

For the attention of Richard Price, Case Manager  
Examining Authority  
Planning Inspectorate  
3/18 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

From Robin Brown  
Hayes Community Development Forum

[REDACTED]  
[REDACTED]

Your reference: TR010019

Interested Party reference: 10031720  
26<sup>th</sup> November 2015

Dear Richard Price

Re: Planning Act 2008 (as amended) Section 88 and the Infrastructure  
Planning (Examination Procedure) Rules 2010 (as amended)  
Application by Highways England for an Order Granting Development Consent for the proposed M4  
Junctions 3 to 12 Smart Motorway

For 'Deadline IV': Write up of oral submission on Thursday 19<sup>th</sup> November 2015 by Robin Brown on  
behalf of the Hayes Community Development Forum

**Respondent:** Robin Brown: local resident 20 years, a planner supporting community activities in and  
around Hayes, Middlesex, through the Hayes Community Development Forum.  
Forum: acts as a networking opportunity for local groups throughout southern part of Hillingdon  
Borough to come together to discuss issues and progress projects. Some 400 organisations on a  
wider email contact list are invited to respond to significant issues.

**Submission:** Based on my near 20 years of experience of community involvement in Hayes, I believe  
the following to be a reasonably accurate sounding of local opinion on the scheme: namely, a  
widespread belief that there is a high degree of inevitability that this scheme will go ahead, so that  
the Forum should focus on securing mitigations for those impacts – principally noise, air quality,  
visual & water – that locals perceive as arising from the scheme during construction and operation.

**Traffic Impacts:** That is to say that local people are not concerned about potential traffic impacts –  
echoing LB Hillingdon's reference to Junction 3 and the Hayes Bypass/A312 already near, at or above  
capacity for long periods of the day, and the potential knock on adverse effects on the local road  
network as traffic cascades from the strategic highway network. The view is that traffic rises to fill  
road space provided.

**Mitigations:** The Forum is greatly encouraged by the point – the "additional question" - made by the  
Panel, and indeed by the response made by Highways England, at the Tuesday 17<sup>th</sup> November  
session at the end of 'Preliminary Matters'; and during the Wednesday 18<sup>th</sup> session on 'Noise &  
Vibration Question D6 on enhanced noise mitigation strategy' when the Panel cited the NPSNN's  
para 3.4: "... deliver developments in accordance with Government policy and in an environmentally  
sensitive way, including considering opportunities to deliver environmental benefits".  
The implementation of Design Manual for Roads & Bridges is not enough. But the enhancement of a  
1960s Motorway with its back garden type closed boarded fencing to a standard equivalent to  
contemporary motorway is at the heart of the mitigations sought locally.

Noise: There is the 'action point' raised by the Panel at the end of 'Noise Question D9' that all should assist Highways England in its ongoing work on enhanced noise strategy on reviewing noise barrier proposals by 26<sup>th</sup> November. The work programme voiced by Mr Alf Maneylaws is quite clear and welcomed, but having reviewed the relevant plan (submitted by HE for the 8<sup>th</sup> October Deadline Section 1-8 Appendix F to Section 4, 12-2 for Hayes, Cranford) the Forum asks that the following should be rectified:

The proposed noise barriers only extend from St Dunstan's Subway in Cranford Park in a westerly direction, but do not extend eastwards. Here, to the east, the rise of the through carriageways to fly over Junction 3, coupled with the slip roads, all at a higher height than Cranford Park and the housing at Roseville Road, facilitate a wide dispersion of noise. The existing fencing here functions only to demarcate the highway boundary. This boundary fencing, and the open railing to the flyover, do not effectively attenuate noise.

The proposed noise barriers do not include the northern tip of Harlington Village at St Peter's Subway. Here also the existing fencing here functions only to demarcate the highway boundary and do not effectively attenuate noise.

The Forum does recognise that both these locations are Conservation Areas and, therefore a balance has to be struck between barrier design/height and visual impact.

Noise barriers should be in place before substantial construction work starts, especially if there is night time working, to protect Cranford housing which stretches along the north side of the M4 from Roseville Road west to Harlington High Street overbridge, and the northern tip of Harlington Village. The verbal assurance that low noise surfacing will cover all the scheme is welcomed. Relevant plans, including their keys, should confirm this.

Air Quality: That this locality is a hotspot of exceedance is well known and the adverse health impacts are steadily being known in range and in depth. Here there is the opportunity to abate noise, air pollution and visual impacts with more innovative approach than presently evident. Transport for London since circa 2012 has been planting street trees and creating 'plant towers' and green walls as part of the Mayor's Clean Air Fund programme funded by the Department for Transport with the intention to trial the capturing of harmful pollutants (<https://tfl.gov.uk/travel-information/improvements-and-projects/clean-air-fund> - go to the Green Infrastructure Research Report). There are commercially available noise barriers that can be quickly covered with climbing. When trees were planted at Sam Phelps Park, north side of St Peter's Subway, some 15 years ago, the arboriculturist for Trees for Cities observed that the existing (originally light coloured barked) trees had the blackest bark that he had ever seen. Such planting can help trap pollutants (reference here to some interesting discussion at <https://theconversation.com/do-trees-really-help-clear-the-air-in-our-cities-48202> ). Given that LB Hillingdon control land along parts of the motorway, the Forum encourages offsite planting in agreement with local stakeholders, as well as planted noise barriers where possible. The Forum does recognise that there is a 275K volt underground cable running along the northern side of the M4 most of the way between Junctions 3 & 4.

Water: The Forum shares the disappointment of Buckinghamshire County Council, Wednesday 18<sup>th</sup> session, that sustainable drainage with swales, reed beds and ponds have not so far been pursued by agreement with adjoining landowners. Cranford Park and the River Crane are used as educational resources connecting children with nature and water quality is monitored (through the Zoological Society of London and Friends of River Crane). In November 2014 monitoring had found only one of the expected six species of invertebrate so rating this as an early warning of issues. Any existing and proposed discharges of surface water into the local watercourses is an issue for the Forum which asks that sustainable drainage measures be adopted to ensure that water quality is protected and improved.

END