

# TRANSPORT FOR LONDON

## M25 JUNCTION 28 IMPROVEMENTS – RESPONSE TO WRITTEN QUESTIONS (WQI)

4 FEBRUARY 2021

This document provides TfL's responses to the Written Questions and requests for information made by the Examining Authority for the M25 Junction 28 improvements scheme (WQI). Responses have been provided to all questions directed to TfL and any other questions relevant to TfL's interests.

Reference	Subject and Interested Parties	Question	TfL's response
CA	Compulsory Acquisition		
CA I.2	<i>Protective Provisions</i> <b>All Statutory Undertakers</b>	<p>A number of Statutory Undertakers have raised concerns regarding Protective Provisions.</p> <p>i) If there are substantive concerns with the wording of Protective Provisions as set out in the draft DCO [APP-015] provide a clean and tracked changed version of the Protected Provisions required together with an explanation for the need for the change. Or;</p> <p>ii) If the changes are not substantive, set out where there are differences of opinion and what changes would be required.</p>	<p>TfL is presently in discussions with the Applicant regarding the impact of the scheme on TfL's existing network and the extent of new highways and structures which are proposed to become the maintenance responsibility of TfL. TfL has indicated to HE that it believes that protective provisions in favour of TfL should be incorporated into the DCO.</p> <p>TfL is aware of the recent decision on the A303 Sparkford to Ilchester Dualling DCO which established the appropriateness of incorporating in a DCO protective provisions in favour of the local highway authority. Until discussions between TfL and HE are progressed further, it is not possible to set out what any protective provisions in favour of TfL will cover.</p>

DCO	<b>Draft Development Consent Order (draft DCO) – Schedules</b>		
DCO I.22	<p><i>Schedule 2, Part 1</i></p> <p><b>The Applicant</b></p> <p><b>All relevant Planning Authorities</b></p> <p><b>Transport for London</b></p>	<p>Requirements 3 through 12 requires the SoS to be the determining authority for the discharge of the said Requirements.</p> <p>Explain why the Local Authorities would not have responsibility for the discharge of these Requirements.</p>	<p>TfL is aware that it is usual for the SoS to determine the discharge of any requirements on HE DCO schemes. While TfL has no objection to this it considers that in this case it would be more appropriate for the local authorities having responsibility for discharge of Requirements 3 to 12. This would facilitate the necessary discussions between the London Borough of Havering and TfL on the requirements to ensure the impacts on the highway network as a whole are co-ordinated.</p> <p>Regardless of responsibility for discharge of requirements, TfL wishes to ensure that its role as a strategic highway authority whose network is impacted by the scheme is recognised by the inclusion in the DCO in Requirements 3 to 12 (as appropriate) provision for TfL to be consulted and/or to approve details for the design and construction of the scheme.</p>
FDW	<b>Flood Risk, Drainage and Water</b>		
FDW I.14	<p><i>Surface Water Management Plan</i></p> <p><b>The Applicant</b></p> <p><b>All Relevant Planning Authorities</b></p>	<p>Although Chapters 8 [APP-030] and 16 [APP-038] of the ES and the REAC [APP-097] identify no significant effects from the Proposed Development on flooding and water, they nonetheless rely on the outline CEMP and in particular the submission of a SWMP to mitigate any potential effects caused from the construction of the Proposed Development.</p> <p>The Outline CEMP [APP-096] contains little details on how measures set out in the REAC would be achieved and the SWMP has not been submitted into the Examination. Moreover, paragraph 4.4.3 of the CEMP lists the SWMP as a document which may or may not be ultimately submitted as part of the CEMP and Requirement 4 of the draft DCO [APP-015].</p> <p>The ExA is concerned that water management and drainage matters are not adequately addressed at this stage having regard to the concerns raised in RRs and that pre-</p>	<p>While this question is not directed to TfL, TfL would support the request for an appropriate SWMP to be submitted to the Examination given that it is proposed that TfL will become responsible for the future maintenance of part of the scheme including drainage infrastructure. This will ensure that the impacts of drainage from TfL infrastructure and any necessary mitigation are understood and incorporated into the design at the earliest opportunity to maximise any benefits.</p>

		<p>commencement works as set out in the draft DCO [APP-015] would be uncontrolled. The ExA considers the approach to surface water drainage should be known in this Examination.</p> <p>i) Comment on the approach not to submit an SWMP into the Examination.</p> <p>ii) Explain how the ExA can be satisfied that pre-commencement and uncontrolled works would have no significant effect on drainage matters and the discharge of Requirement 8 of the draft DCO and that mitigation would be adequate. OR</p> <p><b>For the Applicant:</b></p> <p>iii) Submit an outline SWMP into the Examination and update Requirement 8 of the draft DCO accordingly securing the final SWMP to be in accordance with the outline version.</p>	
<b>TA</b>	<b>Traffic and Access</b>		
<b>TA I.I</b>	<p><i>Traffic Management Plan</i></p> <p><b>The Applicant</b></p> <p><b>Essex County Council</b></p> <p><b>London Borough of Havering</b></p> <p><b>Transport for London</b></p>	<p>Although the REAC [APP-097] identifies no significant effects by the construction and operation of the Proposed Development in respect to noise and vibration and people and communities from traffic issues, it does nonetheless rely on the submission of a Traffic Management Plan (TMP) to mitigate any harmful effects. However, this document is not before the Examination and the ExA is concerned that traffic management matters are not adequately addressed at this stage having regard to the concerns raised in RRs. The ExA considers the approach to mitigation on traffic management matters should be known in this Examination.</p> <p>Additionally, concerns have been raised in RRs that construction traffic and construction site access requirements could lead to significant disruption to traffic on local roads and to access westwards along the A12 for residents of Woodstock Avenue.</p> <p>i) Comment on the approach not to submit an TMP into the Examination. OR</p>	<p>TfL supports the request for an outline TMP to be submitted to the Examination. TfL has previously indicated in its representations that it should have the right to approve any traffic management arrangements which affect its network. Having sight of outline proposals at this stage will shorten any approvals required to be given at the discharge of requirements stage prior to construction of the scheme.</p> <p>TfL would expect any final TMP to be substantially in accordance with an outline TMP that formed part of the application documents and which had been subject to examination. In addition, given the substantial impact on traffic management around the A12 resulting from the works, consultation with TfL on the TMP is insufficient. No protective provisions are currently in the draft DCO in favour of TfL which would offer TfL further reassurance on traffic management.</p>

		<p><b>For the Applicant:</b></p> <p>ii) Submit an outline TMP into the Examination update Requirement 10 of the draft DCO securing the final TMP to be in accordance with the outline version.</p>	
<p><b>TA I.13</b></p>	<p><i>Accessibility</i></p> <p><b>London Borough of Havering</b></p> <p><b>Transport for London</b></p>	<p>Particular concern has been raised by residents of Woodstock Avenue in relation to a lack of access westbound along the A12 from their road as it is currently not possible to execute a right turn from the junction of Woodstock Avenue on to the A12.</p> <p>i) Comment on the level of support within each organisation for the provision of a right turn from Woodstock Avenue onto the A12.</p> <p>ii) Comment on the practicalities of such a provision on the current network.</p> <p>iii) Provide an opinion as to whether the Proposed Development would alleviate the current issues faced by residents of the properties.</p>	<p>i) TfL does not support the provision of a right turn from Woodstock Avenue onto the A12. During construction, the forecasts presented in the Transport Assessment Supplementary Information Report indicate that during the most disruptive period of construction, journey times for residents of Woodstock Avenue wishing to access the westbound A12 will be between 35 and 64 seconds. TfL considers this increase in journey time to be modest and would not unduly affect residents making journeys on this route.</p> <p>Following completion of the scheme, there will be a substantial improvement in journey times for residents making this movement compared to the Do Minimum (a forecast improvement of over 12 minutes in the 2037 AM peak), with the scheme resulting in journey times similar to the base year. In the PM peak there are negligible impacts.</p> <p>Furthermore, surveys undertaken by the London Borough of Havering indicate that the number of people currently existing Woodstock Avenue and seeking to access the westbound A12 is an average of four vehicles per hour and a maximum of seven vehicles per hour (for the hours surveyed).</p> <p>Providing a right turn from Woodstock Avenue onto the A12 would require a signalised junction, with all traffic on the A12 in both directions stopped for the signal phase allowing traffic out of Woodstock Avenue, as there is no space between the carriageways for traffic to wait. This would lengthen average journey times for all traffic in both directions on the A12, affecting a much greater number of vehicles.</p>

			<p>Given the small increase in journey times for a relatively short period during construction, the beneficial impacts post-construction, and the small number of people affected compared to the much larger number of users of the A12 who would be adversely affected by a new junction, TfL does not support the provision of a right turn from Woodstock Avenue onto the A12</p> <p>ii) There is insufficient space at the junction between the A12 and Woodstock Avenue for right-turning vehicles to wait between the carriageways before joining the westbound carriageway. Any junction would therefore need to be signalised to stop all traffic in both directions on the A12 to allow vehicles to turn right out of Woodstock Avenue. This junction would be close to the existing signalised junction with Harold Court Road.</p> <p>A junction of this type may be technically feasible but would have likely have substantial adverse impacts on existing road users on the A12.</p> <p>iii) TfL considers that the Proposed Development will not substantially alleviate any traffic issues currently faced by users of Woodstock Avenue. However, it is expected to alleviate issues that would be faced in the future, given the forecast substantial improvement in journey times in the modelled future years in the AM peak.</p>
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