

M25 junction 28 improvement scheme

TR010029

9.74 Applicant's response to J Allan's written summary of hearings

Rule 8(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure)
Rules 2010

Volume 9

April 2021

Infrastructure Planning

Planning Act 2008

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

M25 junction 28 scheme Development Consent Order 202[x]

9.74 Applicant's response to J Allan's written summary of hearings

Rule Number:	Rule 8(k)
Planning Inspectorate Scheme Reference:	TR010029
Application Document Reference:	TR010029/EXAM/9.74
Author:	M25 junction 28 improvement scheme project team, Highways England

Version	Date	Status of Version
0	13 April 2021	Deadline 5

Table of contents

Chapter	Pages
1. Purpose and structure of responses to written representations	4
2. REP4-035 Jane Allan written summary of oral submissions put at the hearings held the week commencing 1 march 2021	5

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 J Allan's Written Representation 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. REP4-035 Jane Allan written summary of oral submissions put at the hearings held the week commencing 1 March 2021

Response reference:	Representation Issue	HE Response
REP4-035-01	<p>I am very concerned that at this late stage in the Examination (Ex) process there is still no Traffic Management Plan (TMP) from Highways England (HE) highlighting access issues for residents of Woodstock Avenue (WA). This has been a concern of many since the start of the consultation process (years ago) and nothing has been done to address this even though we (residents of WA) were advised by HE at a residents representative meeting (organised at our request on the 20 March 2019) that consultation responses from residents will be taken into consideration when HE produce their TMP.</p>	<p>Highways England has submitted an outline Traffic Management Plan (TMP) to the Examination Authority at Deadline 4 (REP4-013). The TMP will be secured through Requirement 10 of the draft Development Consent Order (DCO) (TR01029/APP/3.1(4)). Under Requirement 10, the TMP will have to be submitted to and approved by the Secretary of State following consultation with the relevant highway authority before construction works can start.</p>
REP4-035-02	<p>Properties in WA (and those similarly affected along the eastbound A12 between Kenilworth Avenue and Woodstock Avenue) should be assessed separately to others in the Harold Park area as unlike other roads we do not have options for travelling westbound- we have to make a U turn via the M25/j28 roundabout hence any roadworks on (or closure of) the slip road will impact us greatly and disproportionately more than others.</p>	<p>The People and Communities Chapter of the ES (APP-035) has been undertaken in accordance with DMRB guidance. Notwithstanding this, comments raised by residents of Woodstock Avenue as part of this examination have been responded to throughout by Highways England through REP1-002 response to Relevant Representations and REP3A-022 response to Written Representations.</p>

Response reference:	Representation Issue	HE Response
REP4-035-03	<p>When the eastbound A12 off slip is closed :</p> <ul style="list-style-type: none"> - It will be unacceptable for residents of WA (and the properties mentioned above) to have to undertake a 12 mile (minimum) diversion (on a busy section of the A12) to do a U turn to access local shops, schools, public transport and services within our own borough. Traffic on both sides of the A12 is often congested (particularly at peak times) in this area, which may result in residents having to make even longer diversions via Shenfield and Brentwood or Mountnessing when the slip road is closed and traffic is heavy. Tailbacks are renowned in this area following any incident along the A12, M25 and A127 triangle between Gallows Corner, the M25j28 and the M25j29. 	<p>To minimise disruption, full closure of the A12 eastbound off-slip would only take place on a few occasions and overnight when there would be less traffic on the road network (and not congested), and the demand for access to shops, schools, etc. is expected to be low.</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>
REP4-035-04	<ul style="list-style-type: none"> - It is unrealistic to expect residents to leave their vehicles (even with written notice) elsewhere when there are no safe, accessible, alternative parking locations (particularly for elderly and disabled residents) within our neighbourhood. 	<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>

Response reference:	Representation Issue	HE Response
REP4-035-05	<ul style="list-style-type: none"> - It is unacceptable for health/social care workers providing essential services to residents (particularly those requiring long term multiple day/night visits) to make long diversions regularly on busy congested roads. 	<p>The temporary traffic management arrangements necessary to construct the Scheme have been designed to minimise disruption and additional traffic delay expected during construction as far as reasonably practicable.</p> <p>The Outline TMP (REP4-013) sets out the proposed approach to temporary traffic management during construction of the Scheme. Table 2.1 of the Outline TMP (REP4-013) explains that procedures will be in place that allow emergency services to travel through the road works, diversion routes will be in place and sufficient notification of closures will be given to emergency services in order to attend incidents in a timely manner.</p>
REP4-035-06	<ul style="list-style-type: none"> - Our main bus route (498) will be significantly disrupted for extended periods. 	<p>In regard to the bus route 498, Requirement 10 of the draft Development Consent Order (dDCO) (TR010029/EXAM/3.1(4)) requires the preparation and implementation of a TMP that will have to be submitted to and approved by the Secretary of State following consultation with the relevant highway authority before the relevant part of the works can start. The TMP (REP4-013) will set out the temporary diversions for bus routes required by traffic management arrangements, including overnight road closures. When preparing the TMP, it is standard practice for the appointed Principal Contractor to liaise with the relevant bus operators regarding temporary diversion to minimise disruption to services as far as</p>

Response reference:	Representation Issue	HE Response
		reasonably practicable. Table 2.1 of the Outline TMP (REP4-013) highlights those key customers with whom liaison would take place which includes bus operators.
REP4-035-07	I was disappointed with the response from HE (at the Open Floor Hearing (OFH)) not wishing to entertain the idea of a right hand/ U turn along the A12 between WA and the current slip road because the A12 is owned/maintained by TfL.	<p>The option of installing an alternative means of access/exit from Woodstock Avenue on to the A12 is outside the scope of the Scheme, and Highways England has explained that this would need to be considered by 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 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 would pose the same safety risks to road users on the A12.</p>
REP4-035-08	I noted during subsequent meetings that examples of joint collaborative working (on intergreen and slip road matters) between the various agencies involved is required during both the construction and maintenance phases of this project. I would therefore like to request that a similar approach is taken for access issues in WA? This project will impact greatly on all adjoining roads whether they are	TfL as the highway authority, is responsible for addressing any access issues on this section of the A12. TfL's position on the access issues to Woodstock Avenue is set out in paragraph 7.7 – 7.10 of their Written Representation (REP2-036).

Response reference:	Representation Issue	HE Response
	maintained by HE, TfL, Essex CC or the London Borough of Havering (LBH).	
REP4-035-09	<p>WA has been 'severed' enough (via road, pathway and public transport) over the past 40 years following construction of the A12 dual carriageway and the M25.</p> <p>I do not believe this development will reduce severance and improve accessibility to residents of WA without addressing access issues hence I would like to request that a Site Specific Plan is produced for this matter?</p>	<p>The Scheme will reduce future traffic congestion and delay at junction 28, and as a result, also reduce queuing on the A12 eastbound carriageway approaching the junction. The Scheme is not expected to significantly alter the traffic volumes on the A12, particularly on the section adjacent to Woodstock Avenue, and therefore, will not contribute to any existing severance issues along the A12.</p> <p>TfL is the highway authority responsible for the A12 west of junction 28. Therefore, TfL, not Highways England, is responsible for addressing any current severance and safety issues on this section of the A12. A Site-Specific Plan for Woodstock Avenue would not provide any further detail to that which is currently part of the examination, and is therefore not necessary</p>
REP4-035-10	<p>This project should also improve accessibility to pathways/cycle routes/public transport in the vicinity of WA. It would be helpful if there was a 498 bus stop on the eastbound A12 dual carriageway in a similar position to the Maylands Way bus stop on the westbound A12 carriageway. Safety barriers for pedestrians along the A12 could also be improved.</p>	<p>TfL is the highway authority responsible for the A12 west of junction 28 and TfL manage the infrastructure and operations supporting the 498 bus route. Therefore, TfL, not Highways England, is responsible for addressing any current issues with pathways, cycle routes, public transport and safety barriers on this section of the A12.</p>

Response reference:	Representation Issue	HE Response
REP4-035-12	<p>The new double loop road could at times reduce accessibility for local residents as tailbacks along the eastbound A12 could form quicker:</p> <ul style="list-style-type: none"> - The eastbound A12 is currently single lane under the Brook Street roundabout which will post construction have four lanes (two from the new double loop road plus two from the existing eastbound A12 dual carriageway) merging into one lane which could create more traffic congestion. - Having a new double loop road joining the A12 within approximately half a mile of WA will create another area (in addition to traffic entering and leaving the petrol station and Maylands Golf Club plus the A12 off slip and Grove Farm exit on to the slip road) for incidents and congestion to occur. 	<p>The A12 eastbound currently reduces from two lanes to one lane (lane drop) under junction 28. The Scheme moves this lane drop further west to the point where the proposed new eastbound off slip road to the junction 28 roundabout diverges from the A12. The proposed loop road reduces from two lanes to one lane prior to its merge with the A12 eastbound carriageway. Where the proposed loop road joins the A12 eastbound, it will therefore be one lane and the loop road will join as a lane gain merge with the A12, to provide two lanes eastbound from the merge.</p> <p>The Scheme will provide additional capacity at junction 28 to accommodate forecast traffic growth and therefore reduce congestion and delay at the junction. Traffic modelling has demonstrated that the flow of traffic at the junction and on the A12 approaches is expected to improve with the Scheme in place, compared to future situation without the Scheme. As such it is expected that there will not be any traffic congestion where traffic merges into a single eastbound lane on the A12.</p> <p>The reduction in congestion and delay due to the Scheme should also reduce the number of shunt accidents expected at junction 28. This has been demonstrated by a road safety risk assessment and the traffic modelling of the Scheme that indicate a reduction in the likelihood of incidents occurring is expected.</p> <p>The additional capacity delivered by the Scheme will also improve the resilience of the junction; that is the ability of the roundabout to remain operational in the event of any incidents when they</p>

Response reference:	Representation Issue	HE Response
		occur, and thereby reduce their impact on traffic congestion and delay on the strategic and local networks.
REP4-035-13	I do believe residents of WA will be affected by noise and vibration during and post construction of this project hence I hope both (suitable) temporary and long term noise mitigation barriers are put in place.	<p>Highways England has provided a response to this issue in its response to Relevant Representation (RR-014-1) set out in Highways England's responses to Relevant Representations (REP1-002). Chapter 6 (Noise and vibration) of the Environmental Statement (ES) (REP3A-006) concludes that with the application of recommended management and mitigation measures, outlined in the Register of Environmental Actions and Commitments (REAC) (REP3A-011), there are unlikely to be any significant effects from noise due to the construction of the Scheme, and the changes in noise from the operation of the Scheme for the residents of Woodstock Avenue will be negligible. Based on the above noise mitigation barriers are not required.</p> <p>The construction noise assessment, reported in the ES Chapter 6 Noise submitted at Deadline 3A (see para 6.10.8, page 39, REP3A-006), concludes that for receptors in Woodstock Avenue there is no noise impact. Receptors in Woodstock Avenue are now included in Appendix 6.2 (REP3A-008) showing construction noise levels. The noise levels are presented in the 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>

Response reference:	Representation Issue	HE Response
		<p>In relation to operation, the assessment of road traffic noise from the Scheme takes the likely perception of noise changes into account. Changes in noise smaller than 1dB are not perceptible as outlined in ES Chapter 6 Noise and vibration, section 6.5 assessment methodology (TR010029/APP/6.1(3)). Chapter 6 Appendix 6.3 (Noise Sensitive Receptors) of the ES (TR010029/APP/6.3(3)) presents the predicted road traffic noise levels with and without the Scheme in its opening year (2022) and future assessment year (2037) for a selection of sensitive receptors within the study area. Tables 6.1 and 6.2 show that the change in predicted daytime and night-time noise road traffic noise levels with or without the Scheme are similar at 10 and 42 Woodstock Avenue, and all smaller than 1dB.</p>
REP4-035-14	<p>There will be increased traffic in the vicinity of WA during construction from deliveries of equipment/ raw materials and the workforce.</p>	<p>Section 6 of the Transport Assessment Supplementary Information Report (PDB-003) presents the assessment of the impacts of the Scheme during construction. Additional traffic generated by construction of the Scheme represents a very small increase in vehicle flows over existing traffic flows on the A12 and will therefore have a minimal impact.</p>
REP4-035-15	<p>WA is built on an incline resulting in properties towards the top of the road being higher than Maylands Cottages hence please take this into consideration when comparisons are made for noise mitigation purposes.</p>	<p>Please refer to paragraph 8.1.23 of Highways England's written summary of the Issue Specific Hearing 1 (ISH1) submitted at Deadline 4 (REP4-016).</p> <p>The noise assessment is based on a 3-dimensional (3D) computer-based noise model of the existing situation and the situation with the proposed scheme. The model uses Ordnance</p>

Response reference:	Representation Issue	HE Response
		<p>Survey data for its topographic data, and the heights of all receptors are based on this data. The noise modelling takes height into account in line with the standard calculation methods. It is agreed that receptors at the northern end of Woodstock Avenue are at a higher elevation than Maylands Cottages and this has been considered in the assessments.</p>
<p>REP4-035-17</p>	<p>As a resident I do consider this area to be 'locally sensitive' to visual changes hence would be keen for an independent design panel to be consulted prior to commencement of what was described as a difficult complex project? Building something iconic, functional and aesthetically pleasing would be very much welcomed in this area.</p>	<p>Highways England submitted 'The road to good design' summary table (REP4-023) at Deadline 4 which provides an explanation of how the principles within the road to good design guide are incorporated by the Scheme. Highways England has incorporated the principles of good road design in this Scheme and has prepared a summary table capturing the key considerations and measures taken during the development of the preliminary design.</p> <p>Further information is provided in Highways England response to written questions LV1.6 to LV1.9 (REP2-011) and in paragraph 7.1.19 of Highways England's written summary of the Issue Specific Hearing 1 (ISH1) submitted at Deadline 4 (REP4-016).</p>
<p>REP4-035-18</p>	<p>I was shocked to hear during the meetings that the ExA had not been made fully aware of issues involving local deer. There are hundreds of deer roaming between Maylands and South Weald via an underpass beneath the M25 hence please ensure adequate fencing is in situ along the A12 and M25 to protect the deer during and post construction.</p>	<p>Deer fencing and its location will be considered as part of detailed design. Requirement 13 of the draft DCO submitted at Deadline 4 (REP4-002) has been amended to secure the provision of deer fencing.</p>

Response reference:	Representation Issue	HE Response
REP4-035-19	<p>Flooding on the M25j28 roundabout (where it joins the A1023) is dangerous and needs resolution to improve the flow of traffic in this area.</p>	<p>In relation to the flooding issue on Brook Street roundabout (floods between A1023 Brook Street and M25 southbound on-slip), Connect Plus Service on behalf of Highways England has programmed repair works to be completed by summer 2022. These repair works will not have a direct impact on the Scheme and will be completed before carriageways resurfacing under the Scheme is carried out.</p>
REP4-035-20	<p>Please ensure: all HE documentation refers to Woodstock Avenue and not Woodlands Avenue; all comments received from local residents during consultation and examination are shared with the Secretary of State.</p> <p>A collaborative multi agency approach is required between all agencies involved in this project</p> <p>(and others running at the same time) with clearly defined roles and responsibilities. Assurances to local residents is paramount.</p> <p>As a community we remain solution focused and hope the ExA truly appreciates the issues local residents are facing during both the constriction and maintenance phases of this project.</p>	<p>A community Relations Strategy will be prepared by the Principal Contractor and it will form part of the final CEMP. This will include the communication protocols with the local residents, general public, key stakeholders and other parties likely to be affected by the Scheme during the pre-construction and construction stages. The requirements to liaise with the community during construction are outlined in the REAC in Table 1.1, page 24, people and communities section (REP3A-011).</p> <p>All of the examination documents can be seen on the National Infrastructure Planning website.</p>

© Crown copyright (2020).

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence:

visit www.nationalarchives.gov.uk/doc/open-government-licence/
write to the Information Policy Team, **The National Archives, Kew, London TW9 4DU**,
or email psi@nationalarchives.gsi.gov.uk.

Printed on paper from well-managed forests and other controlled sources.

Registered office Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ
Highways England Company Limited registered in England and Wales number 09346363