

M25 junction 28 improvement scheme

TR010029

9.116 Applicant's comments on Jane Allan's Deadline 7 submission

Rule 8(1)(k)

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1. Purpose and structure of this response

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to Jane Allan's comments on the proposed development (REP7-040) submitted to the Examining Authority (ExA) on or before Deadline 7 (20 May 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. REP7-040 Jane Allan Comments on the Proposed Development

Response reference:	Representation Issue	Highways England Response
REP7-040-01	<p>Following the meeting I have the following issues/concerns:</p> <p>1. Please clarify if consultation with local residents has occurred on the proposed NMU Designated Funds Scheme in this area? I do not recall seeing or hearing any information about this scheme. The proposed scheme predominantly improves accessibility on the A12 southbound carriageway and does not meet the needs of residents on the northbound A12 carriageway. I would expect local residents to be fully consulted prior to any decisions being made on such an important scheme with a budget of @ £3.5 million? If funding for NMUs was from the M25j28 project (not the NMU Designated Funds Scheme) would the consultation process be different? The whole area (northbound and southbound of the A12) needs upgrading for NMUs (and 498 bus stops) with improved pathways, barriers and safe crossing areas on both sides of the A12. The suggested A12 subway crossing point close to Petersfield Avenue is renowned for attracting unsociable behaviour and finding abandoned burnt out bikes, burnt walls, smashed lights and other waste matter- because of this, I, like other residents in the area, do not use the subway as a regular crossing point and resort to</p>	<p>Please refer to Highways England's response to Action Point 1 of the Issue Specific Hearing 3 (ISH3) response document (REP7-019).</p> <p>In ISH3 Highways England explained that in developing the designated funds scheme, various alternative options were examined to improve accessibility for non-motorised users (NMUs) between Brentwood and Harold Hill. These alternatives included options along the northern side of the A12 carriageway as well as the southern side of the A12 carriageway. As a result of this process Highways England took the view that on balance the option along the southern side performed best in terms of catering for the needs of NMU users including local residents, design feasibility, safety for NMUs, and value for money. In the ISH3 hearing Highways England explained that the southern option makes use of the existing subway on the A12 adjacent to Petersfield Avenue, approximately 100m from Woodstock Avenue. This subway is of a good standard and forms part of the national cycle network route 136 (NCN136) to facilitate the safe and convenient crossing of the A12. As such Highways England's position is that this route option on the southern side of the A12, with its connection to the NCN136 at the subway, would improve accessibility considerably and is the safest route for NMUs between the eastern and western sides of the M25 motorway.</p>

Response reference:	Representation Issue	Highways England Response
	crossing the A12 at nearby non pedestrian controlled traffic lights.	The existing footway facility on the northern side of the A12, including the eastbound off slip road, would remain, albeit replaced as part of the reconstruction of the slip road. This route would continue to be available for pedestrians (it would not be a shared use path) but the NMU scheme offers a safe and convenient alternative for the vast majority of NMU users.
REP7-040-02	<p>2. The outline TMP does not meet the needs of residents in Woodstock Avenue (WA). As previously highlighted on multiple occasions in writing and verbally it is unacceptable to expect residents of WA to make diversions to the Shenfield junction along the A12 to travel westbound when the A12 off slip is closed during the construction phase of this project. In addition to the temporary (not defined) A12 off slip road closures other proposed diversions and delivery of construction materials throughout this project will impact residents of WA significantly more than other residents in this area which is why the TMP should facilitate the inclusion of a right hand turn between WA and the M25j28 off slip.</p> <p>This project will create a significant amount of disruption (noise, dust, vibration, traffic etc) for all local residents but more-so for residents of WA because of its locality issues. I believe tolerance levels of all disruptive aspects of this project would be significantly improved for residents of WA if we were able to avoid the Brook Street roundabout altogether during the construction phase and avoid having</p>	<p>Highways England recognises that temporary overnight closures of the A12 eastbound off-slip will result in Woodstock Avenue residents having to make a diversion via A12 junction 12 to the east because there is no right turn from Woodstock Avenue on the A12. The amended Outline TMP submitted at Deadline 7 (REP7-017) references this as a key challenge in Section 1.3. It is for this reason that the temporary closures of the off-slip will be kept to the absolute minimum practicable and will only be in place overnight in order to minimise disruption (<u>not</u> during peak travel times in the day). A few overnight closures of the A12 eastbound off-slip are unavoidable for some construction activities to be undertaken safely. As the closures would only be overnight, the diversion route via A12 junction 12 is anticipated to add only an additional 10 to 15 minutes to journey times because typically traffic volumes are significantly lower at night and no traffic congestion is expected during the proposed hours of closure (that is between 22:00 and 05:30 hours).</p> <p>The Scheme is forecast to result in a minimal change in traffic flows on the A12, and therefore there is no expectation that this will exacerbate any historic severance issues along the A12 during construction or operation.</p>

Response reference:	Representation Issue	Highways England Response
	<p>to make extended diversions to Shenfield just to turn right whilst making local journeys.</p> <p>WA has already been significantly severed from the local community (Harold Park) when the A12 became a dual carriageway and when the M25 was constructed hence should not be severed further during this construction phase.</p>	<p>TfL is the highway authority responsible for the A12 west of M25 junction 28. It is therefore TfL's responsibility to rectify any ongoing severance issues on this section of the A12. It is also TfL's responsibility to consider the need for and feasibility of providing a right turn on to the A12 from Woodstock Avenue. TfL has previously stated that it does not support the introduction of a right turn from Woodstock Avenue because of the adverse impact it would have on the operational performance of the A12 (TA1.13 REP2-037).</p>
REP7-040-03	<p>3. I think a Community Engagement Plan would be helpful to local residents for signposting purposes during the construction phase.</p>	<p>Highways England has submitted an Outline Community Engagement Plan into the Examination at Deadline 8 (TR010029/EXAM/9.110).</p>
REP7-040-04	<p>4. HGVs should be prohibited (and monitored) from making U turns along the A12 at Petersfield Avenue during the construction phase. Traffic lights at this junction have been knocked down on several occasions by large vehicles trying to make U turns here.</p>	<p>As stated in the Outline TMP submitted at deadline 7 (REP7-017), all suppliers of construction materials and equipment will be notified of the construction lorry routes to be used when orders are placed, explaining that no other routes are to be used by construction delivery vehicles. They will also be issued with identification cards or stickers that will have to be displayed in vehicle windscreens, enabling them to be clearly identified as being associated with construction of the junction 28 scheme. Temporary signage on the road network will be installed directing construction delivery vehicles along the designated lorry routes. Arrangements for the temporary signage will be set out in the final TMP to be submitted to the Secretary of State for approval under Requirement 10 of the dDCO.</p>

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		<p>Should local residents or the local authorities become aware of construction traffic associated with the Scheme not following the designated construction lorry routes, then they will be able to raise the issue with Highways England's appointed Principal Contractor and appropriate action will be taken to prevent further instances.</p>
REP7-040-05	<p>5. All bridges should be aesthetically pleasing in this area. As a resident who overlooks the M25j28 I do consider this area to be locally sensitive.</p>	<p>At Deadline 7, Highways England prepared a summary document of the design process for the Scheme (REP7-028). Section 4.2 explains how the Scheme design adheres to the relevant principles set out in the National Policy Statement for National Networks (NPS NN) including how it has been designed to be aesthetically sensitive as it can reasonably be. The summary document sets out how structures have been designed to ensure that they are fit for purpose and are sustainable. These factors have permeated the design of the structures, the proposed materials and finish.</p> <p>Paragraphs 4.2.3 to 4.2.5 provide detail about the bridges and explain that apart from Maylands bridge, the other bridges are not visible to the public in the main, or at all.</p> <p>The photomontage for Viewpoint D – Maylands Cottages (REP5-022) which is closer to the Scheme than Woodstock Ave demonstrates that visual impacts experienced during the construction period and early years of operation would be mitigated by the proposed environmental measures and the woodland belt located to the west of the loop road, screening the loop road and bridges from view.</p>

Response reference:	Representation Issue	Highways England Response
REP7-040-06	<p>6. I would like to request that those attending the unaccompanied site inspection scheduled for June 2021:</p> <ul style="list-style-type: none"> • Attempt to cross the A12 off slip on to the M25j28 roundabout • Walk the proposed NMU route from WA along the northbound A12 pathway, under the subway at Petersfield Avenue and along the southbound side of the A12 to the suggested crossing point on the A12 on slip road. • Drive the proposed diversion route for residents of WA along the A12 to the Shenfield junction and back to WA. 	<p>Highways England would remind the ExA that the proposed diversion route for residents of Woodstock Avenue would only be in place between the hours of 22:00 and 05:30 for those times that the diversion would be in place. Traffic conditions, and hence the expected travel time for the diversion (at night time) would be quite different during peak travel times and throughout the daytime.</p>

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