

## **M25 junction 28 improvement scheme**

**TR010029**

### **9.71 Applicant's response to A Manley's written summary of hearings**

Rules 8(1)(k)  
Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

April 2021

# Infrastructure Planning

## Planning Act 2008

### Infrastructure Planning (Examination Procedure) Rules 2010

### M25 junction 28 improvement scheme Development Consent Order 202[x ]

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<b>Rule Number:</b>	Rule 8(1)(k)
<b>Planning Inspectorate Scheme Reference</b>	TR010029
<b>Application Document Reference</b>	TR010029/EXAM/9.71
<b>Author:</b>	M25 junction 28 scheme, Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
0	13 April 2021	Deadline 5

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# 1. Purpose and structure of responses to written representations

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to A Manley's Written summary of the hearings submitted to the Planning Inspectorate on or before Deadline 4 (17 March 2021).
- 1.1.2 Highways England has sought to provide comments where it is helpful to the Examination to do so, for instance where a representation includes a request for further information or clarification from Highways England or where Highways England considers that it would be appropriate for the Examining Authority (ExA) to have Highways England's views in response to a matter raised by an Interested Party in its representations. Where issues raised within a representation have been dealt with previously by Highways England, for instance in response to a question posed by the ExA in its first round of written questions or within one of the application documents submitted to the Examination, a cross reference to that response or document is provided to avoid unnecessary duplication. The information provided in this document should, therefore, be read in conjunction with the material to which cross references are provided.
- 1.1.3 Highways England has not provided comments on every point made within the representation (for instance, Highways England has not responded to comments made about the adequacy of its pre-application consultation given that Highways England has already provided a full report of the consultation it has undertaken as part of its application for the Development Consent Order (DCO)) and the Planning Inspectorate has already confirmed the adequacy of the pre-application consultation undertaken when the application was accepted for Examination. In some cases, no comments have been provided, for instance, because the written representation was very short, or because it expressed objections in principle to the Scheme or expressions of opinion without supporting evidence.
- 1.1.4 For the avoidance of doubt, where Highways England has chosen not to comment on matters raised by Interested Parties, this is not an indication Highways England agrees with the point or comment raised or opinion expressed.

## 2. REP4-032 - ANTHONY MANLEY DEADLINE 4 WRITTEN SUMMARY OF ORAL SUBMISSIONS AT HEARINGS HELD WEEK COMMENCING 1 MARCH 2021

Response reference:	Representation Issue	Highways England Response
REP4-032-01	<p>It would be very helpful if a proviso was put in place within the planned works, before the inevitable traffic delays occur during construction, to include a U-Turn on the A12, with a traffic light control. This could be placed anywhere between Woodstock Avenue and the exit slip road off the A12 Eastbound to take the pressure off Brook street junction and avoid the diversion whenever the exit is closed. All residents who live in Woodstock and Kenilworth Avenues that have to travel Westbound will then avoid the minimum of a 12 mile diversion. Every day at peak times heavy traffic builds up from the slip road junction A12/M25 (travelling west bound) which would make the diversion a complete nightmare because journey times would exceed an hour just to return to the opposite side of our road along the A12 where it started.</p>	<p>The option of installing a U-Turn as part of the Scheme, with a traffic light control, on the A12 between Woodstock Avenue and the exit slip road is outside the scope of the Scheme and would need to be considered by Transport for London (TfL) as the highway authority for this section of the A12.</p> <p>Please refer to paragraphs 7.8 to 7.10 of TfL's Written Representation (REP2-036) and TfL's response to Written Question TA1.13 (REP2-037) which explains that TfL, as the highway authority for the A12, does not support the provision of a permanent right turn from Woodstock Avenue because it has concerns about the feasibility of designing a safe junction and the disruption such a junction would cause to a greater number of road users on the A12. Highways England expects that a temporary U-turn on the A12 would pose similar safety risks.</p> <p>Temporary traffic management arrangements required to construct the Scheme will inevitably result in some temporary additional traffic congestion and delay. However, there will only be a few overnight occasions when the U-turn from the A12 eastbound off-slip to the A12 westbound at junction 28 will not be permitted and a temporary signposted alternative diversion route put in place. To minimise disruption, full closure of the A12</p>

Response reference:	Representation Issue	Highways England Response
		<p>eastbound off-slip would only take place overnight when there would be much less traffic on the road network and delays to journey times therefore kept to acceptable levels. The diversion route for occasional overnight closures of the A12 eastbound off-slip will be via the Mountnessing junction on the A12 to the east, which will add approximately 10 to 15 minutes to journeys that would otherwise U-turn at junction 28 to head west on the A12.</p>
<p>REP4-032-02</p>	<p>I also want to know how the noise levels are going to be managed late at night during slip road closures? Highways England stated at the first meeting that heavy equipment will be moving around and bright flood lights used, for up to 3 years as forecast. This will impact all residents of Woodstock Avenue. We are already affected by the noise from vehicles travelling on the motorway day and night and in particular when the wind is blowing from the East which is most of the time.</p>	<p>Highways England has provided a response to this issue in its response to Mr Manley's Relevant Representation (RR-003-1) set out in Highways England's responses to Relevant Representations (REP1-002).</p> <p>As described in section 6.9 of the Environmental Statement (ES) Chapter 6 Noise and vibration (REP3A-006), night-time works will be avoided as far as reasonably practicable however, night-time works will be required on the existing highway network when the new road infrastructure needs to be tied in to the existing road infrastructure. It is anticipated that these activities will be undertaken between 23.00 and 07.00. These activities are likely to include installing traffic management, and various construction activities such as: working on the gantries, road surfacing, white lining, and constructing the tie ins to the existing network. The Principal Contractor will apply for a Section 61 consent under the Control of Pollution Act 1974 for some construction works, and any night-time works. This would be discussed when engaging with the local authorities prior to works commencing and include</p>

Response reference:	Representation Issue	Highways England Response
		<p>any additional noise assessment undertaken at that stage to inform the Section 61 consent. The Principal Contractor will keep local residents informed of the works. The construction noise assessment, reported in the ES Chapter 6 Noise (see para 6.10.8, page 39) submitted at Deadline 3A (REP3A-006), concludes that for receptors in Woodstock Avenue there is no noise impact. The noise levels are presented in ES Noise chapters figures document (REP3A-008) where figures 6.2 (daytime) and 6.3 (night time) show the current noise levels, while figures 6.5 to 6.8 show the daytime noise levels, and figures 6.12 to 6.15 show the night time noise levels likely to be generated by the Scheme during the construction stage.</p> <p>The Register of Environmental Actions and Commitments (REAC) (REP3A-011) outlines the mitigation measures required before the start of construction (Table 1.2), during construction (Table 1.3) and after construction (Table 1.4) and initially forms part of the Outline Construction Environmental Management Plan (CEMP) (REP3A-010).</p> <p>Table 1.3, commitment LV2.1 in the REAC requires that the contractor must use limited and/or directional lighting wherever possible to restrict night-time impacts. The CEMP will be prepared and maintained by the Principal Contractor and will reflect the mitigation contained with the REAC and will be secured through Requirement 4 of the DCO (TR010029/APP/3.1(5)).</p>

Response reference:	Representation Issue	Highways England Response
REP4-032-03	<p>The suggestion made by HE that residents are expected to park in nearby roads when the diversion is in place, is ridiculous and will be very dangerous.</p> <p>The only road we could possibly use would be Kenilworth Avenue but this would just be making a dangerous situation even worse by adding to the number of vehicles attempting to turn right at this point along the A12 plus there isn't additional parking spaces available in KA and it is still too far for many residents to walk. It is not a safe and viable option.</p>	<p>Highways England has not suggested that residents park their car elsewhere when occasional overnight road closures of the A12 eastbound off-slip are required.</p> <p>Highways England will put in place suitable signposted temporary diversions when temporary overnight road closures are required. The diversion route for occasional overnight closures of the A12 eastbound off-slip will be via the Mountnessing junction on the A12 to the east, which will add approximately 10 to 15 minutes to journeys that would otherwise U-turn at junction 28 to head west on the A12.</p>



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Highways England Company Limited registered in England and Wales number 09346363