

M25 junction 28 improvement scheme TR010029

9.84 Applicant's comments on Transport for London's response to ExAWQ2

Rules 8(1)(c)(ii)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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The Infrastructure Planning (Examination Procedure) Rules 2010

M25 junction 28 scheme

Development Consent Order 202[x]

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1. REP5-070 Transport for London Responses to the Examining Authority's Further Written Questions and requests for information



1. Purpose and structure of this response

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to Transport for London's (TfL) response to the Examining Authority's Further Written Questions (ExA WQ2) (REP5-070), submitted to the Examining Authority (ExA) on or before Deadline 5 (13 April 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. REP5-070 Transport for London Responses to the Examining Authority's Further Written Questions and requests for information

Question Number	Question	IP Response	HE Response
CA 2.2 Plot 1/6, and Plots 1/3 and 1/1(a) to (d) Transport for London	At the CAH1, TfL cited concerns with the need for Plot 1/6 to be CA for the freehold. The Applicant responded, confirmed in its vritten summary of oral submissions put at a Hearing [REP4-014] and in its response to Action Point 9 [REP4-018] that Plot 1/6 was necessary "to secure access to an existing drainage channel and outfall associated with the A12 but which will also serve the new Loop road, for ongoing maintenance". The Applicant goes on to state that "TfL has since providedfurther comments which are under consideration". i) Update the ExA as to whether objections to Plot 1/6's CA remain. ii) Respond to the Applicant's response to Action Point 9 in respect to Plots 1/1(a) to (d) and Plot 1/3.	 i) As set out in paragraphs 2.2.10 and 2.2.11 of TfL's Deadline 4 submission [REP4-038], the Applicant has now provided further information about why permanent rights over Plot 1/6 are required. TfL is now satisfied with the approach being taken by the Applicant for this plot. ii) TfL has reviewed the Applicant's response to Action Point 9 from the Compulsory Acquisition Hearing [REP4-018], the changes to Schedules 6 and 8 of the draft DCO [REP4-007], and the changes to the Book of Reference and Land Plans [REP4-019]. TfL has no remaining issues with the compulsory acquisition proposals for, and any amendments to the boundaries of, Plots 1/1b, 1/1c and 1/1d. For Plot 1/1a, TfL remains of the view that the acquisition of permanent rights as proposed in the draft DCO is unnecessary, as the New Roads and Street Works Act 1991 (NRSWA) could be used to obtain the necessary permissions instead. The Applicant acknowledged this in its response to TfL's Deadline 3b submission [REP4-011 table row REP3B-008-1] but stated that it "does not wish to rely on other Legislation but instead to bring all the necessary powers within the scope of the DCO where it may do so". TfL does not consider the acquisition of permanent rights to be necessary given the established alternative of the NRSWA that is available to the Applicant. For Plot 1/3, the acquisition of permanent rights is only appropriate if TfL is responsible for the ownership and maintenance of the new A12 eastbound off slip road. Should it be determined that the Applicant will own and maintain this new slip road then permanent acquisition of Plot 1/3 would be mecessary instead. TfL's remaining issue with Plot 1/3 is associated with the small part of this plot towards the western end Located at the entrance of the new private means of access. (Work No. 19A) for maintenance of the scheme. TfL considers that this part of Plot 1/3 should be maintenance of the acquisition of the part of Plot 1/3 at the entrance to the new private	 Highways England co for utility diversions in powers to guarantee a the rights could be lice instead of a licence (w authority and be subje- rights to retain their an access to it. Highways England's p for utility diversions is England DCO scheme justified having made In the case of Plot 1/1 by TfL, that all of it fall weight to Highways E Highways England ret the new A12 eastbour (REP5-037). Accordin acquire this Plot 1/3 p utilities that will be div plans submitted at De As regards the entran (PMA) (Work No.19A) permanent acquisition entrance. These ame Land Plans and Book
GS 2.1 Ground Investigation Report London Borough of Havering Transport for London	Comment on the adequacy of the Ground Investigation Report (GIR) submitted at Deadline 1 [REP1-023, REP1-024 and REP1-025] and the Applicant's response as set out at ISH1, confirmed in its oral submissions at Deadline 4 [REP4-016] that an outline Materials Management Plan does not need to be submitted into the Examination.	TfL has reviewed the Ground Investigation Report and considers it to be comprehensive and contains the information on ground conditions that TfL needs to see. The report highlights risks around the stability of the ground in the area which are set out below and emphasises the importance of TfL being involved in the design process if it becomes responsible for the new A12 eastbound off slip road. The report confirms the presence of superficial materials near the surface consisting of soft cohesive soils with high plasticity and high potential for swell/shrinkage with saturated groundwater Levels. The construction of embankments and other Load bearing structures on this type of material poses a significant risk regarding future settlement and maintenance concerns over a Long period of time. While these risks have been highlighted in	As stated in the Stater 031) all parts of the So meet the relevant requ Bridges (DMRB). Higl discussions with TfL re with the TLRN. This in particular future owner Highways England ex response to TfL's Rele agrees in principle to of far as they relates to the



considers that it is necessary to take permanent rights in Plot 1/1a. Highways England is seeking these a right in favour of the asset owner, whether or not icensed under NRSWA 1991. The provision of rights (which could be terminated by the street works oject to conditions) guarantees the utility provider with apparatus in the street in perpetuity and also rights of

s preferred approach of acquiring rights in highways is consistent with a number of other Highways mes in which the Secretary of State considered this e the DCOs concerned.

/1a, there is some doubt, according to plans provided alls within the public highway, which adds further England taking this approach for certainty.

remains of the view that TfL should be responsible for und off slip as provided for by Article 11 of the dDCO lingly, Highways England is not pursuing powers to permanently, only rights in it on account of the liverted into this plot. This is reflected in the Land Deadline 5 (REP5 –002).

Ance to the proposed new private means of access A) Plot 1/3 will be split as requested to reflect that on will be taken to accommodate the new PMA rendments will be submitted in the next iteration of the ok of Reference after Deadline 6.

tement of Common Ground with TfL (para 2.1 REP5-Scheme including those relating to the TLRN will equirements of the Design for Manual for Roads and ighways England is continuing to engage in regarding the proposed Scheme and its interfaces includes the responsibilities of both organisations, in hership and maintenance responsibilities. As expressed at the start of the examination in its elevant Representation (RR-028) Highways England to consult with TfL on matters of detailed design in so the assets to become TfL's responsibility TfL.

	Question	IP Response	HE Response
Question Number			
		 the report, TfL does not have information about how these risks have been mitigated through the design option being taken forward. TfL is therefore seeking more information from the Applicant about how the design option selection process took on board the recommendations of the Ground Investigation Report so that it can be assured that the option chosen will not suffer from increased maintenance requirements in the Long term. Other key areas highlighted by the report where TfL requires further information from the Applicant are: 	With regard to ground based upon existing ground investigation in the areas of proper Investigation Report recommendations w England and they de design the subject of
		 the above-mentioned excavated cohesive material is to be re- used for the construction of new earthworks and embankments, which will result in these structures having settlement and swell/shrink characteristics that could impact on maintenance requirements; TfL needs to understand what whole Life cost assessment has been carried out and the design measures to mitigate ground movement adopted to reduce the burden of additional resulting maintenance; 	As regards the varior information, Highwa and will deal with the involve a meeting be practicable.
		 the use of reinforced earth embankments, reinforced earth walls and abutments will impact on the durability and design Life of the scheme; more information on the fill materials is required. 	
		 the 7.5-metre high embankment for the new A12 eastbound off slip road will be filled with expanded polystyrene; TfL needs to understand the design Life of this product and records of its performance where used elsewhere in the UK as TfL has no experience of maintaining assets composed of such material; and 	
		 a contiguous anchored pile wall is to be used but it is not clear what type of anchors are to be used, and the future inspection and testing of ground anchors will present a high maintenance cost during the whole design Life of the structure. 	
		Given the concerns over the risk of settlement impacting on the structures and carriageway, TfL is seeking information from the Applicant on the forecast upper and Lower bounds of Likely settlement on the carriageway, to understand whether this is acceptable from a maintenance perspective.	
		There are also various exceedances of certain constituents observed in the assessment of soil reported. TfL will need to review the engineering solutions that are developed during the detailed design phase to mitigate the risk of pollutants reaching the water courses, to ensure there is no risk of drainage infrastructure that TfL is asked to take on having a role in pollutant Linkages.	
		3.6 With regards to an Outline Materials Management Plan, this will be important to TfL as it will provide evidence of which materials will be used in construction of the embankments and structures, and which will be discarded. For example, it is Likely that bands of 'soft' clays will be encountered during the excavation which would not be suitable for the construction of embankments and structures. While TfL recognises that a full Materials Management Plan cannot be produced until the detailed design is completed, TfL considers that submission of an outline plan to the Examination would be beneficial to provide assurance on the	



bund investigation matters, the preliminary design was ng historical ground investigation data. An additional on was then undertaken to target the ground conditions oposed construction, as reported in the Ground ort (REP1-023 - REP1-025). The findings of and the within this report have been considered by Highways do not justify any change to the preliminary scheme t of the Application.

rious requests made by TfL for further detailed ways England continues to discuss the scheme with TfL these requests as part of this process. This is likely to between respective technical experts as soon as M25 junction 28 improvement scheme TR010029 9.84 Applicant's comments on Transport for London's response to ExAWQ2

5 <u>+</u>	Question	IP Response	HE Response
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		principles of re-use of excavated materials given concerns over their suitability for use in the embankments and structures.	
TA 2.2 Extended Intergreen Signalling at Brook Street Roundabout The Applicant Transport for London	 In its response to ISH1 Action Points 2 [REP4-021] received at Deadline 4, the Applicant confirmed that it has agreed, following a meeting on 8 March 2021, to address the matter of intergreen signalling at Brook Street as part of a separate Legal agreement. i) Confirm that the Legal agreement described will be completed before the close of the Examination. ii) Submit a draft version of the separate Legal agreement to the Examination at Deadline 5, Tuesday 13 April 2021. 	TfL and the Applicant held a further meeting on 1 April 2021 where the means of securing a reduction in delays on the A1023 approach to the Junction 28 roundabout, by extending the timing of the intergreen period for the traffic signals, was discussed. The Applicant has advised TfL that instead of securing this in a Legal agreement, it does not object to including an additional requirement in respect of intergreen timing in the DCO. TfL considers this to be more appropriate given that Essex County Council, Brentwood Borough Council, and the London Borough of Havering all have an interest in the management of delays on the A1023; it is not just a matter between the Applicant and TfL. TfL understands that the Applicant will submit proposed wording for a new requirement on this matter at Deadline 5.	Highways England h matter in the version
TA 2.3 Proposed Access / Egress at Grove Farm The Applicant Transport for London London Borough of Havering	The representatives of Mr & Mrs Jones submitted revised proposals at Deadline 4 [REP4-036] for access / egress to and from their property. Provide comments on these proposals.	TfL has reviewed the proposed new Location for the egress from Grove Farm onto the new A12 eastbound off slip road set out in the plan in document REP4- 036. This results in the egress being Located approximately 120 metres from the proposed stop Line at the roundabout instead of the current distance of approximately 70 metres, an increase of 50 metres. TfL has not identified any immediate safety concerns with this proposal when compared with the Layout currently proposed by the Applicant. It would be important to demonstrate that there is sufficient visibility to and from the new egress Location for the required design speed. The alternative egress Location may require a new or revised departure from standards. TfL is not able to comment on the proposal in terms of construction feasibility or environmental impacts and we would expect the Applicant to consider these alongside a full assessment of road safety implications.	Noted
TA 2.4 Outline Traffic Management Plan The Applicant Interested Parties	An outline TMP was submitted by the Applicant at Deadline 4 [REP4- 013]. The ExA notes that the outline TMP does not appear to address the impact of temporary closures to the A12 eastbound off slip to junction 28 and any associated diversions during construction work. <u>For the Applicant:</u> i. Confirm that temporary closures are no Longer considered necessary for this section of road. If this is not the case indicate where the diversion caused by such a closure is described in the outline TMP. <u>For Interested Parties:</u> ii. Comment on the outline TMP.	 Introduction 4.1 TfL welcomes the submission of the Outline Traffic Management Plan (TMP) [REP4-013] to the Examination as it provides valuable additional information about the construction impacts of the scheme. Impact of the works on traffic flows and journey times 4.2 TfL has reviewed the proposals for traffic management in the context of Section 6 of the Transport Assessment Supplementary Information Report (TASIR) [PDB-003] which considered the traffic impacts during construction. TfL recognises that the TMP is an outline document and the details of traffic impacts will become clearer as the design is developed. However, TfL notes that disruption on the A12 set out in Table 2-4 of the outline TMP is more significant than suggested by paragraph 6.1.4 of the TASIR, with Lane 1 of the eastbound A12 carriageway closed for approximately 1.8 km during off peak periods for a total of 141 days over a seven-month period for statutory undertakers diversions. This in particular draws into question the validity of the off-peak modelling 	 4.2 – Highways Englatraffic management a Assessment Supplemincludes measures reeastbound carriagew remaining open durin presented in Figure 6 drawn from this informatemporary traffic mar (REP4-013). Paragraph 6.1.4 of the management measure periods of time and cobe in place for part of 4.3 - The traffic flow of peak period is forecat theoretical capacity of per hour. Consequent for the conse



has proposed a new requirement dealing with this on of the dDCO submitted at deadline 5 (REP5-037).

gland's traffic modelling of the proposed temporary t arrangements presented in the Transport ementary Information Report (TASIR) (PDB-003) relating to closure of the nearside lane on the A12 eway that would result in only one eastbound lane ring the inter-peak period. Therefore, the information e 6-2 and Table 6-1 of the TASIR and the conclusions ormation in that report correctly reflect the proposed anagement measures listed in the Outline TMP

the TASIR only lists the temporary traffic sures that will be in place 24 hours a day for extended d does not therefore list other measures that will only of the day or for short periods of time.

v on the A12 eastbound carriageway during the intercast to be 1,233 vehicles per hour in 2022. The v of a single traffic lane is approximately 1,800 vehicles ently, the forecast traffic demand on the A12

	Question	IP Response	HE Response
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		 presented in the TASIR, which only considered a Lane closure on the A12 eastbound off slip road and Junction 28 roundabout. 4.3 Modelled data for the 2022 Do Minimum scenario provided to TfL by the Applicant shows that off peak flows on the eastbound A12 approaching M25 Junction 28 are between 65 and 81 per cent of the flows during the peak periods, i.e. traffic levels during the off-peak period are only reduced by up to 35 per cent. However, a daytime Lane closure will reduce road capacity by approximately 50 per cent. TfL is therefore 	eastbound carriagew capacity of a single to the temporary closure not forecast to result delay as reported in \$ 4.4 - Please refer to I Examining Authority's
		concerned that the daytime Lane closures of the eastbound A12 for diversions of utilities for 141 days may be more disruptive than the scenarios presented in the TASIR. TfL requests that the Applicant assesses the impact of this A12 carriageway Lane closure to identify the scale of impact of the disruption and submits this to the Examination.	4.5 - Highways Engla running proposed on periods, to enable the undertaken, can be in pedestrians on the ac of the lanes being tow
		4.4 TfL also notes that no full closures of the A12 eastbound off slip road are Listed in Tables 2- 3 to 2-5 of the outline TMP despite the Applicant previously advising that at Least some night closures would be necessary. If no full closures of this slip road are required, then some of the concerns that TfL and other Interested Parties have previously raised would be removed; for example, there would be no need for diversion of TfL buses that use this slip road. TfL requests that the Applicant clarifies the position about whether any closures of this slip road are necessary.	footway. Further, a tr footway from the carr achieved during peak only be closed during Furthermore, followin companies, the durat eastbound carriagew less disruptive solution
		4.5 TfL is also concerned about the statement in paragraph 2.3.14 of the outline TMP which suggests that narrow Lane running on the eastbound A12 could cause increased hazards to pedestrians on the adjacent footway, with the implication that nearside Lane closures of the eastbound A12 may be necessary instead. Given that Table 2-4 shows that narrow Lanes are proposed for a total of 185 days (in addition to the 141 days of off-peak Lane closures described in paragraph 4.2 above), this has the potential for significant disruption to the A12 if the narrow Lane solution was found to not be safely operable. TfL considers the safety of pedestrians to be paramount but is also greatly concerned about the substantial disruption that an additional 185 days of the nearside Lane being closed (not just in off peak periods) would cause. If a prolonged closure or diversion of the Non-Motorised User route is to be proposed as an alternative, the implications of this also need to be understood. TfL considers that additional clarity on this matter is required and submitted to the Examination so that it can be assured about the impact of the scheme on traffic flows on the A12 and pedestrian safety.	consideration. Nonetheless, the foor 28 will need to be clo Scheme. During this temporarily diverted y to the footway along pedestrians observed road to junction 28 is the associated divers
		4.6 TfL agrees with the Applicant's conclusion that the junction between the A12 and Petersfield Avenue is not suitable for turning large construction vehicles, as set out in TfL's response to Written Question TA 2.5 above.	
		Co-ordination with other works	
	ectorate scheme reference: TR010029	4.7 Table 2-2 of the plan includes key principles, with principle 01 referring to co-ordination with other roadworks and improvements, with further detail provided in paragraphs 2.3.21 to 2.3.24. TfL welcomes the acknowledgment of the need to co-ordinate with works for the Lower Thames Crossing, and to co-ordinate with other works being undertaken by Highways England, TfL, and Essex County Council. In particular, TfL is aware of several separate programmes to resurface the M25 for durations of between 15 and 40 nights, during which traffic will be diverted onto the TfL Road network (TLRN). Any such closures need to	



eway during the inter-peak periods will not exceed the e traffic lane (less than 70% of capacity) and therefore, ure of the nearside lane during the inter-peak period is alt in any significant additional traffic congestion and in Section 6 of the TASIR.

o Highways England's response TA 2.4 to the y's further written questions (REP5-041).

gland can confirm that the temporary narrow lane on the A12 eastbound carriageway during peak the necessary statutory utility diversion works to be e implemented safely and will not pose a hazard to adjacent footway. This is as a result of the narrowing cowards the central reserve, rather than towards the a temporary barrier will be erected to segregate the arriageway. Since narrow lane running can be safely tak periods, the intention is that the nearside lane will ng the inter-peak periods and not during peak periods. *v*ing further discussions with the statutory utility ration for the inter-peak lane closure on the A12 eway is now likely to be significantly reduced because tions to the diversion of statutory utilities are under

botway on the A12 eastbound off-slip road to junction closed for an extended period during construction the is closure the intention is that pedestrians will be d via the subway under the A12 at Petersfield Avenue g the southern side of the A12. The number of red using the footway on the A12 eastbound off-slip is negligible and therefore its temporary closure and ersion will not have any significant impacts.

Question	IP Response	HE Response
	 be co-ordinated between the contractors for these works, to ensure that disruption is manageable. Diversion routes 4.8 TfL notes the substantial Length of several of the diversion routes during any closures but agrees that in principle the routes are appropriate. Given that most routes use the TLRN, early co-ordination with TfL will be vital to ensure appropriate planning and co-ordination with any other works, and timely and effective communication to drivers and other affected stakeholders must be put in place. 4.9 TfL also notes that the customer requirements table (Table 2-1) specifies that appropriate diversion routes will be agreed with bus operators. TfL considers that should diversion to bus routes actually be necessary (see paragraph 4.4 above), this agreement is needed sufficiently in advance of the works affecting bus operations to ensure the diversion routes and customer communications can be planned appropriately. TfL also welcomes the acknowledgment that a process and procedure is needed for emergency services to have access through the works; this will be particularly important if any closures of the A12 eastbound off slip road to general traffic are required. Communications 4.10 TfL is Listed as a partner in Table 2-1 and the intention for TfL to be invited to traffic management meetings is supported. The table also specifies that TfL will be provided with advance notice of closures and diversions; this will be essential for the successful management of the works and it is imperative that TfL has good communication with the scheme managers, to ensure appropriate planned responses are put in place. 4.11 TfL also welcomes the use of advance notices via Variable Message Signing (VMS) and various media outlets, as set out in principles 09 to 12 and 15 of Table 2-2 to ensure that drivers are notified and can plan alternative routes if necessary during disruptive periods of works, helping to mitigate any congestion impacts. 	
In its response to Action Point 2 [REP4-026] of ISH2 [EV-010], the Applicant declined to delete Part 3, Article 18(2)(c) which authorises the use as a parking place on any road. The Applicant confirms that Woodstock Avenue would not be used for operative or construction parking. Confirm whether the outline TMP [REP4-013] contains within it a construction parking strategy for operatives and / or identifies which of the surrounding road network would be used under this Article in the draft DCO [REP4-002].	TfL has not identified any reference to parking for construction workers in the outline TMP. TfL notes that the construction parking strategy needs to consider any safety or operational impacts on the A12. In addition to considering implications for Local residents, if workers are required to walk alongside or cross the A12, the strategy must demonstrate how this could safely be achieved.	Please refer to High Authority's further w Workers will be inst cars anywhere exce adequate parking p no requirement for w
	In its response to Action Point 2 [REP4-026] of ISH2 [EV-010], the Applicant declined to delete Part 3, Article 18(2)(c) which authorises the use as a parking place on any road. The Applicant confirms that Woodstock Avenue would not be used for operative or construction parking. Confirm whether the outline TMP [REP4-013] contains within it a construction parking strategy for operatives and / or identifies which of the surrounding road network would be used under this Article in the draft	be co-ordinated between the contractors for these works, to ensure that disruption is manageable. Diversion routes 4.3 TH, notes the substantial Length of several of the diversion routes during any closures but agrees that in principle the routes are appropriate. Given that most routes use the TLRN, carry co-ordination with TL will be viait to ensure appropriate planning and co-ordination with TL will be viait to ensure appropriate planning and co-ordination with TL will be viait to ensure appropriate planning and co-ordination with any other works, and they and effective communication to drivers and other afficiend stakeholders munications can be planned appropriate diversion routes will be agreed with bus operators. THL considers that should diversion to bus routes actually be necessary (see paragraph 4.4 abov), this agreement is needed sufficiently in advance of the works affecting bus operations to ensure the diversion routes and customer communications can be planned appropriate. This unable events the actionadyment that a process and protect the works affecting bus operations to ensure the diversion routes and customer communications can be planned appropriate; this will be assential for the works affecting bus and protect the works affecting bus operations to ensure the A12 exection of the second general traffic are required. Communications 4.10 TL is Listed as a partner in Table 2-1 and the intention for TL to be invided to traffic management meetings is becaused and appropriate that the association may and the appropriate planned responses are put in place. 4.11 TL is be velocenes the use of advance notices via Variable Message Signing (VMS) and variance notices via Variable Message Signing (VMS) and variance notices via Variable Message Signing (VMS) and variance the dididion to construction partner the aution TMP [REP4-



ighways England's response TA 2.6 to the Examining r written questions (REP5-041).

nstructed by the Principal Contractor not to park their except within the main construction worksite where g provision will be provided. Consequently, there will be for workers to walk alongside or cross the A12.

3. Request for further information

onse nce:	Issue	HE Response
Response reference:		
REP5-070- 01	 5. Transport for London comments on responses for Deadline 4 5.1 TfL also wishes to comment on the Applicant's response to Action Points from Issue Specific Hearing 2 [REP4-026]. TfL notes the Applicant's response to Action 9 regarding how improvements to the Non-Motorised User (NMU) route could be secured in the DCO. TfL remains of the view that the pedestrian/cycle crossings around the Junction 28 roundabout are the greatest barrier to use of this route, leading to severance, so this part of the route should be improved as part of the M25 Junction 28 improvements scheme. 5.2 TfL would in principle support the Applicant's proposal to include additional works in the DCO to improve the route through Junction 28, including the enhancement to provide a shared footway/cycle track with toucan crossings where the route crosses the roundabout. However, it is not clear whether this would address the concern raised in paragraph 5.13 of TfL's Written Representation [REP2-036] that the Applicant must ensure that safe crossings of the slip roads must be provided where the NMU route crosses these. The Applicant must demonstrate that these crossings are safe as part of any proposal for upgrading the NMU route. 5.3 TfL also notes that the Applicant has approached TfL and other highway and planning authorities to enquire whether the twe could make a financial contribution and/or assist in the procurement and delivery of the separate scheme to upgrade the NMU route for which the Applicant is bidding for designated funds. TfL does not consider it appropriate that it should financially contribute towards improvements to the NMU route around the Junction 28 roundabout which are necessary to address the impact of the national road network on severance at this Location. 	 5.1 – Highways England maintain the position set out in response to from ISH2 (REP4-026). 5.2 – Firstly, Highways England is not proposing to include these ac with these works via Highways England designated funds scheme. NMU route across the junction from east to west so that NMUs <u>do n</u> M25 southbound on-slip. This is achieved by providing the following Signal controlled shared use pedestrian/cyclist (Toucan) cross southbound circulatory carriageway, the westbound circulator road. A shared use pedestrian/cycle path on the southern side of th under the M25. The designated funds scheme has been subject to an independent safe. 5.3 – Highways England agrees that it would not be appropriate for make a financial contribution to enhanced NMU facilities at junction that it may be appropriate for TfL and other highways or planning at elements of the designated funds scheme where it extends beyond 28 towards Harold Hill and Brentwood.



e to Action 9 of Highways England's to action points

- e additional works in the DCO. It is proposing to deal ne. The designated fund scheme would alter the do not have to cross the exit of the roundabout to the ving:
- rossings across the A12 westbound off-slip road, the atory carriageway and the M25 northbound off-slip
- f the roundabout island connecting these crossings
- ent road safety audit that confirms the proposals are
- for TfL and other highway or planning authorities to ion 28 itself. However, Highways England considers g authorities to make a financial contribution towards and the Strategic Road Network and the M25 junction

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