

## **M25 junction 28 improvement scheme**

**TR010029**

### **9.75 Applicant's response to Hinson Parry & Company on behalf of Mr and Mrs Jones of Grove Farm's Deadline 4 submission**

Rule 8(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure)  
Rules 2010

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## **Infrastructure Planning**

### **Planning Act 2008**

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

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<b>Rule Number:</b>	Rule 8(k)
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## REP4-036 HINSON PARRY & COMPANY ON BEHALF OF MR & MRS JONES OF GROVE FARM – TRANSPORTATION & HIGHWAY SUPPLEMENTARY REPRESENTATIONS

Response reference:	Representation Issue	Highways England Response
REP4-036-1	<b>1.0 Introduction</b> 1.1 Further to the Planning Inspectorate (PINS) Hearing regarding Highways England's (HE) application for a Development Consent Order (DCO) to carry out a M25 Junction 28 Improvement Scheme ('The HE Scheme'), our first submission consisted of Grove Farm Transportation & Highway Written representations (Ref: PMcL/3396d1/Feb 2021) which was responded to by Highways England (HE) and discussed in detail during the formal PINS Hearing.	No response needed.
REP4-036-2	1.2 After further consideration of comments made by all parties during the Hearing, we have now prepared Drawing No. REDW-3396-115 showing our suggested and amended improvements to the HE Scheme surrounding Grove Farm. Drawing No. REDW-3396-115 shows the HE proposals at an adequate scale and establishes the position of the HE Scheme relative to the location of the three dwellings on the Farm. The existing A12 eastbound off-slip (shaded yellow on the plan) will be closed as part of the HE Scheme. The new alignment of the A12 eastbound off-slip will be located significantly closer to the existing dwellings (shaded grey on the plan).	No response needed.
REP4-036-3	1.3 It should be noted that there are three dwellings located at Grove Farm. The effect on the living environment of the owners and their family will be permanent and detrimental unless adequate mitigating measures as suggested are incorporated into the HE Scheme.	Please see response to REP4-036-4 below.
REP4-036-4	1.4 The owners of Grove Farm have concerns that no permanent noise mitigation measures are included in the HE Scheme surrounding Grove Farm. To rectify this omission my Drawing No. REDW-3396-115 shows the suggested location of permanent noise attenuation fencing surrounding the	The noise modelling confirms that a noise barrier at Grove Farm would not be justified, given the negligible noise impacts from the Scheme. Therefore, Highways England is not proposing a permanent noise barrier for the reasons outlined in Highways England's response to Issue Specific Hearing (ISH) 2,

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	<p>properties which would contribute towards mitigation of increased environmental traffic noise brought about by the HE Scheme. We request that HE include in an amended HE Scheme permanent noise mitigation measures surrounding Grove Farm as shown on my Drawing No. REDW-3396-115.</p>	<p>Agenda item 5.1 - The effects of the Proposed Development on the living conditions of the occupiers of Grove Farm (REP4-016).</p> <p>Highways England has continued to engage with the owners of Grove Farm and their land agent with regard to mitigation and some additional mitigation measures are being proposed.</p> <p>In addition to the planting proposed for the Scheme, in order to provide immediate year- round visual screening Highways England is proposing to install a visual screening fence adjacent to the proposed A12 eastbound off slip carriageway. A new commitment will be added to the REAC (Table 1.1, commitment LV0.6 and Table 1.3 LV1.11, TR010029/APP/7.3(3)) at a future deadline. These measures will provide adequate year-round mitigation for the relevant landscape and visual effects at Grove Farm. Highways England also intends to maximise the retention of established vegetation between the dwellings and the slip road, and landscape planting of a species mix in agreement with the owners of Grove Farm.</p>
REP4-036-5	<p><b>2.0 GROVE FARM ACCESS PROPOSALS – M25 NORTHBOUND ON-SLIP</b></p> <p>2.1 The location of the existing Grove Farm access is already a significant departure from highway design standards by its location close the north-west egress of the roundabout. HE stated at the formal Hearing that their proposals do not affect the existing access to Grove Farm from the M25 northbound slip, therefore no alteration to Grove Farm access is necessary. We do not agree that the HE Scheme does not affect the existing Grove Farm access.</p>	<p>Please see Highways England's response to the Jones Family's written Representation (REP3A-022) with regards to their alternative access proposals via the M25 northbound on-slip road. Highways England has reviewed the Jones Family's Deadline 4 submission (REP4-036) and maintains its position that the Scheme does not affect the existing access to Grove Farm from the M25 on-slip and it would not be appropriate to pursue the suggested proposals.</p>
REP4-036-6	<p>2.2 The HE Scheme introduces new safety concerns in that the access to Grove Farm is now immediately after the M25 northbound exit from the roundabout relative to the new alignment of the A12 eastbound off-slip.</p>	<p>Please see Highways England response to the Jones Family's written representation, in particular paragraph REP2-033-13 (REP3A-022) with regard to road user signalling. Highways England considers that familiarity with the</p>

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	Currently, the existing access is approximately 30 metres from the northbound exit from the roundabout. This reduction in the separation between the site access and the roundabout brought about by the HE Scheme will introduce new road safety issues whereby a road user signaling can be misinterpreted by following vehicles. Road users indicating left to exit a roundabout may not have sufficient time to cancel their indicator and re-indicate before turning left from the main road. This could result in following road users failing to anticipate the left turn manoeuvre by the proceeding vehicle increasing the risk of late braking and/or rear end shunt type collisions.	existing situation will reduce confusion and the close proximity of the existing access to the roundabout mitigates the issue raised. Highways England has reviewed the Jones Family's Deadline 4 submission (REP4-036) and maintains its position that it would not be appropriate to pursue these proposals.
REP4-036-7	2.3 We still maintain that our proposal to close the existing access into Grove Farm and relocate the Grove Farm access a short distance north beyond the electrical sub-station layby will provide a safer access for the farm and at the same time can be combined with the proposed access for the HE pond maintenance vehicles and electricity board vehicles providing a safer access for all.	Please see Highways England response to the Jones Family's written Representation, in particular paragraph REP2-033-17. (REP3A-022). Highways England has reviewed the Jones Family's Deadline 4 (REP4-036) submission and maintains its position that it would not be appropriate to pursue these proposals as the further the access to Grove Farm is moved away from the roundabout, the higher the speeds of vehicles accelerating towards the M25 motorway, and the higher the likelihood and severity of accidents.  The new access proposed by Highways England in this approximate location is for access for maintenance purposes only. As such it would be used only infrequently (a few times a year) by trained maintenance operatives, and therefore does not give rise to safety concerns.
REP4-036-8	2.4 Given the new safety issues arising from retaining the Grove Farm access in its present location, we can see no practical reason why the relocation of the Grove Farm access could not be facilitated as shown on my <b>Drawing No. REDW-3396-115</b> . My proposals will not introduce any new conflicting vehicle crossing movements and will provide a safer access for the farm and no egress onto the M25 northbound on-slip for farm traffic.	Please see Highways England response to the Jones Family's written Representation (REP3A-022) with regard to access proposals from M25 northbound on-slip road. Highways England has reviewed the Jones Family's Deadline 4 submission (REP4-036) and maintains its position that it would not be appropriate to pursue these proposals.

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REP4-036-9	2.5 The proposed relocated site access off the M25 northbound on-slip has a short deceleration length and is a departure from design standards, however overall I and the Grove Farm safety audit team consider there would be a nett benefit in road safety terms when compared to the existing Grove Farm access arrangements as the new access would be further away from the roundabout. M25 northbound on-slip vehicle speeds would still be relatively low as the relocated access is marginally further north of the existing farm access. HE confirmed at the Hearing that whilst the formal speed limit of the on-slip is 70 mph, the Design Speed for this section of road is 70kph (44mph) reflecting the fact that vehicle speeds will still be low (i.e. less than 40mph) leaving the roundabout.	<p>Please see Highways England response to the Jones Family's written Representation (REP3A-022) with regard to access proposals from M25 northbound on-slip. Highways England has reviewed the Jones Family's Deadline 4 submission (REP4-036) and maintains its position that it would not be appropriate to pursue these proposals as the further the access to Grove Farm is moved away from the roundabout, the higher the speeds of vehicles accelerating towards the M25, and the higher the likelihood and severity of accidents. Highways England's position is that an access here would introduce an unacceptable safety hazard.</p> <p>Vehicle speed is not regulated by the design speed but by the posted speed limit, which for this stretch of road will be 70mph.</p>
REP4-036-10	2.6 My <b>Drawing No. REDW-3396-113</b> which accompanied the first Written Representations (Ref: PMcL/3396d1/Feb 2021) showed a 15.5m long farm vehicle transporter leaving the M25 northbound on-slip and safely turning into the farm and a 12 metre rigid lorry leaving the M25 northbound on-slip and safely turning into the HE dedicated access road leading to the pond maintenance area in advance of the security gates. We consider a 12 metre rigid would be significantly larger than the longest vehicle expected to access the pond service area. The track included in the first Written Representations on <b>Drawing No. REDW-3396- 113</b> shows that this vehicle can turn into a dedicated waiting area in front of the HE security gates without obstructing traffic entering Grove Farm.	<p>Please see Highways England's response to the Jones Family's written Representation, in particular paragraph REP2-033-21 (REP3A-022). Highways England has reviewed the Jones Family's Deadline 4 submission (REP4-036) and maintains its position that it would not be appropriate to pursue these proposals as it is best practice to provide some buffer in situations like these as drivers may not stop their vehicle precisely in front of the gate. In a situation where a vehicle longer than 12 m was to enter this area, or if the vehicle was not stationed precisely in front of the gate, the access to Grove Farm would be obstructed with potential safety concerns.</p> <p>Whilst Grove Farm and the representatives have looked to increase the storage area as shown on Drawing No. REDW-3396-113, this does not change Highways England's position on the key issues of road safety on the M25 northbound on-slip.</p>
REP4-036-11	2.7 Notwithstanding these satisfactory track drawings, HE commented that the distance between the security gates and the access to the farm could result in a vehicle of exceptional length waiting in front of the gates which could block traffic entering the farm. A straight-forward engineering solution to this issue is shown on <b>Drawing No. REDW-3396- 115</b> whereby the	Please see Highways England's response to the Jones Family's written Representation (REP3A-022) with regard to access proposals from M25 northbound on-slip. Highways England has reviewed the Jones Family's

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	distance between the pond access security gates and the farm access has been increased to 20 metres; more than adequate to safely contain any size of vehicle legally allowed to use UK roads.	Deadline 4 submission) (REP4-036) and maintains its position that it would not be appropriate to pursue these proposals.
REP4-036-12	<p>2.8 All land required for the amended farm access proposals from the M25 northbound on-slip is either in the ownership of HE or Grove Farm. Given the amended proposals shown on <b>Drawing No. REDW-3396-115</b>, we request that HE include in an amended HE Scheme:</p> <ul style="list-style-type: none"> <li>i) Closure of the existing access to Grove Farm from the M25 northbound on-slip;</li> <li>ii) 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.</li> </ul>	Please see Highways England's response to the Jones Family's written Representation (REP3A-022) with regard to access proposals from M25 northbound on-slip. Highways England has reviewed the Jones Family's Deadline 4 submission ((REP4-036) and maintains its position that it would not be appropriate to pursue these proposals.
REP4-036-13	<p><b>3.0 GROVE FARM EGRESS PROPOSALS – A12 EASTBOUND OFF-SLIP</b></p> <p>3.1 Grove Farm's previous submission suggested providing a new access into Grove Farm from the A12 eastbound off-slip, combined with the Grove Farm egress. After further consideration of comments received during the Hearing, the proposals have been amended to remove the request for a new access to Grove Farm from the A12 eastbound off-slip.</p> <p>3.2 The proposal shown on my Drawing No. REDW-3396-115 now removes a new access, however the proposal includes a relocation of the existing Grove Farm egress further west which will have the following benefits:</p> <ul style="list-style-type: none"> <li>i) The current location will result in Grove Farm traffic leaving the site queuing directly outside the Grove Farm main house as the distance between the farmhouse and the A12 off-slip has been significantly</li> </ul>	<p>Highways England has continued to engage with the owners of Grove Farm and their agents including with regards to options for possible mitigation.</p> <p>With regard to the Grove Farm alternative egress from the A12 eastbound off-slip, Highways England discussed with Grove Farm's agents the proposal they submitted at Deadline 4 (REP4-036) highlighting the significant environmental and visual impacts of the proposed option and confirming that this option cannot be adopted.</p> <p>However, Highways England intends to put forward a change request for an alternative solution to the Grove Farm proposal submitted at Deadline 4 (REP4-036) involving a relocation of the egress further from the Farmhouse. This would provide a balanced approach, considering safety, impacts on the dwellings and biodiversity on the Grove Woodland. Highways England considers that this alternative option would achieve the benefits set out in points i), ii) and iii) of Grove Farm's Deadline 4 response in terms of moving any queuing traffic further away from the Farm house, allowing for more planting between the farmhouse</p>



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	<p>reduced. The relocation will move this queuing traffic further away from the farmhouse;</p> <p>ii) The relocated egress will allow for the inclusion of a reasonably sized landscaped area between the farmhouse and suggested noise attenuation fencing;</p> <p>iii) Traffic leaving the farm heading south on the M25 will be provided with more distance to adequately cross to the right-hand lane when approaching the roundabout.</p>	<p>and the proposed visual fence and traffic leaving the farm heading south on the M25 will be provided with more distance to adequately cross to the right-hand lane when approaching the roundabout.</p>
REP4-036-14	<p>3.3 All land required for the amended farm egress proposals onto the A12 eastbound off-slip is either in the ownership of HE or Grove Farm. Given the amended proposals shown on <b>Drawing No. REDW-3396-115</b>, we request that HE include in an amended HE Scheme:</p> <p>i) Closure of the amended egress from Grove Farm to the A12 eastbound off-slip;</p> <p>ii) Construction of a new dedicated egress from Grove Farm to the A12 eastbound off-slip with alteration of on-site roads to suit.</p>	<p>Highways England intends to put forward a change request for an alternative solution to the Grove Farm proposal submitted at Deadline 4 (REP4-036) involving a relocation of the egress further from the residence which would provide a balanced approach, considering safety, impacts on the dwellings and biodiversity on the Grove Woodland. This would result in the closure of the amended egress from Grove Farm to the A12 eastbound off-slip and the construction of a new dedicated egress from Grove Farm to the proposed A12 eastbound off-slip road.</p>



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