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# **GROVE FARM**

# **TRANSPORTATION & HIGHWAY** SUPPLEMENTARY REPRESENTATIONS

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#### **CONCERNING**

**HIGHWAYS ENGLAND DEVELOPMENT CONSENT ORDER APPLICATION (DCO) FOR** M25, JUNCTION 28 IMPROVEMENT SCHEME

Redwood Reference: PMcL/3396d2/March 2021



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# **DRAWINGS**

Drawing No. REDW-3396-115- Amended Grove Farm Access Overview



#### 1.0 INTRODUCTION

- 1.1 Further to the Planning Inspectorate (PINS) Hearing regarding Highways England's (HE) application for a Development Consent Order (DCO) to carry out a M25 Junction 28 Improvement Scheme ('The HE Scheme'), our first submission consisted of Grove Farm Transportation & Highway Written representations (Ref: PMcL/3396d1/Feb 2021) which was responded to by Highways England (HE) and discussed in detail during the formal PINS Hearing.
- 1.2 After further consideration of comments made by all parties during the Hearing, we have now prepared **Drawing No. REDW-3396-115** showing our suggested and amended improvements to the HE Scheme surrounding Grove Farm. **Drawing No. REDW-3396-115** shows the HE proposals at an adequate scale and establishes the position of the HE Scheme relative to the location of the three dwellings on the Farm. The existing A12 eastbound off-slip (shaded yellow on the plan) will be closed as part of the HE Scheme. The new alignment of the A12 eastbound off-slip will be located significantly closer to the existing dwellings (shaded grey on the plan).
- 1.3 It should be noted that there are three dwellings located at Grove Farm. The effect on the living environment of the owners and their family will be permanent and detrimental unless adequate mitigating measures as suggested are incorporated into the HE Scheme.
- 1.4 The owners of Grove Farm have concerns that no permanent noise mitigation measures are included in the HE Scheme surrounding Grove Farm. To rectify this omission my **Drawing No. REDW-3396-115** shows the suggested location of permanent noise attenuation fencing surrounding the properties which would contribute towards mitigation of increased environmental traffic noise brought about by the HE Scheme. We request that HE include in an amended HE Scheme permanent noise mitigation measures surrounding Grove Farm as shown on my **Drawing No. REDW-3396-115**.



### 2.0 GROVE FARM ACCESS PROPOSALS – M25 NORTHBOUND ON-SLIP

- 2.1 The location of the existing Grove Farm access is already a significant departure from highway design standards by its location close the north-west egress of the roundabout. HE stated at the formal Hearing that their proposals do not affect the existing access to Grove Farm from the M25 northbound slip, therefore no alteration to Grove Farm access is necessary. We do not agree that the HE Scheme does not affect the existing Grove Farm access.
- 2.2 The HE Scheme introduces new safety concerns in that the access to Grove Farm is now immediately after the M25 northbound exit from the roundabout relative to the new alignment of the A12 eastbound off-slip. Currently, the existing access is approximately 30 metres from the northbound exit from the roundabout. This reduction in the separation between the site access and the roundabout brought about by the HE Scheme will introduce new road safety issues whereby a road user signaling can be misinterpreted by following vehicles. Road users indicating left to exit a roundabout may not have sufficient time to cancel their indicator and re-indicate before turning left from the main road. This could result in following road users failing to anticipate the left turn manoeuvre by the proceeding vehicle increasing the risk of late braking and/or rear end shunt type collisions.
- 2.3 We still maintain that our proposal to close the existing access into Grove Farm and relocate the Grove Farm access a short distance north beyond the electrical sub-station layby will provide a safer access for the farm and at the same time can be combined with the proposed access for the HE pond maintenance vehicles and electricity board vehicles providing a safer access for all.
- 2.4 Given the new safety issues arising from retaining the Grove Farm access in its present location, we can see no practical reason why the relocation of the Grove Farm access could not be facilitated as shown on my **Drawing No. REDW-3396-115**. My proposals will not introduce any new conflicting vehicle crossing movements and will provide a safer access for the farm and no egress onto the M25 northbound on-slip for farm traffic.
- 2.5 The proposed relocated site access off the M25 northbound on-slip has a short deceleration length and is a departure from design standards, however overall I and the



Grove Farm safety audit team consider there would be a nett benefit in road safety terms when compared to the existing Grove Farm access arrangements as the new access would be further away from the roundabout. M25 northbound on-slip vehicle speeds would still be relatively low as the relocated access is marginally further north of the existing farm access. HE confirmed at the Hearing that whilst the formal speed limit of the on-slip is 70 mph, the Design Speed for this section of road is 70kph (44mph) reflecting the fact that vehicle speeds will still be low (i.e. less than 40mph) leaving the roundabout.

- 2.6 My **Drawing No. REDW-3396-113** which accompanied the first Written Representations (Ref: PMcL/3396d1/Feb 2021) showed a 15.5m long farm vehicle transporter leaving the M25 northbound on-slip and safely turning into the farm and a 12 metre rigid lorry leaving the M25 northbound on-slip and safely turning into the HE dedicated access road leading to the pond maintenance area in advance of the security gates. We consider a 12 metre rigid would be significantly larger than the longest vehicle expected to access the pond service area. The track included in the first Written Representations on **Drawing No. REDW-3396-113** shows that this vehicle can turn into a dedicated waiting area in front of the HE security gates without obstructing traffic entering Grove Farm.
- 2.7 Notwithstanding these satisfactory track drawings, HE commented that the distance between the security gates and the access to the farm could result in a vehicle of exceptional length waiting in front of the gates which could block traffic entering the farm. A straight-forward engineering solution to this issue is shown on **Drawing No. REDW-3396-115** whereby the distance between the pond access security gates and the farm access has been increased to 20 metres; more than adequate to safely contain any size of vehicle legally allowed to use UK roads.
- 2.8 All land required for the amended farm access proposals from the M25 northbound on-slip is either in the ownership of HE or Grove Farm. Given the amended proposals shown on **Drawing No. REDW-3396-115**, we request that HE include in an amended HE Scheme:
  - i) Closure of the existing access to Grove Farm from the M25 northbound on-slip;
  - ii) Construction of a new dedicated auxiliary left-turn lane access to Grove Farm from the M25 northbound on slip road to be shared with the HE service access already proposed for pond maintenance and electricity board vehicles.



### 3.0 GROVE FARM EGRESS PROPOSALS – A12 EASTBOUND OFF-SLIP

- 3.1 Grove Farm's previous submission suggested providing a new access into Grove Farm from the A12 eastbound off-slip, combined with the Grove Farm egress. After further consideration of comments received during the Hearing, the proposals have been amended to remove the request for a new access to Grove Farm from the A12 eastbound off-slip.
- 3.2 The proposal shown on my **Drawing No. REDW-3396-115** now removes a new access, however the proposal includes a relocation of the existing Grove Farm egress further west which will have the following benefits:
  - i) The current location will result in Grove Farm traffic leaving the site queuing directly outside the Grove Farm main house as the distance between the farmhouse and the A12 off-slip has been significantly reduced. The relocation will move this queuing traffic further away from the farmhouse;
  - ii) The relocated egress will allow for the inclusion of a reasonably sized landscaped area between the farmhouse and suggested noise attenuation fencing;
  - iii) Traffic leaving the farm heading south on the M25 will be provided with more distance to adequately cross to the right-hand lane when approaching the roundabout.
- 3.3 All land required for the amended farm egress proposals onto the A12 eastbound off-slip is either in the ownership of HE or Grove Farm. Given the amended proposals shown on Drawing No. REDW-3396-115, we request that HE include in an amended HE Scheme:
  - i) Closure of the amended egress from Grove Farm to the A12 eastbound off-slip;
  - ii) Construction of a new dedicated egress from Grove Farm to the A12 eastbound offslip with alteration of on-site roads to suit.

