slip. The layout of the A245 at this location is not affected by the Scheme and there is nothing to suggest that wider impacts of the Scheme will make this location less safe for users.</p>
RR-035	<p>b) The new road in Painshill Park adjacent to the A3 to give access to the A3 has no fencing and will let in travellers and other undesirable personnel into Painshill Park and the adjacent residences.</p>	<p>The Scheme Layout Plans (APP-012) sheets 7 and 8 show that the proposed private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits higher than the slip road. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks will reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>
RR-035	b) In addition there will be increased noise level from the felling of trees in [Redacted] Christmas tree wood exposing the Painshill Residents directly to A3 traffic.	<p>The model used in the noise assessment in Chapter 6 of the Environmental Statement (APP-051) to predict road traffic noise in the operation phase does not attribute any noise attenuation to the existing trees along the road corridor, in accordance with standard practice. This is because any such reduction in noise levels will be, at best, small and will vary according to planting density, species, height, condition and season. The proposed tree felling will have a negligible impact on noise levels within the park and estate. Any small increases will be more than negated by the effects of the low noise road surfacing proposed on the A3, as shown by the noise contours on Figures 6.11 and 6.12 in APP-067.</p>
RR-035	c) The previous Bridge option previously approved by Painshill Residents Association dealt with the above problems and I do not know why this has been changed without proper consultation with Painshill Residences.	<p>All the options generated for the provision of replacement access to the properties to the southeast of the A3 between Painshill junction and junction 10 would have had some adverse effect on the extent of the historic designation of Painshill Park, as this includes land up to the existing A3 highway fence and outside the existing park boundary.</p> <p>The options that included bridges over the A3 would have caused additional visual impact on the park and its setting due to their height and some would have increased loss from the ancient woodland, as well as adding considerably to the Scheme's cost. Historic England and Painshill Park Trust objected to the options that entailed a road or road bridge close to the Gothic Tower within the park.</p> <p>The option chosen for the Scheme minimises the impact close to the Gothic Tower and minimises the need for land to be acquired from within the current extent of the park. A large part of the alignment of the proposed access is broadly an upgrade of the existing access tracks from the A3, which minimises the effects on the landscape of the historic designated area that lies outside the existing park. The first part of the access road from the A3 southbound on-slip will be in cutting and plantation woodland and, therefore, will be screened by earthworks and existing trees from views within the park to the south.</p> <p>The consideration of alternatives is set out in the Statement of Reasons (APP-22) and Chapter 3 of the Environmental Statement (Chapters 1-4) (APP-049).</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-035	d) I consider that this Scheme as detailed on the above drawing has brought a blight to Painshill Residences lowering the house price due to the traffic disruption during the construction phase.	<p>Those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor.</p> <p>For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance</p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to: https://www.gov.uk/compensation-road-property-value/make-a-claim.</p>
RR-035	I my opinion the safety of the existing M25 Junction could have been improved by proper signage and warning notices rather than waste the taxpayers Money, causing multiple traffic hazards and confusion whilst the works take place. Please re- look at this scheme particularly the design around Painshill Roundabout and challenge the Scheme and its absolute necessity as a whole	<p>Chapter 2 of the Planning Statement (APP-133) sets out the need for the Scheme.</p> <p>The Scheme Assessment Report (which is publicly available on the Highways England website), provides a summary of the 'do-nothing' consequence and provides a comprehensive analysis of the alternative schemes considered at different stages of the Highways England design process (PCF-0 TO PCF-2).</p> <p>The Environmental Statement Chapter 3 (APP-049) looks at the assessment of alternatives and the Habitats Regulations Assessment Stage 3-5 (APP-044) provides a robust assessment of alternatives for the IROPI case.</p> <p>Highways England has prepared a full Economic/Business case for the Scheme in accordance with Department for Transport Major Scheme Appraisal Guidance. This can be seen in Section 4 of the Planning Statement (APP-133). This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		money, with a high cost benefit ratio of 2.2. The economic/business case has been scrutinised and approved by the DfT.

RR-036 REGENA COULT

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-036	<p>Since part of this project is to work on Old Lane, which is an existing toad crossing, could this be an opportunity to build a toad tunnel? Old Lane is a fast road and dangerous for toad wardens to patrol at night. Many toads get killed there every year. If an amphibian tunnel was built there, this would mean a net gain for biodiversity. If you could build something to save amphibians' lives on that road for the long term it would be wonderful. Many thanks.</p> <p>I'm concerned about the routing of the new access road to Wisley. This not only results in the loss of habitat, it also causes fragmentation of habitats. Amphibians already get killed on Old Lane. This new dissection will inevitably become an additional death trap for hundreds of them. What measures are taken to stop these deaths? There needs to be a net gain for biodiversity, how can this be achieved in view of these expected losses? In other areas where amphibians are required to cross busy roads to get from their breeding ponds to their summer habitats they have all but disappeared. Why can the new road not be routed along the RHS gardens where the impact would be much smaller? I also understand that there are plans to build a green bridge across the A3. This is very welcome.</p>	<p><i>Toad Crossing on Old Lane</i></p> <p>The scheme includes dense scrub planting around Wisley Lane Diversion shown on Sheet 2 of the Scheme layout plans (APP-012)) to provide sufficient habitat for reptiles and amphibians that may be present in the wider area.</p> <p>The Environmental Statement, in Table 7.7 (page 78) of Chapter 7 (APP-052) identified the potential for some localised fragmentation of reptile and amphibian populations as a result of the new section of Wisley Lane separating the area of woodland from the Wisley Airfield. Paragraph 7.10.43 of Chapter 7 of the Environmental Statement (APP-052) states that the permeability of Wisley Lane for reptiles and amphibians will be maintained, and indicates the sort of measures that may be incorporated, during detailed design. These include wildlife friendly underpasses or culverts under the road to enable the passage of toads and other wildlife.</p> <p>It is however recognised that there is already a high mortality rate for toads at Old Lane and the predicted increases in traffic as a result of the Scheme are likely to exacerbate this situation further. Highways England is seeking to bring forward mitigation proposals to incorporate these measures within the Scheme, by way of a change to the dDCO. By letter dated 4 November 2019, Highways England has notified the Planning Inspectorate of its intention to bring forward a number of changes to the Scheme. A copy of the letter can be found on the Scheme's section of the Planning Inspectorate's website.</p> <p><i>Biodiversity Net Gain</i></p> <p>Due to the location of the Scheme in an area of very high environmental value, it has not been possible to avoid loss of land from national and international statutory designated sites and irreplaceable habitat outside designated sites (ancient woodland and veteran trees). Therefore, in keeping with published guidance [Baker et al (2019) Biodiversity Net Gain. Good Practice Principles for Development. CIRIA.], overall the Scheme cannot achieve 'biodiversity net gain' and, in line with good practice, metrics to quantify the Scheme's biodiversity outcomes have not been used. Rather, the ecological design has been based on the mitigation hierarchy to avoid and minimise losses as far as practicable, and a landscape-level approach for the compensation to deliver long-term benefits for nature conservation. This includes approximately 91 ha</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>of SPA compensation land, SPA enhancement areas and replacement land, all of which will undergo habitat management or habitat creation (ref SPA Management And Monitoring Plan (APP-105) and the Landscape and Ecology Management and Monitoring Plan (APP-106)) which will be of benefit to a range of fauna, including reptiles and amphibians.</p> <p>In addition, Bolder Mere will undergo enhancements as outlined in Section 7.6 SPA management and monitoring plan (APP-105). Although primarily aimed at benefiting odonata, (carnivorous flying insects such as dragonflies) these measures will improve the edges of the waterbody and should benefit other fauna, such as amphibians.</p> <p><i>Route of Wisley Lane Diversion</i></p> <p>The widening of the A3 to four lanes requires the closure of the existing access to Wisley Lane from the A3 northbound for safety reason. Numerous options to replace the access were developed and assessed during the development of the scheme. The assessments considered a wide range of factors including environmental effects, cost, buildability, safety and traffic matters. The proposed alignment was considered to be better overall than an option on the RHS Wisley side of the A3 and hence has been included in the Scheme as proposed. Further details on the selection of alternatives are found in Chapter 3 of the Environmental Statement (APP-049) with detail on the choice between the two options for Wisley Lane in Table 3.1.</p> <p><i>Green Bridge</i></p> <p>Your support for the green bridge across the A3 is noted and welcomed. At present the dDCO provides for the possibility of a 10m wide green bridge but Highways England is seeking to bring forward proposals in the DCO (by way of a non-material change application) for a 25m green bridge, which would be subject to designated funds becoming available. By letter dated 4 November 2019, Highways England has notified the Planning Inspectorate of its intention to bring forward a number of changes to the Scheme. A copy of the letter can be found on the Scheme's section of the Planning Inspectorate's website.</p>

RR-037 HELEN COWELL

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-037	<p>My concerns are regarding the destruction of many hectares of the Thames Basin Heaths Special Protection Area (TBHSPA) following the increase in size of Junction 10 and the widening of the A3 both northbound and southbound. The area of Wisley and Ockham commons is a very nature sensitive area. The areas of 'new' SPA designated land are in small pockets and not one contiguous large area that could be designated. An area of land does exist that could be designated as such, but this has been overlooked by Highways England in their proposals.</p>	<p>Highways England have worked closely with a number of stakeholders, including Natural England, Surrey Wildlife Trust (SWT) and the RSPB from an early stage in the process and continue to do so. As a result, these stakeholders have been involved in discussions from Scheme option selection through to the assessment of alternatives. The consideration of alternatives can be found in Section 3 of the HRA Stages 3-5 (APP-044).</p> <p>The HRA Stage 2 (APP-043) concluded that it is not possible to ascertain that this habitat loss of land would have no adverse effect on the integrity of the SPA. This included the requirement for compensatory measures.</p> <p>Natural England, Forestry Commission, RSPB, Surrey County Council and SWT were consulted on an appropriate suite of compensatory measures. A range of options were considered as SPA compensation land and two areas of SPA compensation land were identified, both of which are immediately adjacent to the SPA and consist of whole fields that would benefit from wood pasture planting to provide an increased invertebrate resource for the SPA birds.</p> <p>The SPA compensation land parcels will provide an increased invertebrate resource for SPA qualifying species, and will also provide potential foraging habitat for nightjars. These areas and the proposed works were agreed by the listed stakeholders. Details of the suite of compensatory measures can be found in Section 5 of the HRA Stages 3-5 (APP-044).</p> <p>In response to there being an area of land that does exist that could be designated as the new SPA land, Highways England cannot ascertain what land is being referred to here and therefore cannot respond specifically to this comment. In any event, Highways England is satisfied that the SPA compensation land parcels are appropriate.</p>
RR-037	<p>2. The proposal by Highways England for the large road bridge over the A3 as the entrance to RHS Wisley Gardens is unnecessary as there is sufficient unused scrub land within the current central reservation to enable an access road to be built on the north side of the A3, thereby saving £millions of pounds on the project.</p>	<p>The use of the land that currently accommodates a drain in the A3 central reservation will not allow enough space for an access road to be built on the north side of the A3, without also taking land from RHS Wisley Garden. The section of central reservation in question is approximately 1km in length and its use would require the A3 northbound carriageway to be realigned, which would cause significant delay to traffic and construction and incur additional costs. Note that the Scheme would have included a bridge at this location in any event, to provide a bridleway connection</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	In addition the large road bridge proposed by Highways England cuts through ancient woodland, further adding to the environmental excesses of this project.	<p>across the A3 between Wisley Lane and Elm Lane, even if the Wisley Lane diversion had followed a different route.</p> <p>The alignment of Wisley Lane diversion has been chosen to avoid impact on the area of ancient woodland, which is to the south of Wisley Common. However, it is acknowledged that there will be a relatively small loss of mature (not ancient) woodland from Wisley Common to construct the new road and this is reported in Paragraph 9.10.7 of Chapter 9 (Landscape) of the Environmental Statement (APP-054).</p> <p>Alternative options were assessed and reported in Chapter 3 of the Environmental Statement (APP-049), due to the environmental impacts on RHS Wisley Garden, Wisley Common and the safety of the travelling public, a road bridge to connect Wisley Lane to Ockham Park junction was chosen as the preferred solution.</p>
RR-037	3. In the Environmental Statement Chapters 1-4 there are plans for enhancement work to the area of land between Bolder Mere and Elm Corner which involves the removal and thinning of much of the trees in this area. This will severely impact noise and light pollution in the hamlet of Elm Corner and there has been absolutely no consultation on this plan with any of the 16 householders in this road.	<p>The SPA enhancement area around Bolder Mere includes the clearance of woodland around the edge of Bolder Mere and the proposed thinning of some woodland between Elm Corner and the A3. This thinning is intended to increase the diversity of the pine-dominated woodland, and works will include new woodland planting (with a proportion of evergreen species) to ensure that a more diverse structure is created with more foliage at lower levels than at present. This will lead to increased visual screening from the A3 for the Elm Corner properties. Outline details are provided in the HRA Stage 3-5 (APP-044) and the SPA management and monitoring plan (APP-105) and will be refined during detailed design.</p> <p>The noise assessment in Chapter 6 of the Environmental Statement (APP-051) concludes that no significant adverse effects are likely at Elm Corner during the construction and operation phases of the Scheme, provided that mitigation measures secured in a Construction Environment Management Plan (CEMP) are used to minimise construction noise levels. Examples of CEMP measures for reducing construction noise are provided in Section 6.9 of the Environmental Statement (APP-051). No significant effects were identified relating to construction traffic (APP-051 6.10.11).</p> <p>During the operation of the Scheme, minor noise decreases were predicted at Elm Corner in the short term (APP-051, 6.8.33) and negligible changes in the long term (APP-051 6.8.38). On this basis, no significant effects are likely to occur at Elm Corner (as summarised in Table 6.24, APP-051). These predictions take into account</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>low noise road surfacing on the A3 incorporated by the Scheme to reduce road traffic noise.</p> <p>Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting of the Scheme as a result of construction and identifies no likely significant effects in terms of light pollution during construction or operation.</p> <p>As can be seen on sheet 2 of the Temporary Works Plan (APP-015), the construction compound at Wisley Airfield is mostly for use for material storage and mainly topsoil storage. As such it would be little used by machinery apart from at the start and end of the works when the soil would be placed and removed. A small area of land as shown blue on sheet 2 of Temporary Works Plan (APP-015) will be used as a work site to construct the new Wisley Lane overbridge and associated works but would be decommissioned once these are complete. Lighting would only be required in the small construction compound (i.e. the blue shaded area) when the daytime working hours would be affected by shorter day lengths in the winter months.</p> <p>The CEMP is secured under Schedule 2 Requirement 3 of the draft DCO (APP-018) and includes the requirement for a management plan to be approved for construction site artificial lighting prior to the commencement of that part of the Scheme.</p>

RR-038 HARRY EVE

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-038	I have concerns about the impact of the current proposal on the local road network – including the operation of the Ockham Park interchange roundabout and the likely flows generated on other roads.	<p>As presented in the Transport Assessment (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme by up to 741,000 vehicle kilometres on an average day, which equates to approximately a 1% reduction across the modelled local road network. This is as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered on it by the Scheme.</p> <p>Regarding traffic at the Ockham Roundabout, the modelling suggests the Scheme reduces traffic approaching from Ockham Road North in both the morning and evening peak periods. Further, modelling of the operation of the amended Ockham Roundabout with traffic signals has also demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay at the junction.</p>
RR-038	These concerns include the impact of the proposed signalling on the various arms of the Ockham Park roundabout and details regarding safety of NMU crossings.	<p>The impact of the proposed signalling was assessed by traffic modelling, please see the response in the above row.</p> <p>The safety of non-motorised users (NMUs) will be enhanced by the Scheme as NMU routes under the A3 at Ockham Park junction will now be provided in the road verges via signal-controlled crossings. Toucan crossings have been proposed at locations along these routes to allow pedestrians and cyclists to cross under the safety of signal control.</p> <p>The new bridge for Wisley Lane diversion also includes a bridleway provision to provide a safe route over the A3 for all NMUs, which will enhance connections in the public rights of way network near the Ockham Park junction.</p>
RR-038	I have concerns about the impact on biodiversity.	<p>As described in Chapter 7 of the Environmental Statement (APP-052) a wide range of surveys have been undertaken, and a detailed assessment has been carried out to determine the potential impacts of the Scheme on designated sites, and protected and notable habitats and species, during construction and operation of the Scheme. A range of mitigation, compensation and enhancement measures have been established in response to these impacts, and these are outlined in section 7.10 of the Environmental Statement (APP-052).</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>As required under the Conservation of Habitats and Species Regulations 2017, the impacts on the Thames Basin Heaths SPA have also been assessed in the Habitats Regulations Assessment (HRA Stage 2 (APP-043) and HRA Stages 3-5 (APP-044)). The HRA includes mitigation measures to reduce impacts, and a suite of compensatory measures.</p> <p>The suite of compensatory measures have been carefully designed in consultation with Natural England, Forestry Commission, Surrey Wildlife Trust, RSPB and Surrey County Council. Details of the suite of compensatory measures can be found in Section 5 of the HRA Stages 3-5 (APP-044).</p>
RR-038	I have concerns about the impact on air quality.	<p>The air quality assessment as documented in Chapter 5 of the Environmental Statement (APP-050) considered the impact of the Scheme on receptors near to roads likely to be affected by changes in traffic. The assessment showed that in the opening year there would be an imperceptible effect (less than 0.1 µg/m³) with the Scheme at the closest receptor to the Ockham Park junction roundabout (receptor R57 RHS Wisley Gardens), compared to the situation without the Scheme (Section 5.7 of APP-080). Annual average concentrations of nitrogen dioxide in the opening year would be around half of the national air quality objective value of 40 µg/m³ indicating relatively good air quality.</p>
RR-038	I have concerns about the assumptions made with regards to the Guildford Local Plan.	<p>Table 3-1 of the Traffic Assessment Report (APP-136) highlights the local developments, including those from the Guildford Local Plan that were included in the transport modelling.</p> <p>As highlighted in the section 3.5 of the Transport Assessment Report (APP-136), the traffic modelling process requires the production of a 'Core' Scenario that represents forecast future conditions against which the Scheme is assessed. The core scenario is intended to provide a sound basis for decision-making given current evidence. It must be robust and evidence-based taking on board different factors and uncertainties affecting travel demand and network provision in the future, as listed in the uncertainty log. The purpose of the uncertainty log is to record the central forecasting assumptions that underpin the core scenario and record the degree of uncertainty around these central assumptions.</p> <p>The core scenario used for assessment of the Scheme was developed based on:</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<ul style="list-style-type: none"> Local developments (totalling more than 18,000 dwellings and 10,000 full time equivalent jobs) and the associated likelihood they will proceed, including developments at: <ul style="list-style-type: none"> Wisley Airfield; Gosden Hill Farm; Greater Normandy; and Blackwell Farm. National Trip End Model forecasts on travel demand growth in the south east (reflecting expected growth from developments outside the local area). Local road schemes and the associated likelihood they will proceed. Appropriate modelling assumptions. <p>The management of the uncertainties in formulating the core scenario follows relevant Department for Transport major scheme appraisal guidance (WebTAG), which recommends the establishment of an uncertainty log, and subsequently forming a core scenario based on the level of uncertainty identified. In the uncertainty log, each likely change in the future is classified according to the likelihood that they will occur. Where a scheme or land use change is considered “near certain” or “more than likely”, it has been included in the core scenario.</p>
RR-038	Having read through the transport assessment I have requested some information (e.g. missing details) and clarification from Highways England to help inform my response to the planning application.	Noted. Information has now been provided.

RR-039 PETER GELARDI

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-039	<p>This is taking a very expensive hammer to crack a small nut. Two lane filters taking traffic from the A3 onto the M25 (from north and south) which flow directly onto the motorway but by-pass the roundabout/lights would solve the traffic backup issues at this junction for at least ten year and cost about 10% of the cost of your proposed solution.</p>	<p>The Scheme Assessment Report (which is publicly available on the Highways England website), provides a summary of the 'do-nothing' consequence and provides a comprehensive analysis of the alternative schemes considered at different stages of the Highways England design process. This process was robust and considered to ensure Highways England chose the most effective scheme and is summarised below.</p> <p>Strategic options to address the key problems at M25 junction 10 were identified in the Strategy, Shaping and Prioritisation Stage. These strategic options gave high-level consideration to a range of alternatives dealing with transport supply and demand and included options for different modes of travel as well as different scales of highway intervention. At this stage it was apparent that a do-nothing approach would not be a viable option to solve the problems at junction 10. Based on assessments undertaken by the project team, a strategic option focussing on localised highway improvements at M25 junction 10 and Painshill interchange was confirmed as the preferred solution and taken forward to the Option Identification Stage.</p> <p>At Option Identification Stage, considered the scale of intervention required to ensure that the interchange would operate below capacity in ten and fifteen years' time, it was found that either the existing roundabout would need to be significantly enlarged or at least all left turns and two of the three busy right turns would need to be removed from the M25 junction 10 roundabout and provided separately. Providing additional left turns alone would not be sufficient. Twenty-one options that fulfilled these criteria were developed and assessed, which were then reduced to the most suitable ten options. These ten options were subject to further assessment and testing to examine their viability to achieve the objectives for the Scheme. Option 16, 9 and 14 were considered further.</p> <p>Options 9 and 14 were taken forward for further design and assessment in the Option selection stage. Having established options that were viable and could satisfy the Scheme objectives, during the option selection stage the Scheme options were also considered further in relation to the legal and policy tests set out in the National Policy Statement for National Networks.</p> <p>Therefore, Highways England have been through a robust process to identify the need for the improvements, they have assessed appropriate alternatives and</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>delivered an appropriate scheme design for the issues that exist within this area of the M25 and A3.</p> <p>This assessment of alternatives is outlined in the Environmental Statement Chapter 3 (APP-049) and Section 3 of the HRA Stages 3-5 (APP-044).</p>

RR-040 DEBORAH GILLAN

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-040	<p>Response specific to planned access road, leading off the slip road from the Painshill roundabout onto the A3.</p> <p>1. Loss of woodland, currently providing habitat for local species: badger, deer, bats etc</p>	<p>Surveys for a range of species including badgers, dormice, breeding birds, bat roosts and reptiles were carried out in this location. The impacts on all designated sites, protected habitats and protected species during construction and operation are reported in Chapter 7 of the Environmental Statement (APP-052), and appropriate mitigation and compensation measures are identified.</p> <p>Breeding birds, foraging bats, reptiles and badgers occur within or near this location. However, the construction and operation of this private means of access is not considered to cause the loss of any protected species or fragmentation of their habitats.</p>
RR-040	<p>"Loss of woodland (...) and protection from pylon"</p>	<p>As shown on the Scheme Layout Plans (APP-012), sheet 8, the Scheme will remove some of the trees in the plantation woodland between the transmission line pylon between the A3 and houses within the Painshill Park estate. However, there will still be a substantial width of trees remaining to provide screening of the pylon in the views from these properties.</p>
RR-040	<p>2. Security threat to Painshill residents and the Park</p>	<p>As shown on the Scheme Layout Plans (APP-012), sheets 7 and 8, the proposed private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits at higher than the entry slip. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks will reduce in height beyond the proposed security gate, as the access road arrives at the same level as the existing ground. There will be highway fencing provided on both sides of the private means of access, which will deter unauthorised access.</p>
RR-040	<p>3. Road hazard where the access road is too close to Painshill roundabout and causing further congestion, with traffic slowing to allow access. This would cause a backup of traffic onto the roundabout and make</p>	<p>The proposed private means of access from A3 the southbound on-slip has been assessed as being safer than the existing direct accesses onto the A3 southbound carriageway. It has been designed to incorporate the existing bus stop and provide safer access and egress.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	entry and exit for Painshill residents even more dangerous and difficult than it is currently.	<p>As shown on the Scheme Layout Plans (APP-012), sheet 8, a deceleration lane will be provided, which will remove slowing vehicles from the on-slip lanes. This will leave those vehicles joining the A3 unaffected by vehicles ahead reducing speed to turn left into the access road. The access to Painshill Park Estate will remain as existing and, therefore, access for residents will not be adversely affected.</p> <p>As shown on the Speed Limits and Traffic Regulations drawings, sheet 4 (APP-011), the proposed speed limit is 40mph on the roundabout and A3 southbound on-slip until the end of the merge taper from the private means of access, where the proposed speed limit changes to national speed limit (70mph). The 40mph speed limit will help to keep all vehicles travelling along this part of the slip road (including those leaving and joining the private means of access) at a similar speed.</p> <p>As set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads.</p> <p>Modelling of the operation of the amended Painshill junction (including the private means of access from the southbound on-slip) has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction, thereby improving access to Painshill Park Estate at busy times.</p> <p>There have been no personal injury collisions recorded in the past five years at the junction of the A245 / Painshill Roundabout / A3 southbound on-slip. The layout of the A245 on the Cobham side of the junction is not affected by the Scheme and there is nothing to suggest that wider impacts of the Scheme will make this location less safe for users.</p>
RR-040	4. Devaluation of grade 2 listed properties and the environment surrounding the Park.	<p>Chapter 11 and Appendix 11.3 of the Environmental Statement (APP-056) provide the assessment of impacts on designated and non-designated heritage assets. No direct physical impacts to Grade II listed buildings have been identified by the assessment. Impacts to the settings of several Listed Buildings and the Grade I Registered Park and Garden have been assessed in the Environmental Statement. The Scheme would not impact the aesthetic, historical, or evidential values of these properties (outlined in Appendix 11.3, Section 11.1.4)</p> <p>Chapter 11 of the Environmental Statement (APP-056) identifies the impacts of the Scheme on the significance of Painshill Park as a Grade I Registered Park and</p>

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		<p>Garden, as well as the numerous listed buildings within the Park, including Painshill House. The significance of Painshill House is in its age and design, particularly its plasterwork and its association with the architect Thomas Jupp. The Scheme will not have an adverse impact on these characteristics.</p> <p>The impacts of the Scheme on the Grade I Registered Park and Garden, along with its constituent listed and non-designated components, are discussed in Chapter 11 of the Environmental Statement (APP-056) and in Appendix 11.3 Statements of Significance (APP-123). The Scheme will preserve the aesthetic, historical and evidential significance of Painshill Park. As such, the environment surrounding the Park and its status as a Grade I Registered Park and Garden is not under threat.</p>

RR-042 CHRISTOPER HALEY

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-042	<p>This representation is made in a personal capacity as a local resident who has lived in the area for 40 years. The principal submissions that I intend to make concern: First, the need to respect and preserve the rare bell-barrow and tumuli immediately to the West of the interchange. This is especially important given the developing understanding of the pre-history of the area, such as the significant Bronze Age 'Ockham Hoard', unearthed 6 years ago, which points to an important Bronze Age presence here. Second, the need to preserve as much of Ockham Heath and Wisley Common as possible, for the enjoyment of walkers and horse-riders. The area is a popular location, as well as an important site for wildlife.</p>	<p>The extents of the two scheduled monuments (the bell barrow and tumulus) to the west of Junction 10 are defined. The design of the Scheme and development of its construction intentions have ensured that there will be no direct impact on the scheduled extents of these monuments. There will be some changes to the setting of the bell barrow, which is close to the Scheme and there is potential to impact as-yet unknown archaeological remains within the vicinity of the two scheduled monuments. Mitigation measures outlined in Section 11.9 of Cultural Heritage chapter of the Environmental Statement (APP-056) state that the design has been developed to avoid direct impacts on the monuments and that a Written Scheme of Investigation (WSI) for a programme of archaeological works is required to identify, evaluate, and record significant archaeological remains that would be disturbed by the Scheme construction. The requirement for WSI is secured by means of Requirement 10 (Archaeology) of the draft Development Consent Order (APP -018). As a result of these measures, the residual effect on both of the scheduled monuments would be slight adverse (Table 11.5 in APP-056). The WSI will also address impacts to non-designated heritage assets, including the known and potential Bronze Age remains.</p> <p>As outlined in section 11.5.13-14 of Chapter 11 of the Environmental Statement, consultation with Historic England has been ongoing and a Statement of Common Ground is being developed to address impacts to the settings of the scheduled monuments and ensure proper treatment of any nationally significant archaeological remains that may be identified.</p> <p>The design has also sought to minimise the use of land within Wisley Common, Ockham Common and Chatley Heath, all of which have public access and all of which are also designated as SPA and/or SSSI. Where permanent acquisition of this public access land is proposed (or where the acquisition of a permanent right is proposed that will be a burden on the land), the Scheme will provide replacement land in exchange for the loss, in accordance with the requirements of the Planning Act 2008.</p> <p>This will ensure that the benefits of this location for the enjoyment of walkers and riders will be maintained. The replacement land will also be managed for the benefit of wildlife. Management works will also be undertaken for parts of the SPA that will enhance the value of the habitats that support the qualifying bird species. These areas are shown on the Scheme Layout Plans (APP-012 and APP-013), the Special</p>

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		Category Land Plans (APP-009) and described in Appendix C to the Statement of Reasons (APP-023).

RR-043 TIM HARROLD

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-043	<p>After collaborative discussion with HE and Atkins it was unexpected when the latest version of the draft Highways England plans failed to honour the assurances previously made that access onto the A3 at the western end of the park would either be retained, or reinforced by a separate access track for the use of service vehicles and for emergency purposes.</p> <p>This is a crucial requirement for Painshill as the final stage of the restoration programme will concentrate on the western end of the park, and recent trials have indicated that a fire tender would be unable to reach the Gothic Tower in a sufficiently short time to deal with an emergency. The Gothic Tower has burnt down previously and had to be restored subsequently so that it could be used again for residential accommodation.</p> <p>Recent fire damage to National Trust's Clandon House resulted from the inability of the fire service to be able to supply water in sufficient quantity quickly enough. It is therefore in our view only reasonable that, with this warning in mind, Highways England be advised that the Painshill Trust's requirements for the access road they have requested should be met.</p>	<p>We accept that assurances were given; however, these assurances related to earlier versions of the Scheme that included elements from which a vehicular access into the western part of the park could have been provided directly.</p> <p>The assurance recorded in the November 2018 minutes related to a version of the Scheme that included a non-motorised user (NMU) route past the Gothic Tower to Red Hill bridge that could have provided the basis for a vehicular access into the park, close to the existing access, connected to the private means of access (PMA) to Court Close Farm.</p> <p>Since that time, the NMU route from Red Hill bridge has been moved to the north side of the A3, primarily to accommodate the Girl Guide's Association concerns over safeguarding for the children who visit the campsite, which is considered to be of paramount importance. The Scheme, therefore, no longer includes a new track past the Gothic Tower (and the existing western access to the park) that could be used by vehicles. Relocating the NMU route to the north side of the A3 also accords with the wishes of the Trust and Historic England to minimise impacts on the setting of the tower.</p> <p>This design change was made in the context that the existing direct access from the A3 southbound carriageway could not be re-provided in the Scheme on safety grounds (as it would not be compliant with design standards for four-lane carriageways, sightline distances or weaving lengths) and is not required by the emergency services. We have consulted with the Surrey Fire and Rescue Service (SFRS), who have confirmed they are able drive their fire appliance to the Gothic Tower via the existing internal road network at Painshill Park. SFRS also advised that they would not use the direct access onto the A3 because it is not safe to do so.</p> <p>To provide a direct access to the western end of the park would entail a new route across privately-owned third-party land to connect to the PMA at Court Close Farm. As the western part of Painshill Park can be accessed via the internal network of maintenance tracks, there is no basis for Highways England to acquire rights across third-party land to provide the Trust with such an access for the Trust's work, including any restoration programme.</p> <p>The speed bumps within the park will not prevent access by a fire appliance and such controls are commonly found in residential areas as a means for traffic calming. In case of an emergency, measures can be put in place by the Trust to ensure gates</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>along the route required within the park can be opened ahead of the arrival of the fire service or other emergency service.</p> <p>The issue of providing an access to the western part of the Park has been discussed with the Trust at meetings in 2019. The Scheme does not preclude an access track from the Court Close Farm PMA to the existing park boundary fence.</p>

RR-044 EMILY INGE

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-044	Our concerns include but are not limited to: <ul style="list-style-type: none"> • Safety of the proposed junction between 'new' Elm Lane and Old Lane 	The new Elm Lane junction with Old Lane will be resurfaced with new road markings and signing. Vegetation will be removed to provide improved sight lines in both directions from the junction to give better visibility of oncoming traffic and improve road safety.
RR-044	<u>Exacerbation of lewd and antisocial behaviour on 'old' Elm Lane (concerns shared by SCC and SWT).</u> <p>Inclusion of old Elm Lane in the DCO boundary was urged by residents so it could be returned to nature and thereby dissuade such behaviour in this unlit dead end. HE instead propose to keep it open for occasional maintenance access to drainage attenuation ponds.</p>	Highways England is aware of anti-social behaviour at this location, but enforcement in relation to such problems is beyond the scope of the Scheme. <p>The byway open to all traffic (BOAT) will be resurfaced early in the construction programme to enable residents of Elm Corner to access the road network via Old Lane. This will enable the section of Elm Lane south of Elm Corner through to the A3 to be stopped up. Retention of the redundant carriageway is necessary to enable ongoing maintenance access to the proposed drainage attenuation ponds adjacent to the A3 either side of the Wisley Lane diversion. There will be no access to or from the A3 at this point.</p> <p>A gate is being provided as part of the Scheme, as shown on sheet 23 of the Scheme Layout Plans (APP-013) in the vicinity of Orchard Cottage. Therefore, there will be no vehicular access to 'old' Elm Lane from Old Lane.</p>
RR-044	<u>Noise, light and air pollution during the construction phase, and completed scheme.</u> <p>This pollution will be exacerbated by:</p> <ul style="list-style-type: none"> • Construction phase: night works and construction compound location on the former Wisley Airfield adjacent to Orchard Cottage, Blenheim Cottage and Meadows, with works vehicles passing and turning by the other properties, and • Final scheme: environmental mitigation including 4 hectares of clearance and 7.3 hectares intense selective thinning in the narrow section of woodland between Elm Corner and the A3 with no detail provided on mitigation. 	Generally, the works will not be carried out at night. However, there are some particular circumstances in which works beyond the usual working hours may be permitted and these are set out in Requirement 3(2) (b) of the draft Development Consent Order (APP-018). <p>As can be seen on sheet 2 of the Temporary Works Plan (APP-015), the construction compound at Wisley Airfield is mostly for use for material storage and mainly topsoil storage. As such it would be little used by machinery apart from at the start and end of the works when the soil would be placed and removed. A small area of land as shown blue on sheet 2 of Temporary Works Plan (APP-015) will be used as a work site to construct the new Wisley Lane Overbridge and associated works but would be decommissioned once these are complete. Lighting would only be required in the small construction compound (i.e. the blue shaded area) when the daytime working hours would be affected by shorter day lengths in the winter months.</p> <p>Access would initially be via the existing Elm Lane off the A3 and subsequently off the Ockham Park Junction once the new bridge over the Stratford Brook is completed (which is expected to be early in the construction phase). The existing section of Elm</p>

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		<p>Lane at Elm Corner would not be used for construction traffic apart from those needed to improve Elm Lane/the By-way Open to All Traffic (BOAT) itself. As such the amount of construction traffic operating in this area would be limited.</p> <p>The air quality assessment in Chapter 5 of the Environmental Statement (APP-050, APP-064, APP-065, APP-080) shows that during construction, with the application of appropriate mitigation measures secured in a Construction Environmental Management Plan, significant residual effects at nearby sensitive receptors including Orchard Cottage, Blenheim Cottages and Meadows, would be unlikely (paragraph 5.10.3, APP-050). As documented in the Environmental Statement, the air quality assessment showed that during operation of the Scheme there is not expected to be an overall significant adverse effect (Table 5.15, APP-050).</p> <p>The noise assessment in Chapter 6 of the Environmental Statement (APP-051) demonstrates that no significant adverse effects are likely at Elm Corner during the construction and operation phases of the Scheme, provided that mitigation measures secured in the outline CEMP (APP-134) are used to minimise construction noise levels. Examples of the CEMP measures for reducing construction noise are provided in Section 6.9 of the Environmental Statement (APP-051). No significant effects were identified relating to construction traffic (APP-051, 6.10.11).</p> <p>During the operation of the Scheme, minor noise decreases were predicted at Elm Corner in the short term (APP-051, 6.8.33) and negligible changes in the long term (APP-051, 6.8.38). On this basis, no significant effects are likely to occur at Elm Corner (as summarised in APP-051 Table 6.24). These predictions take into account low noise road surfacing on the A3 that is included as part of the Scheme to reduce road traffic noise.</p> <p>The SPA enhancement area around Bolder Mere includes the clearance of woodland around the edge of Bolder Mere and the proposed thinning of some woodland between Elm Corner and the A3. This thinning is intended to increase the diversity of the pine-dominated woodland, and together with new woodland planting (with a proportion of evergreen species) will ensure that a more diverse structure is created with more foliage at lower levels than at present. This will lead to increased visual screening from the A3 for the Elm Corner properties in the long term. Outline details are provided in the HRA Stage 3-5 (APP-044) and the SPA management and monitoring plan (APP-105) and will be refined during detailed design. Highways England would be glad to liaise with the residents to develop the planting proposals.</p>

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		Chapter 9 of the Environmental Statement (APP-054) considers the impacts of lighting from the Scheme. Lighting on the A3 will be replaced but there will be no additional new lighting. Neither the Wisley Lane Diversion nor the improved Elm Lane/BOAT will be lit. As such there will be no increase in light pollution arising from the Scheme in the Elm Corner area.
RR-044	Our concerns include but are not limited to: Loss of habitat for dormice and other protected species located in sites proposed for construction	Chapter 7 of the Environmental Statement (Biodiversity) (APP-052) assessed the impacts of the Scheme on protected species, as a result of its construction and operation. Dormice surveys carried out over the past two years for the Scheme have assessed that dormice are likely to be absent from the Scheme footprint, and therefore as stated in 7.8.124 of Chapter 7 of the Environmental Statement (APP-052), these were not considered any further in the assessment.
RR-044	Our concerns include but are not limited to: Disparity in design detail between information in documents and information provided by project team	Highways England endeavours to ensure consistency of information provided at various points in the design development process. The Scheme has been updated and refined as a result of the three consultation exercises that have taken place since August 2017. The documents submitted as part of the DCO application contain the most up to date Scheme design detail and can be found on the Planning Inspectorate website.
RR-044	Our concerns include but are not limited to: Widening of a section of Elm Lane which does not require it	The decision to use the Elm Lane/BOAT for access to the local road network was made taking into account the preferences expressed by the Elm Corner Residents following consultation. The existing unsurfaced track (BOAT) between Elm Corner and Old Lane is currently unsuitable for most vehicles. To provide access of a suitable standard for vehicular access to Elm Corner (including for public service vehicles such as bin lorries) this section of BOAT will be constructed to Surrey County Council standards which stipulate a 4.1m wide carriageway which will be suitable for all vehicles to access Elm Corner. This is of a similar standard to the current provision where Elm Lane links to the A3.
RR-044	Our concerns include but are not limited to: Continuity of vehicular access to properties at all times with minimal disruption to residents	The Scheme maintains and improves access to Old Lane to and from the A3 and thereby, maintains access to Elm Corner residents. The works would be sequenced so that the surfacing of the Elm Lane/BOAT and access to Old Lane would be completed before the existing Elm Lane access to the A3 would be closed. Access over the hard-surfaced, northern end of Elm Lane/BOAT

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		would be maintained at all times. This would ensure that there is no disruption to access for residents.
RR-044	<p>The proposed works include stopping up the sole vehicular access to sixteen Elm Corner properties, and building a new access road past Wilderness Cottage and The Wilderness. Our concerns include but are not limited to:</p> <p>A new elevated section of road over the A3 is not the most appropriate design solution due to the impacts on nearby residents and the SPA, where surveys show dormice and other rare and protected species are detected. Alternative design solutions are available which will reduce the impact and these should be explored further</p>	<p>Many alternative options were assessed to maintain access to Wisley Lane but owing to the environmental impacts on RHS Garden Wisley and Wisley Common and the safety of the travelling public which would have arisen had other options been proposed a road and bridge to connect to Ockham Park junction was chosen as the preferred solution. See table 3.1 of the Environmental Statement (APP-049) summarises reasons for the selection of the Wisley Lane diversion alignment.</p> <p>The road would be screened from Elm Corner by retained mature vegetation with noise and air quality impacts being minimal in this context. The bridge has been aligned to ensure that it and the realigned Wisley Lane would not affect the SPA.</p> <p>It should be noted that a bridge in this location would be required even if an alternative solution was proposed as there is a requirement to maintain a bridleway connection over the A3 at this point.</p> <p>Chapter 7 of the Environmental Statement (APP-052) assesses the impacts of the Scheme on protected species, as a result of its construction and operation.</p> <p>It should be noted that dormice surveys have determined that dormice are considered likely to be absent from the Scheme footprint.</p> <p>As identified in Table 7.7 of Chapter 7 of the Environmental Statement (APP-052) traffic movements on the new side roads could have the potential to result in direct mortality or injury to badgers due to traffic collisions. Highways England is willing to investigate the potential for providing a culverted underpass within the embankment on the new section of Wisley Lane during detailed design to facilitate the passage of wildlife.</p>
RR-044	<p>We request engagement with residents regarding remedial accommodation works and reinstatement of boundary features following the acquisition of land, including the owner having the requisite level of input and control over building materials, timing of works, revised boundary treatments/features, etc.</p>	<p>Highways England will continue to engage with residents throughout the development and implementation of the Scheme as is standard on all Highways England improvement schemes.</p> <p>The Construction Environmental Management Plan (CEMP) to be approved by the Secretary of State under Requirement 3 of the draft Development Consent Order (dCO) (APP-018) is to ensure the works are carried out in an appropriate manner and includes the need to put in place a community relations strategy.</p>

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		The dDCO (APP-018) (Article 31) contains provisions requiring the undertaker to give notice before taking temporary possession of the land and to restore the land upon completion of the works to the reasonable satisfaction of the relevant owner.
RR-044	We request engagement with residents or making available information regarding mitigation for air, noise and light during the construction phase and final scheme	<p>Highways England will continue to engage with residents throughout the development and implementation of the Scheme as is standard on all Highways England improvement schemes.</p> <p>Information relating to mitigation of air, noise and light pollution likely to arise during construction and operation was provided in the Preliminary Environmental Information Report which was published during statutory pre-application consultation.</p> <p>The Environment Statement submitted with the DCO application includes chapters on Air Quality (APP-050) and Noise (APP-051). The Outline Construction Environmental Management Plan (APP-134) details the proposed mitigation measures for air quality, noise and light pollution during construction.</p> <p>The Environmental Statement sets out the likely environmental effects of the Scheme both during construction and operation. It identifies appropriate measures for the control of dust during construction (paragraph 5.9.1, App-050).</p> <p>The air quality assessment in Chapter 5 of the Environmental Statement (APP-050) showed that during operation of the Scheme there is not expected to be an overall significant adverse effect (Table 5.15), so no further mitigation measures are required for air quality during operation of the Scheme.</p> <p>Noise mitigation measures during the construction and operation phases are documented in the outline CEMP (APP-134) and REAC (APP-134, Appendix G). This includes a commitment to inform local residents about the progress of the construction works and to provide advance notice of any activities likely to generate high levels of noise or vibration (APP-134, Table G.1).</p> <p>The noise mitigation for the operation phase is set out in Table 6.24 of the Environmental Statement (APP-051), but the final selection of materials will be made during the detailed design of the Scheme.</p> <p>Arrangements for control of light pollution during the construction phase are set out in the outline Construction Environmental Management Plan (APP-134).</p> <p>The contractor for the Scheme will be required under Requirement 3(2) (e) of the draft DCO to engage with local residents and businesses ahead of the start of works to</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		inform them of proposals and to listen to and respond to concerns over the construction works that are raised.
RR-044	We request that Highways England should work with property owners and residents to ensure that the necessary commitments are entered into in advance of the appointment of contractors and commencement of the works	The construction of the Scheme is subject to a range of controls in the dDCO including a CEMP to be approved by the Secretary of State that must cover a wide range of matters relevant to the construction process and which must also include a community relations strategy (Requirement 3 of the DDCO). In addition, a traffic management plan in relation to the construction process must be approved by the Secretary of State under Requirement 4 of the dDCO.

RR-046 HELEN JEFFRIES

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-046	Insufficient attention has been paid to the traffic on local roads specifically Ockham Road North and Portsmouth Road Ripley.	<p>A primary objective of the Scheme is to reduce traffic congestion and delay on the Strategic Road Network (SRN) and on the local roads, accounting for forecast traffic growth.</p> <p>Assessment of the Scheme covers the M25, A3 and local roads in the vicinity of Junction 10, including Ockham Road North and Portsmouth Road, Ripley.</p> <p>Traffic modelling of the Scheme, presented in the Transport Assessment (APP-136), has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the SRN and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered by the Scheme.</p> <p>The modelling has also demonstrated that the Scheme will result in minimal additional traffic flows through Ripley, with less than a 4% increase in daily traffic flow through the junction of Ripley High Street/Portsmouth Road with Newark Lane and Rose Lane.</p> <p>Modelling of the operation of the amended Ockham Roundabout with traffic signals has similarly demonstrated that it will operate within capacity with forecast traffic growth and alleviate traffic congestion and delay at the junction.</p>
RR-046	My second concern relates to Air Quality and the impact of the additional vehicles on the A3 north of Ockham Park and the impact on the Thames Basin Heath Special Protection Area. Case law prevents projects which add to pollution and it also prevents counting improvements in emissions before the emissions have improved. Secondly, the impact of the routing of the 1,000,000 cars which visit the RHS at Wisley annually, 600,000 of which are likely to use Portsmouth Road Ripley to access the A3 South - air quality monitors on this road already show readings in excess of legal limits and I do not understand how this project helps us to meet AQ standards in any shape or form.	<p>The estimated concentrations as derived from Government sources of fleet composition and emission rates, which are based on existing policy and legislation, and subsequently verified through monitoring data and sensitivity tested for future trends, can therefore be considered as reasonably certain, and not contrary to case law.</p> <p>The air quality assessment as documented in Chapter 5 of the Environmental Statement (APP-050), included the calculation of concentrations of oxides of nitrogen (NOx) and nitrogen deposition at receptor points within the Thames Basin Heaths SPA for comparison with the critical level and critical loads respectively. The assessment for the opening year showed that both the critical level of NOx concentrations and critical load of nitrogen deposition were exceeded within the SPA, both with and without the Scheme, with concentrations/ deposition rates decreasing with distance from the road. The potential for adverse effects resulting from nitrogen</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>deposition on the integrity of the SPA is considered within the HRA Stage 2 (APP-043). All increases greater than 1% of the critical range are confined to woodland areas within 12 m from the road edge and will have no adverse effect on the habitats used by the SPA qualifying species.</p> <p>The case law referred to in the relevant representation is assumed to be the Court of Justice of the European Union (CJEU) ruling in the case of <i>Coöperatie Mobilisation for the Environment UA, Vereniging Leefmilieu V College van gedeputeerde staten van Limburg and Stichting Werkgroep Behoud de Peel v College van gedeputeerde staten van Noord-Brabant (C-293/17 and C-294/17)</i> that a reduction in emissions can only be taken into account in an appropriate assessment if the expected benefits are certain at the time of the assessment. Certainty is taken from previous case law to mean “where no reasonable scientific doubt remains”. (Institute of Air Quality Management’s Guidance for assessing the air quality impacts on nature sites, paras 3.8 and 3.9).</p> <p>The air quality assessment presented in the Environmental Statement (APP-050) follows the Highways England standard methodology for road schemes, using the most up to date tools and datasets available at the time of the assessment. When modelling future concentrations of air pollutants, these are estimated using DEFRA’s Emissions Factors Toolkit which takes into account expected improvements in vehicle emissions technology resulting from the European emission standards, together with the Department for Transport’s projected vehicle fleet composition.</p> <p>In addition, for Highways England road schemes, a sensitivity test or ‘long term trends analysis’ is undertaken for nitrogen oxides (NOX) concentrations, to account for the fact that there are uncertainties in future emissions. This analysis gives higher estimated concentrations, and the results were presented in the air quality chapter of the Environmental Statement, Appendix 5.7 (APP-080) and used in the Stage 2 HRA (APP-043).</p>

RR-047 KARUNA LAWRENCE

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-047	I am concerned that the proposed widening of the slip road from Painshill roundabout to the A3 will impact on my ability to access my property at busy times of the day.	<p>The Scheme Layout Plans (Sheets 1-10 of 31) (APP-012), sheet 8 show that the access to Painshill House will remain as existing, therefore your access will not be adversely affected.</p> <p>As set out in application document Volume 7.4 Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads. Modelling of the operation of the amended Painshill roundabout has demonstrated that it will operate within capacity with forecast traffic growth and will significantly reduce traffic congestion and delay at the junction, thereby improving access to your property at busy times.</p>
RR-047	Also that security of the fields below my property will be compromised by unauthorised use once the access road is opened up.	<p>The Scheme Layout Plans (APP-012), sheets 7 and 8 show that the private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits at higher than the on-slip. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks will reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>

RR-048 LESLEY LLOYD-ELEY

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-048	<p>The Pains Hill roundabout will be adversely impacted by the proposal to site the entrance to the access road for the three properties. The entrance is sited too close to the roundabout and insufficient warning will be given to a vehicle going down the slip road that vehicles may be emerging at a considerably slower speed than people drive on the slip road. Alternatively, that vehicles will need to brake swiftly to enter the access road at a point where many vehicles will be accelerating to join the faster A3.</p>	<p>As shown on the Scheme Layout Plans (APP-012), sheet 8, a deceleration lane will be provided, which will remove slowing vehicles from the on-slip lanes. This will leave those vehicles joining the A3 unaffected by vehicles ahead reducing speed to turn left into the access road.</p> <p>The Speed Limits and Traffic Regulations drawings, sheet 4 (APP-011) show the proposed speed limit as 40mph on the roundabout and A3 southbound on-slip as far as the end of the merge taper from the private means of access, where the proposed speed limit changes to national speed limit (70mph). The 40mph speed limit will help to keep all vehicles travelling along this part of the slip road (including those leaving and joining the access road) at a similar speed.</p> <p>The inclusion of merge and diverge tapers and the speed limit will avoid conflict between accelerating and decelerating vehicles on the southbound on-slip.</p>
RR-048	<p>The security of both Pains Hill Park and Pains Hill residents will be affected. Security of Pains Hill residents afforded by electronic gates will be nullified by access to the estate from the new access road coming off the slip road. Not only might the security of the Park be affected but it could undermine the economy of the Park by people avoiding the entrance fees.</p>	<p>The Scheme Layout Plans (APP-012) sheets 7 and 8 show that the private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits higher than the slip road. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p> <p>The proposed private means of access will be entirely outside the boundary of the existing Painshill Park and, therefore, will not provide the public with an alternative access to the park instead of the ticketed entrance.</p>
RR-048	<p>The proposed bridge across the A3, in 2018, which was put forward as the favoured of the 13 proposals, had a significantly lower impact on the Pains Hill community. It was communicated as the best approach to the new 3 property access road until we were consulted this year regarding the latest scheme</p>	<p>All the options generated for the provision of replacement access to the properties to the southeast of the A3 between Painshill junction and junction 10 would have had some adverse effect on the extent of the historic designation of Painshill Park, as this includes land up to the existing A3 highway fence and outside the existing park boundary.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
	<p>to acquire our neighbour's field and come much closer to our 12 properties with the attendant consequences relating to health, noise, security, economics and safety.</p>	<p>The options that included bridges over the A3 would have caused additional visual impact on the park and its setting due to their height and some would have increased loss from the ancient woodland, as well as adding considerably to the Scheme cost. Historic England and Painshill Park Trust objected to the options that entailed a road or road bridge close to the Gothic Tower within the park.</p> <p>The option chosen for the Scheme minimises the impact close to the Gothic Tower and minimises the need for land to be acquired from within the current extents of the park. A large part of the alignment of the proposed access is broadly an upgrade of the existing access tracks from the A3, which minimises the effects on the landscape of the historic designated area that lies outside the existing park. The first part of the access road from the A3 southbound on-slip will be in cutting and plantation woodland and, therefore, will be screened by earthworks and existing trees from views within the park to the south.</p> <p>The consideration of alternatives is set out in Statement of Reasons (APP-22) and Chapter 3 of the Environmental Statement (Chapters 1-4) (APP-049).</p> <p>In terms of other impacts referred to in your representation please see below.</p> <p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible decreases are predicted throughout Painshill Park, including at The Tower, Gothic Temple and the Temple of Bacchus. Negligible changes, positive or negative, would not be perceptible.</p> <p>With regard to economic impacts those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor. For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance .</p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to: https://www.gov.uk/compensation-road-property-value/make-a-claim.</p> <p>Effects on health are reported in the Environmental Statement Chapter 14: Health impacts (APP-059). Design, mitigation and enhancement measures have been incorporated into the construction and operation of the Scheme to avoid, reduce and compensate for the adverse health impacts as appropriate, as detailed in paragraphs 14.9.1 -14.9.3. The health assessment concludes that, after mitigation, the Scheme will not have a significant effect on health.</p> <p>With regard to safety and security, please see the response to the queries above.</p>

RR-049 DUNCAN MACBRYDE

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-049	I am aware of the project and have no real issues with the scheme. Ultimately long term I think it will benefit anyone using the junction. My only concern is the impact it has on my land during the project and after. I am always happy to discuss anything in person that will affect my property.	<p>As indicated in Volume 2.2 Land Plans (APP-006) Sheets 13 and 14 and Volume 2.8 Scheme Layout Plans (Sheets 11-31 of 31) Sheets 13 and 14 there will be no direct land take from the property. Land north and south of Pointers Road to the east and west of the property will be used as replacement land and will be subject to environmental enhancement works, and ongoing maintenance following completion of the project. This replacement land will be defined as common land or open space and managed to enhance public accessibility and biodiversity. Pointers Road will become a public right of way (bridleway) from just west of the property.</p> <p>There will be no direct impacts on land holding identified.</p>

RR-050 DIANA VARBANESCU ON BEHALF OF GUSTAV MAUER

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-050	The proposed development will impact the current status of Painshill House and gardens.	<p>Chapter 11 Cultural Heritage in the Environmental Statement (APP-056 and APP-075) identifies the impacts of the Scheme on the significance of Painshill Park as a Grade I Registered Park and Garden, as well as on the listed buildings within the Park, including Painshill House. The significance of Painshill House is in its age and design, particularly its plasterwork and its association with architect Thomas Jupp. The Scheme will not have an adverse impact these characteristics.</p> <p>The impacts of the Scheme on Painshill Park Grade I Registered Park and Garden, along with its constituent listed and non-designated components, are discussed in Section 11.10 of the ES chapter and in Appendix 11.3 (APP-123) Statements of Significance. The Scheme preserves the aesthetic, historical and evidential significance of Painshill Park. As such, its status as a Grade I Registered Park and Garden is not under threat.</p>
RR-050	The proposed development is a significant step back that will undo a great part of restoration work (and granted investment) at Painshill Park	<p>The Scheme proposes to remove a small portion of the land within Painshill Park. There will be no direct impacts on the recent restoration works. The Environmental Statement Appendix 11.3 (APP-123) outlines the significance of the features originally designed in the Park and how they relate to the significance of the Park's design and history. The proposed land-take from the Park does not include areas that contribute to the design and significance of the Park and does affect any of the areas that have been the subject of restoration or investments made to the Park.</p>
RR-050	<p>Safety:</p> <p>Traffic congestion on the Painshill roundabout is not addressed, the proposed development will only aggravate the current situation (generating more traffic in an already congested area)</p>	<p>Traffic forecasts presented in the Traffic Forecast Report Table C.1 of Appendix C (Submitted at Deadline 1 as Volume 9.13) show that compared to a 'do-minimum' approach, the Scheme will result in only minimal increases in traffic flows through Painshill Roundabout of 2.5% in 2022 and 3.1% in 2037.</p> <p>As set out in paragraphs 7.10.32 to 7.10.34 of the Transport Assessment Report (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads. Modelling of the operation of the amended Painshill junction has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction.</p> <p>There have been no personal injury collisions recorded at the junction of Painshill roundabout with the A245 from Cobham or the southbound A3 on-slip in the past five</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>years. The layout of the A245 at this location is not affected by the Scheme and there is nothing to suggest that wider impacts of the Scheme will make this location less safe for users.</p> <p>The Scheme includes capacity enhancements at the Seven Hills junction to accommodate the forecast increase in traffic demand and to improve operational performance of the junction. This will reduce the likelihood of traffic congestion at this junction extending back to Painshill junction.</p>
RR-050	Painshill Park and Painshill Estate residents' security will severely be affected by the proposed changes	<p>The Scheme Layout Plans (APP-012), sheets 7 and 8 show that the proposed private means of access will tie-in and be at the same level as the A3 southbound entry slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits at higher than the on-slip. There will be a highway fence at the top of the earthworks and the existing trees will be seen behind the fence. The combination of earthworks slope, fence and trees should act as a deterrent, along with the park boundary fence.</p> <p>The earthworks will reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>
RR-050	The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air and noise pollution experienced by residents and visitors to the park.	<p>Traffic forecasts presented in the Traffic Forecast Report Table C.1 of Appendix C (Submitted at Deadline 1 as Volume 9.13) show that compared to a 'do-minimum' approach, the Scheme will have only a small effect on the A3 traffic levels. Daily traffic flows on the A3 between Painshill junction and M25 junction 10 are forecast to increase by 3.8% in 2022 and 4.7% in 2037 due to the Scheme. The forecast increase in traffic flow is because the additional capacity at junction 10 delivered by the Scheme means traffic diverts on to the Strategic Road Network (SRN) from alternative routes on the local road network. Traffic levels on the proposed private means of access will be small, principally related to use of the Girl Guides camp site as well as Court Close Farm and New Farm.</p> <p>The air quality assessment in the Environmental Statement Chapter 5 (APP-050), included one receptor within the Painshill estate and close to the Painshill Roundabout (receptor R30 – West Lodge). The results at this receptor (Environmental Statement Appendix 5.1, Section 5.7, APP-080) show a small decrease in annual average nitrogen dioxide concentrations of 1.1 µg/m³ with the Scheme when compared to without the Scheme, with actual concentrations around</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>The assessment also included a receptor east of the A3 near the Painshill estate (receptor R26 -The Bungalow, Heyswood Camp). Although the results at this receptor show a small increase in annual average nitrogen dioxide concentrations of 0.7 µg/m³ with the Scheme compared to without the Scheme, the actual concentrations are less than half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>Further away from the A3, pollutant concentrations would be even lower.</p>
RR-050	<p>The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air and noise pollution experienced by residents and visitors to the park.</p> <p>Losing trees from the ancient woodland (natural barrier) will further impact the remaining park and estate</p>	<p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible changes, positive or negative, would not be perceptible.</p> <p>The model used in the noise assessment in Chapter 6 of the Environmental Statement (APP-051) to predict road traffic noise in the operation phase does not attribute any noise attenuation to the existing trees along the road corridor, in accordance with standard practice. This is because any such reduction in noise levels will be, at best, small and will vary according to planting density, species, height, condition and season. The proposed tree felling will have a negligible impact on noise levels within the park and estate. Any small increases will be more than negated by the effects of the low noise road surfacing proposed on the A3, as shown by the noise contours on Figures 6.11 and 6.12 in APP-067.</p>
RR-050	<p>Human Rights of Residents</p> <p>The right to a family/private life and enjoyment of property enshrined in European legislation is relevant</p>	<p>Highways England recognises that the Scheme has an impact on individuals. In preparing the DCO, Highways England has had due regard to the European Convention on Human Rights (ECHR) and the Human Rights Act 1998. Chapter 6 of the Statement of Reasons (APP-022) explains how the Scheme complies with this</p>

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	in this context. We believe that the current proposals would violate the rights of approximately 30 people who live on the Painshill Estate.	legislation, notwithstanding any infringement of the private rights of those whose interests in the land may be affected by the Scheme. Highways England considers that the significant public benefits that will arise from the Scheme as set out in the Statement of Reasons outweigh any harm to those individuals. The DCO strikes a fair balance between the public interest in seeing the Scheme proceed (which is unlikely to happen in the absence of the DCO) and the private rights that will be affected.
RR-050	It also appears that in the consultation process to date the rights of Painshill residents have been assigned a much lower priority vs. impact.	<p>Highways England has considered and has had regard to all consultation responses in equal priority. The Consultation Report (APP-026 to APP-037) illustrates the extensive engagement and where the comments of all stakeholders have been considered in the development of the scheme.</p> <p>Highways England held three rounds of consultation and all responses have been analysed and considered by the project. The outcome of the consultations and feedback from ongoing engagement has helped inform the Scheme design, including the views of Painshill Residents that have been considered as part of this process.</p>
RR-050	Impact on Property Values The current proposals will lead to substantial compensation claims by the 12 households on the Painshill Estate for the "blight" caused by the construction work including loss of market value of the properties.	<p>Those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor. For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance.</p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to: https://www.gov.uk/compensation-road-property-value/make-a-claim.</p>

RR-051 LORD MICHAEL MURPHY

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-051	I am very concerned that we already have very high levels of air pollution in our village and this proposal will increase the amount of traffic pollution in the area.	<p>Concentrations of nitrogen dioxide – the key pollutant associated with road traffic - are monitored by Guildford Borough Council at several locations in Ripley as part of its local air quality management duties. At the two locations, documented in the Appendix 5.1 of the Environmental Statement, Table 5.6.1 (APP-080), annual average concentrations in 2016 and 2017 were below the national air quality objective of 40 µg/m³ set to protect human health, indicating relatively good air quality.</p> <p>The air quality assessment considered the impact of the Scheme on receptors within Ripley (receptors R59 to R62 as documented in the Environmental Statement Chapter 5, APP-050). The assessment showed that there would be an imperceptible effect (a change in levels of nitrogen dioxide of 0.4 µg/m³ or less) with the Scheme at all of these receptors, compared to the situation without the Scheme (which can be found in section 5.7 of APP-080). Annual average concentrations of nitrogen dioxide in the opening year would be below half of the national air quality objective value of 40 µg/m³ indicating relatively good air quality.</p>
RR-051	It will also increase the pollution to Wisley Gardens a world famous botanical site.	<p>The air quality assessment considered the impact of the Scheme at RHS Wisley Gardens (receptor R57, as documented in the Environmental Statement Chapter 5, App-050). The assessment showed that there would be an imperceptible effect (a change in levels of nitrogen dioxide of 0.1 µg/m³ or less) with the Scheme at this receptor, compared to the situation without the Scheme (section 5.7 of APP-080). Annual average concentrations of nitrogen dioxide in the opening year would be around half of the national air quality objective value of 40 µg/m³ indicating relatively good air quality.</p>
RR-051	I am concerned that this proposal [sic] together with other local proposals will greatly increase traffic which is already in gridlock at peak hours.	<p>A primary objective of the Scheme is to reduce traffic congestion and delay at the A3/M25 Junction 10 Wisley Interchange, accounting for forecast traffic growth.</p> <p>As presented in the Transport Assessment (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) (M25 and A3) and local roads. It has also demonstrated that traffic flows on local roads generally reduce with the Scheme, as a result of traffic being diverted away</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		from local roads and onto the SRN, due to reductions in traffic congestion and delays on it delivered by the Scheme.

RR-052 GUISEPPINA O'BRIEN

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-052	<p>Since the original 13 proposals were reduced down to the two bridge proposals in summer 2018, Painshill residents have not been part of the consultation process and yet during that time the new access point onto the slip road was put forward as the favoured proposal. The earlier proposal of a bridge over the A3 is fundamentally a better alternative on the grounds of security and safety in that it is potentially dangerous to have an entrance to a new access road off the slip road so close to the Painshill roundabout.</p>	<p><i>Design Development</i></p> <p>The Scheme includes the closure of all direct private and minor access off the A3 carriageways for safety reasons. Consequently, the Scheme includes provision for alternative means of access to the affected premises, including four properties on the southeast side of the A3 – New Farm, the gas valve compound, Heyswood Girl Guide camp site and Court Close Farm, all of which lie within the historic designation of Painshill Park but outside the existing extent of the park.</p> <p>Option development and selection process for the local road, non-motorised users (pedestrians and cyclists, referred to below as NMU) and property access issues in the Painshill Park area is complex and went through various iterations. The main aspects that were considered included including the impact on the existing park, impact on the historic designated area of the park, impact on listed buildings and their settings, impact on local residents and the Girl Guide camp, cost, constructability, clearance underneath electricity transmission lines, road safety and impact on ancient woodland.</p> <p>Public consultation at the end of design stage 2 showed a new road bridge at Red Hill providing access from Redhill Road to these properties, past the Gothic Tower, requiring land from Painshill Park. During design stage 3 Painshill Park Trust and Historic England objected regarding proximity of these proposals to the Gothic Tower. Highways England changed the Scheme to the current proposal using a left in/out connection to the A3 southbound on-slip for all movements.</p> <p>Towards the end of design stage 3, Highways England addressed concerns raised by the Girl Guides' and removed NMU connection through their site, limiting this to an access to Court Close Farm only. The NMU link along the A3 corridor was transferred to the Red Hill bridleway bridge and along the private means of access on the north side of the A3.</p> <p>Highways England held three rounds of consultation, which were publicised in accordance with the relevant legal requirements and all responses have been analysed and considered by the project. The outcome of the consultations and feedback from ongoing engagement has helped inform the Scheme design, including the views of Painshill residents that have been considered as part of this process. More specifically, residents of Painshill Park whose land interests would be affected by the design change were consulted during design stage 3 as part of the targeted</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>consultation process, but this did not include all residents of the park. The option selection process is summarised in Chapter 3 of the Environmental Statement (APP-049).</p> <p><i>Security</i></p> <p>Sheet 7 and 8 of the Scheme Layout Plans (APP-012) show that the private means of access (PMA) will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the PMA will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits at higher than the on-slip. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access.</p> <p>The earthworks reduce in height beyond the proposed security gate, as the access road arrives at the same level as the existing ground. There will be highway fencing provided on both sides of the local access road, which will deter unauthorised access</p> <p><i>Road safety</i></p> <p>The PMA will not have any adverse impact on the Painshill roundabout because the frequency of traffic flowing in and out of the access will be minimal. Additionally, as shown on the Speed Limits and Traffic Regulations drawing (APP-011), sheet 4, the proposed speed limit is 40mph on the roundabout and A3 southbound entry slip until the end of the merge taper from the access road, where the proposed speed limit changes to National Speed Limit (70mph). The 40mph speed limit will help to keep all vehicles travelling along the slip road (including those leaving and joining the access road) at a similar speed.</p>
RR-052	In the alternative, there are other proposals that have been dismissed that would have had less adverse effects on the Painshill Grade 1 landscape.	<p>The assessment of alternative options for the local access road considered a variety of factors, including the impact on the existing park, impact on the historic designated area of the park, impact on listed buildings and their settings, impact on local residents and the Girl Guide camp, cost, constructability, clearance underneath electricity transmission lines, road safety and impact on ancient woodland.</p> <p>All the options considered for the provision of replacement access to the properties to the southeast of the A3 between Painshill junction and junction 10 would have had some adverse effect on the extent of the historic designation of Painshill Park, as this includes land up to the existing A3 highway fence and outside the existing park boundary.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>The options that included bridges over the A3 would have caused additional visual impact on the park and its setting due to their height and some would have increased loss from the ancient woodland, as well as adding considerably to the scheme cost. Historic England and Painshill Park Trust objected to comments about the options that entailed a road or road bridge close to the Gothic Tower within the park.</p> <p>The option chosen for the Scheme minimises the impact close to the Gothic Tower and minimises the need for land to be acquired from within the current extents of the park. A large part of the alignment of the proposed access is broadly an upgrade of the existing access tracks from the A3, which minimises the effects on the landscape of the historic designated area that lies outside the existing park. The first part of the access road from the A3 southbound on-slip will be in cutting and plantation woodland and, therefore, will be screened by earthworks and existing trees from views within the park to the south.</p>
RR-052	The proposed scheme negates the security of the Painshill estate and the security and the economic viability of Painshill Park.	<p>The Security issues are dealt with in the response above.</p> <p>Furthermore, the proposed private means of access will be entirely outside the boundary of the existing Painshill Park and, therefore, will not provide the public with an alternative access to the park instead of the ticketed entrance, or an alternative access to the Painshill Park Estate.</p> <p>As assessment of the impacts of the Scheme on Painshill Park as a local business is set out in Chapter 13 (People and communities) of the Environmental Statement: (APP-058), paragraph 13.10.38, Table 13.37 and Table 13.38. For both construction and operation, the effects are assessed as minor and the significance of the effect is assessed as "Slight adverse; Insignificant". Additionally the results of amenity effects on Painshill Park are set out in Table 13.32: and Table 13.36. No amenity effects have been identified by those assessments.</p>

RR-053 LAWRENCE DAVID SIMMONS

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-053	<p>The project for the upgrading of Junction 10 of the M25 and the A3 is based on highly flawed premises.</p> <p>First, the principle of road expansion with a view to traffic capacity increase has been proven to be self-defeating over the decades. As new highways have been built, they have attracted and encouraged growth in traffic and car ownership. The M25 itself is carrying volumes far in excess of its initially projected levels.</p> <p>To attempt to cater for traffic is tail chasing that will inevitably result in even larger congestion events.</p> <p>People will generally tend to opt to use new and improved roads in the belief that these will facilitate journeys and reduce travel times. The net effect is that as the public pursue these options en-masse, they create the very problem the projects were intended to reconcile in the first instance. The aim should be to encourage people to choose sustainable means of movement such as rail, local bus and cycling.</p>	<p>The Scheme has been tested using a traffic model that has been developed in accordance with Department for Transport guidance. This includes a variable demand model (VDM) element in creating forecasts of future year traffic demand. The VDM process modifies demand forecasts to reflect the impacts of increasing congestion on the road network by producing a without-scheme scenario (do minimum), and then, when required for scheme testing, capturing the relief of congestion by producing a with-scheme scenario (do something). Thus, the issue mentioned is considered in terms of reflecting the increased propensity to use improved highways.</p> <p>The Scheme Assessment Report (which is publicly available on the Highways England website), provides a summary of the 'do nothing' consequence and provides a comprehensive analysis of the alternative schemes considered at different stages of the Highways England design process.</p> <p>This is presented in Environmental Statement Chapter 3 (APP-049), which looks at the assessment of alternatives in the context of the Environmental Statement.</p> <p>Overall the process was robust and considered to ensure Highways England chose the most effective scheme. A two-stage approach was undertaken in developing options for the Scheme.</p>
RR-053	<p>Secondly, the new scheme will destroy even more as yet undeveloped green belt land with all the ecological, environmental and scenic disbenefits that will result.</p>	<p>As set out in Chapter 6 of the Planning Statement (APP –133) the Scheme will not detract from the fundamental purpose of the Green Belt nor from its openness.</p> <p>As noted in Paragraphs 5.170-5.171 of the Planning Statement (APP-133) development within the Green Belt is a key issue within the National Planning Policy Framework (NPPF), and the impact of the Scheme on the Green Belt is addressed fully in the consideration of the National Policy Statement for National Networks (NPS NN) policy framework.</p> <p>Within Section 5.5 of the Planning Statement (APP-133) an assessment of the Green Belt is completed. Paragraph 5.5.58 to 5.5.83 provide an assessment of the Scheme and its impact on the Green Belt. In determining the extent to which harm may be caused to the Green Belt by the Scheme, reference is made to the five purposes of the Green Belt, set out in paragraph 134 of the NPPF.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>The analysis of planning policy in Section 6 of the Planning Statement demonstrates that the Scheme is compliant with relevant planning policy, including the NPS NN, and explains that, in the case of its location within the Green Belt and Special Category Land there are 'special circumstances' for the location of the Scheme and compensation packages prepared to mitigate the effects of the Scheme.</p> <p>The Environmental Statement, completes an Environmental Impact Assessment of the Scheme which includes an assessment of the impact on Biodiversity in Chapter 7 (APP-052) and Landscape in Chapter 9 (APP-054). As set out in these Chapters and in the summary in Table 17.1: Summary of significant residual environmental effects detailed in the individual topic chapters (Chapters 5 to 15, Volume 6.1) in Chapter 17 (APP-062) that there will be effects from the Scheme, but appropriate mitigation is provided to reduce the impacts both in terms of landscape and biodiversity.</p>
RR-053	More vehicle sourced pollution will be generated and this in turn will exacerbate current low-level air quality problems.	<p>The air quality assessment, as documented in the Environmental Statement (Table 5.13, APP-050), showed that despite the expected increase in vehicle kilometres travelled in future years, emissions of oxides of nitrogen and particulate matter would decrease from the base year as a result of expected improvements in vehicle technology. This decrease in air pollution is further borne out by examination of measured nitrogen dioxide concentrations which generally show a decreasing trend at most locations in the local authority areas affected by the Scheme. This is documented in the Environmental Statement Appendix 5.5 (APP-080).</p>
RR-053	To pursue a scheme leading to the worsening of pollution on this scale is in direct conflict with Government aims on air quality improvement.	<p>The Scheme will not lead to significant adverse impacts on air quality. There are some receptors expected to have a small increase in pollutant concentrations with the Scheme, there are also some receptors expected to have decreases, most notably within Esher AQMA as a result of a decrease in traffic on the A244 (section 5.8 and paragraph 5.8.13 of Chapter 5 of the Environmental Statement, APP-050). The Scheme is compliant with the relevant national policy on air quality as documented in Table 5.2 of APP-050.</p>
RR-053	Noise levels will also be increased to the detriment of those in earshot and wildlife.	<p>The noise assessment for the operation phase indicated that no significant adverse effects would occur due to road traffic noise (Chapter 6 of the Environmental Statement, APP-051, Table 6.24) and mitigation measures outlined in the Outline Construction Environmental Management Plan (APP-134, Appendix A.1). The Scheme's design includes mitigation measures to minimise pollution, as described in the Environmental Statement (APP-051, Table 6.21). These measures include noise barriers at Junction 10 and low noise road surfacing on the A3.</p>

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		<p>Although noise increases were predicted in some locations, the majority of noise increases were classified as “negligible” according to criteria set out in the Design Manual for Roads and Bridges (APP-051, Table 6.5, Table 6.15, and Table 6.16). Nine dwellings at Hatch Lane and Ockham Lane were predicted “minor” noise increases in the short-term. In the long-term, 12 properties were predicted to experience “moderate” noise increases and 10 properties were predicted “minor” noise increases. All of the minor and moderate increases were predicted on local roads at Ockham, Bridge End and Martyr’s Green (APP-051, 6.8.42).</p> <p>The Environmental Statement shows that road traffic noise levels are predicted to decrease within the Thames Basin Heath SPA (APP-051, 6.8.35 and 6.8.39; APP-067 Figure 6.11 and Figure 6.12). The noise reduction is due to lower noise road surfacing being laid on the A3 as part of the Scheme’s proposals.</p>
RR-053	<p>Thirdly, the traffic levels on the M25 have been levelling off over the past decade and only the recent artificially created jams caused by the unjustified frequently imposed lower speed limits between junctions 9 and 16 and in particular between junctions 10 and 11 have given the impression that levels have risen.</p> <p><i>The smart motorway system has been abused to somehow justify the proposed scheme therefore on the basis of falsely created congestion</i></p>	<p>Highways England accepts that historical traffic trends in almost all-time periods and directions at M25 Junction 10 have generally shown flat or declining growth since 2009.</p> <p>Despite the lack of growth in traffic in recent years, severe traffic congestion and delay at M25 junction 10 is a regular occurrence, especially during peak periods.</p> <p>As presented in Table 7-5 of the Transport Assessment Report (APP-136), substantial traffic growth is forecast on the road network in the vicinity of junction 10, due to a combination of background traffic growth, as forecast by Department for Transport’s (DfT’s) National Trip End Model, and local development proposals. The projected increases in average annual daily traffic (AADT) flows through junction 10 compared to 2015 baseline are 11% in 2022 and 29% in 2037 without the Scheme. With the Scheme these increase further to 13% and 32% respectively. The reason the forecasts are higher with the Scheme is that without it, traffic congestion at junction 10 causes traffic to divert onto alternative routes via local roads, which is undesirable. The additional capacity delivered by the Scheme means that traffic which would otherwise divert on to the local road network, routes via the Strategic Route Network (SRN) instead, resulting in greater traffic growth at junction 10 with the Scheme than without it.</p> <p>These infrastructure and land use developments are projected to result in the large increase in traffic growth through junction 10. Without the intervention of measures to improve the junction, congestion on the approaches to, and through the junction will continue. This will become exacerbated by future traffic growth which would</p>

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		<p>discourage economic growth in the immediate surrounding areas, and along the A3 corridor. It would hinder the aspirations of the Enterprise M3 Local Economic Partnership as well as Surrey County Council and Guildford Borough Council.</p> <p>The Scheme has been designed to accommodate future traffic growth, which has been identified.</p>
RR-053	<p>Fourthly, the expense of this scheme cannot be justified when budgets are tight and road safety initiative spending must surely take priority. In addition, pothole infilling, surface quality improvement, drainage improvement, safe streets, charging point proliferation and sponsorship of electric vehicle take-up would surely represent tax-payers' money far better spent. I thereby call upon the inspector to reject this scheme.</p>	<p>The Government sets out its long-term investment plan in the road network, and particularly the SRN, in the Road Investment Strategy 2015-2020 (RIS), which was published in December 2014 and was last updated in November 2016. The "Strategic Vision" within Part 1 of the RIS advises that it expects Highways England to:</p> <p>"Make the network safer and improve user satisfaction, while smoothing traffic flow and encouraging economic growth. We want to see [Highways England] delivering better environmental outcomes and helping cyclists, walkers, and other vulnerable users of the network at the same as time as achieving real efficiency and keeping the network in good condition."</p> <p>Part 2: Investment Plan of the RIS lists key investments on the SRN. A total of £15.2 billion is committed by the Government to the enhancement and long-term maintenance of the network between 2015/16 and 2020/21 including 127 major enhancements. The Scheme is recognised in the RIS as being a key investment on the SRN.</p> <p>The Scheme is specified in the RIS. It is anticipated to be funded from sources within central government, providing that the necessary statutory approvals are granted, and the Scheme demonstrates value for public money. The Scheme also aligns with the objectives detailed within the Strategic Vision outlined within the RIS.</p> <p>The Funding Statement (APP-024) demonstrates that the Scheme will be adequately funded through the RIS, using the change control processes set out in Part 6 of the Highways England Licence.</p> <p>Furthermore Section 4.2 of the Planning Statement (APP-133), which outlines the Economic Case for the Scheme demonstrates its compliance to the NPS NN objective that strategic highway improvements benefit the economy. It assesses and monetises anticipated economic, environmental and social benefits of the Scheme based on a 60-year appraisal period, in accordance with DfT guidelines. This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.2. The longer-term operations of the</p>

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		Scheme will provide reduce travel times hence is value for money. The economic/business Case has been scrutinised and approved by the DfT.

RR-054 PAUL TILLER

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-054	I live in [Redacted] close to the Painshill Junction of the A245 and the A3 and will be affected by the planned works. I am not sure I fully understand the implications of the project on the enjoyment of my property hence my interest.	<p>Please see the Book of Reference (APP-025), Land Plans (APP-006) and Work Plans (APP-007) for further details of how your property will be affected. The Scheme Layout Plans (APP-012), sheet 8, shows that the access to Painshill House and associated properties will remain as existing, therefore your access will not be adversely affected.</p> <p>Modelling of the operation of the amended Painshill junction has demonstrated that it will operate within capacity with forecast traffic growth and will significantly reduce traffic congestion and delay at the junction, thereby improving access to local property at busy times, as set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34.</p>

RR-055 SUE TOWNER

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-055	"I want to ensure that all of RHS Wisley is safeguarded"	<p>As set out in Section 1.3 of the Consultation Report (APP-026) one of the objectives of this project is to recognise the significance of designated heritage assets close to the route of the Scheme, including RHS Gardens Wisley through incorporating suitable mitigation and/or design measures to avoid or reduce significant harm.</p> <p>An assessment of the likely significant environmental effects, on RHS Wisley, arising from the construction and operation of the Scheme is contained within the Environmental Statement (APP-047 to APP-131). The Environmental Statement has been produced in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and did not identify any significant environmental effects at RHS Wisley with mitigation in place.</p> <p>Table 5.20 of the Consultation Report (APP-026) demonstrates that Highways England has engaged extensively with RHS Gardens Wisley in order to develop new access arrangements.</p> <p>There is a small area of land-take required, away from the core of the park. This would not impact any of the features that contribute to the significance of the park, as assessed in Chapter 11 (APP-056) and Appendix 11.3 of the Environmental Statement (APP-113).</p> <p>Engagement with RHS Wisley is ongoing and will continue throughout the DCO examination to ensure that the site is safeguarded appropriately.</p>

RR-056 FIONA TOWSON

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-056	<p>1. Safety Severe traffic congestion on the Painshill roundabout, particularly during the morning and evening rush hours, already presents a significant safety risk to Painshill residents driving in and out of the estate through the main gates which open onto the roundabout. The current proposal for the Access Road will make that problem far worse due to the increased volume of traffic using the roundabout resulting from the widening of the A3 and the construction of the Access Road near to the roundabout, plus the fact that nothing is being done to substantially reduce the build up of traffic backing onto the roundabout from the A245 Seven Hills Road</p>	<p>As set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads.</p> <p>Modelling of the operation of the amended Painshill junction (including the private means of access from the southbound on-slip) has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction. Traffic modelling forecasts show that compared to a 'do-minimum' approach, the Scheme will reduce traffic flows through Painshill Roundabout from an average annual daily traffic figure of 66,924 to 55,286 in the design year, 2022. The 'do-minimum' forecast and comparison to the Scheme is shown in paragraph 8.5.24 of the Transport Assessment Report (APP-136).</p> <p>There have been no personal injury collisions recorded at the junction of Painshill roundabout with the A245 from Cobham or the Southbound A3 on-slip in the past five years. The layout of the A245 on the Cobham side of the junction is not affected by the Scheme and there is nothing to suggest that wider impacts of the scheme will make this location less safe for users.</p> <p>The Scheme includes capacity enhancements at the Seven Hills junction to accommodate the forecast increase in traffic demand and improve operational performance of the junction. This will reduce the likelihood of traffic congestion at this junction extending back to Painshill junction.</p>
RR-056	<p>2. Security The Access Road would render redundant all security systems operated by day and night across Painshill Park and Painshill Estate leading to uncontrolled access by vehicles and pedestrians. Security is already a concern for the Park and Estate with recent incidents involving groups of Travellers who set up camp within the Park. The current proposal would further compromise the Park's chargeable entry policy causing a loss of revenue.</p>	<p>The Scheme Layout Plans (APP-012) sheets 7 and 8 show that the private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits higher than the slip road. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		The proposed private means of access will be entirely outside the boundary of the existing Painshill Park and, therefore, will not provide the public with an alternative access to the park instead of the ticketed entrance, or an alternative access to the Painshill Park Estate.
RR-056	3. The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air pollution and noise pollution experienced by residents some of whom are elderly or have health problems, particularly during the two year construction phase.	<p><i>Traffic Volume</i></p> <p>Traffic forecasts presented in Table C-2 Appendix C of the Traffic Forecast Report (Submitted at Deadline 1 as Volume 9.13) show that compared to a 'do-minimum' approach, the Scheme will have only a small effect on the A3 traffic levels. Daily traffic flows on the A3 between Painshill junction and M25 junction 10 are forecast to increase by 3.8% in 2022 and 4.7% in 2037 due to the Scheme. The forecast increase in traffic flow is because the additional capacity at junction 10 delivered by the Scheme means traffic diverts on to the Strategic Road Network (SRN) from alternative routes on the local road network. Traffic levels on the proposed private means of access will be small, principally related to use of the Girl Guides camp site.</p> <p><i>Air Quality</i></p> <p>The air quality assessment in the Environmental Statement Chapter 5 (APP-050), included one receptor within the Painshill estate and close to the Painshill Roundabout (receptor R30 – West Lodge). The results at this receptor (Environmental Statement Appendix 5.1, Section 5.7, APP-080) show a small decrease in annual average nitrogen dioxide concentrations of 1.1 µg/m³ with the Scheme when compared to without the Scheme, with actual concentrations around half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>The assessment also included a receptor east of the A3 near the Painshill Estate (receptor R26 -The Bungalow, Heyswood Camp). Although the results at this receptor show a small increase in annual average nitrogen dioxide concentrations of 0.7 µg/m³ with the Scheme compared to without the Scheme, the actual concentrations are less than half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>Further away from the A3, pollutant concentrations would be even lower.</p> <p>During construction, the assessment shows that there would be no change in pollutant concentrations as a result of additional traffic at these same receptors, with</p>

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		<p>concentrations again around half of the air quality objective (see section 5.10 of Chapter 5 of the Environmental Statement APP-050).</p> <p><i>Noise</i></p> <p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible decreases are predicted throughout Painshill Park, including at The Tower, Gothic Temple and the Temple of Bacchus. Negligible changes, positive or negative, would not be perceptible.</p> <p>The noise assessment for construction traffic shows that no significant effects would occur at the Painshill Park and the Painshill Estate. Figure 6.6 (APP-066) of the Environmental Statement (APP-051) shows the predicted changes in road traffic noise levels due to construction traffic; noise levels from the A3 will be up to 2.9 dB quieter during the construction phase, which will reduce road traffic noise levels at affected properties.</p> <p>Properties closer to Painshill junction will also be affected by noise from the A245 into Cobham and the A3 slip roads. Noise from these roads is predicted to decrease by less than 1 dB, which is not a perceptible change.</p>
RR-056	4a. Painshill Park and Painshill Estate have unique landscapes and buildings of considerable historical, architectural and environmental importance. The widening of the A3 and current proposals for the Access Road would damage Grade 1 listed fields and Grade 2 listed houses closest to the A3.	<p>Environmental Statement Chapter 11 and Appendix 11.3 (APP-056, APP-075 and APP-123) provide the assessment of impacts on designated and non-designated heritage assets. No direct physical impacts to Grade II listed buildings have been identified by the assessment.</p> <p>There will be a small area of land-take from the current extent of Painshill Park, away from the core of the park. This would not have an adverse impact on any of the features that contribute to the significance of the park, as assessed in Appendix 11.3 (APP-123).</p>

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		Impacts to the settings of several Listed Buildings and the Grade I Registered Park and Garden have been fully assessed in the Environmental Statement. The outcome of the assessment demonstrates that the Scheme would not impact the aesthetic, historical, or evidential values of these properties, as outlined in Appendix 11.3, Section 11.1.4 (APP-123).
RR-056	4b. The widening of the A3 and current proposals for the Access Road would damage the local eco-system which is home to a diverse variety of wildlife including bats, badgers, dormice, deer, adders and bees.	<p>Surveys for habitats and a range of species including badgers, dormice, breeding birds, bat roosts and reptiles were carried out in this location.</p> <p>The impacts on all designated sites, protected and notable habitats and species during construction and operation were assessed in Chapter 7 of the Environmental Statement (APP-052), and appropriate mitigation and compensation measures were identified. The construction and operation of this access road is not considered to cause the loss any protected species or fragmentation of their habitats.</p>
RR-056	5. Human Rights of Residents The right to a family/private life and enjoyment of property enshrined in European legislation is relevant in this context. We believe that the current proposals would violate the rights of approximately 30 people who live on the Painshill Estate.	Highways England recognises that the Scheme has an impact on individuals. In preparing the DCO, Highways England has had due regard to the European Convention on Human Rights (ECHR) and the Human Rights Act 1998. Chapter 6 of the Statement of Reasons (APP-022) explains how the Scheme complies with this legislation notwithstanding any infringement of the private rights of those whose interests in the land may be affected by the Scheme. Highways England considers that the significant public benefits that will arise from the Scheme, as set out in the Statement of Reasons (APP-022), outweigh any harm to those individuals. The DCO strikes a fair balance between the public interest in seeing the Scheme proceed (which is unlikely to happen in the absence of the DCO) and the private rights that will be affected.
RR-056	-It also appears that in the consultation process to date the rights of Painshill residents have been assigned a much lower priority than those of non-residents.	<p>Highways England has considered and has had regard to all consultation responses in equal priority. The Consultation Report (APP- 026 to 037) illustrates the extensive engagement and where the comments of all stakeholders have been considered in the development of the Scheme.</p> <p>Highways England held three rounds of consultation and all responses have been analysed and considered by the project. The outcome of the consultations and feedback from ongoing engagement has helped inform the scheme design, including the views of Painshill residents that have been considered as part of this process.</p>
RR-056	6. Impact on Property Values The current proposals will lead to substantial compensation claims by the 12	Those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the

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	households on the Painshill Estate for the "blight" caused by the construction work including loss of market value of the properties.	<p>reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor. For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance.</p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to https://www.gov.uk/compensation-road-property-value/make-a-claim.</p>
RR-056	<p>7. Better Options Exist</p> <p>We believe that better options exist that avoid the problems highlighted above. For example, siting the Access Road further past the Gothic Tower towards Pointers Road.</p>	<p>All the options generated for the provision of replacement access to the properties to the southeast of the A3 between Painshill junction and junction 10 would have had some adverse effect on the extent of the historic designation of Painshill Park, as this includes land up to the existing A3 highway fence and outside the existing park boundary.</p> <p>The options that included bridges over the A3 would have caused additional visual impact on the park and its setting due to their height and some would have increased loss from the ancient woodland, as well as adding considerably to the scheme cost. Historic England and Painshill Park Trust objected to the options that entailed a road or road bridge close to the Gothic Tower within the park.</p> <p>The option chosen for the Scheme minimises the impact close to the Gothic Tower and minimises the need for land to be acquired from within the current extents of the park. A large part of the alignment of the proposed access is broadly an upgrade of the existing access tracks from the A3, which minimises the effects on the landscape of the historic designated area that lies outside the existing park. The first part of the access road from the A3 southbound on-slip will be in cutting and plantation</p>

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		<p>woodland and, therefore, will be screened by earthworks and existing trees from views within the park to the south.</p> <p>The consideration of alternatives is set out in Statement of Reasons (APP-22) and chapter 3 of the Environmental Statement (APP-049).</p> <p>The proposed private means of access is located to minimise land take and reduce the environmental impact on Painshill Park and the setting of the Gothic Tower. This change was made as a result of consultation feedback and engagement with stakeholders.</p>

RR-057 MARK TOWSON

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-057	<p>1. Safety Severe traffic congestion on the Painshill roundabout, particularly during the morning and evening rush hours, already presents a significant safety risk to Painshill residents driving in and out of the estate through the main gates which open onto the roundabout. The current proposal for the Access Road will make that problem far worse due to the increased volume of traffic using the roundabout resulting from the widening of the A3 and the construction of the Access Road near to the roundabout, plus the fact that nothing is being done to substantially reduce the build up of traffic backing onto the roundabout from the A245 Seven Hills Road</p>	<p>As set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads.</p> <p>Modelling of the operation of the amended Painshill junction (including the private means of access from the southbound on-slip) has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction. Traffic modelling forecasts show that compared to a 'do-minimum' approach, the Scheme will reduce traffic flows through Painshill Roundabout from an average annual daily traffic figure of 66,924 to 55,286 in the design year, 2022. The 'do-minimum' forecast and comparison to the Scheme is shown in paragraph 8.5.24 of the Transport Assessment Report (APP-136).</p> <p>There have been no personal injury collisions recorded at the junction of Painshill roundabout with the A245 from Cobham or the Southbound A3 on-slip in the past five years. The layout of the A245 on the Cobham side of the junction is not affected by the Scheme and there is nothing to suggest that wider impacts of the scheme will make this location less safe for users.</p> <p>The Scheme includes capacity enhancements at the Seven Hills junction to accommodate the forecast increase in traffic demand and improve operational performance of the junction. This will reduce the likelihood of traffic congestion at this junction extending back to Painshill junction.</p>
RR-057	<p>2. Security The Access Road would render redundant all security systems operated by day and night across Painshill Park and Painshill Estate leading to uncontrolled access by vehicles and pedestrians. Security is already a concern for the Park and Estate with recent incidents involving groups of Travellers who set up camp within the Park. The current proposal would further compromise the Park's chargeable entry policy causing a loss of revenue.</p>	<p>The Scheme Layout Plans (APP-012) sheets 7 and 8 show that the private means of access will tie-in and be at the same level as the A3 southbound on-slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits higher than the slip road. There will be a highway fence at the top of the earthworks and the existing trees will remain behind the fence. The combination of earthworks slope, security gate, fence and trees should act as a deterrent to unauthorised access, along with the park boundary fence.</p> <p>The earthworks reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>

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		The proposed private means of access will be entirely outside the boundary of the existing Painshill Park and, therefore, will not provide the public with an alternative access to the park instead of the ticketed entrance, or an alternative access to the Painshill Park Estate.
RR-057	3. The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air pollution... experienced by residents some of whom are elderly or have health problems, particularly during the two year construction phase.	<p>Traffic forecasts presented in Table C-2 Appendix C of the Traffic Forecast Report (Submitted at Deadline 1 as Volume 9.13) show that compared to a 'do-minimum' approach, the Scheme will have only a small effect on the A3 traffic levels. Daily traffic flows on the A3 between Painshill junction and M25 junction 10 are forecast to increase by 3.8% in 2022 and 4.7% in 2037 due to the Scheme. The forecast increase in traffic flow is because the additional capacity at junction 10 delivered by the Scheme means traffic diverts on to the Strategic Road Network (SRN) from alternative routes on the local road network. Traffic levels on the proposed private means of access will be small, principally related to use of the Girl Guides camp site.</p> <p>The air quality assessment in the Environmental Statement Chapter 5 (APP-050), included one receptor within the Painshill estate and close to the Painshill Roundabout (receptor R30 – West Lodge). The results at this receptor (Environmental Statement Appendix 5.1, Section 5.7, APP-080) show a small decrease in annual average nitrogen dioxide concentrations of 1.1 µg/m³ with the Scheme when compared to without the Scheme, with actual concentrations around half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>The assessment also included a receptor east of the A3 near the Painshill estate (receptor R26 -The Bungalow, Heyswood Camp). Although the results at this receptor show a small increase in annual average nitrogen dioxide concentrations of 0.7 µg/m³ with the Scheme compared to without the Scheme, the actual concentrations are less than half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>Further away from the A3, pollutant concentrations would be even lower.</p> <p>During construction, the assessment shows that there would be no change in pollutant concentrations as a result of additional traffic at these same receptors, with concentrations again around half of the air quality objective (see section 5.10 of Chapter 5 of the Environmental Statement APP-050).</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-057	3. The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of ... noise pollution experienced by residents some of whom are elderly or have health problems, particularly during the two year construction phase.	<p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible decreases are predicted throughout Painshill Park, including at The Tower, Gothic Temple and the Temple of Bacchus. Negligible changes, positive or negative, would not be perceptible.</p> <p>The noise assessment for construction traffic shows that no significant effects would occur at the Painshill Park and the Painshill Estate. Figure 6.6 (APP-066) of the Environmental Statement (APP-051) shows the predicted changes in road traffic noise levels due to construction traffic; noise levels from the A3 will be up to 2.9 dB quieter during the construction phase, which will reduce road traffic noise levels at affected properties.</p> <p>Properties closer to Painshill junction will also be affected by noise from the A245 into Cobham and the A3 slip roads. Noise from these roads is predicted to decrease by less than 1 dB, which is not a perceptible change.</p>
RR-057	4a. Painshill Park and Painshill Estate have unique landscapes and buildings of considerable historical, architectural and environmental importance. The widening of the A3 and current proposals for the Access Road would damage Grade 1 listed fields and Grade 2 listed houses closest to the A3.	<p>Environmental Statement Chapter 11 and Appendix 11.3 (APP-056, APP-075 and APP-123) provide the assessment of impacts on designated and non-designated heritage assets. No direct physical impacts to Grade II listed buildings have been identified by the assessment.</p> <p>There will be a small area of land-take from the current extent of Painshill Park, away from the core of the park. This would not have an adverse impact on any of the features that contribute to the significance of the park, as assessed in Appendix 11.3 (APP-123).</p> <p>Impacts to the settings of several Listed Buildings and the Grade I Registered Park and Garden have been fully assessed in the ES. The outcome of the assessment</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		demonstrates that the Scheme would not impact the aesthetic, historical, or evidential values of these properties, as outlined in Appendix 11.3, Section 11.1.4 (APP-123).
RR-057	4b. The widening of the A3 and current proposals for the Access Road would damage the local eco- system which is home to a diverse variety of wildlife including bats, badgers, dormice, deer, adders and bees.	<p>Surveys for habitats and a range of species including badgers, dormice, breeding birds, bat roosts and reptiles were carried out in this location.</p> <p>The impacts on all designated sites, protected and notable habitats and species during construction and operation were assessed in Chapter 7 of the Environmental Statement (APP-052), and appropriate mitigation and compensation measures were identified. The construction and operation of this access road is not considered to cause the loss any protected species or fragmentation of their habitats.</p>
RR-057	5. Human Rights of Residents The right to a family/private life and enjoyment of property enshrined in European legislation is relevant in this context. We believe that the current proposals would violate the rights of approximately 30 people who live on the Painshill Estate.	Highways England recognises that the Scheme has an impact on individuals. In preparing the DCO, Highways England has had due regard to the European Convention on Human Rights (ECHR) and the Human Rights Act 1998. Chapter 6 of the Statement of Reasons (APP-022) explains how the Scheme complies with this legislation notwithstanding any infringement of the private rights of those whose interests in the land may be affected by the Scheme. Highways England considers that the significant public benefits that will arise from the Scheme, as set out in the Statement of Reasons (APP-022), outweigh any harm to those individuals. The DCO strikes a fair balance between the public interest in seeing the Scheme proceed (which is unlikely to happen in the absence of the DCO) and the private rights that will be affected.
RR-057	It also appears that in the consultation process to date the rights of Painshill residents have been assigned a much lower priority than those of non-residents.	<p>Highways England has considered and has had regard to all consultation responses in equal priority. The Consultation Report (APP- 026 to 037) illustrates the extensive engagement and where the comments of all stakeholders have been considered in the development of the scheme.</p> <p>Highways England held three rounds of consultation and all responses have been analysed and considered by the project. The outcome of the consultations and feedback from ongoing engagement has helped inform the scheme design, including the views of Painshill residents that have been considered as part of this process.</p>
RR-057	6. Impact on Property Values The current proposals will lead to substantial compensation claims by the 12 households on the Painshill Estate for the "blight" caused by the construction work including loss of market value of the properties.	Those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor. For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance.</p> <p>For specific guidance and to apply to make a Part 1 Claim, please go to https://www.gov.uk/compensation-road-property-value/make-a-claim.</p>
	<p>7. Better Options Exist</p> <p>We believe that better options exist that avoid the problems highlighted above. For example, siting the Access Road further past the Gothic Tower towards Pointers Road.</p>	<p>All the options generated for the provision of replacement access to the properties to the southeast of the A3 between Painshill junction and junction 10 would have had some adverse effect on the extent of the historic designation of Painshill Park, as this includes land up to the existing A3 highway fence and outside the existing park boundary.</p> <p>The options that included bridges over the A3 would have caused additional visual impact on the park and its setting due to their height and some would have increased loss from the ancient woodland, as well as adding considerably to the scheme cost. Historic England and Painshill Park Trust objected to the options that entailed a road or road bridge close to the Gothic Tower within the park.</p> <p>The option chosen for the Scheme minimises the impact close to the Gothic Tower and minimises the need for land to be acquired from within the current extents of the park. A large part of the alignment of the proposed access is broadly an upgrade of the existing access tracks from the A3, which minimises the effects on the landscape of the historic designated area that lies outside the existing park. The first part of the access road from the A3 southbound on-slip will be in cutting and plantation woodland and, therefore, will be screened by earthworks and existing trees from views within the park to the south.</p>

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		<p>The consideration of alternatives is set out in Statement of Reasons (APP-22) and Chapter 3 of the Environmental Statement (APP-049).</p> <p>The proposed private means of access is located to minimise land take and reduce the environmental impact on Painshill Park and the setting of the Gothic Tower. This change was made as a result of consultation feedback and engagement with stakeholders.</p>

RR-058 PETER EJ TREW

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-058	<p>1. Traffic conditions approaching and on the Painshill Roundabout, arising out of increased traffic and present planned location of the new access off the A3 to three properties adjoining Painshill Park.</p> <p>Does this location comply with deceleration guidelines and should it be further from the Painshill roundabout?</p>	<p>As set out in the Transport Assessment Report (APP-136), paragraphs 7.10.32 to 7.10.34, traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads.</p> <p>Modelling of the operation of the amended Painshill junction (including the private means of access from the southbound on-slip) has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction. Traffic forecasts presented in Table C-2 Appendix C of the Traffic Forecast Report (Submitted at Deadline 1 as Volume 9.13) show that compared to a 'do-minimum' approach, the Scheme will result in only minimal increases in traffic flows through Painshill Roundabout of 2.5% in 2022 and 3.1% in 2037.</p> <p>The 'do-minimum' forecast and comparison to the Scheme is shown in paragraph 8.5.24 of the Transport Assessment Report (APP-136).</p> <p>The private means of access has been provided on the slip road, so the three properties have a safer single point of access, instead of each having a direct access on to the A3, which is no longer permitted by current design standards for dual 3-lane all-purpose road. Accordingly, it is implied that this is also not permitted for dual 4-lane all-purpose roads (which is what the A3 will become).</p> <p>The location of the new private means of access has been located near to an existing bus stop of which, there are no recorded accidents in the last five years. The junction is designed with a deceleration lane of approximately 100m when the design standard only requires a length of 55m. The Painshill Roundabout and the southbound on-slip to the A3 will have a speed limit of 40mph, which increases to National Speed Limit (70mph) after the private means of access and before joining the A3 mainline, as shown on the Speed Limits and Traffic Regulations drawings, sheet 4 (APP-011).</p> <p>The junction for the private means of access cannot be located further south along the on-slip, due to the position of an existing pylon carrying high voltage electric cables and because the junction merge will interact with the on-slip merge with the A3 carriageway.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-058	2. Security within Painshill Park and the Painshill Residential Estate during construction of the new road works.	During construction the principal contractor will be responsible for maintaining the safety and security of the site and this will ensure any boundary which abuts the site will be kept secure at all times. Construction measures will be included in a Construction Environmental Management Plan (CEMP), secured under Schedule 2 Requirement 3 of the draft DCO (APP-018). In accordance with Requirement 3 the CEMP will need to be approved before construction starts.
RR-058	3. Increase in noise level and pollution from increased traffic.	<p>The air quality assessment in the Environmental Statement Chapter 5 (APP-050), included one receptor within the Painshill estate and close to the Painshill Roundabout (receptor R30 – West Lodge). The results at this receptor (Environmental Statement Appendix 5.1, Section 5.7, APP-080) show a small decrease in annual average nitrogen dioxide concentrations of 1.1 µg/m³ with the Scheme when compared to without the Scheme, with actual concentrations around half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>The assessment also included a receptor east of the A3 near the Painshill estate (receptor R26 -The Bungalow, Heyswood Camp). Although the results at this receptor show a small increase in annual average nitrogen dioxide concentrations of 0.7 µg/m³ with the Scheme compared to without the Scheme, the actual concentrations are less than half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>Further away from the A3, pollutant concentrations would be even lower.</p>
RR-058	3. Increase in noise level and pollution from increased traffic.	<p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible changes, positive or negative, would not be perceptible.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-058	4. Justification for the proposed roadworks. Has this been established by an adequate cost benefit analysis?	Justification for the proposed roadworks has been established by an adequate cost benefit analysis. Highways England has prepared a full Economic/Business Case for the scheme in accordance with Department for Transport (DfT) major scheme appraisal guidance. This can be seen in Section 4 of the Planning Statement (APP-133). This includes a cost benefit analysis of the Scheme which demonstrates that it offers good value for money, with a high cost benefit ratio of 2.2. The economic/business Case has been scrutinised and approved by the DfT.

RR-059 DIANA VARBANESCU

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-059	The proposed development will impact the current status of Painshill House and gardens.	<p>Chapter 11 Cultural Heritage in the Environmental Statement (APP-056 and APP-075) identifies the impacts of the Scheme on the significance of Painshill Park as a Grade I Registered Park and Garden, as well as on the listed buildings within the Park, including Painshill House. The significance of Painshill House is in its age and design, particularly its plasterwork and its association with architect Thomas Jupp. The Scheme will not have an adverse impact these characteristics.</p> <p>The impacts of the Scheme on Painshill Park Grade I Registered Park and Garden, along with its constituent listed and non-designated components, are discussed in Section 11.10 of Chapter 11 of the Environmental Statement and in Appendix 11.3 (APP-123) Statements of Significance. The Scheme preserves the aesthetic, historical and evidential significance of Painshill Park. As such, its status as a Grade I Registered Park and Garden is not under threat.</p>
RR-059	The proposed development is a significant step back that will undo a great part of restoration work (and granted investment) at Painshill Park	<p>The Scheme proposes to remove a small portion of the land within Painshill Park, which is away from the core of the park. There will be no direct impacts on the recent restoration works. The Environmental Statement Appendix 11.3 (APP-123) outlines the significance of the features originally designed in the Park and how they relate to the significance of the Park's design and history. The proposed land-take from the Park does not include areas that contribute to the design and significance of the Park and does affect any of the areas that have been the subject of restoration or investments made to the Park.</p>
RR-059	Safety Traffic congestion on the Painshill roundabout is not addressed, the proposed development will only aggravate the current situation (generating more traffic in an already congested area)	<p>Traffic modelling forecasts show that compared to a 'do-minimum' approach, the Scheme will reduce traffic flows through Painshill Roundabout from an average annual daily traffic figure of 66,924 to 55,286 in the design year, 2022, as set out in the Transport Assessment Report (APP-136).</p> <p>As set out in paragraphs 7.10.32 to 7.10.34 of the Transport Assessment Report (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth, whilst also reducing traffic congestion and delay on both the Strategic Road Network and local roads. Modelling of the operation of the amended Painshill junction has demonstrated that it will operate within capacity with forecast traffic growth, with significantly reduced traffic congestion and delay at the junction.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
		<p>There have been no personal injury collisions recorded at the junction of Painshill roundabout with the A245 from Cobham or the southbound A3 on-slip in the past five years. The layout of the A245 at this location is not affected by the Scheme and there is nothing to suggest that wider impacts of the Scheme will make this location less safe for users.</p> <p>The Scheme includes capacity enhancements at the Seven Hills junction to accommodate the forecast increase in traffic demand and to improve operational performance of the junction. This will reduce the likelihood of traffic congestion at this junction extending back to Painshill junction.</p>
RR-059	Painshill Park and Painshill Estate residents' security will severely be affected by the proposed changes	<p>The Scheme Layout Plans (APP-012), sheets 7 and 8 show that the proposed private means of access will tie-in and be at the same level as the A3 southbound entry slip from the Painshill junction. Therefore, the start of the private means of access will be cut into the adjacent ground, with earthworks that slope up to the level of Painshill Park, which sits at higher than the on-slip. There will be a highway fence at the top of the earthworks and the existing trees will be seen behind the fence. The combination of earthworks slope, fence and trees should act as a deterrent, along with the park boundary fence.</p> <p>The earthworks will reduce in height beyond the proposed security gate, as the private means of access arrives at the same level as the existing ground. There will be highway fencing provided on both sides, which will deter unauthorised access.</p>
RR-059	The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air and noise pollution experienced by residents and visitors to the park.	<p>Traffic forecasts presented in Table C-2 Appendix C of the Traffic Forecast Report (Submitted at Deadline 1 as Volume 9.13 show that compared to a 'do-minimum' approach, the Scheme will have only a small effect on the A3 traffic levels. Daily traffic flows on the A3 between Painshill junction and M25 junction 10 are forecast to increase by 3.8% in 2022 and 4.7% in 2037 due to the Scheme. The forecast increase in traffic flow is because the additional capacity at junction 10 delivered by the Scheme means traffic diverts on to the Strategic Road Network (SRN) from alternative routes on the local road network. Traffic levels on the proposed private means of access will be small, principally related to use of the Girl Guides camp site.</p> <p>The air quality assessment in the Environmental Statement Chapter 5 (APP-050), included one receptor within the Painshill estate and close to the Painshill Roundabout (receptor R30 – West Lodge). The results at this receptor (Environmental Statement Appendix 5.1, Section 5.7, APP-080) show a small decrease in annual average nitrogen dioxide concentrations of 1.1 µg/m3 with the</p>

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		<p>Scheme when compared to without the Scheme, with actual concentrations around half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>The assessment also included a receptor east of the A3 near the Painshill estate (receptor R26 -The Bungalow, Heyswood Camp). Although the results at this receptor show a small increase in annual average nitrogen dioxide concentrations of 0.7 µg/m³ with the Scheme compared to without the Scheme, the actual concentrations are less than half of the 40 µg/m³ national air quality objective value, so air quality can be considered relatively good in this area.</p> <p>Further away from the A3, pollutant concentrations would be even lower.</p>
RR-059	The increased volume of traffic associated with the A3 widening and the Access Road is expected to increase further the high levels of air and noise pollution experienced by residents and visitors to the park. Losing trees from the ancient woodland (natural barrier) will further impact the remaining park and estate	<p>The predicted effects of the Scheme on noise levels at Painshill Park and the Painshill Estate vary according to location, but none of the effects will be significant. The noise assessment in Chapter 6 of the Environmental Statement (APP-051) shows that negligible changes of less than 1 dB will occur in this area, as shown on the noise contour maps in Figures 6.11 and 6.12 (APP-067) of Environmental Statement: Chapter 6 Noise and Vibration Figures.</p> <p>Three properties within the Painshill Estate (The Belfry House, 2 Pains Hill House, The Clock House) are predicted as having negligible increases at their worst affected building facades. All other properties at the Painshill Estate are predicted as having negligible decreases at their worst affected building facade. Negligible changes, positive or negative, would not be perceptible.</p> <p>The model used in the noise assessment in Chapter 6 of the Environmental Statement (APP-051) to predict road traffic noise in the operation phase does not attribute any noise attenuation to the existing trees along the road corridor, in accordance with standard practice. This is because any such reduction in noise levels will be, at best, small and will vary according to planting density, species, height, condition and season. The proposed tree felling will have a negligible impact on noise levels within the park and estate. Any small increases will be more than negated by the effects of the low noise road surfacing proposed on the A3, as shown by the noise contours on Figures 6.11 and 6.12 in APP-067.</p>
RR-059	Human Rights of Residents. The right to a family/private life and enjoyment of property enshrined in European legislation is relevant in this context. We	Highways England recognises that the Scheme has an impact on individuals. In preparing the DCO, Highways England has had due regard to the European Convention on Human Rights (ECHR) and the Human Rights Act 1998. Chapter 6 of

PINS APP Reference	Relevant Representation Issue	Highways England Response
	believe that the current proposals would violate the rights of approximately 30 people who live on the Painshill Estate	the Statement of Reasons (APP-022) explains how the Scheme complies with this legislation, notwithstanding any infringement of the private rights of those whose interests in the land may be affected by the Scheme. Highways England considers that the significant public benefits that will arise from the Scheme as set out in the Statement of Reasons outweigh any harm to those individuals. The DCO strikes a fair balance between the public interest in seeing the Scheme proceed (which is unlikely to happen in the absence of the DCO) and the private rights that will be affected.
RR-059	It also appears that in the consultation process to date the rights of Painshill residents have been assigned a much lower priority vs. impact.	<p>Highways England has considered and has had regard to all consultation responses in equal priority. The Consultation Report (APP-026 to APP-037) illustrates the extensive engagement and where the comments of all stakeholders have been considered in the development of the Scheme.</p> <p>Highways England held three rounds of consultation and all responses have been analysed and considered by the project. The outcome of the consultations and feedback from ongoing engagement has helped inform the Scheme design, including the views of Painshill Residents that have been considered as part of this process.</p>
RR-059	Impact on Property Values The current proposals will lead to substantial compensation claims by the 12 households on the Painshill Estate for the "blight" caused by the construction work including loss of market value of the properties.	<p>Those with an interest in properties affected by our proposals may be entitled to compensation. Homeowners with a qualifying interest may be able to claim for the reduction in value to their property resulting from the use of the new works. Such claims are made under Part 1 of the Land Compensation Act 1973, this is usually referred to as "Part 1 Claim". A claimant must demonstrate that the reduction in value is caused by the 'physical factors' from the use of the new works. The physical factors considered include noise, vibration, and artificial light. Such claims can be made one year after the new works are open to public use. In some circumstances a landowner may also be able to claim for compensation where the exercise of the powers granted by the DCO interferes with their interest in property. It is necessary to demonstrate that this interference is the cause of a loss of value to the property. Such claims are made under Section 10 of the Compulsory Purchase Act 1965.</p> <p>Claims for compensation are subject to a number of requirements and conditions including who can make a claim and when a claim can be made. If you think you may be entitled to claim, please seek professional advice from a suitably qualified lawyer or chartered surveyor. For further information on compensation more generally please see Government guidance documents on compulsory purchase https://www.gov.uk/government/collections/compulsory-purchase-system-guidance.</p>

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		For specific guidance and to apply to make a Part 1 Claim, please go to: https://www.gov.uk/compensation-road-property-value/make-a-claim .

RR-060 ALAN WATTS

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-060	<p>I use the junction regularly travelling from the A3 northbound to the M25 eastbound, and regularly encounter delays back onto the main A3 carriageway which is dangerous.</p> <p>Likewise in the reverse direction the queue often stretches for a mile on the M25.</p>	<p>A primary objective of the Scheme (as illustrated in Section 2.3 of the Planning Statement (APP-133) is to reduce traffic congestion and delay at the A3/M25 Junction 10 Wisley Interchange.</p> <p>As presented in the Transport Assessment (APP-136), traffic modelling of the Scheme has demonstrated that it will accommodate forecast traffic growth whilst also reducing traffic congestion and delay on both the Strategic Road Network (SRN) and local roads.</p> <p>It has also demonstrated that traffic flows on local roads generally reduce with the Scheme as a result of traffic diverting away from local roads and onto the SRN due to the reduction in traffic congestion and delay delivered on it by the Scheme.</p>

RR-061 YOUNG FAMILY

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-061	<p>Alternative access is proposed by Highways England through the construction of a new road to replace the existing BOAT 525 byway, currently unsuitable to most vehicles, that connects Elm Lane and Old Lane to the east. This will require the widening of the existing road and track, creation of turning heads, stopping up of Elm Lane and realignment of existing private access off Elm Lane, which requires the acquisition of land. Part of the Property is proposed to be acquired to facilitate these works. Whilst there has been some engagement with Highways England as to the nature of the works, these discussions have not provided the necessary level of assurance that the works will be undertaken in a fashion that:</p> <p>(i) maintains vehicular access to the Property at all times and minimises disruption to residents;</p>	<p>The Principal Contractor will ensure that disruption is minimal and vehicular access to properties is maintained at all times during construction. This will be secured through the Traffic Management Plan under Schedule 2 Requirement 4 (Traffic management during construction) of the draft DCO (APP-018).</p> <p>The construction sequence for the Scheme will improve access from Elm Corner to Old Lane prior to stopping up of the existing access from the A3 to Elm Corner and will, therefore, maintain access for Elm Corner residents.</p> <p>A bridleway will be designated along the stopped-up length of Elm Lane to maintain the continuity of the public right of way network as shown on the Streets, Rights of Way and Access Plans (APP-008).</p>
RR-061	<p>(ii) minimises the amount of land to be acquired;</p>	<p>As set out in paragraph 2.4.3 of the Statement of Reasons (APP-022), the Scheme has been designed to minimise land take from and interference with the rights of third parties. Detailed design may further minimise land take. The existing unsurfaced track (byway open to all traffic (BOAT)) between Elm Corner and Old Lane is currently unsuitable for most vehicles. This section of BOAT will be constructed to Surrey County Council's standards of a 4.1m wide carriageway and will be suitable for all vehicles to access Elm Corner.</p> <p>Highways England is continuing to engage with landowners throughout the development of the Scheme.</p>
RR-061	<p>(iii) ensures that the works required to the private accesses of properties is properly managed with the owner having the requisite level of input and control over building materials, timing of works, revised boundary treatments/features, etc.</p>	<p>Highways England will continue to engage with Elm Corner residents throughout the development and implementation of the Scheme. The CEMP (APP-134) sets out the commitments to carrying out the works in an appropriate manner and this will be updated before construction to take account of concerns expressed by residents and businesses.</p>

PINS APP Reference	Relevant Representation Issue	Highways England Response
RR-061	(iv) addresses the reinstatement of boundary features following the acquisition of land.	Highways England will ensure that suitable boundary features will be reinstated as part of the works and are committed to ongoing engagement with impacted landowners throughout the development of the Scheme.
RR-061	Highways England should work with property owners and residents to ensure that the extent of works and necessary commitments are entered into in advance of the appointment of contractors and commencement of the works.	Highways England is continuing to engage with residents throughout the development and delivery of the Scheme. We are currently engaging with landowners regarding temporary and permanent land requirements.

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