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Subject: Grove Farm - On behalf of Mr and Mrs Jones - Deadline 5
Date: 13 April 2021 18:50:10
Attachments: [3396d3 Grove Farm J28 M25 DCO Supplementary Highway & Transportation No.2.pdf](#)

Dear Sirs,

Please find attached our response to the examiners supplementary questions that were raised on the 25th March 2021.

If you require any further information please do not hesitate to contact me,

Kind Regards

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GROVE FARM

TRANSPORTATION & HIGHWAY SUPPLEMENTARY REPRESENTATIONS No.2

**BY
PAUL McLAUGHLIN BSc CEng MICE MCIHT**

CONCERNING

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

Redwood Reference: PMcL/3396d3/April 2021



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1.0 INTRODUCTION & BACKGROUND

- 1.1 A formal 'Issue Specific Hearing 1' was held on 3rd March 2021 by The Planning Inspectorate (i.e. Examining Authority – ExA) to consider Highways England's (HE) application for a Development Consent Order (DCO) to carry out a M25 Junction 28 Improvement Scheme ('HE Scheme'). Discussions were held at the Issue Specific Hearing 1 concerning the access and egress alterations to Grove Farm submitted at Deadline 2 on behalf of Grove Farm in our first Written Representations submission (Ref: PMcL/3396d1/Feb 2021) and the response by Highways England (HE) to those Written Representations.
- 1.2 Subsequent to the Hearing, further Supplementary Representations were submitted on behalf of Grove Farm which included **Drawing No. REDW-3396-115** showing amendments to Grove Farm's suggested improvements to the HE Scheme (Ref: PMcL/3396d2/March 2021).
- 1.3 The ExA issued written questions on 25 March 2021 requesting more information from 'The Applicant' (HE). This document updates the ExA on the position of Grove Farm with regards the latest response from HE and, where appropriate, refers to a unique reference number (in square brackets within the text) of a specific ExA question where relevant to Grove Farm. Since the issue of our Supplementary Representations (Ref: PMcL/3396d2/March 2021) a number of online meetings have been held with Atkins representing HE.
- 1.4 This document is submitted on behalf of the Jones family, the owners of Grove Farm.



2.0 GROVE FARM ACCESS PROPOSALS – M25 NORTHBOUND ON-SLIP

- 2.1 The location of the existing Grove Farm access from the M25 northbound on-slip is already a significant departure from highway design standards by its very location close the north-west egress of the roundabout. HE, incorrectly in our opinion, stated at Issue Specific Hearing 1 that the HE Scheme does not affect the existing access to Grove Farm from the M25 northbound slip, therefore no alteration to Grove Farm access is necessary.
- 2.2 Grove Farm does not accept that the HE Scheme will not have a detrimental effect on the safe operation of the existing Grove Farm access for reasons detailed in our initial Written Representations and Supplementary Representations. The farm access will be located much closer to the new A12 eastbound off-slip at the roundabout compromising highway safety at the entrance which will result in confusion for vehicles travelling behind vehicles left-turn signaling whilst leaving the A12 off-slip, turning left and accelerating onto the northbound M25 on-slip with their left turn indicator still active passing the farm access and vehicles indicating a left turn into the farm but decelerating, all within a much shortened merge length after leaving the roundabout (Ref: PMcL/3396d1/Feb 2021 and Ref: PMcL/3396d2/Mar 2021).
- 2.3 Grove Farm considers the alternative proposal to close the existing farm access and relocate to a new farm access a short distance north beyond the electrical sub-station layby will provide a safer access for farm and other businesses on the site and can be combined with the proposed access for HE pond maintenance vehicles and electricity board vehicles providing a safer entrance for all users.
- 2.4 We consider the relocation of the farm access to be a safety improvement, further supported by an independent and leading highway safety consultant Mayer Brown (Ref: PMcL/3396d1/Feb 2021 – Appendix A).
- 2.5 It is confirmed by Grove Farm that all Grove Farm land required for the amended farm access proposals from the M25 northbound on-slip can be made available to HE for the construction of the amended farm access. Grove Farm requests that the Examining Authority require HE to include in an amended HE Scheme, farm access proposals as shown on **Drawing No. REDW-3396-115** including the following:



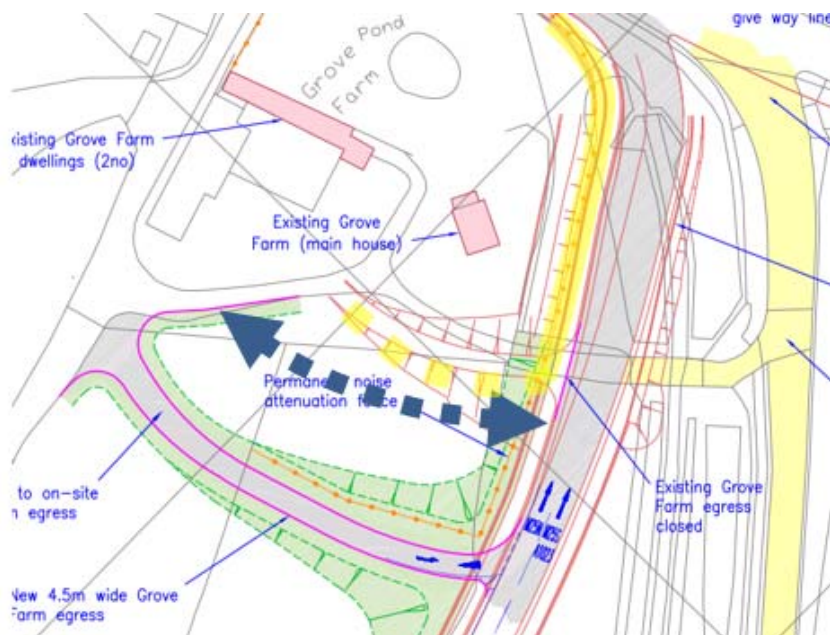
- i) The closure of the existing access to Grove Farm from the M25 northbound on-slip;
- ii) The construction of a new dedicated auxiliary left-turn lane access to Grove Farm from the M25 northbound on slip road to be shared with the HE service access already proposed for pond maintenance and electricity board vehicles.



3.0 GROVE FARM EGRESS PROPOSALS – A12 EASTBOUND OFF-SLIP

- 3.1 Notes from the ExA issued after the Hearing required HE to provide plans at scale 1:1000. HE stated during our online meeting that although plans states ‘not to scale’, the plans are at 1:1000. HE should provide plans showing correct scale [ExA question - PC2.1].
- 3.2 HE’s response to **Drawing No. REDW-3396-115** raised issues of the impact of our suggested egress onto the A12 eastbound off-slip on tree loss and the effect on the habitats for bats and badgers. We have previously requested a copy of the topographical survey so that the impact of the HE Scheme on Grove Farm can be considered appropriately. Whilst the topographical survey is not needed in the formal planning application documentation, we would expect that the topographical survey could be made available to Grove Farm as an internal document to better inform Grove Farm’s response to the HE Scheme proposals [ExA question - LV2.2]. HE also agreed to provide Grove Farm with 3D CAD modelling so that implications of road embankments can be considered. No 3D CAD files have been received.
- 3.3 HE has confirmed they are assessing the feasibility of providing an amendment to the alignment of the Grove Farm egress. **Figure 3.1** shows a blue dash of the current potential line of an amended farm egress currently being investigated by HE:

Figure 3.1 – HE preliminary route for Grove Farm egress





3.4 Grove Farm welcomes this response from HE with regards alteration of the farm egress onto the A12 eastbound off-slip as the relocation of the farm egress will:

- i) Move queuing traffic leaving the site further away from the farmhouses;
- ii) Allow for the inclusion of a reasonably sized landscaped area between the farmhouse;
- iii) Allow for the inclusion of suggested noise attenuation barriers;
- iv) Provide traffic leaving the farm heading south on the M25 with more distance to adequately cross to the right-hand lane when approaching the roundabout.

3.5 It is confirmed by Grove Farm that all Grove Farm land required for a change request for the amended farm egress proposals onto the A12 eastbound off-slip can be made available to HE for the construction of the amended farm egress. Grove Farm request that the distance between the farmhouse and the egress road be maximised.

3.6 Grove Farm requests that ExA require HE to include in an amended HE Scheme:

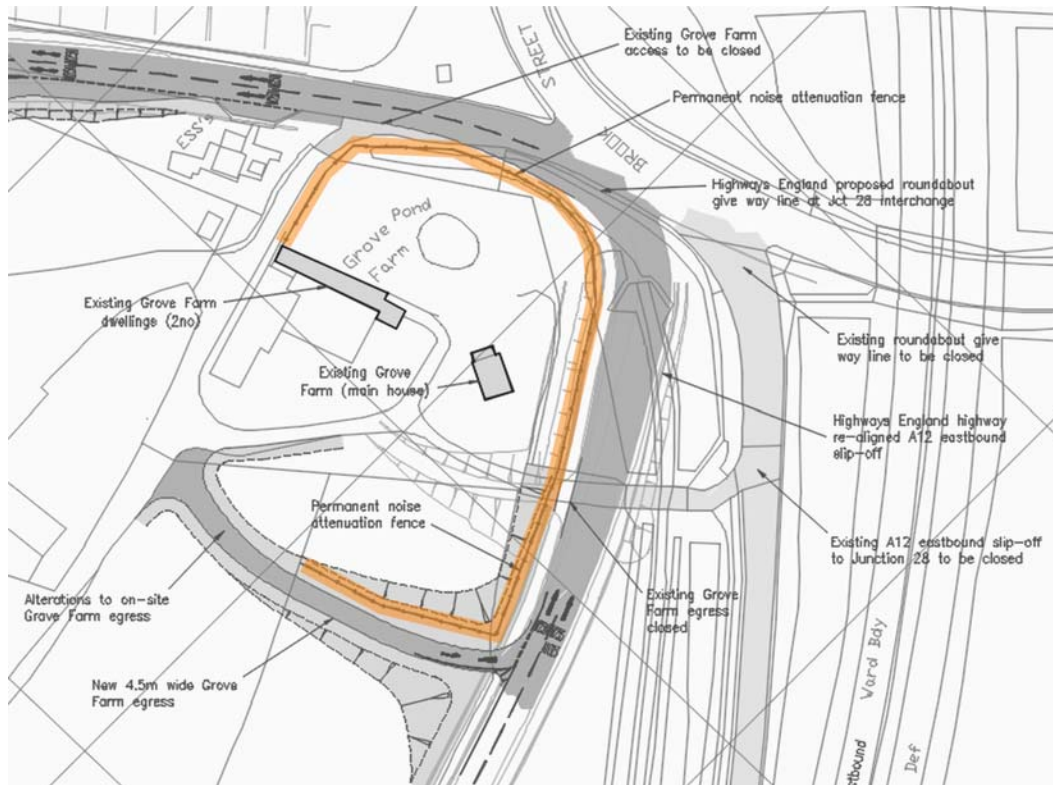
- i) The closure of the current amended egress from Grove Farm to the A12 eastbound off-slip;
- ii) Construction of a new dedicated egress from Grove Farm to the A12 eastbound off-slip with alteration of on-site roads to suit;
- iii) Provide Grove Farm with a copy of the CAD topographical survey and CAD 3d survey as an internal document;
- iv) Provide proposals at scale 1:1000 [ExA question - PC2.1].



4.0 PERMANENT NOISE ATTENUATION

- 4.1 The owners of Grove Farm remain concerned that no permanent noise mitigation measures are included in the HE Scheme surrounding Grove Farm. Our **Drawing No. REDW-3396-115**, previously issued, showed Grove Farm’s suggested location of permanent noise attenuation barriers which would contribute towards the enhancement of Grove Farm’s environment and mitigate increased environmental traffic noise brought about by the HE Scheme. HE proposals for additional landscaping or standard visual fencing will not provide any material benefit for traffic noise reduction [ExA question - PC2.3 (ii)]. HE has dismissed any need for noise attenuation barriers based upon their noise assessment and has not worked with Grove Farm with a view to include a noise attenuation barrier in the HE Scheme; only suggesting visual fencing [ExA question - PC2.4 (ii)].
- 4.2 **Figure 4.1** shows an extract of our **Drawing No. REDW-3396-115** showing Grove Farm’s suggested line for permanent noise attenuation fence (highlighted in orange):

Figure 4.1 – Grove Farm’s suggested location for noise attenuation fencing





- 4.3 The HE Scheme will not reduce traffic flows and associated future traffic growth on the new and closer A12 eastbound off-slip or the M25 northbound on-slip both next to Grove Farm. The highlighted noise attenuation barrier shows the fence returning into the site at the existing farm entrance and our suggested farm egress. These barrier returns will mitigate against increased noise from traffic flows on the closer A12 eastbound off-slip and the M25 northbound on-slip.
- 4.4 HE's current position on the effect of the HE Scheme on traffic noise is that their noise assessment has established such a significant base level of background noise from the M25 and A12 that the HE Scheme will not produce a material change in traffic noise sufficient to warrant inclusion of physical noise attenuation measures. Mr R Bedson representing Grove Farm at the Hearing referred to his experience in other projects where subsequent post-development noise measurements were greater than the pre-development assessment.
- 4.5 The HE position that noise attenuation is unnecessary runs contrary to the stated ethos of HE to '*enhance the environment for people living and working close to our network*'. We refer the Examining Authority to HE's own publication 'Protecting the Environment':
(<https://highwaysengland.co.uk/media/u20b3kvg/protecting-the-environment.pdf>)

The opening statement from Mike Wilson, Executive Director Safety, Engineering and Standards, Highways England within that document states:

'We're thinking differently too. We now place far greater emphasis on what we can do to enhance the environment for people living and working close to our network.' (Our underlining).

- 4.6 Grove Farm appreciates that HE is constrained in proposing expenditure for noise attenuation where theoretical noise studies show no material effect from development proposals. However, the HE Scheme provides the opportunity to enhance the environment of Grove Farm and partially mitigate the detrimental effects of the HE Scheme on Grove Farm. The provision of a noise attenuation barrier fully supports HE's own goal to enhance the environment for people living and working close to the HE network and not just retain a detrimental status quo.



- 4.7 Grove Farm requests that the ExA require HE to include an appropriate and visually pleasing noise attenuation barrier as environmental mitigation along the coloured line suggested in **Figure 4.1**.