

# M25 junction 28 improvement scheme

TR010029

# 9.135 Applicant's comments on Jane Allen's Deadline 9 submission

Rule 8(1)(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

Volume 9

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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]

#### 9.135 Applicant's comments on Jane Allen's Deadline 9 submission

Rule Number:	Rule 8(1)(k)
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Author:	M25 junction 28 scheme, Project Team,
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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 Allen's Deadline 9 submission (REP9-081) submitted to the Examining Authority (ExA) on or before Deadline 9 (30 June 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. REP9-081 Jane Allen's response to Deadline 9 submission

Response reference:	Representation Issue	Highways England Response
REP9-081- 01	I wish to respond to REP7-040-02.  I was hoping that a more collaborative approach would have been considered by Highways England (HE),TFL (and other parties involved) to address the unique severance and accessibility issues faced by residents of Woodstock Avenue (WA) during and after this scheme - as described for intergreen and slip road issues during one of the hearings?  As I understand from Plan B (26 October 2018) WA is within the boundary of affected areas of this project hence I thought this would have meant that our severance and accessibility issues should therefore be considered within the interests of the scheme (not as secondary issues)?  This scheme provides an ideal opportunity to improve severance and accessibility issues faced by residents of WA which have been neglected for decades from when the A12 became a dual carriageway and the M25 was constructed (and subsequently amended on multiple occasions).  Comments from TFL (in TA1.13) referenced by HE in this response do not consider the impact this project will have on residents of WA travelling Eastbound- only westbound which is a significant omission.	Highways England has previously provided a response on this matter. See response REP4-035-09 (REP5-046).



Response reference:	Representation Issue	Highways England Response
REP9-081- 02	I understand it would be disruptive to users of the A12 in the short term if a right hand turn was installed at the bottom of WA but possibly less/ no more disruptive than residents of WA are facing during a 3 year project to improve the M25j28?  TFL do acknowledge (in TA1.13) that it would be technically feasible to install a right hand turn out of WA - our neighbouring (adjacent) road  Kenilworth Avenue already has this option in place which was not mentioned in TA1.13.	Highways England has previously provided a response on this matter. See response REP4-035-07 (REP5-046).  Highways England note that TfL do not acknowledge in TA1.13 (REP2-037) that the right turn from Woodstock Avenue would be technically feasible. TfL state that "A junction of this type may be technically feasible but would likely have substantial adverse impacts on existing road users on the A12".  The gap in the central reservation on the A12 near Kenilworth Avenue is designed for motorists turning right from the A12 eastbound into Harold Court Road. The road markings on the A12 do not suggest It was designed to allow right turn movements from Kenilworth Avenue onto the A12 westbound. Such a manoeuvre would be potentially unsafe.
REP9-081- 03	TFL also acknowledge that the proposed development will not substantially alleviate any traffic issues currently faced by users of WA - as the scheme will be introducing a new double loop road (this will be in addition to traffic entering and leaving the petrol station at the bottom of WA, Maylands Golf Club plus traffic entering the construction site and traffic exiting Grove Farm on to the off slip) into an already very busy small section of the A12 between WA and the M25j28 off slip I am concerned that journey times and accessibility for residents of WA will actually be worse following completion of this project?	Highways England has previously stated in response TA1.13 (RE2-011) that the Scheme will reduce traffic delays at junction 28 and therefore, residents of Woodstock Avenue will experience an improvement in journey times when making U-turns at junction 28 to travel westbound on the A12 compared to without the Scheme.



Response reference:	Representation Issue	Highways England Response
	Residents of WA will be affected significantly more than others in this area hence all (East and West bound) our short and long term journey time issues should be considered in full as part of this scheme.	
REP9-081- 04	It would therefore be helpful if the whole traffic signalling operation from Petersfield Avenue to the M25j28 off slip road was reviewed as part of this scheme with a view to installing a right hand turn somewhere in the vicinity for residents of WA (and a safer right hand turn option for residents of Kenilworth Avenue).	TfL is the highway authority responsible for the A12 from Petersfield Avenue to the junction 28 eastbound off slip road. It is therefore TfL's responsibility to manage traffic signalling on this section of the A12. It is also a matter for TfL as to whether there is a need for and the 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).

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