

From: Mark Woodger - Principal Planning Officer (New Settlements)
[REDACTED]

Sent: 28 January 2021 13:27

To: M25 Junction 28 <M25Junction28@planninginspectorate.gov.uk>

Cc: [REDACTED]
[REDACTED]

Subject: M25 Junction 28 National Strategic Infrastructure Project (NSIP)

Dear Casework Team

Please find attached Essex County Council's response to the request to submit a Local Impact Report (LIR) for the above development.

It is recognised that this submission is late, the reasons for this are set out in the as attached letter and are not repeated here. It is requested that in the current national pandemic the Planning Inspectorate use their professional discretion and judgement to allow this document, the content of which is not considered sufficient to prejudice the smooth running or the overall timetable of this submission, nor unduly prejudice the applicant in any way, discussions with whom are on going at this time, on the limited matters which are contained within this LIR.

Kind regards

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Planning Service
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Essex County Council
[REDACTED]

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In line with government advice relating to the COVID-19 pandemic, from 20 March the ECC Planning Service is working remotely, away from the office for the foreseeable future. This is a challenging time, and as a service we are adapting where possible. This means staff are working flexibly throughout the day around caring responsibilities and/or have been redeployed to support critical council services.

Sent by Email

M25Junction28@planninginspectorate.gov.uk

Our ref: MW/G&D/M25J28
Your ref: 20025479
Date: 28 January 2021

Dear M25 Junction 28 Casework Team

**Re: Local Impact Report
M25 junction 28 improvements
Application by Highways England**

I write with reference to the request to submit the above by the set deadline of the 21 January 2021. It is with regret that this response is submitted late but with Essex County Council being involved in multiple NSIP projects, at a time when the current national pandemic is causing significant resource implications, it is requested that the Planning Inspectorate use their judgement and allow this brief submission.

This Local Impact Report (LIR) follows the guidance in the Planning Inspectorates (PINS) Advice Note one (Local Impact Reports April 2012 Version 2), and in the same it advises that “*Authorities should cover any topics they consider relevant to the impact of the proposed development on their area*”. This LIR therefore does not seek to comment on matters that do not affect Essex, and which are matters primarily for the London Borough of Havering and is considered proportionate to the scale of development proposed within Essex County Council (ECC).

In particular the Guidance states “*The report (LIR) should consist of a statement of positive, neutral and negative local impacts, but it does not need to contain a balancing exercise between positives and negatives; nor does it need to take the form of a formal committee report.*”

Due to current workloads and pressure during the current nationwide pandemic it is stressed that this LIR is compiled by the officer Team dealing with this National Strategic Infrastructure Project (NSIP).

This document has been written on the basis that ECC and the applicants Highways England (HE) have worked, and continue to work together to prepare a comprehensive Statement of Common Ground (SoCG) which is fully expected to be agreed and submitted, although not by Deadline 1 on 21 January 2021 as there are a few technical matters to be clarified as to:

- Traffic forecasting
- Construction impacts and relationship with Lower Thames Crossing (LTC)

- Impact on Brook Street as a matter of detail only.
- Pedestrians and Traffic
- Wider impact

Where issues are agreed in the SoCG they are not explored further in this Local Impact Report (LIR) and these two documents should, as may be agreed, be read in conjunction with each other. However, in the submission of an LIR the Council will assist PINS as the Examining Authority (ExA) by identifying local issues which might not otherwise come to its attention in the examination process.

It is noted that the description of development has been commented upon by both the London Borough of Havering and Brentwood Borough Council. These are considered accurate and are not repeated here.

It is noted that only a small part of the as proposed development is within Essex itself, however the impact on Essex, particularly as it relates to the flow of traffic between the M25 and the A12 will be significant. In particular they are limited to improvements to the existing A12 eastbound and westbound carriageways and A12 eastbound entry (on-slip) road; improvements to the existing junction 28 roundabout, the existing M25 northbound carriageway and the M25 northbound off-slip; gantries and signage.

The scheme being promoted by HE seeks to increase capacity of junction 28 of the M25 by providing a new dedicated link between the M25 and the A12, the realignment of the same, with associated structures. It proposes a two lane loop road, with a hard shoulder, for traffic travelling from the M25/Northbound carriageway onto the A12 eastbound carriageway, without having recourse to use the existing J28 Brook Street roundabout.

Essex County Council is supportive of this scheme in principle, this has been expressed in consultation. The Council acknowledges that Junction 28 of the M25 (also known as the Brook Street interchange) is both a junction which experiences significant levels of congestion ("the Junction") is a collision 'hotspot' as well as a junction that currently experiences significant levels of congestion. The current junction impacts on the journey time of through traffic onto the strategic A12 as well as the residents of Essex. It is anticipated that with proposed traffic increases over the coming years such delays will increase.

With both these impacts in mind the proposals as within the DCO will benefit journey time and reduce collisions.

However the positive impact of the scheme must be balanced against any potential impact on matters including but not limited to landscape impact, ecology, biodiversity, archaeology, heritage, flood risk, air quality and noise. In discussions with the promoting DCO Team as such matters are considered agreed, providing the necessary mitigation as proposed is implemented and the impacts of the scheme monitored.

In terms of flood risk Essex County Council as the Lead Local Flood Authority for the area covered within ECC remain in discussions with the applicant Team to work on the current SoCG. At this time the following matter remains under discussion:

- The disapplication of sections 23, 30 and 32 of the Land Drainage Act 1991 as set out in Part 4 of Schedule 9 of the DCO as regards to the protection of the ordinary watercourses

The scheme has been amended since submission in December 2020. These changes have been discussed with the applicants and are considered insignificant as far as they relate to Essex.

On traffic impacts relating to the ECC managed network we are pleased that the applicants have worked with officers to mitigate the primary concern raised – that of delays on Brook Street leading into the development area. The revised signal timing (an extended inter-green phase for the junction A12 westbound off-slip with the Junction 28 roundabout) has significantly reduced the delays on the Brook Street approach to the roundabout and is now included in the Scheme. Such signalling must be implemented. The applicant is also seeking to secure separate funding for the optimisation of both Nags Head Lane and Mascalls Lane / Spitals Lane Junction with Brook Street through the designated funding programme. ECC would urge that this is considered integral to the project.

ECC remains concerned on the impact of construction traffic on its network and also with the cumulative effects of works also planned in the area on the Lower Thames Crossing. ECC will continue to engage with the applicant and seek to ensure adequate measures are in place through the Construction Traffic Management Plan.

The existing cycle/pedestrian route that runs adjacent to the A12 eastbound carriageway and crosses at the A12 eastbound off slip will be replaced with a like for like cycle/pedestrian route. However, the applicant has indicated that they would seek to secure additional funding for improvements to these routes through Highway England's designated funds programme. As with the revised signalling highlighted above ECC would urge that this is considered integral to the project delivering a full solution that includes modes of active transport. ECC believes that the provision of proper walking and cycling routes is integral to any highway project in the 21st century.

For full details of the traffic related impacts I would refer you to the "M25 Junction 28 Improvement Scheme Assessment Review," appended to this report.

The impacts of the development as proposed are considered largely positive. Whilst as with all development there will be impact, particularly of the amenity of the community living close to the development, this should be properly mitigated against.

As with all major road schemes, and in particular where they propose significant lengthy works to junctions where there is evidence of significant delays and collisions, the Construction Management Plan (CMP) will be a key tool in reducing and mitigating impact on this heavily used and important junction to ensure the free flow of traffic and collision reduction during the period of works.

We look forward your consideration of the above, and if you do have any comments, then please make them in the first instance to the contact as shown below.

Yours sincerely



Graham Thomas
Head of Planning and Development

Contact: Mark Woodger
Principal Planning Officer (Major Development and New
Communities)

Telephone: [REDACTED]
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Email: [REDACTED]