

M25 junction 28 improvement scheme

Supplementary consultation

4 November to 2 December 2019



M25 junction 28 improvement scheme

Why we are undertaking a supplementary consultation

From late 2018 to early 2019 we held a statutory consultation and invited the community, affected landowners and other stakeholders to comment on our proposals to improve junction 28 on the M25.

Since then, we have been considering feedback, developing our design and undertaking further environmental assessments including additional survey work.

From this, we have developed our plans to take into account key infrastructure in the area and have identified further measures to mitigate the effects of the scheme.

As a result, we are now proposing changes to the scheme and to the extent of the scheme red line boundary. The plan to the right shows the red line boundary identified at statutory consultation (refer to key) and the new proposed red line boundary.

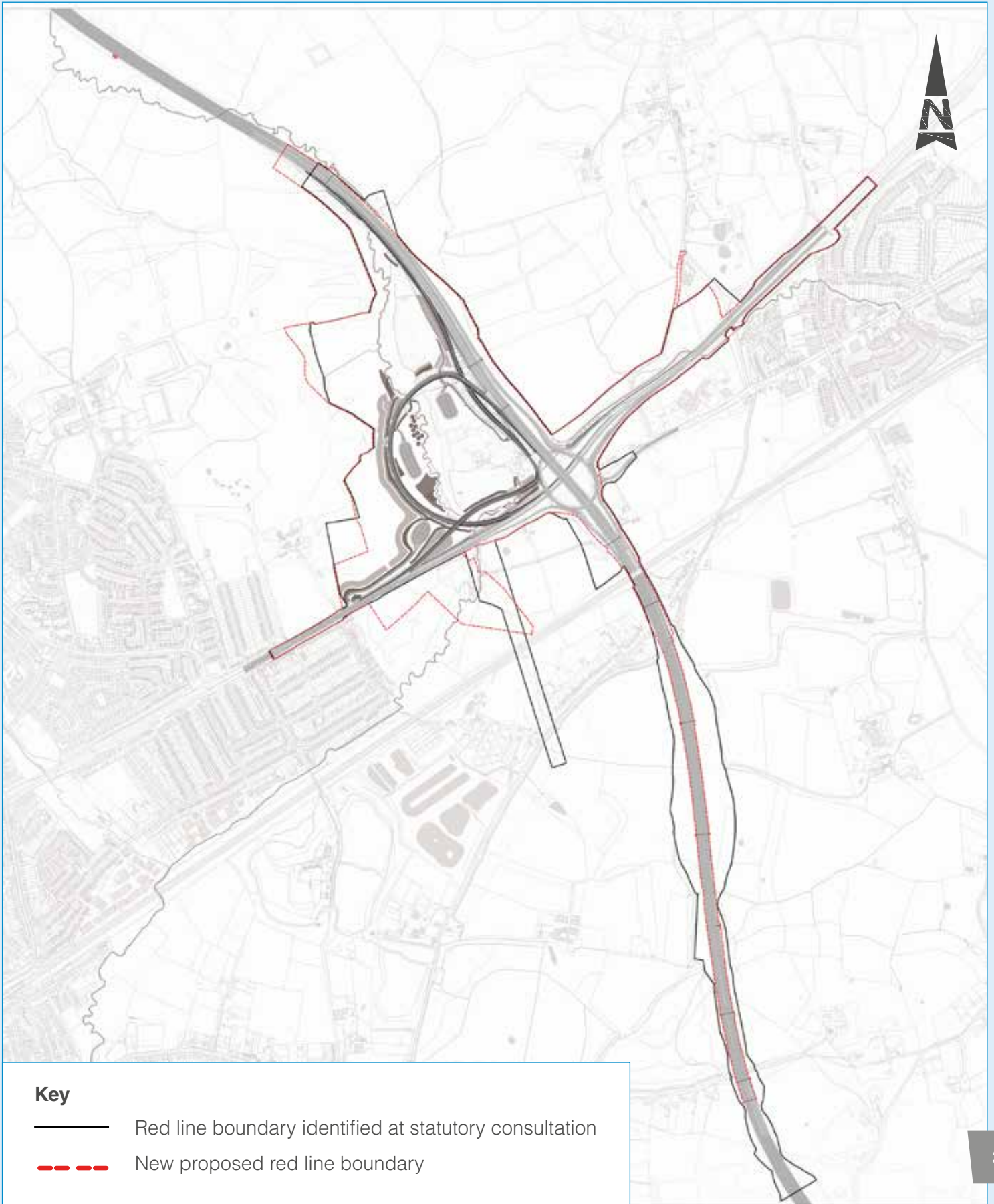
We have identified ten key changes to the proposals on which we would welcome your views:

1. Mitigation proposals
2. Weald Brook mitigation works
3. High-pressure gas main diversion
4. Proposed construction compound
5. Proposed satellite compound
6. Redesign of the A12 eastbound exit road
7. Ingrebourne River mitigation works
8. Drainage ponds and access tracks
9. Location of replacement of gantry
10. Potential use of existing access track

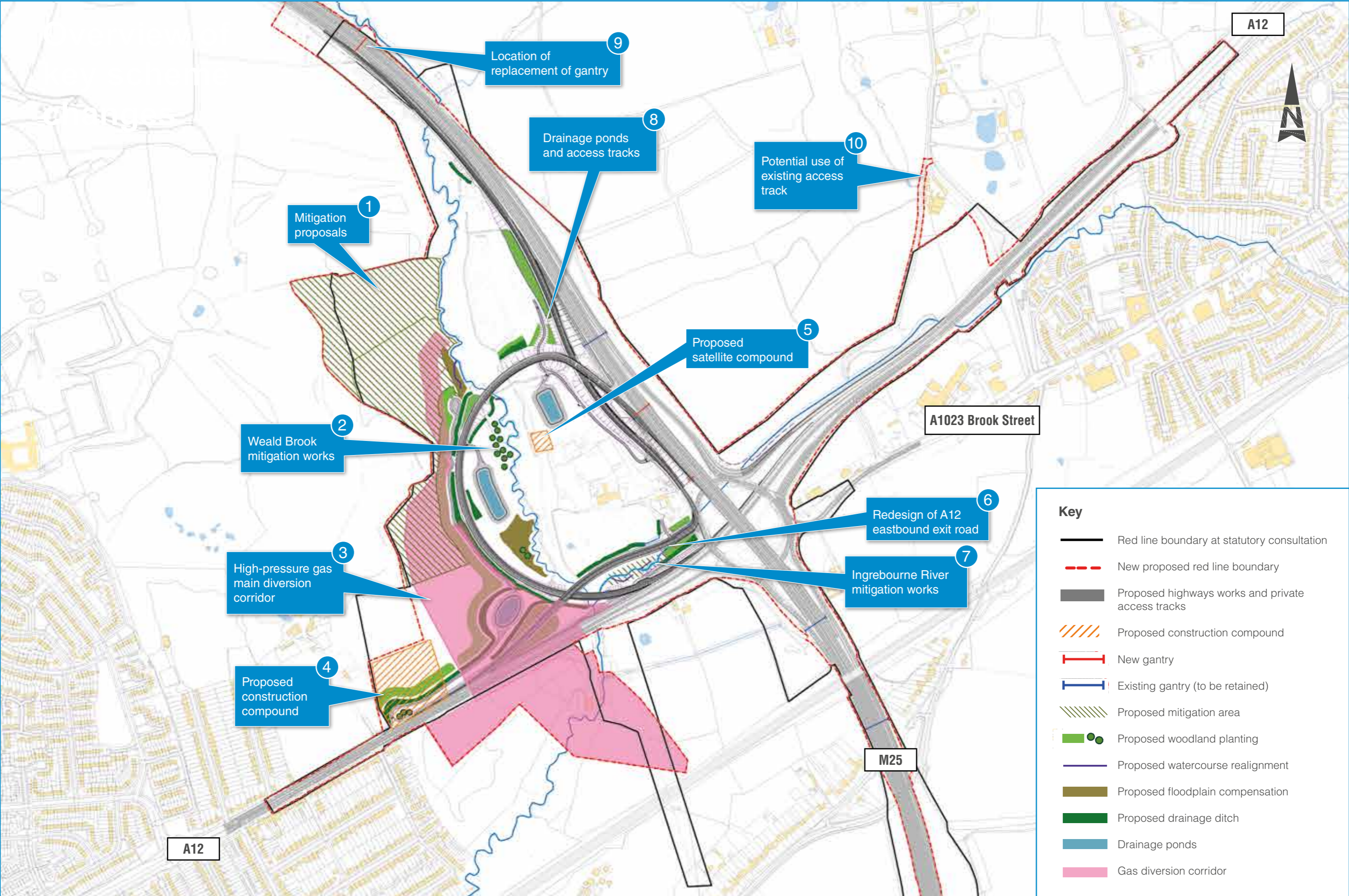
Please refer to **Overview of key scheme changes** plan on page 4.

We would welcome your views now, before we submit our Development Consent Order (DCO) application to build the scheme.

Consultation on the proposed changes and newly identified impacts runs from 4 November to 2 December 2019.



Overview of key scheme changes



The changes we are consulting on

The changes are outlined in the following sections and then tables set out how the main preliminary environmental effects are now different from those presented at our statutory consultation.

We have also collected new baseline information and established the presence of veteran trees (a tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value). Therefore, we have also included a section in this brochure on **newly identified impacts** which outlines further preliminary environmental information relating to effects on veteran trees including details of the surveys we have completed to date.

1. Mitigation proposals

Parts of the scheme are within the Ingrebourne Valley Site of Metropolitan Importance (Ingrebourne Valley SMI) for Nature Conservation, which is used by protected species including great crested newts. A biodiversity assessment has been undertaken to establish the impacts of the scheme on the Ingrebourne Valley SMI. This has enabled us to develop our mitigation proposals that include improving an existing part of the Ingrebourne Valley SMI to compensate for loss of habitats and other impacts.

Further assessment work has also been undertaken to establish other impacts of the scheme, including the visual impact of the new loop road and the potential impact on Maylands golf course.

To ensure we can adequately mitigate the impacts, we have extended the red line boundary and identified the area shown on the **Overview of key changes** plan as being utilised for mitigation purposes. The ecological elements are likely to include:

- habitat features for great crested newts (including terrestrial refuges and ponds)
- installing habitat management for reptiles

- management of the habitat to reduce (or remove) invasive plant species of negligible ecological value
- planting of woodland and scrub
- management of grassland to encourage species diversity
- overall management of the area in a way that is sympathetic to the habitats in the Ingrebourne Valley SMI
- management of the river corridor to clear or coppice trees and scrub and open it up to provide more diversity
- ground lowering next to a reach of the Weald Brook to create a back channel and area of wet grassland that floods regularly

We continue to develop our mitigation proposals for this area and the detailed proposals are subject to ongoing discussions with key stakeholders including Maylands Golf Club.

Question 1 in the response form (at the end of this brochure) gives you the opportunity to comment on the proposed use of this area to reduce the impacts of the scheme.

2. Weald Brook mitigation works

As explained at our last consultation, the proposed loop road would involve crossing the Weald Brook in two locations as indicated in [diagram 1](#). These crossings would involve the construction of bridges over and straightening of the watercourse. Further design refinement has identified that the bridge pier of Duck Wood bridge and the loop road embankment would encroach onto the floodplain.

Working in consultation with the Environment Agency, we have been developing proposals to mitigate these impacts on the watercourse and floodplain. It is now proposed to alter the course of the Weald Brook within the loop road to a more natural form as shown in [diagram 2](#).

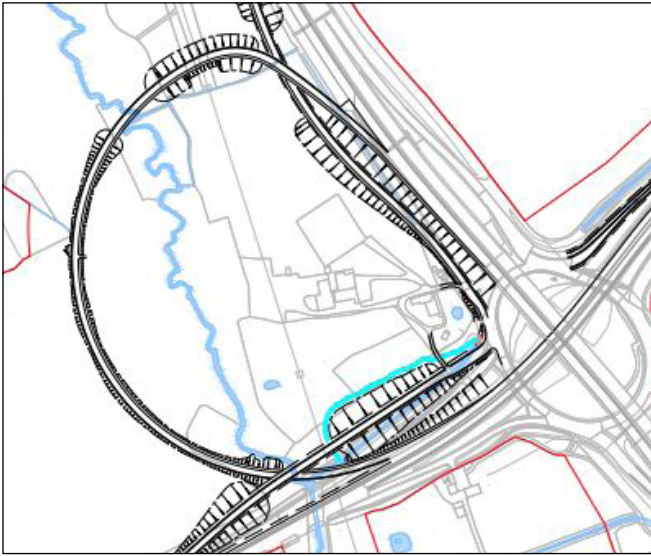


Diagram 1: Proposal at statutory consultation



Diagram 2: Current proposal

Question 2 in the response form gives you the opportunity to provide your views on our proposals for the Weald Brook.

3. High-pressure gas main diversion

Since statutory consultation we have had further discussions with Cadent Gas and understand we would need to divert an existing high-pressure gas main that runs through the site of the proposed loop road. This diversion is unavoidable, and work is underway to identify the route that the new section of gas main would take.

Whilst the precise alignment of the proposed gas diversion is not yet known, the corridor within which it would be located has been identified in consultation with Cadent Gas and is shown in diagram 3 on the right.

To accommodate the proposed gas main diversion, the red line boundary has been extended to cover land situated to the south of the A12. This includes parts of Oak Farm, part of which has planning permission for use as a burial ground and is next to the Caravan Park Putwell Bridge.

Question 3 in the response form gives you the opportunity to comment on the corridor identified for the proposed gas diversion.



Diagram 3: Corridor within which the gas diversion could take place

4 and 5. Proposed construction and satellite compounds

Since our previous consultation, we have developed our plans to construct the scheme and have now identified the proposed locations for the temporary construction compound and the satellite compound.

The key purpose of the main construction compound would be to provide site offices, storage areas and car parking, as well as to provide access to the main construction areas through internal haul roads within the site.

The satellite compound would also contain some welfare accommodation and provide an area to store materials, waste and equipment. By utilising a satellite compound in this way, it can help to minimise vehicle movements around the construction site.

As part of our DCO application we will produce a draft Outline Construction Environmental Management Plan (OCEMP). This will outline the measures we will adopt to minimise the impact of the works on the local environment and communities during construction.

The proposed location of the two compounds has been determined having regard to; existing utility infrastructure, the need to provide safe access and exit from the A12, the floodplain of the watercourses, existing land uses and maintaining accesses to local properties and businesses.

We seek to minimise disruption to neighbouring occupiers and road users and will put in place measures to control nuisances such as noise and dust. The land would be used for the compounds and haul roads on a temporary basis. When they are no longer needed for construction purposes, it is intended that the land would be reinstated and its current use restored, unless otherwise shown on the scheme plans or agreed with the relevant land owner.

Question 4 in the response form gives you the opportunity to tell us about anything you think we need to consider as we develop our plans for the proposed construction and satellite compounds.



6. Redesign of A12 eastbound exit road

Our proposals at statutory consultation showed the A12 eastbound exit road situated closer to the existing A12. Following ongoing discussions with the owners of existing infrastructure in this location we need to ensure there would be sufficient clearance between the new A12 eastbound exit road, existing overhead electricity lines and an underground pipeline. As a result, the proposed exit road has been relocated northwards. This change would mean the

extension of an existing culvert (underground channel which carries the Ingrebourne River beneath junction 28) from approximately 40 to 80 metres in length. As well as affecting the watercourse this change will still be within the Ingrebourne Valley SMI. We have therefore also developed proposed mitigation measures in relation to this change and these are described in the section on the **Ingrebourne River mitigation works** below and illustrated in [diagrams 4 and 5](#).



Diagram 4: Proposal at statutory consultation



Diagram 5: Current proposal

7. Ingrebourne River mitigation works

Change 6 on page 9 describes a proposed design change to the A12 eastbound exit road. As a result of this change and the resulting effect it would have on the Ingrebourne River we have developed proposals to realign a section of the river creating a more natural form. We are also proposing to lower ground levels on either side of the river to reconnect the channel with its floodplain. The slopes of the river banks would also be slackened (made less steep) to increase ecological diversity. These mitigation works have been developed in consultation with the Environment Agency. Our proposed mitigation works along this section of the Ingrebourne River would also involve the creation of a wet grassland and woodland habitat to compliment the local habitat within the Ingrebourne Valley SMI.

[Question 5 in the response form gives you the opportunity to comment on our mitigation proposals for the Ingrebourne River and Ingrebourne Valley SMI \(see changes 6 and 7\).](#)

8. Drainage ponds and access tracks

We need to consider how we will deal with water falling on the road when it rains to ensure it drains effectively for the safety of drivers but does not flood the local water system by draining too quickly. Taking into account the existing drainage catchments, utility infrastructure and floodplain, we have identified three locations near the proposed loop road, where we could dig drainage ponds as shown (in blue) on our **Overview of key scheme changes** plan. These ponds would fill with water in the event of heavy rain and drain gradually to ensure the local water system is not flooded.

We would also need to provide private access tracks in various locations to ensure that the new road, drainage ponds and existing overhead electricity lines could be maintained in the future, as well as providing the landowner with access to their land.

[Question 6 in the response form gives you the opportunity to let us know what you think about the location of the drainage ponds and access tracks.](#)

9. Location of replacement gantry

Our plans at statutory consultation indicated a working area on the southbound side of the M25 to enable us to modify an existing gantry (structure over the motorway that holds signage). Following discussions with landowners, we are now proposing a new gantry further northwards to avoid potential impacts that could arise to Maylands golf course from the previous gantry proposal. Therefore, we have extended the red line boundary northwards to accommodate the new proposed gantry. The plans on page 11 show the area at our last consultation ([diagram 6](#)) and our current proposal ([diagram 7](#)).

[Question 7 in the response form provides you with the opportunity to tell us what you think about the location of the replacement gantry.](#)

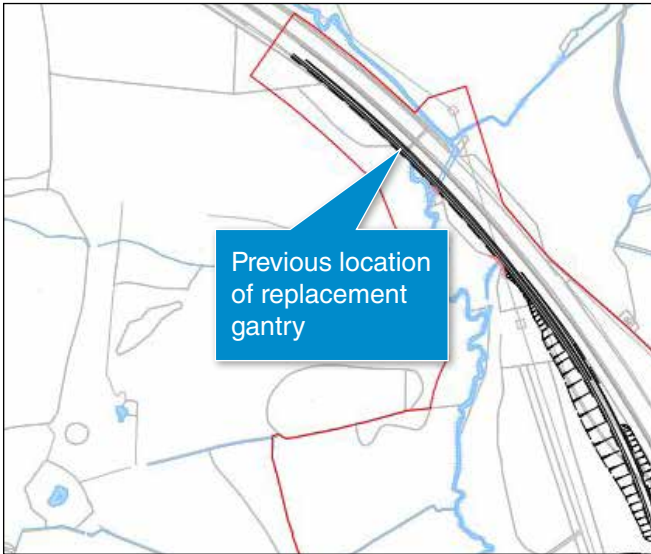


Diagram 6: Proposal at statutory consultation



Diagram 7: Current proposal

10. Potential use of existing access track

We are exploring the potential provision of environmental mitigation in the area to the north of the A12 and east of the M25. Further consideration has been given to the means by which we might access this area. Rather than creating a new access from the main road, Wigley Bush Lane, we are considering using an existing access from Wigley Bush Lane to minimise disruption. We have therefore reduced the red line boundary away from the main road and extended it along the existing access lane as shown in [diagram 8](#) and [diagram 9](#).

Discussions with the Environment Agency are ongoing to identify appropriate mitigations on the Ingrebourne River.

[Question 8 in the response form asks for your comments on the potential use of this existing access track.](#)



Diagram 8: Proposal at statutory consultation



Diagram 9: Current proposal

Preliminary environmental information relating to the scheme changes

The following tables summarise the main preliminary environmental effects of the key changes we are consulting on now, compared with the effects of the proposals presented for statutory consultation.

Where a topic is not covered in the tables ([changes 6, 8, 9 and 10](#)), there are no differences arising from the proposed scheme changes as against the effects assessed at the time of our statutory consultation.

Scheme change	1. Mitigation proposals	
Topic	Preliminary environmental effects at statutory consultation	Preliminary environmental effects after change
Biodiversity	The areas for ecological compensation had not been confirmed.	<p>The proposed ecological compensation area has now been identified and the majority of the compensation area lies within the Ingrebourne Valley SMI. These areas will be used to provide habitat for great crested newts and to enhance habitats as compensation for permanent habitat loss within the Ingrebourne Valley SMI. This is part of a wider package of compensation including the enhancement of the river corridors and appropriate reinstatement and management of habitats to reduce the effect of the scheme on the Ingrebourne Valley SMI and great crested newts in the long-term.</p> <p>The exact extent and composition of the ecological compensation area is dependent on finalisation of temporary works, landscape design and negotiations with land owners. However, the aim is to avoid as far as possible net loss of the habitats which comprise the Ingrebourne Valley SMI.</p>
Landscape and visual	Receptors nearby would have experienced visual impacts from the proposed loop road, but mitigation had not been identified.	Additional landscape design has been developed to mitigate the landscape and visual impacts on nearby receptors, and enable a greater degree of woodland screen planting, primarily along the western edge of the proposed loop road. Where present, this will screen receptors from the proposed scheme and help mitigate adverse impacts.
People and communities	Land take for mitigation purposes had not been identified.	The proposed area for mitigation would involve permanent land take resulting in a slight adverse effect at both construction and operational stages. This results in a change from an unknown effect.
Road drainage and the water environment	Mitigation measures had not been identified.	<p>Part of the mitigation area next to the Weald Brook has been lowered to compensate for loss of flood storage resulting from the scheme. This has provided opportunities to landscape the area to reconnect the brook with its floodplain and create wet grassland area. Backwaters are also proposed to create additional still water habitat.</p> <p>Accounting for the proposed mitigation measures, the overall effect is neutral.</p>

2. Weald Brook mitigation works		
Scheme change		
Topic	Preliminary environmental effects at statutory consultation	Preliminary environmental effects after change
Biodiversity	These features were described as potential mitigation opportunities to reduce the effect of the scheme on the Weald Brook to neutral in the long-term.	Mitigation features are now part of the embedded design to integrate the Weald Brook and floodplain habitats, which will increase ecological diversity by including backwaters and natural meanders. With additional design detail it is now possible to assess the residual impacts on the Weald Brook and Ingrebourne Valley SMI with more certainty and potential for long term beneficial effects on the receptor.
Road drainage and the water environment	Bridges spanned the extent of the floodplain and avoided physically impacting the Weald Brook.	Accounting for the proposed mitigation measures, the overall effect of the scheme remains neutral.

3. High-pressure gas main diversion		
Scheme change		
Topic	Preliminary environmental effects at statutory consultation	Preliminary environmental effects after change
People and communities	The scheme was not impacting Oak Farm (part of which has planning permissions for use as a burial ground), south of the A12.	Requires provision to be made for temporary land take on the south side of the A12 and permanent access would be required to the new section of the gas main. Due to these land interest requirements, the effect on Oak Farm (including the proposed burial ground) is considered to have changed from neutral to moderate adverse.
Noise and vibration	The scheme was not impacting Oak Farm (part of which has planning permissions for use as a burial ground), south of the A12.	There is potential for a temporary significant noise impact for the receptors at Caravan Park Putwell Bridge and 17 Colchester Road due to their proximity to the gas diversion construction works. Best practice mitigation measures will be applied to minimise any impact through the application of appropriate noise control measures. These measures will be detailed in the OCEMP.
Cultural heritage	The scheme was not impacting Oak Farm (part of which has planning permissions for use as a burial ground), south of the A12.	The construction of the gas main diversion has the potential to have direct impacts on a recently identified early medieval archaeological site south of the A12. This area includes the London to Colchester Roman Road Archaeological Priority Area and Alluvial Deposit Archaeological Priority Zone. The site has been partially excavated but may extend beyond the features identified during trenching for the burial ground proposal. As the original design included similar impacts on these archaeological assets, the overall effect remains the same. The OCEMP will outline the measures required to identify and evaluate archaeological remains impacted by the works, including measures required to be implemented when preservation <i>in situ</i> is determined to be appropriate.

Scheme change	4 and 5. Proposed construction and satellite compounds	
Topic	Preliminary environmental effects at statutory consultation	Preliminary environmental effects after change
Noise and vibration	It was assumed that construction compounds were required within the red line boundary, but their locations were not known.	There could be a temporary significant noise impact at Maylands Cottages and temporary adverse effect at both the Caravan Park Putwell Bridge and 17 Colchester Road. The mitigation measures proposed to be implemented during the construction phase will be detailed in the OCEMP which would reduce the noise impact on these receptors.
Biodiversity	It was assumed that construction compounds were required within the red line boundary, but their locations were not known.	The proposed main compound lies partly within Ingrebourne Valley SMI on an area of grassland. The satellite compound lies outside of Ingrebourne Valley SMI. Haul roads will be required which may include temporary working areas within Ingrebourne Valley SMI and could include temporary crossings over the Weald Brook. The overall effect on the SMI during construction remains temporary moderate due to the temporary loss of habitat.
Cultural heritage	It was assumed that construction compounds were required within the red line boundary, but their locations were not known.	<p>The construction compounds have the potential to impact as-yet unknown archaeological remains in areas where topsoil may be stripped.</p> <p>The OCEMP will outline the measures required to identify and evaluate archaeological remains impacted by the works, including measures required to be implemented when preservation <i>in situ</i> is determined to be appropriate.</p>

Scheme change	7. River Ingrebourne mitigation works	
Topic	Preliminary environmental effects at statutory consultation	Preliminary environmental effects after change
Road drainage and the water environment	Bridges spanning the floodplain minimise physical impacts on the River Ingrebourne.	<p>Measures including floodplain reconnection and re-meandering of rivers have been proposed on the Ingrebourne and elsewhere in the scheme to mitigate the effects of the new A12 eastbound exit road realignment.</p> <p>Accounting for the proposed mitigation measures, the overall effect of the scheme remains neutral.</p>

Newly identified impacts

Further environmental surveys have been undertaken since statutory consultation, including arboricultural, ecological, noise, landscape and visual surveys as outlined in the Preliminary Environmental Information Report (PEIR) presented at statutory consultation. These were needed to establish the environmental baseline information for the scheme, as well as identifying appropriate mitigation measures through design and construction stages. Results of these surveys will be detailed in the Environmental Statement that will be submitted in support of our DCO application.

Prior to the above surveys, an initial desktop study was undertaken during the preparation of the PEIR, and this did not identify the presence of veteran trees. Since then, the arboricultural survey has been undertaken and this has identified the presence of 15 veteran trees within the scheme red line boundary, with three of these trees directly impacted by the scheme.

Through the ongoing design process, efforts have been made to avoid where possible the removal of veteran trees. Design changes were possible to avoid the removal of one veteran tree. Further design and construction alterations to avoid all veteran trees are not feasible, mainly due to highways design and road safety requirements.

Therefore, the proposed scheme would involve:

- the removal of two veteran trees
- protective measures to eight of the veteran trees during construction works (these will be outlined in the OCEMP)

The remaining five veteran trees within the scheme red line boundary are not considered to be directly impacted.

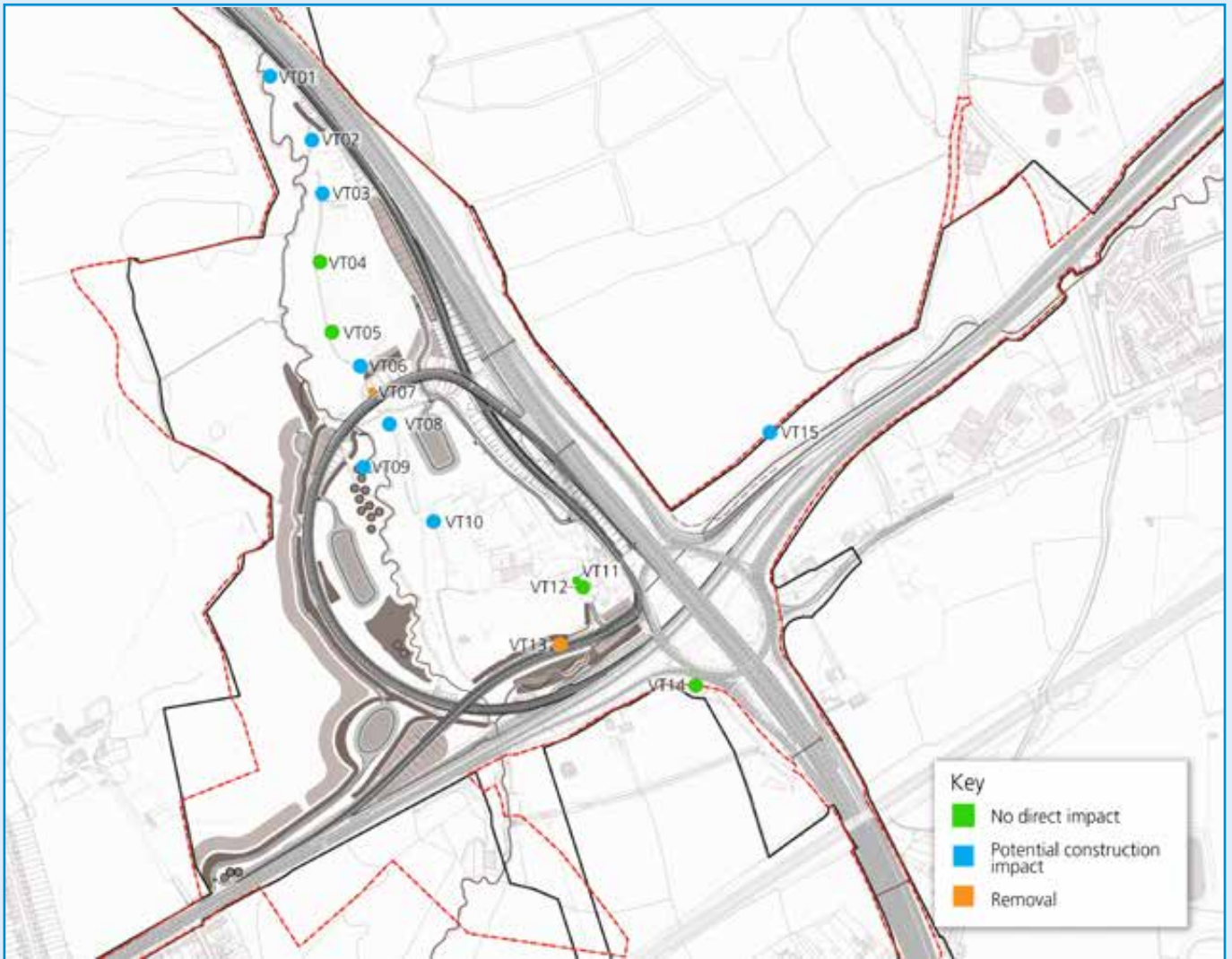
The plan on page 16 shows the indicative locations of the likely affected veteran trees.

The removal of two veteran trees is a newly identified ecologically significant effect resulting from additional baseline information rather than a change in the design. The removal of these veteran trees will be assessed as part of the Environment Statement. The overall landscape and visual effect remains as 'slight adverse' post construction, as identified in the PEIR.

We will be submitting an Environmental Statement and an OCEMP in support of our DCO application that will set out the environmental impacts of the scheme and our mitigation proposals.



Indicative locations of veteran trees



This supplementary consultation runs from 4 November to 2 December 2019.

How to have your say

This is your opportunity to give your views on our proposals.

Please respond using one of the following methods by **23:59 on 2 December 2019**:

- **Online:** complete the response form at www.highwaysengland.co.uk/m25j28
- **Complete the response form** at the end of this brochure and return to **FREEPOST M25 junction 28 improvement scheme** (no need to add a stamp)
- **Email** your response to info@highwaysengland.co.uk
- **Write** to us at **FREEPOST M25 junction 28 improvement scheme**

Next steps

Your feedback will inform our continuing development of the scheme. You will be able to view all the changes we are making in response to consultation in our Consultation Report. Similarly, the likely significant environmental effects of the scheme will be reported in our Environmental Statement. These will be published as part of our DCO submission which we expect to make in spring 2020 and will be made available to the public then.

Data protection statement

Your comments will be analysed by Highways England and its appointed agents. Copies may be made available in due course to the Secretary of State, the Planning Inspectorate and other relevant statutory authorities so that your comments can be considered as part of the DCO application process. We will request that your personal details are not placed on public record and will be held securely by Highways England in accordance with the General Data Protection Regulations and will be used solely in connection with the consultation process and subsequent DCO application and, except as noted above, will not be passed to third parties. If you would like more information about how we manage data, or a copy of our privacy notice, please contact:

DataProtectionAdvice@highwaysengland.co.uk

Contact us

Visit our scheme website for more information and how to have your say, or call or email us:

- Online: www.highwaysengland.co.uk/m25j28
- Email: info@highwaysengland.co.uk
- Telephone: **0300 123 5000**
- Post: **FREEPOST M25 junction 28 improvement scheme**

Response form: M25 junction 28 improvement scheme

Section 1: About you

Please tell us your name and address. This information is optional but will allow us to update you on the outcome of the consultation and the next stages in the project. If you do not want to provide these details, please just give us your postcode.

Name: _____

Address: _____

Postcode: _____

Email: _____

Are you an affected landowner? (Tick box)

Yes

No

If you are responding on behalf of an organisation, please provide your organisation title and address below:

Section 2: Your feedback on our proposed changes and newly identified impacts

Additional sheets can be attached, but please mark each one with [M25 junction 28 improvement scheme](#) and include the question number you are responding to.

Q1: Do you have any comments on the area, that we are proposing to use, to reduce the impacts of the scheme? (See change 1)

Q2: What is your view on our proposals for Weald Brook? (See change 2)

Q3: Do you have any comments on the corridor identified for the proposed gas diversion? (See change 3)

Q4: Is there anything we need to consider as we develop our plans for the proposed construction and satellite compounds? (See changes 4 and 5)

Q5: Do you have any comments on our proposals for the Ingrebourne River and Ingrebourne Valley SMI? (See changes 6 and 7)

Q6: What is your view on the location of the drainage ponds and access tracks? (See change 8)

Q7: What do you think about the location of the replacement gantry? (See change 9)

Q8: Do you have any comments on the potential use of the existing access track? (See change 10)

Q9: Do you have any further comments on the scheme changes and newly identified impacts detailed in this brochure?

Please detach this form, place in an envelope and send to us at FREEPOST M25 junction 28 improvement scheme. Alternatively, you can complete it online at www.highwaysengland.co.uk/m25j28

If you need help accessing this or any other Highways England information, please call **0300 123 5000** and we will help you.

Contact us

Please use the following methods to contact us or to respond to the statutory consultation:

- Complete the consultation response form online at www.highwaysengland.co.uk/m25j28

You can also:

- Complete the response form in this brochure and send to us at: **FREEPOST M25 junction 28 improvement scheme**
- Email info@highwaysengland.co.uk (You can also sign up for email alerts)
- Call **0300 123 5000** (24 hours)

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