

## **M25 junction 28 improvement scheme**

**TR010029**

### **9.76 Applicant's response to Mr and Mrs Strutt's written representation**

Rules 8(1)(c)(i)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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## Infrastructure Planning

### Planning Act 2008

### The Infrastructure Planning (Examination Procedure) Rules 2010

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

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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 Mr and Mrs Strutt'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. REP4-033 Christopher Strutt and Tina-Preston Strutt Written Representation

Response reference:	Representation Issue	HE Response
REP4-033-02	<p><b>Road safety and volume of traffic:</b>            Due to overall increased traffic flow there is already very limited time to exit both Kenilworth and Woodstock Avenue onto the A12 safely. When lights on the A12 change there is a large amount of traffic coming left off Petersfield Avenue. Overtime this has massively increased due to the rapid increase in housing on Harold hill and increased car use. Traffic speed of 50mph along the A12 is too fast as cars accelerate through the lights and often appear to exceed 50 mph again leaving less time to pull out safely.</p>	<p>As presented in Section 2 of the Transport Assessment Supplementary Information Report (PDB-003), the Scheme will reduce traffic congestion and delay at junction 28, and as a result, also reduce queuing on the A12 eastbound carriageway approaching the junction. The Scheme itself will not significantly alter the traffic volumes on the A12. TfL is the highway authority responsible for the A12 west of junction 28. Therefore, TfL, not Highways England, is responsible for addressing any current issues with the operation and safety of this section of the A12.</p>
REP4-033-03	<p>The exit at Kenilworth onto the A12 does not line up with the lights so any turn out towards the lights has to be executed carefully to avoid breaching the lanes. Unfortunately due to volume of traffic it has become a regular occurrence that cars are chancing getting into the queue to turn at Harold Court/A12 lights, resulting in cars jutting out into the lanes on the A12 - further accidents can be expected here.</p>	<p>See response REP4-033-02 above.</p>
REP4-033-04	<p>Increased activity at Grove Farm contributes to delays at the M25 junction as large lorries turn in and out right next to the M25 lights as well as increased noise and pollution. As yet we are unsure as to the impact of the gardens of Peace on the other side of the A12.</p>	<p>Existing delays at junction 28 are primarily due to current demand exceeding capacity and the necessary stop time at red lights at the traffic signals. With predicted traffic growth in the future these delays are expected to get significantly worse in the future with predicted traffic growth without intervention. The Scheme will reduce traffic demand at junction 28, allowing it to operate within capacity, and thereby reduce delays. By comparison, any minor</p>

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		and very intermittent delays caused by large lorries entering and leaving Grove Farm will have a negligible impact on overall traffic delays at junction 28.
REP4-033-05	<p>Historic deals done by the council incumbent at the time of the M25/A12 development has meant that current residents are suffering due to lack of foresight and traffic management planning. The suspect historic deal of reduced rates for Woodstock Avenue residents to compensate for lack of right turn out of the road has long since been eroded, leaving current residents trapped by lack of safe exit out of Woodstock Avenue, with no right access or U turn and only option of going around the accident hotspot of junction 28 of the M25. It seems inconceivable now that this type of deal was brokered as the volume of traffic on the A12 and M25 has grown exponentially.</p>	<p>The option of installing an alternative means of access/exit from Woodstock Avenue 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 response to Written Question TA1.13 (REP2-037) which explain 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.</p> <p>TfL agrees with Highways England's assessment that with the Scheme in place residents of Woodstock Avenue will experience an improvement in journey times in the future during peak travel times when making U-turns via junction 28 to travel westbound on the A12.</p>
REP4-033-06	<p><b>Parking</b> - When Woodstock Avenue was built households did not have multiple car ownership - it is now commonplace to have at least 2 cars per household. Where are all these cars to park if not outside their own residences? Any suggestion to routinely park elsewhere is ludicrous as this is not physically possible for some disabled resident, those with</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</p>

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	<p>small children, or lone individuals due to the risk of assault. It also puts individuals at risk if they need to access their car in an emergency situation. It will of course negatively affect car insurance compliance - affecting the residents again not the users of the M25. It is not a practicable option to park elsewhere.</p>	<p>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>REP4-033-07</p>	<p><b>Emergency services access</b> - The recent pandemic has highlighted the need for emergency services to be able to get to patients in a timely manner - we are not out of this situation yet and with the impending road works huge amounts of traffic will be building up at the junction (more so than usual) or a long diversion to Shenfield implemented, putting lives unacceptably at risk due to traffic delays.</p>	<p>The Outline Traffic Management Plan (OTMP) (REP4-013) sets out the proposed approach to temporary traffic management during construction of the Scheme.        Table 2.1 of the OTMP 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>
<p>REP4-033-08</p>	<p><b>Noise pollution</b> - after the increase to 4 lanes on the M25 we can now hear traffic through our double glazing at all times and in the garden consistently - this was never the case before the road widening. In the summer it is particularly miserable as the need for ventilation increases but traffic noise disrupts sleep anyway. This increase in traffic noise is completely unacceptable and can only be the result of increased traffic, poor quality road surfacing and lack of ambient noise baffling. As residents of two decades we are very clear this has changed and are at a loss when told repeatedly by planners that it is all within acceptable</p>	<p>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 Environmental Statement (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</p>

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	limits. We are living the experience - it is not a paper based exercise.	noise levels with or without the Scheme are similar at 10 and 42 Woodstock Avenue, and all smaller than 1dB.
REP4-033-09	<p><b>Air quality</b> - queuing traffic on the A12 due to disruption at the M25 junction or from the A12 traffic light queues especially the turning onto Petersfield which now backs up consistently (Due to increased households and car users on Harold Hill).</p>	<p>The Scheme delivers additional capacity at junction 28 to accommodate forecast traffic growth. It will therefore lessen traffic congestion and delay and, thereby, reduce traffic queues on the A12 eastbound approach to junction 28.</p> <p>The Scheme is not expected to have a significant adverse effect on air quality as reported in the Air Quality chapter of the ES (APP-027).</p>
REP4-033-10	<p><b>Request: Rapid implementation of temporary U-Turn between Woodstock and the exit slip road on the A12 exit</b></p> <p>Time and time again residents have requested that a safe exit from Woodstock Avenue be implemented this has repeatedly been ignored. Apparently every journey matters to the Mayor of London but not if you are a resident of Woodstock Avenue in the Borough of Havering, it is perfectly acceptable to council boards, planners and traffic consultants to work on the bigger picture whilst sidestepping the human cost to local residents. In the grand scheme of things it is not an unreasonable request to ask for safe exit by car out of our road via a U turn before the M25 sliproad. Havering Council has focussed on building housing and not concurrently addressed infrastructure and traffic management.</p>	<p>The option of installing a temporary U-Turn between Woodstock Avenue and the exit slip road is outside the scope of the Scheme and would need to be considered by TfL as the highway authority for this section of the A12.</p> <p>Please refer to the response in REP4-033-05 above. Highways England expects that a temporary U-turn would pose the same safety risks to road users on the A12.</p>



Response reference:	Representation Issue	HE Response
REP4-033-11	<p>Three years is a long time to be able to cope with the changes and inevitable disturbances proposed by Highways England we sincerely hope that residents are actually listened to as we have already lived through the miserable experience of the M25 road widening programme and some of the ongoing negative consequences. The implementation of a turning out of Woodstock Avenue before the M25 junction would demonstrate joined up thinking by all agencies involved and actually respect the justifiable concerns of residents and at last overturning poor historic planning.</p>	<p>The option of installing an alternative means of access/exit from Woodstock Avenue is outside the scope of the Scheme and would need to be considered by TfL as the highway authority for this section of the A12.</p> <p>TfL's position with regard to the provision of a right hand turn from Woodstock Avenue has also been set out in its 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 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.</p>

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