



**Havering**  
LONDON BOROUGH

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Mr Richard Allen  
Lead Member of the Examining Authority

Date 21<sup>st</sup> January 2021

[www.havering.gov.uk](http://www.havering.gov.uk)

Dear Sir,

**London Borough of Havering (20025659) – Response concerning TR010029 9.5  
Transport Assessment Supplementary Information Report**

This letter sets out London Borough of Havering's (Havering) response to TRO10029 9.5 Transport Assessment Supplementary Information Report submitted by Highways England (HE) as part of Procedure Deadline 1.

This document seeks to address the issues raised by relevant representations; including the request to provide additional traffic modelling outputs with sub regional growth scenarios, assessment of construction traffic impacts and, the impacts of the proposed scheme on Gallows Corner and the A12.

Growth Assumptions

Havering remains concerned that the growth scenarios that HE has included in the traffic modelling for the assessment of the scheme, namely low growth and high growth still does not include sub regional growth and the growth that is planned in the Borough. As a result of this omission Havering remains concerned that the full impacts of the proposed scheme have not been fully assessed. This omission also affects the assessment of the noise and air quality impacts.

Havering notes the assessment that has been undertaken for Gallows Corner and the A12. Given that the assessment has not taken into account the sub regional growth, Havering cannot agree with the reported impacts for Gallows Corner and the A12. Havering refers to its Local Impact Report with regards to the effects of the proposed scheme on Gallows Corner and the A12.

Havering notes the proposed extension to the inter-green phase to reduce delays on the Brook Street approach.

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## Construction Traffic Analysis

Havering notes that the traffic impacts of the latest proposed temporary traffic management arrangements during construction of the Scheme have been assessed using the strategic traffic model. Havering's previous comments relating to the growth scenarios that have been applied to the traffic modelling that has been carried out using the strategic model apply here.

Havering would wish to register the following concerns with regards to the proposed construction traffic routes:

Havering seeks clarification on the approach that Highways England will take to recalibrating MOVA at the junctions during the construction period to reflect the changes to queue lengths that will undoubtedly appear.

Figure 6-1 AM peak changes in traffic flows due to construction illustrates the trip redistribution with 9% additional trips in the AM peak travelling up Straight Road (57-61 additional trips) and an additional 10-15% additional trips travelling up Noak Hill Road to the north of the A12 Road (70-80) trips. These routes are also subject to additional trips in the inter peak and the PM peak but to lesser extent than the AM peak.

Straight Road is a key route providing connectivity for residents living in Collier Row and Harold Hill to Gallows Corner junction, from where residents can drive into Romford, further west towards central London or east along the A12 or A127 towards Essex. Noak Hill Road provides connectivity between Harold Hill and eastwards towards the Havering borough boundary.

### Bus routes

The scheme is located on a bus route. The 498 bus service operates between Queens Hospital and Brentwood. The route currently uses the eastbound A12 off slip onto the Brook Street roundabout in order to access Brook Street toward Brentwood Town Centre. There are implications for the bus route during construction both in terms of journey time reliability because of lane closures and potential route diversions if the Eastbound off slip is subject to night time closures at a time when the 498 is still operating (last bus departs Queens Hospital towards Brentwood at Midnight weekdays).

The Council also has concerns with regards the impact the scheme may have on bus services that currently operate along Straight Road. The Transport Assessment Supplementary Information report has identified Straight Road and Noak Hill Road as borough operated roads that are forecast to receive an increase in vehicle traffic during construction with traffic reassigned to avoid using the Brook Street Roundabout. There are several bus routes that operate along these two roads, most notably, 174, 256, 499, 608, 646, 674, 686 and N86. A number of the routes are dedicated school services.

### Supporting Schools through TfL STARS and Road Safety Education

The Council works very closely with schools through the TfL STARS (Sustainable Travel: Active, Responsible, and Safe) School Travel Plan Accreditation Programme, which recognises and rewards schools engaged in promoting safe, active, and sustainable travel, and delivering positive changes in behaviour.

The aim of the programme is to encourage pupils (and their parents or guardians) to travel to school in a more active or sustainable way to help reduce the daily congestion that can be caused by short (single occupancy) car trips on the so called “school run”.

The benefits the programme delivers include health and wellbeing improvements, reduced congestion, greater road safety awareness, and a positive impact on air quality. Research also clearly links active travel to school with improved academic achievement.

The Council also delivers a series of Road Safety Education initiatives in schools. These initiatives raise awareness of the importance of keeping safe when walking or cycling to school and include Theatre in Education productions, an annual Safe Drive Stay Alive event and a Junior Travel Ambassadors programme.

Havering, works with a number of schools in the vicinity of Straight Road and Noak Hill Road through the School Travel Plan Programme. Through the School Travel Plan Programme schools set out targets for modal shift and the Council supports them in delivering initiatives to encourage more people to walk and cycle safely to/from school. Havering wishes to see the protection of school journeys by foot and by bicycle along these routes in the AM peak and therefore request that HE provides additional support to Havering’s STARS Accreditation Programme. Further details can be found in section 23 of the Local Impact Report.

### Construction Traffic Operational Matters

Havering notes that all construction traffic for the Scheme would use the M25, A12 and A127 to access the main and satellite compounds. Construction traffic arrivals to the main compound from the M25 north and A12 east would need to make a U-turn at the A12 junction with Petersfield Avenue to access the site.

Arrivals from the M25 south would use Junction 29 and the A127 westbound to access the site via Gallows Corner. Just in time deliveries to the satellite compound would be from the A12 and M25 via junction 28 and the northbound on slip. These vehicles would not need to U-turn at the A12 junction with Petersfield Avenue or use the A127 westbound and Gallows Corner.

Construction traffic departures would be via the main compound and use the A12 eastbound, with traffic heading for the M25 and A12 west using the A12 eastbound off slip and junction 28 to reach their destinations.

Havering notes with concern the U turn movement that is proposed at the A12 junction with Petersfield Avenue. This movement will be a difficult movement for HGV’s to make due to the narrowness of the lanes and the tight turning circle. There is also potential for HGVs to project into the middle land of the de-restricted A12 when making this movement, i.e. queuing in the filter lane or when making the right turn movement.

Havering request that HE provide swept paths for these proposed movements to demonstrate that the proposed movement can be carried out safely.

## A12 Eastbound off-slip

The Council has sought assurances from Highways England that the existing A12 eastbound off-slip will remain open during construction to allow the residents of Woodstock Avenue to access Brook Street roundabout to travel west along the A12. Highways England have given assurances that the A12 off slip will remain open during construction apart from the occasional night time closures but the detail is to be confirmed in the CEMP produced by the contractor post the DCO being granted. This remains a concern for the Council.

Consultees and the LB Havering have raised the adverse impacts on the residents of Woodstock Avenue should construction methods be left to the contractor without clear controls over closures of the A12 eastbound off slip. Such a closure would create the need for a 14km detour along the A12 for Woodstock Avenue residents who can only access and exit their properties from the A12 eastbound carriageway. Havering considers this potential diversion not just for residents, but also for emergency services exiting from Woodstock Avenue as a significant issue as Havering considers having a 14 km detour as not being acceptable. The Council considers it imperative that the A12 Eastbound off slip remains open to vehicle traffic throughout the construction period to avoid the implications of such as delay.

## Traffic Management Plan

The TA Addendum refers to Requirement 10 of the draft DCO (APP-015) that requires the preparation and implementation of a traffic management plan that would have to be submitted to, and approved by, the Secretary of State following consultation with the relevant highway authority before the works can start. Havering remains concerned that this Requirement does not allow them as Highway Authority for roads within the vicinity of the scheme to approve the traffic management plan and would wish to see the Requirement amended to state that

“...the preparation and implementation of a traffic management plan that would have to be submitted to, and approved by, the Secretary of State in agreement with the relevant highway authority before the works can start”.

Havering notes the commentary provided by HE with regards to the use of the loop road once operational, and the measures proposed by Highways England to encourage its use. Havering has no further comments on this matter.

## Lower Thames Crossing

Havering notes the HE comments regarding the construction impacts in combination with construction of Lower Thames Crossing. At this stage Havering has no further comments, given the uncertainty of the two DCOs being brought on line at the same time.

Yours faithfully,



Daniel Douglas  
**Team Leader Transport Planning**