

M25 junction 28 improvement scheme

TR010029

9.80 Signposting document in response to GQ2.2 and TA2.1

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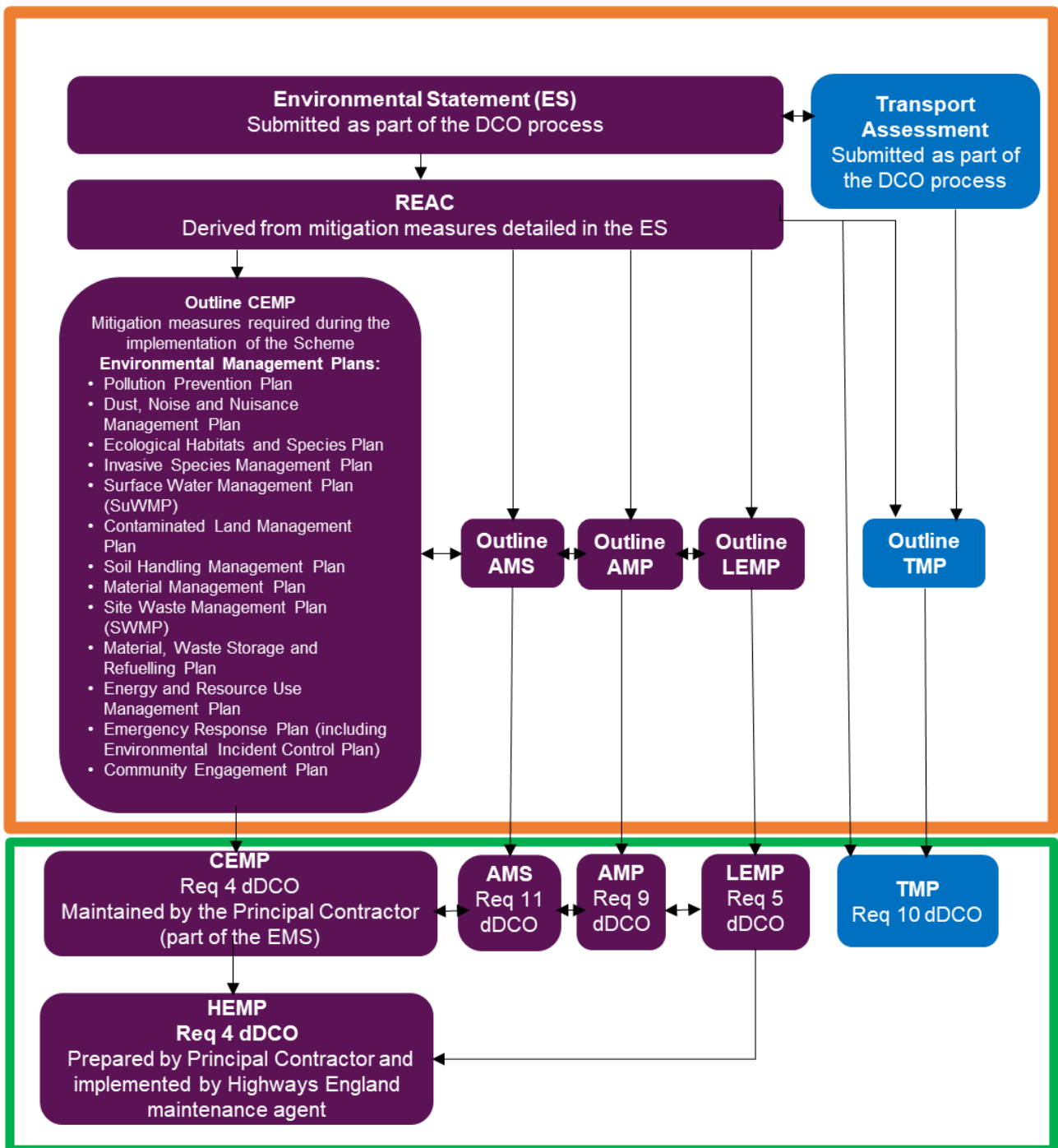
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1. Introduction

1.1 Purpose

- 1.1.1 This document sets out Highways England's response to the Examining Authority's Written Question GQ2.2 request to provide a signposting document that demonstrates the interdependencies between the subject matters covered by the Outline Construction Environmental Management Plan (CEMP), Register of Environmental Actions and Commitments (REAC) and the management plans identified in (REP3B-003), and how these interdependencies will be addressed by the Principal Contractor during the construction phase.
- 1.1.2 This document also provides a response to the Examining Authority's Written Question TA2.1 request to provide a signpost or navigation document explaining where such measures are set out in each document (Outline CEMP and Outline Traffic Management Plan (TMP)), clarifying why such measures are split between the two.
- 1.1.3 The interdependencies between the Outline CEMP, REAC, Outline TMP, TMP, CEMP and Handover Environmental Management Plan (HEMP) are presented in Figure 1.1 below.

Figure 1.1: Interdependencies between the Outline CEMP, REAC, Outline TMP, CEMP and HEMP



Legend:

- DCO application
- Principal Contractor to implement DCO requirements once the DCO is made

1.2 Interdependencies of environmental documents presented in the draft DCO

- 1.2.1 The development of the environmental documents presented in the draft Development Consent Order (dDCO) follows Highways England's Design Manual for Roads and Bridges (DMRB) guidance and these are presented within the Environmental Statement (ES) (APP026 to APP-038). The traffic model data presented in the Transport Assessment (APP-098) was used to support the preparation of the environmental effects assessment presented in the ES.
- 1.2.2 Following the assessment of the environmental effects likely to be generated by the Scheme, and presented within the ES, the environmental mitigation measures required to be implemented during the various stages of the Scheme are presented within the Outline CEMP (TR010029/APP/7.2(3)) and the REAC (TR010029/APP/7.3(3)).
- 1.2.3 Below it is explained what the purpose of each document presented in the dDCO is, and how each fits in within the lifecycle of the Scheme.

REAC

- 1.2.4 The purpose of the REAC is to set out the mitigation committed for the Scheme as part of the ES which will need to be implemented through the detailed design, construction and operational and maintenance stages. The REAC acts in part as a 'bridge' between the Outline CEMP, CEMP and HEMP through the lifecycle of the Scheme.
- 1.2.5 The REAC initially forms part of the Outline CEMP. The CEMP prepared by the Principal Contractor during the implementation of the Scheme will reflect the mitigation contained within the REAC for the detail design and pre-construction works (Table 1.2 of the REAC) and during construction stages (Table 1.3 of the REAC).
- 1.2.6 The items from Table 1.4 of the REAC which relate to the post construction and operational stage of the Scheme will form part of the HEMP to be prepared by the Principal Contractor and provided to the Highways England's maintenance agent.

Outline CEMP

- 1.2.7 The purpose of the Outline CEMP is to inform the preparation of the CEMP which will form part of the Principal Contractor's Environmental Management System (EMS) accredited to ISO 14001:2015. The Principal Contractor is responsible for the development of the detailed design and the implementation of the Scheme through the construction stage in line with the DCO once made.
- 1.2.8 The preparation of the CEMP is secured by Requirement 4 of the DCO and must be submitted to the Secretary of State (SoS) for their approval in writing, following consultation with the relevant planning and highway authorities.
- 1.2.9 The purpose of the CEMP, which must be substantially in accordance with the Outline CEMP is to:
- Identify the environmental issues required to be addressed during the next stages of the Scheme, such as detailed design, construction, operational and maintenance stages.

- Record objectives, commitments and mitigation measures to be implemented and set their achievement through the Scheme lifespan.
- Identify key personnel responsible for overseeing the construction activities and monitoring compliance with the relevant environmental legislation.
- Record environmental risks and the identify control measures to avoid and minimise impacts on the environment during the construction of the Scheme.
- Demonstrate compliance with relevant environmental legislation, policy and good practice.
- Identify key environmental staff and their responsibilities, including communication and training requirements.
- Provide environmental handover information to the body responsible for operational management, including management and monitoring requirements and commitments.
- Provide a review, monitoring and audit mechanism to determine the effectiveness of and compliance with the environmental control measures and how corrective action will take place.

1.2.10 Appendix F of the Outline CEMP also contains a number of outline environmental control plans (ECPs). All ECPs listed in paragraph 4.4.3 of the Outline CEMP will be developed by the Principal Contractor following detailed design as part of the CEMP to be submitted to the SoS for approval in accordance with Requirement 4 of the DCO.

1.2.11 Clause 9.3 of the ISO 14001:2015 requires that the CEMP is kept up to date and reviewed at regular intervals throughout the life of the Scheme to ensure not only that the contact details are up to date but also that the mitigation measures remain appropriate . Any changes identified as needed to the mitigation measures would need to be approved by the SoS in accordance with Requirement 12 of the DCO.

Environmental control plans (ECPs)

1.2.12 The ECPs are topic specific management plans aimed to ensure that construction-related mitigation measures and actions set out in the REAC are successfully implemented during the construction and operation of the Scheme. The ECPs inform the development of associated task-specific mitigation measures as identified in Table 1.3 in the REAC to be included in the development of the construction methodologies and recorded within the task specific method statement. The ECPs will be developed for the final CEMP by the Principal Contractor following detailed design. The following ECPs will be prepared by the Principal Contractor appointed for the Scheme as part of the CEMP:

- Pollution Prevention Plan
- Dust, Noise and Nuisance Management Plan
- Ecological Habitats and Species Plan
- Invasive Species Management Plan
- Surface Water Management Plan
- Contaminated Land Management Plan

- Soil Handling Management Plan
- Material Management Plan
- Site Waste Management Plan
- Material, Waste Storage and Refuelling Plan
- Energy and Resource Use Management Plan
- Emergency Response Plan (including Environmental Incident Control Plan)
- Community Engagement Plan.

1.2.13 In addition, the following ECPs will be prepared for the Scheme as standalone documents to support the implementation of the CEMP and REAC for ecology, landscape and archaeology topics:

- Landscape and Ecological Monitoring and Management Plan (secured under Requirement 5 of DCO).
- Archaeological Management Plan (which will include a Written Scheme of Investigation secured under Requirement 9 of DCO).
- Arboricultural Method Statement (secured under Requirement 11 of the DCO).

1.2.14 Outline versions of a number of ECPs have been prepared for consideration during the examination into the Scheme and are explained in more detail below.

Outline Landscape and Ecological Management and Monitoring Plan (LEMP)

1.2.15 The Outline LEMP (TR010029/APP/6.3) is informed by the preliminary environmental design plan contained in the ES (Figure 2.2, TR010029/APP/6.2(2)) and provides information on the areas identified for ecological and landscape mitigation to inform the development of the environmental mitigation through the detailed design stage and ensure appropriate monitoring and maintenance regime is being put in place during the operational stage. The LEMP is required to be updated by the Principal Contractor, as secured by Requirement 5 of the dDCO (TR010029/APP/3.1).

Outline Archaeological Management Plan

1.2.16 The Outline Archaeological Management Plan (AMP) (TR010029/EXAM/9.45(1)) provides an outline programme of archaeological investigations to be implemented by Highways England during the detailed design and construction stages. This supports the implementation of the archaeological mitigation measures proposed in the REAC. The AMP is required to be updated by the Principal Contractor, as secured by Requirement 9 of the dDCO. (TR010029/APP/3.1).

Outline Arboricultural Method Statement

1.2.17 The Outline Arboricultural Method Statement (AMS) (TR010029/EXAM/9.64) describes the tree protection and mitigation measures required to be implemented during the construction phase of the Scheme. This supports the implementation of the tree protection mitigation measures proposed in the REAC. The AMS is required to be updated by the Principal Contractor, as secured by Requirement 11 of the dDCO (TR010029/APP/3.1).

CEMP

- 1.2.18 The Principal Contractor will need to develop the CEMP in accordance with Requirement 4 of the dDCO and in line with the Outline CEMP (TR010029/AP/7.2(3)). The Principal Contractor will need to update the appendices which form part of the CEMP to ensure the Scheme has in place a robust environmental management system compliant with ISO 14001:2015.

LEMP

- 1.2.19 The LEMP, secured under Requirement 5 of the dDCO (TR010029/APP/3.1(5)), will be prepared by the Principal Contractor once the detailed design is complete and will contain detailed information on the planting proposed for the Scheme (in line with the Outline LEMP). In the preparation of the LEMP the Principal Contractor will consult with the relevant local authority. The LEMP will provide further information on the management of the landscape and ecological compensation areas and the necessary monitoring and maintenance regime to ensure the re-planted areas are establishing and any remedial work will be implemented as appropriate.

AMP

The Outline AMP submitted as part of the DCO application will need to be updated by the Principal Contractor as the detailed design is finalised and the Archaeological Contractor is appointed. The AMP will include the details of the archaeology contractor appointed by the Principal Contractor and will act as the overarching Written Scheme of Investigation for the Scheme during the construction works. The production of the AMP by the Principal Contractor is secured under Requirement 9 of the dDCO (TR010029/APP/3.1(5)) and consultation with the relevant planning authority and Greater London Archaeological Advisory Service will be required. The AMP will be submitted to the SoS for approval.

AMS

- 1.2.20 The Outline AMS which forms part of the dDCO will be updated by the Principal Contractor once the detail design is completed and the construction methodologies are being finalised. In the preparation of the AMS, the Principal Contractor will need to consult with the relevant planning authority and be submitted for approval to the SoS, as secured by Requirement 11 of the dDCO (TR010029/APP/3.1(5)). In the preparation of the AMS the Principal Contractor will consult with the relevant local authority. The AMS is aiming to describe the tree protection measures required during the construction stage.

HEMP

- 1.2.21 The preparation of the HEMP is outlined in Table A.3 of the DMRB LA120 - Environmental management plans.
- 1.2.22 On completion of the Scheme, the Principal Contractor will prepare a HEMP to outline the monitoring and maintenance regime of the environmental features, in line with the REAC (see Table 1.4) and the maintenance and operational requirements outlined in the Operational and Maintenance Manual of the Scheme. The process for the preparation of the HEMP will be secured by Requirement 4 of the dDCO (TR010029/APP/3.1(5)).

- 1.2.23 The HEMP contains the mitigation requirements that are left over in the CEMP, REAC and LEMP for the operational stage, plus any additional requirements identified by Principal Contractor as part of handover of the Scheme back to Highways England maintainer (e.g. drainage and pond maintenance).

1.3 Transport document interdependencies

Transport Assessment

- 1.3.1 The Transport Assessment (APP-098) includes an assessment of the Scheme in terms of the effect it will have on the performance of the strategic and local highway networks, road safety at M25 junction 28, and local sustainable modes of transport. It also considers the traffic and transport effects of the Scheme during its construction phase.
- 1.3.2 The traffic model data presented in the Transport Assessment was used to support the preparation of the environmental effects assessment, as presented in the ES for the Scheme.

Transport Assessment Supplementary Information Report (TASIR)

- 1.3.3 The TASIR (PDB-003) provides supplementary information and clarification to that presented in the Transport Assessment (APP-098).
- 1.3.4 The document includes an update to the traffic impacts during construction of the Scheme.

Outline TMP

- 1.3.5 The Outline TMP (REP4-013) sets out the proposed approach to the temporary traffic management measures required during construction of the Scheme.
- 1.3.6 The likely traffic impacts of the Scheme during construction are outlined in Chapter 6 of the TASIR (PDB-003). The transport assessment undertaken for the Scheme is based on the temporary traffic management arrangements presented in the Outline TMP. The Outline TMP doesn't form part of the environmental documents.
- 1.3.7 The Outline TMP will form the basis for the final TMP which will be prepared by the Principal Contractor and submitted to the SoS for approval before the relevant part of the works can start, following consultation with the relevant highway authorities and in accordance with Requirement 10 of the dDCO.

TMP

- 1.3.8 The Principal Contractor will need to develop the TMP, based on the Outline TMP and reflecting the relevant mitigation measures set out in the REAC (TR010029/APP/7.3(3)) such as construction working hours and noise nuisance and air quality pollution prevention measures, in accordance with Requirement 10 of the dDCO.
- 1.3.9 The TMP will also include the construction workforce travel plan which will set out the measures that will be adopted by the Principal Contractor to encourage the construction workforce to commute by modes of transport other than sole occupancy private car, including public transport, with the aim of minimising any adverse impacts caused by construction workforce commuting.

1.4 Response to TA2.1

- 1.4.1 In Section 1.3 above, Highways England explained the purpose of each traffic management document referred to within the dDCO application.
- 1.4.2 The TMP will detail the temporary traffic arrangements required to be in place during the construction stage of the Scheme. These temporary traffic arrangements will need to be undertaken in line with the environmental commitments described in the REAC and the dDCO.
- 1.4.3 The environmental commitments described in the REAC will be outlined in the CEMP prepared by the Principal Contractor under Requirement 4 of the dDCO and will inform the preparation of the TMP secured under Requirement 10 of the dDCO.
- 1.4.4 Therefore, the TMP prepared by the Principal Contractor will need to extract or make reference to the relevant environmental mitigations (such as noise, air quality, etc.) from the CEMP and REAC and include them in Table 2.9 (see page 32 showing Table 2.9 in the Outline TMP, REP4-013) to ensure the temporary traffic arrangements are taking into consideration the environmental mitigation required.

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