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## **GROVE FARM**

**TRANSPORTATION & HIGHWAY  
SUPPLEMENTARY REPRESENTATIONS No.3**

**BY  
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**CONCERNING**

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

**Redwood Reference: PMcL/3396d4/April 2021**



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## 1.0 INTRODUCTION & BACKGROUND

- 1.1 A formal 'Issue Specific Hearing 1' was held on 3<sup>rd</sup> 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 ('Scheme'). Discussions were held at the Issue Specific Hearing 1 concerning the access and egress alterations to Grove Farm submitted 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 Scheme (Ref: PMcL/3396d2/March 2021).
- 1.3 The ExA issued written questions on 25 March 2021 requesting more information from 'The Applicant' (HE). A further submission as made by Grove Farm as Supplementary Representations No.2 (PMcL/3396d3/April 2021). These further representations were responded to by HE (Ref: TR010029/EXAM/9.75) at Deadline 5.
- 1.4 This document updates the ExA on the position of Grove Farm with regards the latest response from HE and from Grove Farm's response at Deadline 6. 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 Grove Farm's Deadline 4 submission included Supplementary Representations No.2, Section 2.0 (Ref: PMcL/3396d3/April 2021) which outlined the reasons why the ExA should direct HE to include within an amended Scheme the new farm access proposal shown on **Drawing No. REDW-3396-115**.
- 2.2 The Deadline 4 representations were responded to by HE (Ref: TR010029/EXAM/9.75) at Deadline 5. In response to the HE Deadline 5 submission, Grove Farm wishes ExA to consider the following comments and concerns:
- i) The junction with the M25 northbound will be approximately 200 metres further north than existing junction with the M25. The slip road adjacent to Grove Farm will be a link road connecting to the M25 northbound on-slip not the on-slip itself;
  - ii) The M25 northbound on-slip adjacent to Grove Farm is dual carriageway. Vehicles accelerating hard are more likely to be in the outside lane overtaking vehicles which are indicating to turn left into the new farm access after having left the roundabout;
  - iii) HE states that vehicle speeds on the M25 northbound on-slip adjacent to Grove Farm should be considered as 70 mph. Whilst this is will be the speed limit at the immediate exit from the roundabout, it is clear that actual vehicle speeds will be considerably less in this location just at the exit from the roundabout;
  - iv) The proposals for a new farm access shown on drawing **REDW-3396-115** essentially move the junction 50 metres north of its present position. Vehicle speeds at the proposed new access point will be marginally higher than speeds adjacent to the existing access point. This nominal change in distance will not result in a significant increase in vehicle speeds over such a short distance, certainly not sufficient to produce a 'severe' effect;
  - v) No deceleration lane is provided for the maintenance only access currently proposed by HE. Land can be made available from Grove Farm to provide the access as shown on **REDW-3396-115** submitted with Grove Farm's Supplementary Representations No.2, Section 2.0 (Ref: PMcL/3396d3/April 2021) with a deceleration lane. The new access location will improve highway safety for all users of the access;



- vi) The new location of the Grove Farm access will relocate industrial traffic further away from the third dwelling located at the existing site access, improving the amenity of that dwelling;
- vii) The closure of the existing farm access will allow for a noise attenuation barrier to be extended further north mitigating growing traffic noise effects on all three dwellings on the site from the M25 and the M25 northbound slip-on (see section 3.2 iv);
- viii) Further drawings issued by HE should highlight all three residential dwellings on the site (**Fig 3.2**).

2.3 In conclusion, Grove Farm requests that the ExA rectify the Scheme proposals for Grove Farm to provide a safer access and direct HE to include a further design change to the Scheme to provide the amended farm access proposal shown on **Drawing No. REDW-3396-115** including the following:

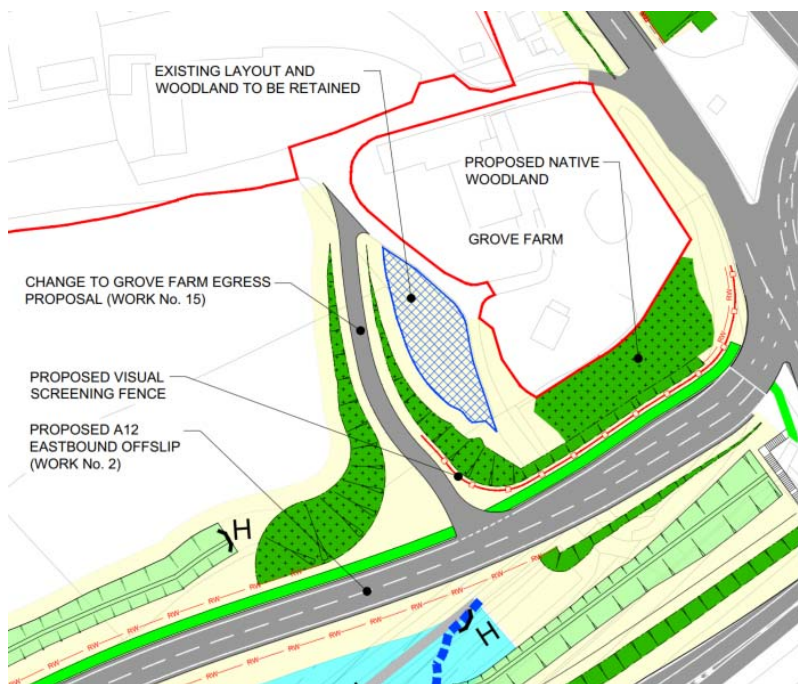
- i) The closure of the existing access to Grove Farm from the M25 northbound on-slip;
- ii) The construction of a new dedicated auxiliary left-turn lane access to Grove Farm from the M25 northbound on slip road to be shared with the HE service access already proposed for pond maintenance and electricity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



### 3.0 GROVE FARM EGRESS PROPOSALS – A12 EASTBOUND OFF-SLIP

3.1 Highways England is developing an alternative option with Grove Farm for the farm's egress onto the A12 eastbound off-slip. The design change is noted as 'Change 8'. Change 8 involves re-positioning the proposed egress road (HE 'Work No. 15') further west away from the Grove Farm and the two adjacent dwellings to help mitigate previously raised concerns. An extract of the Change 8 proposals is shown in **Fig 3.1** below:

**Fig 3.1 - HE Indicative alignment of amended Grove Farm egress (Change 8)**



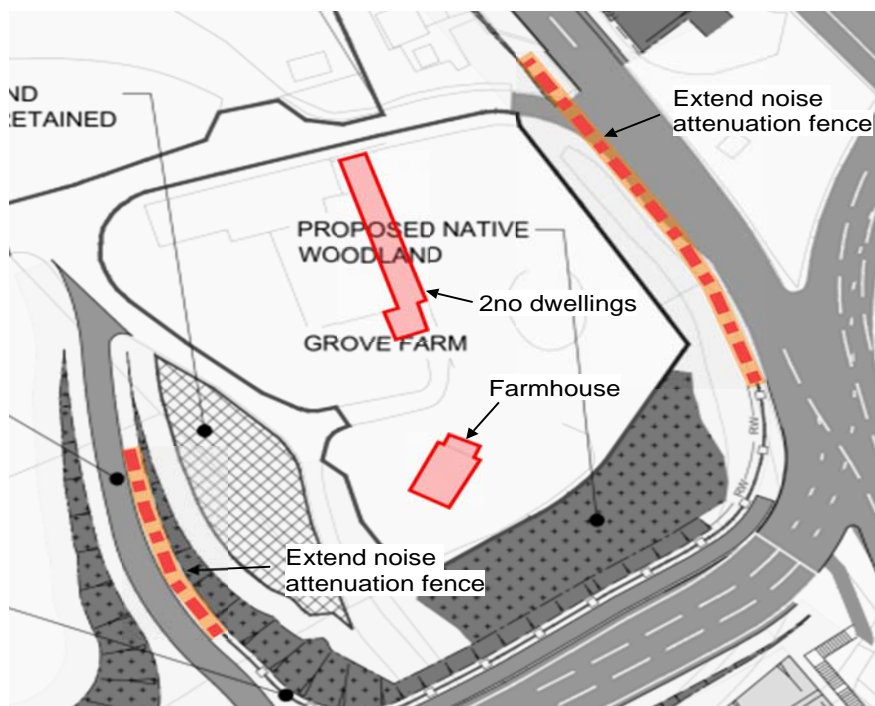
3.2 Grove Farm welcomes the response from HE with regards alteration of the farm egress onto the A12 eastbound off-slip, however a number of concerns remain:

- i) Proposals for Change 8 should be developed with Grove Farm on a topographical survey base not an ordnance survey base so that the full impact of proposals can be adequately reviewed. The request for topographical survey plans have previously been made;
- ii) The Change 8 proposals identify a 'visual screening fence' along the boundary of the A12 eastbound off-slip. Grove Farm's Supplementary Representations No.2, Section 4.0 (Ref: PMcL/3396d3/April 2021) discussed the reasons why a 'visual



- screen' is not acceptable to Grove Farm. The Scheme provides the only opportunity to enhance the environment of Grove Farm and partially mitigate the detrimental effects of the Scheme on Grove Farm. The provision of a noise attenuation barrier instead of a 'visual screen' 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;
- iii) The proposed 'visual screen' will be up to 3m high. This structure will require significant footings in any event and an upgrade is a cost issue. The ExA should direct HE to upgrade the visual screen to a noise attenuation barrier;
  - iv) The HE Scheme will not reduce traffic flows and associated future traffic growth on the M25 northbound on-slip or the A12 eastbound off-slip next to Grove Farm. The benefit of closing the existing farm access and relocating the farm access combining it with the maintenance access north of the sub-station is that increased traffic noise from traffic growth will be mitigated by extending a noise attenuation barrier beyond the existing dwellings and existing access;
  - v) The re-alignment of the A12 eastbound on-slip will relocate traffic flows closer to existing dwellings. A noise attenuation barrier should be extended into the site at the site egress as shown on **Fig 3.2**:

**Figure 3.2 – Grove Farm's suggested location for extra noise attenuation fencing**





- 3.3 In conclusion, Grove Farm requests that the ExA should direct the HE to provide a noise attenuation barrier instead of the 'visual screen' currently proposed and extend the noise attenuation barrier further north on the M25 northbound on-slip and further north into the farm egress as shown on **Fig 3.2**.