



24 May 2007

*File
M25 Widening*



Mr P Kerr
Chief Development Plans and Transportation Officer
Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

Your Ref: DLE/PK/M25 WIDENING/2.1
Our Ref: 0309-GD00701-LNA-CD

Dear Peter

Confidential: M25 Widening Section 1 (Junction 16 – 23) Draft Environmental Statement (ES) Response to Comments

Please find enclosed our response to your Draft ES consultation comments, received on 31 October 2006.

Firstly, thank you for reviewing our Draft ES and sending us your consultation letter. This has provided us with valuable input from Three Rivers District Council into the M25 Widening Scheme, and it is greatly appreciated.

The attached response has been prepared by Hyder Consulting, on behalf of the Highways Agency following detailed analysis by our team of environmental specialists. Where appropriate, responses to your comments have been incorporated into the Environmental Statement and Technical Reports. In other cases, detailed reviews have been undertaken to confirm that the information reported is the most accurate and includes the most appropriate environmental design and mitigation measures.

Following recent traffic developments in the Scheme, some environmental topics have required re-assessment. Consequently, the publication of the ES has been delayed until July 2007. We will issue 1 hard copy of the ES and Figures for your Planning Department, along with a CD copy of the Technical Reports and associated Figures. Additional CD copies of both the ES and Technical Reports will be sent to relevant people within your Council who have been involved in the consultation exercise to date.

A series of Public Exhibitions will take place between late July and mid September, following publication of the ES. Notification of the dates and venues for the Public Exhibitions will be publicised in due course.

In the meantime, thank you once again for your letter.

Yours sincerely

Julia Bentley

**M25 Environmental Coordinator
Hyder Consulting UK Ltd.**



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Hyder Consulting Ltd Response to Consultation Comments MAY 2007

Issue	Three Rivers District Council Comments	Hyder Consulting (HCL) Response
General	Council requests the HA to make a presentation on the scheme.	The Highways Agency has been informed of this request.
General	Council requests a consultation process be set up between HA and Council.	Three Rivers District Council is being consulted, along with the other local authorities within the study corridor. This consultation has included attendance of workshops and reviewing the Environmental Statement to date. This consultation process will continue as the Scheme progresses.
General	Council is very concerned that the introduction of traffic light controls on motorway slip roads will cause local congestion to the detriment of local communities. I would be grateful if this concern can be forwarded to the Highways Agency since I understand it is beyond the remit of the Environmental Statement	This Scheme does not include for traffic light controls on motorway slip roads. This ES assesses the widening Scheme only. Traffic light controls may be an outcome of the Integrated Demand Management study. This comment has been forwarded on to the Highways Agency, as requested.
General	Council is concerned that traffic on local roads will increase during the construction period to the detriment of the local environment and requests that safeguarding measures are taken to prevent this.	The Contract will require the contractor to maintain the existing number of lanes in both directions during normal daytime working. Traffic will not be encouraged to use the local road network except when special closures of the motorway are required to allow the safe installation of structures and the like or are essential for the safe construction of the widening. Where these are necessary the contractor will be required to plan and liaise with the local highway authority in advance. The final ES will include an indicative assessment of traffic movements as a result of traffic management during construction.
Landscape	Maximise the opportunity for new tree, shrub and wild flower planting. Council registers disappointment in the landscape for the original M25.	All opportunities within best practice and Highways Agency guidelines have been maximised. Opportunities to improve planting in some areas have been further identified and can be achieved with the loss of grassland for mitigation.
Lighting	New lighting columns must minimise light spillage and be less intrusive than existing. Signage clutter must be avoided.	The proposed lighting equipment uses 15m high lighting columns with full cut-off high-pressure sodium lanterns with flat glass enclosures, which represents the optimum column height to meet the carriageway lighting requirements and best current technology to minimise light spill. This is essentially the same equipment as used in the currently lit section of motorway within the Three Rivers D.C. area.
Ecology	Maximum retention and provision of habitats.	Retention and provision of habitats has been maximised.

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		maximised.
RD & Water	Design must avoid flood exacerbation.	The drainage design has aimed to maintain or reduce discharge rates from highway run off. The Environment Agency has approved the drainage design.
RD & Water	Scheme must prevent pollution through run-off and contamination of streams, rivers and waterbodies. The Environment Agency, British Waterways and other relevant bodies must comment.	Discharges into all watercourses have been designed to ensure that the rate of discharge is not increased (reduced where possible) and that water quality is improved wherever possible. In particular, the design will include spillage retention resulting from incidents and this improvement has been welcomed as a major benefit for water quality by the Environment Agency.
Noise & Vibration	During construction, use best practicable means to keep noise and vibration to a minimum. Detailed method statements are expected. New low noise road surfaces and upgraded env barriers must be included.	Low noise Surfacing and environmental barriers are part of the Scheme and are defined in the ES. The DBFO contractor will be required to use best practicable means to reduce noise and vibration during construction and will agree method statements with the local authorities.
Air Quality	Council monitors air quality within the AQMA using passive monitoring methods. Council has requested the station be moved to a HA site at Jn 18. Council requests this station move be included the scheme or the HA install their own station and make the data publicly available.	HCL understand that negotiation is ongoing between Three Rivers District Council and the Highways Agency to re-locate a Three Rivers District Council continuous monitor to a compound close to the southbound (anti-clockwise) on-slip road at Junction 18. Therefore there is currently no continuous monitoring data, which HCL could incorporate in the ES for Junction 18.
Geology & Soils	Ensure no damage to underlying geology or contamination of soils.	The assessment predicts that no significant damage would occur to geology or from soil contamination as a result of the Scheme. This has been addressed in the Geology and Soils chapter of the Environmental Statement.
Cultural Heritage	No damage to Listed Buildings or their settings, historic monuments, sites of archaeological interest. Council is concerned that impact to properties in close proximity will be greater than existing.	Although there will be impacts as a result of the Scheme, it is considered that, in the context of the existing M25, the effects have been correctly assessed and appraised.
Vehicle Travellers	Council opposes narrow carriageway lanes, the use of hard shoulder as carriageway and confusing entry/exit lanes as contributing to driver stress.	Hard shoulder running will not be introduced as part of this Scheme. Reduced lane widths are part of widening a road within existing boundaries. Text has been amended in the Environmental Statement and Technical Report to clarify that reduced lane widths are not significantly less safe than standard lane widths. Further, the change of lane width has been designed to be very gradual and would be barely distinguishable by most drivers.

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29 MAY 2007

Issue	Three Rivers District Council Comments	Hyder Consulting (HCL) Response
Vehicle Travellers	Council is concerned about the capacity of existing junctions and the likelihood that queuing on approach roads will worsen.	The traffic assessment undertaken to date indicates that there would be less queuing at the existing junctions after the M25 widening scheme has been implemented than if the widening did not take place.
Policy	Council's objections from Orbit Study are reaffirmed. Council strongly urges HA to adopt an integrated approach to the transport needs of the area. HA needs to consider further traffic management measures to ensure the 'benefit of a 4th lane is retained' in practice.	Integrated Demand Management (IDM) will consider further traffic management measures to ensure retention of benefits from the 4th lane. Although not part of this ES, the IDM study is being undertaken by the HA.
Disruption during Construction	Council is concerned about the disruption to surrounding area. Safeguards should include limited construction hours, limitations to noisy machinery (detailed list of equipment & sound power levels must accompany method statements), restrictions on access roads (large vehicles on country lanes), measures to prevent traffic seeking alternative routes because of congestion and measures to keep the motorway open.	<p>Working times would be agreed with Local Authority's Environmental Health Officers and the DBFO contractor. A balance needs to be met with the aim of getting the project built as quickly as possible. General information will be included in the Construction chapter. Detailed Method Statements would be drawn up by the DBFO contractor, and these would include more information than is currently available for the Construction Chapter.</p> <p>The DBFO Contract will require the contractor to maintain the existing number of lanes in both directions during normal daytime working.</p> <p>Traffic will not be encouraged to use the local road network except when special closures of the motorway are required to allow the safe installation of structures and the like or are essential for the safe construction of the widening. Where these are necessary the contractor will be required to plan and liaise with the local highway authority in advance.</p>