



## **Brentwood Borough Council response to Highways England M25 Junction 28 Improvement Scheme (Supplementary Consultation)**

November – December 2019

1. The Council submitted representations to the two previous M25 Junction 28 consultations in 2017 and 2018. We note that changes have been made to the scheme based on the consultation responses previously received, additional environmental assessments and survey work. This response continues to raise the strategic issues that have previously been raised, where relevant.

### **Impacts to vehicular traffic and congestion:**

2. Brentwood Borough Council supports the need for improvements to M25 Junction 28 (Brook Street roundabout). Evidence and local experience indicate that this junction is heavily congested. This not only delays journeys but also has a negative impact on Brentwood Borough, and both the local and national economies.
3. The Council support the proposed route consisting of a clover loop road to increase capacity of the junction by removing traffic travelling from the M25 anti-clockwise onto the eastbound A12 carriageway. However, as raised previously, this does not address wider congestion issues at the junction / roundabout, such as queuing traffic originating from the A1023, Brook Street. The traffic modelling for the area identifies that when the signalised junction at Mascalls Lane and Nags Head Lane operate over capacity during peak times this causes queues onto Junction 28 and then A12 and M25. This problem is likely to continue considering the proposals do not address the issue, adding to the existing air pollution at the junctions. It is acknowledged that the A1023 is not within the control of Highways England and that Highways England has been working alongside Essex County Council to consider appropriate solutions.
4. The Council responded to the previous consultations regarding the need for more wholesale improvements across the junction, dealing with all issues together and consolidating the inevitable disruption caused by construction activity. This view is repeated, although it is understood why this scheme has come forward

first in terms of securing funding. Nevertheless, that Council is concerned by the likelihood of multiple and long-term disruption in the area as a result of numerous improvement projects.

### **Active Travel Improvements:**

5. While it is acknowledged that a solution is required to address vehicle congestion, the junction is also the location for a Byway which crosses the southern end of the A1023, runs south of The Poplars and then crosses the M25 slip road onwards to Putwell Bridge Farm and Oak Farm, to the south of the M25. The Council is working with Essex County Council on improving the Borough's cycling network and looking at solutions to overcome major road and infrastructure barriers to connect to wider cycling and walking networks across Essex. We are pleased that following the previous consultation, these comments were considered and a potential cycle and pedestrian network is being explored further. We would welcome these network improvements to be developed alongside the rest of the scheme.

### **Proposed Changes and Newly Identified Impacts:**

6. The Council support the mitigation proposals to protect wildlife (great crested newts and reptiles), plants, trees, and shrubs within the Ingrebourne Valley Site of Metropolitan Importance. The mitigation proposal for Weald Brook is also welcomed to reduce impact on the watercourse and floodplain.
7. The Council previously raised concerns regarding the openness of the Green Belt and visual impact which will be caused by the scheme. This section of Green Belt provides separation between the edge of Greater London (specifically Harold Park, London Borough of Havering) and the Brentwood urban area. We welcome the design changes proposed to reduce this impact by lowering the clover loop road to be closer to the gradient of the hillside and improving the woodland screening planting. However, it is important that the issue of Green Belt and visual impact of the proposed scheme continues to be considered through the Development Consent Order process.
8. The high-pressure gas main diversion is a newly identified required measure. The environmental, traffic, and construction management impacts are unknown at this stage. The Council will continue to engage through the duty to cooperate and provide feedback and comments as this is developed further.
9. Further environmental surveys have been undertaken since the last consultation which has indicated that there are 16 veteran trees within the construction area for this scheme. One of these trees is located within Brentwood Borough and identified as potentially being impacted by the construction. The Council encourages Highways England to take all reasonable measures to protect all the

veteran trees within the construction area. Appropriate compensation measures should be adopted where veteran trees are lost or damaged.

10. Changes to the site boundary have been made to allow for a potential access road to the construction site off an existing road from Wigley Bush Lane, in Brentwood Borough. Minimal information has been provided within the Supplementary Consultation Brochure and so further clarification is sought on the nature of any required works. This will assist in gaining an understanding of the potential impacts on the surrounding area.

**Duty to Cooperate:**

11. The Council notes joint working that has taken place with Highways England as part of preparing the Brentwood Local Development Plan, including transport modelling that has informed the Brentwood transport evidence base as well as assessments that informed Highways England proposals. Continued joint working is required to understand the implications of growth in the wider area on the strategic highway network.
12. We thank Highways England for involving the Council in this supplementary consultation. The Council looks forward to continued dialogue on the project.

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