

# **M25 junction 28 improvement scheme**

**TR010029**

## **9.104 Applicant's comments on Grove Farm's Deadline 6 submission**

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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# 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)
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## 1. Purpose and structure of this response

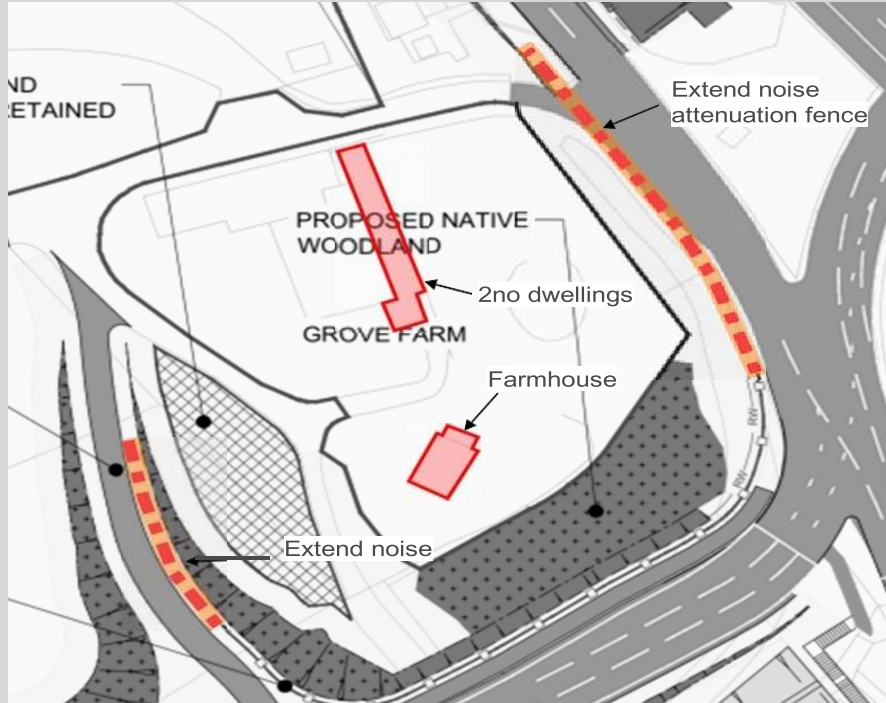
- 1.1.1 This document provides the comments of the applicant, Highways England, in response to Hinson Parry & Company's response on behalf of Mr and Mrs Jones of Grove Farm to the Applicant's Deadline 5 submission (REP6-041) submitted to the Examining Authority (ExA) on or before Deadline 6 (27 April 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. REP6-041 Hinson Parry & Company on behalf of Mr and Mrs Jones of Grove Farm's response to the Applicant's Deadline 5 submission

Response reference:	Representation Issue	Highways England Response
REP6-041-03	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;	The M25 northbound on slip (both now and as improved) is and will be a slip road in accordance with the definition in DMRB design standard CD122.  The entire slip road is a connector road and not a link road. As previously explained an access road off the slip road in the location proposed by the representatives of Grove Farm is unacceptable on safety grounds.
REP6-041-04	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;	The provision of 2 lanes is based on estimated traffic volumes.  Even if it is the case that some vehicles may be on the offside lane accelerating faster, it is anticipated that all vehicles in both lanes would be accelerating.  Traffic accelerates 'hard' in both lanes such is the volume of traffic.
REP6-041-05	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;	Highways England explained that the speed limit for this section of road is 70 mph, and not that all vehicles would be travelling at that speed. However, the important point is that the further the ingress is from the roundabout the higher the vehicle speeds will be as they will be accelerating on the slip road.
REP6-041-06	iv) The proposals for a new farm access shown on drawing <b>REDW-3396-115</b> 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;	As described above, it is important to note that the further the ingress is from the roundabout, the higher the vehicle speeds will be as vehicles accelerate on the slip road. Vehicles will be accelerating at speeds up to 70mph in order to join the M25. The existing ingress to Grove Farm is approximately 36m from the roundabout. The proposed ingress would be approximately 104m from the roundabout. The existing ingress is visible from the roundabout where vehicle speeds are relatively low. The proposed ingress would not be visible from the roundabout and sited where vehicle speeds would be relatively high. As such, this would be an unsafe arrangement.
REP6-041-07	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 <b>REDW-3396-115</b> 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;	Maintenance vehicles will decelerate using the hard shoulder to leave the slip road. These vehicles will be liveried highway maintenance vehicles with roof-mounted flashing amber beacons, driven by competent personnel trained in motorway maintenance access techniques and requirements. These beacons will be illuminated on leaving the roundabout and the proposed turn off the slip road will be signalled to warn following motorists of the maintenance vehicle's intentions.  It has been stated in previous Highways England responses that, whilst Grove Farm's proposals provide a small deceleration lane, this would be substandard for the design speed of the slip road.
REP6-041-08	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;	Highways England is not required to relocate industrial traffic that operates from Grove Farm further away from the third dwelling located at the existing site access. The level of industrial traffic referred to is not attributable to the Scheme and mitigation for the Scheme must be reasonable and proportionate to the impacts of the Scheme.

Response reference:	Representation Issue	Highways England Response
REP6-041-09	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);	The noise impacts shown at Grove Farm are negligible, and Highways England is not proposing to install a noise barrier alongside the A12 slip road, as explained at deadline 6 (REP5-067-11) in (TR010029/EXAM/9.85) and discussed in para 4.1.13 of Highways England's written summary of ISH3 (TR010029/EXAM/9.96)
REP6-041-10	viii) Further drawings issued by HE should highlight all three residential dwellings on the site ( <b>Fig 3.2</b> ).	Noted.
REP6-041-11	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 <b>Drawing No. REDW-3396- 115</b> 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.	Highways England maintains its position with regard to the amended farm access proposal from the M25 on slip road as set out in REP5-047 and REP6-012.  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.
REP6-041-13	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;	The Change 8 proposals have been developed using a topographical survey base and Highways England is content to provide Grove Farm with the relevant drawings in PDF form. This plan has been provided to Grove Farm.
REP6-041-14	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;	Highways England is taking the steps that are appropriate and proportionate to address the environmental effects of the Scheme on Grove Farm. A change request for the egress of Grove Farm is being submitted at Deadline 7 (TR010029/EXAM10.17 – Report and TR010029/EXAM/10.18 – Drawings) as well as the provision of visual screen fencing and additional planting.  The provision of permanent noise barriers at Grove Farm, at considerable expense to the public purse, cannot be justified on the basis of the results of the noise assessment undertaken, which shows that change in noise at Grove Farm are negligible.  The proposed visual screening of traffic by the fence is likely to help reduce psychological awareness of the traffic, and the reduced awareness may lead to perceptions of improved noise conditions, even if there were no change in noise levels.  The Scheme will improve traffic flows through the junction and should reduce queuing at the junction in the vicinity of Grove Farm which will be beneficial to the owners of Grove Farm and together with the proposed visual screen fence and planting, the Scheme provides enhancement to the environment of Grove Farm.
REP6-041-15	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;	The visual screen would most likely take the form of a close boarded timber fence up to 2.8 metres in height, this would require fence posts planted at approximately 1.8 centres, set in concrete foundations. This is a standard approach for erecting fencing of this type, in this application it would not be classed as 'significant'. An acoustic barrier would need to meet the necessary acoustic standard. The increased density and weight of the acoustic barrier



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		<p>panels to meet the acoustic standard would require more substantial foundations in order to support this type of barrier.</p> <p>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.</p>
REP6-041-16	<p>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;</p>	<p>The Scheme would reduce traffic flows on the M25 roundabout as northbound M25 traffic which currently uses the roundabout to travel east on the A12 would use the new loop road, The proximity of the M25 roundabout to Grove Farm does not change with the Scheme.</p> <p>Changes in overall road traffic noise levels at Grove Farm have been shown to be negligible, i.e. smaller than 1dB. Noise levels at Grove Farm are dominated by traffic on the M25 mainline carriageway which runs elevated through the junction and are not altered by the Scheme. Highways England is not proposing to install a noise barrier in this location. See Response to REP6-041-09.</p>
REP6-041-17	<p>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:</p> <p><b>Figure 3.2 – Grove Farm’s suggested location for extra noise attenuation fencing</b></p> 	<p>Highways England have estimated the performance of a 2m noise barrier along the A12 Eastbound off-slip around to the Grove Farm entrance. A noise barrier in this position would change the overall noise levels at Grove Farm by less than half a decibel. The noise levels at Grove Farm are dominated by the traffic on the M25 carriageway, which would not be screened by a barrier in this location. The overall impact of the Scheme would remain negligible if a noise barrier were to be constructed in this location.</p> <p>If a barrier were to be erected in this location, extending it along the Grove Farm egress would make no difference to the results because the extension to the barrier would not interrupt the line of sight between Grove Farm farmhouse and the A12 slip road.</p> <p>If a barrier were to be erected in this location, extending it along the M25 slip road would make a small difference to the results at Grove Farm, because the mainline M25 carriageway remains elevated above the junction. Highways England would expect that changes in noise as a result of the Scheme would remain negligible with any of the barrier options suggested by the representatives of Grove Farm.</p>
REP6-041-18	<p>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 <b>Fig 3.2</b>.</p>	<p>See responses above.</p>

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