



Havering
LONDON BOROUGH

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Mr Richard Allen
Lead Member of the Examining Authority

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Dear Sir,

London Borough of Havering (20025659) – Written Representation M25/J28 Improvement Scheme

Thank you for the opportunity to submit a Written Representation on the M25/J28 Improvement Scheme.

The proposed scheme is within the administrative boundary of London Borough of Havering. The borough is a host authority and has registered as an Interested Party in the Examination stage of the Development Consent Order (DCO) process.

London Borough of Havering Scheme Position

The Council is supportive of this scheme in principle. The Council acknowledges that Junction 28 of the M25 is a collision ‘hotspot’ as well as a junction that currently experiences significant levels of congestion. Many Havering residents use the junction on a daily basis both for business and leisure purposes and the operation of the Junction impacts their journey times.

The Council recognises that traffic volumes at the Junction are expected to increase significantly over the next 15/20 years and improvements are required either through additional capacity improvements or through other forms of demand management to manage future increases.

The Council welcomes further infrastructure investment within Havering, especially where this will provide for safe and convenient movement and will complement wider investment and growth in the borough.

Non – Motorised User Routes

The Council has raised concerns that the scheme as currently proposed does not adequately support users of other modes of transport, particularly for those travelling by foot or by bike. A widened shared use path on the A12 eastbound off-slip is welcome,

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however navigating the Brook Street roundabout by foot or by bike beyond this path is extremely challenging and dangerous at present and will remain so under the proposed scheme.

The Council has set out in section 17 of the Local Impact Report (REP-031) its concerns about severance in more detail, and the need for improvements to be made to the Brook Street roundabout to facilitate safe navigation for pedestrians and cyclists.

Gardens of Peace Cemetery

The Council has concerns over whether the relocation of the Cadent gas pipeline will result in an impact and loss of burial plots at the Gardens of Peace Cemetery. The Council is aware from the Relevant Representation (RR-024) and Procedural Deadline B submission (PDB-009) by Savills on behalf of the Trustees of the Cemetery site, that they have such concerns.

The Trustees are concerned that the construction of the gas main will cause a delay to the opening date raising concerns that they will not be able to meet the needs and demands of the Muslim community.

The Trustees have also indicated that burial plots would be impacted by the gas pipeline diversion and there are concerns that the easement strip will be sterilised from its intended use (burials). Further, the representations indicate that due to the service entrance having to be relocated, this will result in the soil storage area being moved which will further impact on burial plots.

The Council sets out its obligations with regards to burial space and burial capacity within the borough, in sections 10.13 to 10.14.3 of the Local Impact Report (REP-031).

Such an issue being unresolved creates anxiety for both the Trustees of the Cemetery who are clearly very concerned about the financial impact this would have on them (they operate on a non for profit charity basis) but also for the local Muslim community. They will understandably be concerned whether this will have an impact on if they are able to bury their loved ones in the manner that they wish to, in the future.

This outstanding matter remains an important issue that the Council would request the ExA seek clarity from the Applicant on.

Impacts during construction and operation

The Council is concerned with regards to the impact that the construction of the scheme will have on the local road network. This is an important issue as many Havering residents and businesses use the A12 and the surrounding roads on a daily basis and delays to the network could impact on livelihoods.

Whilst the Council welcomes the further work that has been carried out by Highways England to assess the impact during construction (Transport Assessment Supplementary Information Report PDB-003), the Council remains concerned about the impact the scheme will have on some borough roads and some of the proposed constructions routes put forward by the applicant. Further information on the Council's concerns can be found in Havering's response to the Transport Assessment Supplementary Information Report (REP1-034).

Furthermore, the Council remains concerned that the applicant has not fully taken into account sub regional growth as part of its Traffic Modelling and therefore it is not possible to fully appreciate the impact the scheme will have on the Havering road network and Strategic Road Network operated by Transport for London (the TLRN). Further information on the Council's concerns can be found in Havering's response to the Transport Assessment Supplementary Information Report (REP1-034).

Woodstock Avenue

A number of local residents who live in Woodstock Avenue have raised concerns about the impact the scheme will have on the ability to travel westbound along the A12. Currently residents who wish to travel westbound on the A12 have to exit Woodstock Avenue and travel east along the A12, navigate the Brook Street roundabout before heading westbound.

Local residents are understandably very concerned about the potential implications for their ability to travel this journey during construction. These concerns are very real and the Council supports the request made by a local resident at Procedural Deadline B (PDB-008) for the Applicant to undertake feasibility work to assess whether installing traffic signals at this junction would be appropriate. Further information on the Council's views on the implications for Woodstock Avenue can be found in section 22.2 of the Local Impact Report (REP-031) and in the response to Relevant Representations (REP1-034).

Draft DCO

The Council has raised a number of concerns in relation to Clauses and Requirements set out within the draft DCO. These matters remain outstanding at time of submission of this Written Representation. Further details can be found in section 24 of the Local Impact Report.

Production of documentation following DCO being granted

The Council is very concerned that critical documents such as the CEMP, Traffic Management Plan and Contaminated Land Plan will only be produced by the appointed contractor post consent being granted for the DCO. This is extremely concerning for Havering as the Council will have little opportunity at that stage to influence their content and a local authority such as Havering would only be considered as a consultee at that stage in the process.

The Council has similar concerns that the implementation of the REAC will be the responsibility of the appointed contractor following consent being granted.

Further details of LB Havering's concerns can be found in sections, 10.6.2, 10.6.3, 11.4.11, 12.1.6, and 22.2.1 of the Local Impact Report (REP-031).

Planning Obligations

The Council has set out a number of mitigation measures that should form Planning Obligations or a Legal Agreement with Highways England. This includes contributions to support the vital work carried out by the Council on improving local air quality through its Adopted Air Quality Action Plan and the provisions of staffing resource to support this work. A further contribution is also sought to support local skills and training for recruitment for construction staff in the borough.

Additional contributions are sought from the applicant to support the Council's sustainable travel agenda. This is to support the Council's work in encourage people to travel by foot or by bike as an alternative use to the car, and Road Safety Education in schools.

This is considered appropriate to mitigate the impact the scheme will have in terms of traffic reassignment during construction which will impact roads with a number of schools in the area, and also would support the Council's sustainable travel policies as the scheme as it currently stands does not comply with these policy requirements. Further information on Planning Obligations can be found in section 25 of the Local Impact Report (REP-031).

Thank you for the opportunity to submit a Written Representation. LB Havering is happy to assist the Examining Authority (ExA) as the Examination progresses including through any Hearings that are held.

Yours faithfully,

A solid black rectangular box used to redact the signature of Daniel Douglas.

Daniel Douglas
Team Leader Transport Planning