

## M25 junction 28 improvement scheme

TR010029

### 9.124 Applicant's comments on Grove Farm's Deadline 8 submissions

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

June 2021

## Infrastructure Planning

### Planning Act 2008

#### The Infrastructure Planning (Examination Procedure) Rules 2010

#### M25 junction 28 scheme Development Consent Order 202[x ]

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<b>Rule Number:</b>	Rule 8(1)(k)
<b>Planning Inspectorate Scheme Reference</b>	TR010029
<b>Application Document Reference</b>	TR010029/EXAM/9.124
<b>Author:</b>	M25 junction 28 scheme, Project Team, Highways England

<b>Version</b>	<b>Date</b>	<b>Status of Version</b>
0	30 June 2021	Deadline 9

# Table of contents

<b>Chapter</b>	<b>Pages</b>
1. Purpose and structure of this response	4
2. REP8-034 Hinson Parry & Company on behalf of Mr and Mrs Jones of Grove Farm response to the Examining Authority's Rule 9 and 17 letter (26 May 2021)	5
3. REP8-035 Mr and Mrs Jones of Grove Farm comments on the Proposed Development	9

## 1. Purpose and structure of this response

- 1.1.1 This document provides the comments of the applicant, Highways England, in response to two documents submitted by the Jones family and their representatives to the Examining Authority at Deadline 8 (9 June 2021) namely:
- Hinson Parry & Company on behalf of Mr and Mrs Jones of Grove Farm's response to the Applicant's Deadline 7 submissions (REP8-034)
  - Mr and Mrs Jones comments on the proposed development (REP8-035)
- 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. REP8-034 Hinson Parry & Company on behalf of Mr and Mrs Jones of Grove Farm Response to the Applicant's Deadline 7 submissions

Response reference:	Question	Highways England Response
REP8-034-01	<p>We welcome the addition of point 21 within the examiners proposed changes to the Development Consent Order and agree that a site specific plan for Grove Farm will ensure that any mitigation measures such as tree planting, visual barriers and noise mitigation is adequate before the development is commenced. This positive suggestion is a welcome addition by the clients but we strongly feel that a noise barrier needs to be implemented in replacement of the visual barrier. At the last hearing the examiners themselves questioned whether noise surveys can actually measure the highest 10% of noise measurements which are most important for Grove Farm. This interlinks with our clients response at deadline 7 whereby they stipulated the negative impact the proposed noise will have on their lives including the peak noises which cannot be accurately calculated as part of the noise readings which includes the revving of engines,</p>	<p>Highways England does not consider a separate requirement to be necessary or appropriate, please refer to REP8-010 para 21 for detailed reasoning.</p> <p>Please also see REP7-043-06 for Highways England's responses to the Deadline 7 submission from Grove Farm (REP8-018) and REP8-034-05 below.</p>

Response reference:	Question	Highways England Response
	<p>screeching of breaks, car horns, sirens and the such like. There is a concern that this will detrimentally impact their mental wellbeing.</p>	
<b>REP8-034-03</b>	<p>We request that any site specific plan is agreed with ourselves, and that we are involved during this process with a copy provided to ensure that all parties are in mutual awareness and agreement of the plan.</p>	<p>Highways England does not consider a separate requirement to be necessary or appropriate, please refer to REP8-010 para 21 for detailed reasoning.</p> <p>Highways England has already put forward specific arrangements for Grove Farm in proposed Change 8. This change has now been accepted by the ExA and therefore will be subject to scrutiny in the examination.</p> <p>If the requirement is imposed, the site specific plan that the ExA has suggested as an additional requirement in their Consultation draft to the dDCO (PD-021) will be subject to approval by the Secretary of State in consultation with TfL and the London Borough of Havering. The Secretary of State may consider it appropriate to include the owners of Grove Farm as a consultee if he considers such a requirement appropriate.</p>
<b>REP8-034-05</b>	<p>At response reference REP6-041-16 and REP6-041-17 within REP7-024 provided by HE, it is understood that changes in overall road traffic noise levels at Grove Farm have been shown to be negligible, i.e. smaller than 1dB. Interlinking with this and at point REP6-041-17 whereby we have requested the noise barrier be extended, HE disagree with this due</p>	<p>As discussed at the Issue Specific Hearing 3 (ISH3), Highways England has taken into consideration whether the installation of a noise barrier along the A12 eastbound off slip would provide a perceptible (at least 1dB) reduction in noise levels at Grove Farm. The installation of such a noise barrier, excluding the Grove Farm egress, would reduce noise levels by less than half a decibel (reference no REP7-024, REP6-041-17). This reduction would be negligible. The noise barrier</p>

Response reference:	Question	Highways England Response
	<p>to the limited evidence to show that the noise is increasing. We ask that following on from their on-site inspection, the ExA consider this again.</p>	<p>would not provide good value for money because it would not show perceptible acoustic benefits at Grove Farm.</p> <p>Highways England response to Mr and Mrs Jones at Deadline 6 (reference no REP6-012, REP5-067-11) outlines how the road network around the property contributes to total noise levels, and highlights that the M25 corridor is the dominant noise source. Therefore, any permanent noise barrier along the A12 eastbound off slip would not effectively reduce noise levels at the Grove Farm property. Given the considerable expense of providing noise barriers Highways England does not consider that this would be an appropriate use of public funds.</p> <p>The noise assessment has been undertaken in a robust way, following the industry accepted methods and taking into account the specific situation at Grove Farm. Overall noise levels are forecast to change negligibly with the Scheme in place. The visual screen and planting would provide psychological separation from the slip road traffic which may improve perceptions of noise.</p>
<p><b>REP8-034-06</b></p>	<p>From recent experience of standing by the new A380 South Devon Link Road whereby the noise figures demonstrated a nominal or negative change to the noise decibels at various roads and properties impacted by the scheme, I was shocked to find myself in a position whereby I could not believe that the noise had decreased when the amount of tarmac, lanes and vehicles movements had</p>	<p>Highways England cannot compare the proposed Scheme to the new A380 South Devon Link as it is different scheme in a different area and no two schemes have the same impacts. In any event no substantive information has been provided in relation to this Scheme.</p> <p>Highways England welcomes that Grove Farm appreciates the methodology behind undertaking the noise reports which is based on recognised and accepted methodology in DMRB.</p>

Response reference:	Question	Highways England Response
	<p>and will continue to increase. I cannot comprehend that there will only be a 1db change over time as vehicle movements continue to rise. We completely appreciate the methodology behind undertaking the noise reports but nothing can supersede real life experience of noise on the ground of the location.</p>	



### 3. REP8-035 Mr and Mrs Jones of Grove Farm comments on the Proposed Development

Response reference:	Question	Highways England Response
REP8-035-01	<p><b>1. Farm Entrance</b></p> <p>Highways England refer to 70mph speeds of vehicles passing our property and accelerating traffic as being the reasons why the access cannot be moved a short distance further north. Has there ever been a traffic speed survey at our entrance? As clearly vehicle speeds are not this high. Entrances off main roads where traffic is accelerating is very common around the country.</p> <p>The latest road layout will move our entrance closer to the roundabout. Our entrance will be affected, contrary to statements made by Highways England. We will on a daily basis then struggle daily with using the entrance when traffic continues to flow around the roundabout.</p> <p>Our experts consider moving the access north of the sub-station will make our entrance and the access for maintenance vehicles safer. After many decades living here, we agree. As mentioned in our</p>	<p>The reference made to 70 mph was concerned with the posted speed limit on the slip road and not vehicle speeds. As previously stated, vehicles leaving the roundabout are accelerating up to 70 mph on the slip road to merge with the M25 main carriageway. The existing entrance is sited close to the exit from the roundabout where vehicle speeds are low. A frequently used farm access sited further away from the exit of the roundabout (as suggested by the Grove Farm representatives) will be located where vehicles will be travelling at higher speeds as they accelerate away from the roundabout towards the M25. Highways England's road safety and operational safety engineers have expressed safety concerns about a frequently used entrance to the farm relocated further north on the slip road.</p> <p>Please see Highways England response to REP6-041-11 in (REP7-024) which sets out Highways England position. Highways England maintains its position with regard to the amended farm access proposal from the M25 on slip road as also set out in (REP5-047) and (REP6-012).</p> <p>A speed survey on the slip road adjacent to the existing Grove Farm entrance has not been undertaken by Highways England given that the proposed works by the Grove Farm access only comprises resurfacing. The existing farm entrance is situated close to the exit from the</p>

Response reference:	Question	Highways England Response
	<p>previous email, our children and grandchildren live here and we have to make sure that they are safe at all times.</p>	<p>roundabout where observed traffic speeds are low. The absence of any recorded accidents here reflects this.</p> <p>The proposed works on the roundabout carriageway and slip road exit to the M25 adjacent to Grove Farm involves resurfacing only. As such the position of the roundabout will not be changed and the existing entrance to Grove Farm will not be closer to the roundabout. Similarly, the existing layout on the slip road up to and including the entrance to Grove Farm will be unaltered.</p>
<p><b>REP8-035-02</b></p>	<p><b>2. Noise Barriers</b></p> <p>From the latest response it looks like you are going to allow a visual fence with further noise surveys later. At the last hearing, you were not satisfied that the noise survey was able to measure the highest noise levels caused by revving of engines screeching of brakes, use of car horns and sirens. The Highways England noise expert at the last hearing agreed that the loudest 10% of measured noise is not considered. These highest noises are the very noises that will cause us most concern but are being ignored.</p>	<p>Please see response to REP7-043-06 to Highways England's response to the Deadline 7 submission from Grove Farm (REP8-018).</p>
<p><b>REP8-035-03</b></p>	<p>We feel this situation is unique to us and amending the visual fencing to a noise barrier will offset moving the A12 much</p>	<p>Please see response to REP7-043-06 to Highways England's response to the Deadline 7 submission from Grove Farm (REP8-018).</p>

Response reference:	Question	Highways England Response
	<p>closer to our bedroom windows. This is why we need as a minimum the noise barrier around the front and sides of our properties. Our bedroom windows face directly on to the new and much closer proposed slip road. Tree planting will not provide any noise attenuation even when fully grown.</p>	
<p><b>REP8-035-04</b></p>	<p>We understand from statements made by Highways England that they are proposing to noise dampening tarmac on the road in front. Our experts have said that this tarmac would need to be replaced every 6-10 years at least to keep the noise dampening effect and will be covered in any event near to the traffic signals with a coloured skid surface. They need to undertake to replace this tarmac regularly?? Surely this tarmac with its little holes in it to take the noise will fill up with dust and dirt over time making it pointless.</p>	<p>Please see response to REP7-043-08 in Highways England's response to the Deadline 7 submission from Grove Farm (REP8-018).</p>
<p><b>REP8-034-05</b></p>	<p>We are grateful that the Examining Authority came out and stood at various points to understand the human element of this scheme but we ask that the noise barrier is not considered as an afterthought but now as part of the initial construction of the</p>	<p>Please see response to REP7-043-05 to Highways England's response to the Deadline 7 submission from Grove Farm (REP8-018) which states that an acoustic barrier would need to meet the necessary acoustic standard. The increased density and weight of the acoustic barrier panels to meet the acoustic standard would require more substantial foundations than a visual screening fence in order to</p>

Response reference:	Question	Highways England Response
	<p>barriers. If a barrier is already going up surely it is more cost effective to only put up one appropriate barrier up that will benefit us more long term.</p>	<p>support this type of barrier. Moreover, such a noise barrier would offer no acoustic benefit (there being no acoustic change) and its cost would not represent good value for money for the public purse.</p>
<p><b>REP8-034-06</b></p>	<p><b>Summary</b>            Highways England has not considered the full effect of their scheme on our family. Moving our entrance further north to a safer location and providing noise barriers instead of visual fencing is the minimum that would be acceptable to us to mitigate against all the detrimental effects of this project on our family. Our daily mental health due to the road being moved within 20m of our homes and the increase in traffic cannot be taken lightly. These requests are entirely reasonable, but it seems they are not decisions that Highways England are able to take. We would ask you to consider our situation outside their technical constraints and agree with us what we are asking for is the very least that can be provided.</p>	<p>Please see responses above and to REP7-043-06 in Highways England's response to the Deadline 7 submission from Grove Farm (REP8-018).</p>

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